

**Final Initial Study/Mitigated Negative Declaration
Orange Avenue Luxury Apartments Project
City of Redlands, San Bernardino County, California**

State Clearinghouse Number 2019069016

Prepared for:

City of Redlands

Development Services Department

Planning Division

35 Cajon Street, Suite 15

Redlands, CA 92374

909.798.7555

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FirstCarbon Solutions

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San Bernardino, CA 92408

909.884.2255

Contact: Kerri Tuttle, Project Director

Cecilia So, Project Manager

Date: September 25, 2019

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Table of Contents

Section 1: Introduction	1-1
Section 2: Master Responses.....	2-1
2.1 - List of Master Responses.....	2-1
2.2 - Master Responses	2-1
Section 3: Responses to Written Comments	3-1
3.1 - List of Authors	3-1
3.2 - Responses to Comments	3-2
Section 4: Errata.....	4-1
4.1 - Changes in Response to Specific Comments	4-1
Appendix B: Biological Resources Assessment Proposed SD Homes Complex—Alabama and Orange Avenue City of Redlands, CA	
Appendix C: Cultural Resources Supporting Information	
Appendix G: Noise Supporting Information	
Appendix H: SD Homes Redlands Apartments Traffic Impact Analysis	

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SECTION 1: INTRODUCTION

Although not required by the California Environmental Quality Act (CEQA) and CEQA Guidelines, the City of Redlands has evaluated the comments received on the Orange Avenue Luxury Apartments Project Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND). The Responses to Comments and Errata, which are included in this document, together with the Draft IS/MND, Draft IS/MND appendices, and the Mitigation Monitoring and Reporting Program, comprise the Final IS/MND for use by the City of Redlands in its review and consideration of the Orange Avenue Luxury Apartments Project.

This document is organized into three sections:

- **Section 1—Introduction.**
- **Section 2—Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Draft IS/MND. Copies of all of the letters received regarding the Draft IS/MND and responses thereto are included in this section.
- **Section 3—Errata:** Includes an addendum listing refinements to and clarifications on the Draft IS/MND, which have been incorporated during the final stage of document preparation.

The Final IS/MND includes the following contents:

- Draft IS/MND (provided under separate cover)
- Draft IS/MND appendices (provided under separate cover)
- Responses to Written Comments and Errata (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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SECTION 2: MASTER RESPONSES

Master responses address similar comments made by multiple public agencies, businesses, organizations, or individuals through written comments submitted to the City of Redlands. Master responses are provided in the order in which they are referenced in the responses in Section 3.

2.1 - List of Master Responses

- Master Response 1—General Opposition
- Master Response 2—Traffic Data
- Master Response 3—Traffic and Safety
- Master Response 4—Construction Mitigation
- Master Response 5—Citrus Tree Removal
- Master Response 6—Previous Comments
- Master Response 7—Request Not to Approve

2.2 - Master Responses

Master Response 1—General Opposition

Summary of Relevant Comments

Numerous commenters expressed general opposition to the project, without making specific comments on environmental issues related to the project or on the sufficiency of the Recirculated Draft IS/MND's analysis of environmental impacts.

Response

The comments containing personal opinions expressing general opposition to the project are noted and will be part of the administrative record that will be provided to City decision makers and considered when deliberating whether to approve the project or not, and subject to any conditions of approval that will be issued. Similarly, opinions about the general desirability or merits of the project, or comments about economic or political considerations of the project, will be part of the record before the decision makers and will be considered in evaluating the proposed project.

CEQA considerations are limited to environmental issues and the potential impacts of the project on the environment. The environmental issues raised in the various comment letters have been addressed by the City in the Master Responses and individual responses to comment letters within Sections 2 and 3 of this Final IS/MND, and no further response is required under CEQA to address general comments opposing the project or expressing personal opinions.

Master Response 2—Traffic Data

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. One of the comments in the form letter pertains to an incomplete and outdated traffic impact analysis. The comment states:

Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.

Response

As noted in Section 3—Existing Conditions of the Traffic Impact Analysis (TIA), existing traffic volumes used as the baseline for the traffic impact analysis were developed based on measured traffic counts conducted in November 2017 during the AM peak period (7-9 AM) and the PM peak period (4-6 PM) of the surrounding streets. Therefore, traffic volumes associated with existing developments at the time the traffic counts were collected, including The Grove School, are adequately accounted for in the existing traffic volumes.

As described in Section 5—Future Volume Forecasts of the TIA, the analysis adequately accounts for future developments in the area by adding trips associated with pending and approved/unconstructed development projects in City of Redlands, as well as developments in adjacent County of San Bernardino and City of Loma Linda, to the existing measured roadway volumes. Therefore, projects that were under construction and have been completed since the existing traffic counts were collected are adequately accounted for. Specifically, 44 potential future development projects were identified and are listed in Table 3 of the TIA. To provide a conservative analysis, general area-wide traffic growth was also added to existing measured volumes based on regional forecasts derived from the San Bernardino Transportation Analysis Model (SBTAM).

As described in Section 2—Methodology of the TIA, the analysis has been performed in accordance with the input parameters outlined in the County of San Bernardino Congestion Management Program (CMP) as adopted by the City of Redlands, which take into account minimum phase times for pedestrians and bicyclists. Existing pedestrian and bicycle facilities are documented in Section 3—Existing Conditions of the TIA and additional review of proposed crosswalk improvements is provided in Section 8 of the TIA. Furthermore, as required by Mitigation Measure (MM) TRANS-4, the proposed project would construct roadways along the project frontage, including sidewalks and parkway improvements, to their ultimate half-section width. The project will construct new sidewalks along the project frontage and a crosswalk across Orange Avenue at the eastern leg of the Orange Avenue and Iowa Street intersection as shown in the conceptual striping plan in Appendix K of the TIA, which will facilitate local pedestrian mobility near the project.

Master Response 3—Traffic and Safety

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. One of the comments in the form letter pertains to traffic and safety for families. The comment states:

Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

Response

The areas around schools will experience increased traffic during school start/end times and require drivers to slow down unless all pickup traffic can be diverted off the collector road. In general, police enforcement periodically regulates speeding or careless drivers at/near school zones. As described in Section 2—Methodology of the TIA, the analysis has been prepared in accordance with the methodology, performance standards, and thresholds of significance established by the City of Redlands for the evaluation of traffic impacts associated with development projects. In accordance with CEQA, there must be a nexus between a project-related significant impact and the requirement of a project to provide mitigation. In other words, a project is required to provide mitigation if it is determined that it will satisfy one or more of the thresholds of significance established by the City of Redlands. Generally, the City of Redlands defines a significant transportation impact to occur if a proposed development is forecast to cause a degradation in the performance of a study intersection, as measured by Level of Service, beyond the established thresholds. Based on the findings of the TIA, project-related significant impacts are adequately mitigated with implementation of MM TRANS-1 through MM TRANS-4. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. Therefore, no additional mitigation is warranted or required pursuant to the requirements of CEQA. Additionally, the project is adding a new sidewalks and a crosswalk at the intersection of Iowa Street and Orange Avenue as shown in the conceptual striping plan in Appendix K of the TIA.

Roadway safety monitoring is typically part of a larger City-wide effort coordinated between the engineering and police departments. The City development review and approval process ensures all roadway and traffic improvements are designed to the appropriate roadway and safety standards. For CEQA analysis, the City does not have an established threshold specifically for evaluating safety impacts; however, an increase in traffic alone is not considered a significant impact.

While the project will generate additional trips, the project itself is forecast to generate substantially fewer trips than the sum of the approved City of Redlands General Plan land uses for the properties that surround the school. An increase in the amount of traffic alone is not considered a significant impact based on the performance standards established by the City of Redlands. Furthermore, the project is forecast to add a relatively small amount of trips along this segment of Orange Avenue (21 trips during the AM peak hour, or approximately one trip every 3 minutes). The project is forecast to add a relatively small amount of trips along this segment of Iowa Street (14 trips during the AM peak hour, or approximately one trip every 4 minutes). Based on the Level of Service analysis, relatively low

number of project-generated trips forecast to travel along Orange Avenue east of Iowa Street, sidewalk improvements along Orange Avenue, and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact in this area as documented in the TIA. There is no need to close Orange Avenue as a result of the proposed project. Furthermore, closing Orange Avenue would be in conflict with the City's General Plan. No additional mitigation is warranted or required.

Traffic calming measures are generally required to respond to an identified impact. Given the design and use of the streets and the number of new trips, traffic calming measures are not warranted. The project site is located on Alabama Street and Orange Avenue, which are identified as a major arterial and collector street in the City of Redlands General Plan, respectively. Both of these streets are intended as transportation corridors. The proposed project is forecast to result in approximately 109 net new trips leaving the project site during the AM peak hour and 108 net new trips entering the project site during the PM peak hour. The majority of the project trips are forecast to travel to/from the east to Alabama Street (the nearest major arterial providing freeway access) and away from the school. East of Iowa Street, the project is only forecast to contribute approximately 21 to 26 additional trips during the peak hours.

For additional information on traffic and safety and how these matters are addressed in the TIA and Recirculated IS/MND, please also see Response to AMEF-5 regarding project improvements to pedestrian facilities and Response to MIR-7 regarding project impacts on roadway safety. Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

Master Response 4—Construction Mitigation

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. One of the comments in the form letter pertains to construction mitigations. The comment states:

The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am–6pm).

Response

Mitigation Measure TRANS-2 requires that a construction work site traffic control plan be submitted to the City for review and approval prior to the issuance of a grading permit or start of any construction work. It is impracticable to submit the plan prior to project approval because the construction plans are unknown and hypothetical until a contractor is hired for the construction and existing conditions, such as weather, near the project vicinity are subject to changes. Therefore, it is appropriate for the City to approve the traffic control plan after the application for a grading permit is submitted and prior to issuing grading permits because it allows the City and applicant to tailor the plan to fit on-the-

ground environmental conditions. These plans are commonly used during development and, based on their extensive use in development, it is reasonable for the City to conclude that the traffic control plan, as approved by the City, will mitigate any potential impacts. It is standard practice for such plans to avoid peak commute periods, route heavy trucks along major arterials (such as Alabama Street), and coordinate with school schedules and utility providers as necessary, as well as comply with State and Federal traffic control standards outlined in the Manual on Uniform Traffic Control Devices. It is standard practice for the documents to be in the form of an active traffic control program during construction with dynamic adjustments occurring as the project proceeds.

Master Response 5—Citrus Tree Removal

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. One of the comments in the form letter pertains to citrus and tree removal. The comment states:

A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.

Response

The Recirculated Draft IS/MND analyzed impacts related to Agriculture in Section 2.2. All impacts were found to be less than significant. The avocado and citrus trees on site are not currently used for agricultural production and are not located in an area designated for any type of agricultural production. Under CEQA, the City can only require mitigation measures that would reduce a potentially significant impact and that it has the authority to enforce. The policies listed in the General Plan are intended to guide the City to develop incentive programs to encourage retention on private property. These programs would encourage private property owners to maintain agricultural uses, however, these are not requirements and ultimately, the decision to maintain or replace citrus trees on private land is that of the owners.

Master Response 6—Previous Comments

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. One of the comments in the form letter claims that there are inaccuracies in the IS/MND. The comment states:

The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

Response

Comment noted. All comment letters on the IS/MND will be included in the official record of proceedings for the project. Comments submitted on the previous IS/MND will be part of the overall administrative record for the project; however, because the Recirculated Draft IS/MND replaces the previous Draft IS/MND in its entirety, written responses will only be provided to new comments

submitted on the Recirculated Draft IS/MND during the Recirculated Draft IS/MND public comment period.

This comment does not specifically identify inaccuracies in the IS/MND, nor does it provide any specifics as to why further analysis is required or what further mitigation should be considered. Known community concerns were addressed in the Recirculated Draft IS/MND and comments concerning traffic and safety are addressed in Master Response 3—Traffic and Safety. It is unspecified what “ongoing concerns” the comment is referring to. Because these general comments do not provide information indicating that the project would result in new environmental impacts or impacts substantially greater in severity than disclosed in the Recirculated Draft IS/MND, this comment does not present a fair argument that the project will result in significant, adverse, unmitigated impacts. Accordingly, a more detailed response is not possible, nor warranted, under CEQA.

Master Response 7—Request Not to Approve

Summary of Relevant Comments

Numerous commenters submitted a form comment letter. The concluding statement in the letter is a request for the City to “not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.”

Response

The comment makes general conclusory comments regarding the adequacy of the Recirculated IS/MND and does not include substantial evidence in support of a fair argument that the project would result in significant impacts to the environment. Please refer to Master Response 3—Traffic and Safety for the consolidated response to numerous community comments on traffic and safety. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

SECTION 3: RESPONSES TO WRITTEN COMMENTS

3.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Recirculated Draft Initial Study/Mitigated Negative Declaration (IS/MND) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author **Author Code**

State Agencies

California Department of TransportationCALTRANS

Local Agencies

Morongo Band of Mission Indians.....MORONGO

Organizations

Armantrout Montessori Education FoundationAMEF
 Montessori in RedlandsMIR
 RK Engineering Group.....RKE1
 RK Engineering Group.....RKE2
 Mitchell M. Tsai, Attorney At Law..... TSAI

Individuals

Kent BlackBLACK
 Allie Blackburn..... BLACKBURN
 Kate Condon CONDON
 Pamela Ford & Kenneth Alford..... FORD
 Russ Harris HARRIS
 Kurt Heidelberg..... HEIDELBERG
 Michael Holden HOLDEN1
 Pamela Holden HOLDEN2
 Nancy J. Holland HOLLAND1
 Nancy J. Holland HOLLAND2
 Nancy J. Holland HOLLAND3
 Mike Larrance LARRANCE
 Ichen LeLE
 Mary K. Moore..... MOORE
 Emelie Neher NEHER
 Trevor NortonNORTON

Staack Family..... STAACK
 Sara Robin Stevens..... STEVENS
 Nicol Watanabe..... WATANABE
 Younghee Wong..... WONG

Form Letter Comments

Table 3-1 summarizes the individuals that submitted a form comment letter that pertained to the proposed project. The letters are reproduced at the end of this Responses to Written Comments section. Please refer to Master Response 1 through Master Response 7 in Section 2 of this Final IS/MND for the responses to the form comment letters listed below.

Table 3-1: Form Letter Commenters

Signatory	Signatory	Signatory
Tawney Armantrout	Cecilia Barrett	Jennifer Brainerd
Diva Chan	Elisa Crocker	Deng Ding
Kim Gerrard	Eleanor Haire	Margaretann Harrison
Jessica A. Hehman-Schniter	Michael Howo	Nichoel Kimmerle
Pixo Logistics	Mohsen Mabudian	Shanna Newbold
Julio Ochoa	Randy and Adrienne Ortega	Albert Quan
Mike Redpath	Russel and Sandra Rice	Jessica Wagner Sabo
Alexandra Schreur	Christopher Schreur	Jodi Silsbee
Ichen Velasco (Le)	Lacy and Nathan Walls	Stephanie and Bradley Wertman
Teresa Wickstrom	Melanie Wong Randall	Stacie Zeigler

3.2 - Responses to Comments

3.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, this Response to Comments document is provided to the City of Redlands, as the lead agency, for evaluation of the comments timely received on the Recirculated Draft IS/MND (State Clearinghouse No. 2019069016) for the Orange Avenue Luxury Apartments Project. Although not required by CEQA, the following responses to the comments received have been prepared and provided to the public and decision makers. This Response to Comments document becomes part of the Final IS/MND for the project in accordance with CEQA Guidelines Section 15132.

3.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors, above.

DEPARTMENT OF TRANSPORTATION

OFFICE OF LOCAL DEVELOPMENT-INTERGOVERNMENTAL REVIEW

DISTRICT 8, PLANNING

464 W. 4TH STREET, 6TH FLOOR MS-725

SAN BERNARDINO, CA 92401

PHONE (909) 806-3923

TTY 711

www.dot.ca.gov/dist8



Making Conservation
a California Way of Life.

August 9, 2019



File: 08-SBd-10-PM 29.257
Cross Street: Alabama Street
SCH#: 2019069016 - MND

Sean Reilly
Associate Planner
City of Redlands, Planning Division
35 Cajon Street, Suite 20
Redlands, CA 92373

Mitigated Negative Declaration, Orange Avenue Luxury Apartments

Dear Mr. Reilly,

The California Department of Transportation (Caltrans) has completed the review of the Notice of Intent to Adopt a Mitigated Negative Declaration for a multi-family residential use project, proposed on the west side of Alabama Street and is bisected by Orange Avenue, in the City of Redlands. The project proposes to construct a 328-unit low-rise luxury apartment complex (APNs: 0292-167-08, 11, 12, 13, 18, 25 and 0292-168-03, 16, 21, 22).

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when a proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Redlands, due to the project's potential impact to the State facilities, it is also subject to the policies and regulations that govern the SHS. We offer the following comments:

- 1) A ramp widening project (EA#1H160) on I-10 in Redlands at Alabama Street overcrossing from Orange Tree Lane to Industrial Park Avenue (PM 29.2/29.4) is in progress which will widen ramps at Alabama Street. We recommend that the applicant pay their fair share towards the needed improvements.

No further review by this Office is considered necessary at this time. However, if future conditions change and an encroachment into State Right-of-Way is undertaken at time of development, issuance of a Caltrans Encroachment Permit will be required.

1

2

Mr. Sean Reilly
August 9, 2019
Page 2

For information regarding the Encroachment Permit application and submittal requirements, contact:

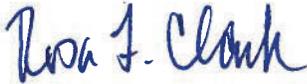
Caltrans Office of Encroachment Permits
464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526

<http://www.dot.ca.gov/ha/traffops/developserv/permits/>

2
CONT

These comments result from a review of the Notice of Intent to Adopt a Mitigated Negative Declaration provided for our evaluation. If this project is later modified in any way, please forward copies of revised plans as necessary so that we may evaluate all proposed changes for potential impacts to the SHS. If you have any questions regarding this letter, please contact Jacob Mathew at (909) 806-3928 or me at (909) 806-3923.

Sincerely,



ROSA F. CLARK
Office Chief
Local Development-Intergovernmental Review (LD-IGR)

State Agencies

California Department of Transportation (CALTRANS)

Response to CALTRANS-1

As stated in Section 9—State Highway Analysis (page 65) of the Traffic Impact Analysis (TIA), the project contributes fewer than 50 peak-hour trips to freeway ramp terminals; therefore, no further traffic analysis was required for the freeway interchange based on the criteria outlined in the County of San Bernardino Congestion Management Program. As stated in Section 10—Mitigation Measures (page 67) of the TIA, “[a]s mitigation for any potential off-site traffic impacts, the proposed project shall contribute through an adopted traffic impact fee program in addition to any fair share contributions shown within the traffic impact analysis which is not covered within this fee program. Fees typically applied are established County fees, for regional transportation improvements, local and/or community development impact fee agreements.”

The proposed project shall contribute to improvements at State highways and interchanges with local roads through payment of applicable City of Redlands Development Impact Fees as a condition of approval. Payment of the fees mentioned above represents the applicant’s fair share contribution to needed improvements, including those related to the ramp widening project identified by Caltrans.

Response to CALTRANS-2

Comment noted. The proposed project does not propose to encroach into the State right-of-way. However, the Lead Agency will contact Caltrans if an encroachment permit or other coordination is required for project construction.

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From: [Tribal Historic Preservation Office](#)
To: [Sean Reilly](#)
Subject: Luxview Apartments, Orange and Alabama (Redlands)
Date: Wednesday, August 07, 2019 12:18:05 PM

Hello Sean,

Regarding the NOI to adopt a Recirculated Mitigated Negative Declaration received by the Morongo THPO Office for this project, we have no further comments as long as Morongo is a consulting tribe and will be involved in the development of the archaeological monitoring plan.

1

Thank you.

Sincerely,

Travis Armstrong
Tribal Historic Preservation Officer
Morongo Band of Mission Indians
951-755-5259
Email: thpo@morongo-nsn.gov



From: Sean Reilly [<mailto:sreilly@cityofredlands.org>]
Sent: Friday, April 12, 2019 1:22 PM
To: Tribal Historic Preservation Office
Subject: RE: Luxview Apartments, Orange and Alabama (Redlands)

Mr. Armstrong,
I have attached a letter to close consultation.
This letter includes the mitigation shared in our previous emails.

Respectfully,

Sean Reilly
Associate Planner
City of Redlands
Development Services Department
P.O. Box 3005

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Local Agencies

Morongo Band of Mission Indians (MORONGO)

Response to MORONGO-1

Comment noted. The Morongo Band of Mission Indians will continue to be a consulting tribe and will be involved in the development of the archaeological monitoring plan, as stated in the comment letter.

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From: [Jo Lynn Lambert](#)
To: [Sean Reilly](#)
Cc: [Pamela J Ford](#); [Michelle Bologna](#)
Subject: AMEF comments on proposed Orange Avenue Luxury Apartments Complex (LuxView Project)
Date: Saturday, August 31, 2019 4:48:04 PM
Attachments: [AMEF comment letter - LuxView.pdf](#)

Dear Mr. Reilly,

Attached please find a comment letter on the Draft MND for the LuxView Apartments project.

Thank you,
Jo Lynn Lambert

JO LYNN LAMBERT
LAMBERT LAW
300 EAST STATE STREET, SUITE 600
REDLANDS, CALIFORNIA 92373

T: (909) 793-4942 • C: (909) 528-6436 • EMAIL: JLambertLaw@Outlook.com

August 31, 2019

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Re: Proposed Orange Avenue Luxury Apartments Complex (LuxView Project)

Dear Mr. Reilly:

I am president of the Armantrout Montessori Education Foundation (“AMEF”), a nonprofit organization that provides support for Montessori in Redlands (“MIR”) and The Grove School through teacher training, curriculum support, summer school and other programs. We are committed to encouraging the full spectrum of Montessori education in Redlands, which is one of the few cities in the country that offers toddler through high school Montessori education. I am writing to provide comments on behalf of AMEF on the recirculated Draft Mitigated Negative Declaration (“Draft MND”) for the Orange Avenue Luxury Apartments Complex (“project” or “LuxView project”), and to request that an Environmental Impact Report (“EIR”) be prepared so that traffic, safety and other impacts can be studied further based on full information.

1

MIR, a private school serving students aged 18 months to 6th grade, is located at 1980 Orange Avenue in Redlands, between Iowa and Nevada streets. The Grove School, a public charter school serving grades 7 to 12, has campuses on both sides of Orange Avenue between Iowa and Nevada streets, with the high school campus adjacent to MIR at 200 Nevada Street and the middle school campus (including a working farm and restored historic schoolhouse) between Iowa Street and Heritage Park. Students often have classes on both campuses and travel on foot between them across Orange Avenue between Iowa and Nevada streets.

2

The LuxView project proposes to construct a large, family-oriented luxury rental complex with 328 units in the immediate area of the MIR and Grove school facilities, on both sides of Orange Avenue between Iowa and Alabama streets. According to the architect, the nearly 22-acre project is aimed at working professionals employed at Loma Linda University Medical Center, the Jerry L. Pettis Memorial VA Medical Center, and ESRI, all of whom will likely drive cars. Because it is also designed to attract professionals with spouses and/or families, most units will likely have 2 cars (a total of over 650 cars).

3

August 31, 2019

These new residents will commute on the same roads used by school parents and students, particularly Orange Avenue and Iowa Street.

While we appreciate that the Planning Commission revised and recirculated the Draft MND for this project, the analysis on the important issues of traffic and safety continues to be based on inaccurate and outdated facts. For example, the 2017 traffic study does not include The Grove School traffic patterns, including the heavy traffic on Iowa Street and Orange Avenue that already occurs at drop-off and pick-up times (some of which will necessarily coincide with heavy traffic times for the professionals renting the new apartments). The traffic study also fails to include other housing and warehousing developments that have been built since the traffic study was completed, and pedestrian and bicycle usage that is heavier than in many locations due to the high number of school students and the nearby park. Area-wide traffic impacts are also ignored.

4
5

Once an accurate analysis of the traffic impacts of the LuxView project is completed, the safety implications of this sizeable increase in traffic must be addressed. Grove and Montessori students cross Orange Avenue many times daily, and their safety must be ensured through traffic and safety mitigation such as warning signs, street lighting, speed bumps, curb extensions and crosswalk markings. Students walk and bike to nearby locations and to travel to and from school; students and parents in cars enter and exit onto both Orange and Iowa streets. In all of these areas, traffic mitigation may be needed. The security of these school campuses should also be considered, given the new residents that may be crossing through from LuxView to Heritage Park. In addition, the cumulative impacts of successive, high-density residential projects in this area must be fully evaluated.

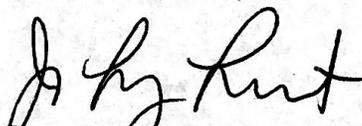
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7

The inaccuracies in the traffic data and related safety concerns present a fair argument that the LuxView project may create a significant environmental impact in both traffic and safety, requiring an EIR. An EIR would provide further opportunities to ensure that the project is designed with its neighbors in mind to avoid or reduce future traffic and safety impacts that will otherwise create headaches or dangers for years to come.

8

Thank you for the opportunity to provide comments on these important issues.

Very truly yours,


Jo Lynn Lambert

cc: AMEF Board of Directors

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Organizations

Armantrout Montessori Education Foundation (AMEF)

Response to AMEF-1

The City prepared a revised and Recirculated IS/MND dated August 1, 2019. While responses to comments on a proposed Mitigated Negative Declaration (MND) are not required by CEQA (Public Resources Code [PRC] § 21000 *et seq.*), this Response to Comments document is provided to demonstrate the City's careful consideration of the comments received in compliance with CEQA. These responses provide the City's good faith, reasoned analysis on the major environmental issues raised in the comments.

The City, in its consideration of the project and the Recirculated Draft IS/MND, reviewed the entire administrative record before it, including, but not limited to the Initial Study, staff reports, comment letters, and numerous technical studies. Based on the entire record, the City conclusively determined that the proposed project, with the incorporation of the mitigation measures prescribed within the Recirculated Draft IS/MND, will not have a significant effect on the environment and that no substantial evidence in light of the whole record has been presented to the City that the proposed project may have a significant effect on the environment.

To show that an MND is not adequate and that an Environmental Impact Report (EIR) is required by CEQA, commenters must demonstrate that the record contains substantial evidence supporting a fair argument that the project may have a significant adverse environmental impact. For purposes of CEQA, "substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact" (PRC § 21080(e)(1)). "Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment" (PRC § 21080(e)(2)).

For a fair argument to be supported by substantial evidence, it must be based upon an accurate, factual understanding of the proposed project. After review of the assertions in the comment letters received on the Recirculated Draft IS/MND, the City has concluded that they contain numerous errors, inaccuracies, and/or incorrect references regarding the project description, the project site and its surroundings, and the traffic analysis, as well as numerous inaccurate conclusions that are not supported by fact. Accordingly, the City finds that there is no substantial evidence in the comments, or elsewhere in the administrative record, to support a fair argument that the project may have a significant environmental impact on traffic, air quality, or any other resource evaluated under CEQA. Therefore, an EIR is not necessary or required for this project.

Response to AMEF-2

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to AMEF-3

Reference to the "addition of 650 cars" appears to be drawn from the number of the parking spaces required for the development. While somewhat related, the number of parking spaces does not

directly equate to the number of trips generated by a development. As noted in Section 4—Project Trip Forecasts of the TIA, the proposed project is forecast to result in approximately 109 net new trips leaving the project site during the AM peak-hour and 108 net new trips entering the project site during the PM peak-hour as residents generally leave for and return from work. In accordance with standard industry practice and guidelines established by both the San Bernardino County Congestion Management Program and City of Redlands, the project trip generation forecast is based on trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017). The majority of the project trips are forecast to travel to/from the east to Alabama Street (the nearest major arterial providing freeway access) and away from the schools. East of Iowa Street, the project is only forecast to contribute approximately 21 to 26 additional trips during the peak-hours. Please refer to Response to MIR-44 regarding anticipated project traffic during school drop off and pick up times.

Response to AMEF-4

As noted in Section 3—Existing Conditions of the TIA, existing traffic volumes used as the baseline for the traffic impact analysis were developed based on measured traffic counts conducted on Wednesday, November 1, 2017, on a regular school day during the AM peak period (7:00 a.m.–9:00 a.m.) and the PM peak period (4:00 p.m.–6:00 p.m.) of the surrounding streets. The Grove School opened at 200 Nevada Street in February 2017 as an additional space for existing students and the traffic counts associated with school operations were therefore included in the traffic counts taken in November 2017. Therefore, traffic volumes associated with existing developments at the time the traffic counts were collected, including The Grove School, are adequately accounted for in the existing traffic volumes.

Response to AMEF-5

As described in Section 5—Future Volume Forecasts of the TIA, the analysis adequately accounts for both existing and future developments in the area by adding trips associated with pending and approved but then-unconstructed development projects in the City of Redlands, as well as developments in the adjacent County of San Bernardino and City of Loma Linda, to the existing measured roadway volumes. Therefore, projects, such as those referenced in the comment letter, that were under construction at the time or that have been completed since the existing traffic counts were collected are already—and adequately—accounted for in the analysis. Specifically, 44 potential future development projects were identified and listed in Table 3 of the TIA. Some of these projects are operational at this time such as the warehouses located on the southwest corner of Alabama Street and Park Avenue and the warehouse located at the northeast corner of Park Avenue and Iowa Street. The comment does not identify any specific relevant developments in the project vicinity that the TIA did not include. To provide a conservative analysis, general area-wide traffic growth that was projected to occur during the relevant time frame was also added to existing measured volumes (2017) based on regional forecasts derived from the San Bernardino Transportation Analysis Model (SBTAM), which is standard protocol.

As described in Section 2—Methodology of the TIA, the analysis was performed in accordance with the input parameters outlined in the County of San Bernardino Congestion Management Program (CMP) as adopted by the City of Redlands, which takes into account minimum traffic signal phase times for pedestrians and bicyclists. A traffic signal phase time is defined as green, change, and

clearance intervals in a signal cycle assigned to a specified movement(s) of traffic.¹ Currently there is a pedestrian activated flashing beacon across Orange Avenue to allow for the safe travel of pedestrians in the project area. Existing pedestrian and bicycle facilities are documented in Section 3—Existing Conditions of the TIA and additional review of proposed crosswalk improvements is provided in Section 8 of the TIA. During construction, Mitigation Measure (MM) TRANS-2 requires that a work site traffic control plan be approved by the City prior to the start of any construction work. Among other things, the plans must show the location of any sidewalk or bike route and identify protective devices, warning signs, and access to abutting properties. Any temporary traffic controls used around the construction area will adhere to the standards in the California Manual of Uniform Traffic Control Devices (2014). Furthermore, as required by MM TRANS-2 and MM TRANS-4, the proposed project shall construct roadways along the project frontage, including sidewalks and parkway improvements, to their ultimate half-section width. The project will construct new sidewalks along the project frontage and a crosswalk across Orange Avenue at the eastern leg of the Orange Avenue and Iowa Street intersection, as shown in the conceptual striping plan in Appendix K of the TIA, which will facilitate local pedestrian mobility near the project. Accordingly, there is no evidence of a potentially significant impact to pedestrian or bicycle circulation during construction or operation of the project.

Response to AMEF-6

As discussed above in Response to AMEF-5, there are no identified potential impacts associated with pedestrians. Accordingly, no mitigation is required. As described in Section 2—Methodology of the TIA, the traffic impact analysis was prepared in accordance with the methodology, performance standards, and thresholds of significance established by the City of Redlands for the evaluation of traffic impacts associated with development projects. In accordance with CEQA, there must be a nexus between a project-related significant impact and the requirement of a project to provide mitigation. In other words, a project is required to provide mitigation if it is determined that the project will result in a potentially significant impact as determined by the thresholds of significance established by the CEQA lead agency. Generally, the City of Redlands defines a significant traffic/transportation impact to occur if a proposed development is forecast to cause a degradation in the performance of a study intersection, as measured by Level of Service, beyond the established thresholds. Based on the findings of the TIA, project-related significant impacts are mitigated to below a level of significance with implementation of MM TRANS-1 through MM TRANS-4. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. No additional mitigation is warranted or required.

While the project will generate additional trips, the project itself is forecast to generate substantially fewer trips than some of the approved City of Redlands General Plan land uses for the properties which surround the school. An increase in the amount of traffic alone is not considered a significant impact based on the performance standards established by the City of Redlands. Furthermore, the project is forecast to add a relatively small amount of trips along this segment of Orange Avenue (21 trips during the AM peak-hour, or approximately one trip every 3 minutes). The project is forecast to

¹ U.S. Department of Transportation Federal Highway Administration. 2008. Traffic Signal Timing Manual. June. Website: <https://ops.fhwa.dot.gov/publications/fhwahop08024/chapter4.htm>. Accessed September 18, 2019.

add a relatively small amount of trips along this segment of Iowa Street (14 trips during the AM peak-hour, or approximately one trip every 4 minutes).

Additionally, the project is adding new sidewalks and a crosswalk at the intersection of Iowa Street and Orange Avenue as shown in the conceptual striping plan in Appendix K of the TIA.

Response to AMEF-7

As noted in Response to AMEF-6, the need to mitigate project-related impacts has been assessed in accordance with the thresholds of significance established by the City of Redlands. Based on the findings of the TIA, potential project-related direct, indirect, and cumulative significant impacts are mitigated to below a level of significance with implementation of MM TRANS-1 through MM TRANS-4. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. No additional mitigation is warranted or required.

As noted in response to AMEF-5, existing pedestrian and bicycle facilities are documented in Section 3—Existing Conditions of the TIA, and additional review of proposed crosswalk improvements is provided in Section 8 of the TIA. As noted in MM TRANS-4, the proposed project shall construct roadways along the project frontage to their ultimate half-section width, including sidewalks and parkway improvements. The project will construct new sidewalks along the project frontage and a crosswalk across Orange Avenue at the eastern leg of the Orange Avenue and Iowa Street intersection as shown in the conceptual striping plan in Appendix K of the TIA, which will facilitate local pedestrian mobility near the project.

As noted in Response to AMEF-5, the TIA adequately accounts for other development projects and area-wide growth.

Response to AMEF-8

Comment noted. Please refer to Response to AMEF-1, Master Response 2—Traffic Data, and Master Response 3—Traffic and Safety.

From: [Jenny Davidson](#)
To: [Sean Reilly](#)
Subject: Concerns regarding Orange Ave Luxview Apartments
Date: Saturday, August 31, 2019 3:03:29 PM
Attachments: [Concerns regarding Orange Ave Luxview project.pdf](#)

Dear Sean,

Attached you will find a letter outlining parent concerns from Montessori in Redlands and The Grove School regarding the proposed Orange Avenue Luxury Apartments Project. Please let me know if you have any questions.

Best regards,

Jenny Davidson

Head of School
Montessori in Redlands
909-793-6989



MONTESSORI
IN REDLANDS

August 29, 2019

Sean Reilly
City of Redlands, Development Services Department
P.O. Box 3005
Redlands, CA 92373

Dear Mr. Reilly,

I know that several parents from Montessori in Redlands and The Grove School will be contacting you directly with concerns regarding the Orange Avenue Luxury Apartments Project. As Head of School I have also received several concerns and requests that parents have asked me to share with you. Our community does not feel that the Initial Study/Mitigated Negative Declaration sufficiently responds to concerns about the impact on the students and families in our communities.

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A summary of parent concerns and requests are included below.
Best regards,

Jennifer Davidson

- The Recirculated Draft Initial Study/Mitigated Negative Declaration (IS/MND) was issued on July 31, 2019, when the school was still closed for summer break. This limited the time available for parents to review and comment on the IS/MND. 2
- The recirculated IS/MND does not address most of the concerns sent by the school in the latter date July 3, 2019.
- The Notice of Intent to Adopt the Mitigated Negative Declaration says that the project is tentatively scheduled for a public hearing before the City of Redlands Planning Commission on Tuesday, September 10, 2019, beginning at 4:00 PM. We kindly request that the public hearing be moved to 6:30 p.m. to allow more school staff and parents to attend. 3
- The City should require the developer to investigate the impacts on the project to the Mill Creek Zanja. 4
- We do understand that there is a housing shortage in the state; but the Project should be developed carefully to avoid worsening other State and regional problems. We can't forget that the state has also recently suffered a 7-year drought and unprecedented wildfires, and the Inland Empire remains one of the worst ozone pollution areas. 5

The IS/MND acknowledges that the Montessori in Redlands (MIR) and Grove School campuses are located on the next block of the proposed Project. However, the amount of car trips per day is not based on an accurate study of traffic generated by the schools. As a result, appropriate mitigations are not proposed in the study to address safety and air quality hazards that will affect the children and staff attending and working at the schools. The following are the most critical concerns from my point of view:

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I. **THE SAFETY OF CHILDREN AND SCHOOL STAFF.** The schools were built when the area was surrounded by orange groves. There are more than 600 children ranging in age from 18 months to 12th grade on both campuses. Children attending the Grove School make multiple crossings across the crosswalk on Orange Avenue each day from the high school campus to the farm campus and Barton School House. Mitigations need to be made to guarantee the safety of the children. The best mitigation is to close Orange Ave between Iowa and Nevada Streets.

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II. **AIR POLLUTION.** The additional 2,261 vehicle trips noted by the study will generate more pollution in the local area. The study does not accurately count current vehicle trips per day, and we cannot be sure of total trips per day as a result. The IS/MND does not currently propose any mitigations to prevent or decrease the air pollution:

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1. The Project includes installing the infrastructure for future solar panels, but panels are not actually being installed; nor are Electric Vehicle (EVA) Charging Stations.
2. Old and established trees on the property can help mitigate air pollution; however, there is no requirement to protect them. Trees absorb odors and pollutant gases (nitrogen oxides, ammonia, sulfur dioxide and ozone) and filter particulates out of the air by trapping them on their leaves and bark. Trees are also a characteristic of Redlands.

Southern California retained the dubious distinction of having the worst air quality in the nation, according to a report released April 18, 2018 by the American Lung Association. From the American Lung Association: Children face special risks from air pollution because their lungs are growing and because they are so active and breathe in a great deal of air. Furthermore, children don't behave like adults, and their behavior also affects their vulnerability. They are outside for longer periods and are usually more active when outdoors. Consequently, they inhale more polluted outdoor air than adults typically do. The Southern California Children's Health study looked at the long-term effects of air pollution on children and teenagers. Tracking 1,759 children who were between ages 10 and 18 from 1993 to 2001, researchers found that those who grew up in more polluted areas face increased risk of reduced lung growth, which may never recover to the full capacity. The average drop in lung function was similar to the impact of growing up in a home with parents who smoked. Community health studies are pointing to less obvious, but serious effects from year-round exposure to ozone, especially for children. Scientists followed 500 Yale University students and determined that living just four years in a region with high levels of ozone and related co-pollutants was associated with diminished lung function and frequent reports of respiratory symptoms. Another earlier Children's Health Study of 3,300 school children in Southern California found reduced lung function in girls with asthma and boys who spent more time outdoors in areas with high levels of ozone.

III. **MITIGATIONS DURING CONSTRUCTION.** The IS/MND does not outline mitigation requirements to minimize impacts to both schools during construction. The schools are requesting:

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- Disallowing construction equipment and hauling routes on Orange Ave between Nevada and Iowa.
- Disallowing street closures of Orange Ave during 7-9 AM and 3-5 PM, which are the major drop-off and pick-up hours for the schools.
- Prohibit detouring traffic around the school when the school is in session.

- Coordinating with the schools on any utility service disruptions for the Project. Utility shut-downs should occur outside school hours, which are 7AM-6PM.

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CONT

IV. **THE IS/MND USES OLD AND INACCURATE TRAFFIC DATA:** Most of the Technical Studies are based on traffic data to create traffic projections.

- The traffic data cited is old. It was collected in 2017, prior to the opening of several other housing developments in the area, and is therefore incomplete.
- The traffic data in the study was not at all accurate, calculating 66 car trips a day based on a total square footage of both schools of 2,000 square feet. Both schools combined encompass more than 20,000 square feet, and the number of car trips are grossly underestimated, given the combined total of more than 600 students, almost 400 families, and almost 100 staff of both schools.
- The traffic data does not include the significant amount of school and medical center traffic to and from both schools on Iowa Street between Orange Ave and Barton Road. The project will increase traffic on this segment considerably.

As a result of these inaccuracies, the traffic projections and consequences noted in the technical studies and consequently the IS/MND are greatly underestimated.

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V. **THE RECIRCULATED IS/MND DOES NOT ADDRESS MANY OF THE CONCERNS SENT BY THE SCHOOLS IN THE LETTER DATED JULY 3, 2019.**

- a. Access, Circulation, and Parking:
 - Vehicular access for the development is on Orange Avenue which directs all traffic coming from, or going to, the west past the schools. Students of the Grove School cross Orange Avenue at the mid-block crosswalk multiple times per day. We request that the project consider traffic flow design to minimize the speed and volume of vehicles on Orange Avenue. The schools' long-term recommendation is to avoid any tragedies by closing Orange Avenue to through traffic from Iowa to Nevada.
- b. Public Services or Utilities: The IS/MND lists the existing public services but does not mention how these services will be able to handle the addition demand:
 - There is no mention of how the existing water, sewer, and road infrastructure will handle the additional 328 apartment units and the 643+ cars that will be introduced to the neighborhood.
 - There is no indication that additional public schools or fire and police stations will be added to accommodate new development and growth.
 - There is no mention of how trash collection and recycling will occur.
- c. Project Energy Futures:
 - The Project will construct the infrastructure for EV charging stations for solar connectors, but they won't be installed by the developer and there is no mention of who will install them or when. Meanwhile, the additional 2,261 vehicle trips generated by the development will add more pollution to the area next to the schools because there are no requirements in the IS/MND to mitigate it.

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- d. Environmental Checklist and Environmental Evaluation:
- 5-1 Aesthetics: The existing area has single family homes, low density residences, orange groves, and schools based in a farm environment. 14
 - The building aesthetics are inconsistent with the area’s historical landmarks and citrus groves including the Barton Villas, the Asistencia San Bernardino, the Barton Mansion, the Barton School House, and Heritage Park.
 - There are old, established trees that are not identified and being incorporated into the design of the development.
 - There is no mention of how the Morey Arroyo Canal and Mill Creek Zanja will be incorporated into the development to ensure their protection.
 - 5-2 Environmental Setting: 15
 - The IS/MND acknowledges that, “There is also a small grove of citrus trees adjacent to the homes and landscaping company to the north and within the project site.” However, there is no reference to the impact to Redlands General Plan 2.4 Citrus Groves / Farms which states in part:
 - a. 2-P.21 Encourage retention of existing privately-owned citrus groves of all sizes.
 - b. 2-A.85 Explore incentives and supportive programs that encourage the ongoing conservation of privately-owned citrus groves.We request that the developer offset the loss of these groves with the development of an equal or greater number of citrus trees in an adjacent area.
 - There is nothing in the document that mentions the old established trees.
 - There are no protections established for the Morey Arroyo Canal and Mill Creek Zanja.
 - 5-3 Air Quality fails to consider the nearest sensitive receptor: 16
 - The Grove School is not identified as a sensitive receptor in section “c) Expose sensitive receptors to substantial pollutant concentrations” at the top of page 37. The Grove School is located on the southwest corner of Iowa St and Orange Ave cater corner from the proposed site. The Grove School is much closer – 100 feet – than the nearest identified school, Montessori in Redlands, which is stated to be 0.42 miles from the site. The EIR states that schools are too distant from the site to be considered sensitive receptors; however, this statement is incorrect since the EIR does not consider The Grove School.
 - Motor-vehicle exhaust contains high concentrations of chemicals that can be harmful, including cancer-causing compounds and respiratory irritants. Concentrations of traffic pollutants can be substantially higher near busy roads. Recent scientific studies from Europe and the United States have found that children living near busy roads have increased asthma symptoms and bronchitis. (Air Pollution from Nearby Traffic and Children’s Health: Information for Schools, Oct 18, 2004). Children can sometimes be more at risk than adults from the harmful health effects of air pollution. Changes to state law (Senate Bill 25, Escutia 1999) established specific requirements to examine the impacts of air pollution on children's health. As Montessori schools, we prioritize use of outdoor spaces for learning. Therefore, both MIR and Grove children spend a significant part of their time outside, including on our working farm. Outdoor activities

extend beyond the school day into after-school childcare and evening activities, including our outdoor athletics and performance spaces.	16
○ Failing to identify one of the nearest sensitive receptors means that project impacts have not been correctly analyzed. Mitigation measures need to be re-evaluated to consider sensitive receptors. The Grove School should be included in the analysis as well as Montessori in Redlands, and we recommend that the Blossom Grove Alzheimer’s Special Care Center and the local medical centers be considered as well.	CONT
○ For construction source emission, we request a list of the construction equipment to be used to ensure safe air during the construction stage.	17
○ There is no requirement to install Electric Vehicle stations to reduce the air polluting of gas and diesel cars.	18
○ In order to reduce local emissions, sidewalk connections to the closest bus station to incentivize use of public transit are requested.	19
● 5-4 Biological Resources impacts:	
○ The mitigation table does not outline a plan for how the Morey Arroyo canal will be protected as defined by Section 404 of the Clean Water Act	20
○ The proposed development conflicts with the City of Redlands Section 2.4 of the development plan, which clearly states a desire to maintain, encourage, and possibly expand citrus groves.	
○ The Mill Creek Zanja is a historic irrigation canal running through the property and is not identified.	
● 5-5 Cultural Resources:	
○ This section does not analyze the impacts to the Barton Villas, the Asistencia San Bernardino, the Barton Mansion, and Heritage Park. Heritage Park was originally part of Rancho San Bernardino. In 1842, the Lugo family bought the land and became the first fixed-settler civilization in the area.	21
○ There are no mitigations to protect the Morey Arroyo and all the nature around it during and after construction. A deed restriction should be required.	
● 5-6 Energy:	
○ In order to truly promote energy efficient projects, the development should be required to install solar panels, solar batteries, and Energy Vehicle (EV) stations. The measure to support energy conservation should not be voluntary but required.	22
○ The new building should reduce water consumption. Water tanks also should be built to collect rainwater for landscape use during the dry season.	23
○ The finding of less-than-significant impact appears inaccurate. There are no mitigations in place to improve air quality and reduce global climate change impacts.	24
● 5-7 Geology and Soils:	
○ The finding of less-than-significant impact appears inaccurate considering the potential for strong seismic ground shaking. Redlands-area historical earthquake activity is near California state average and is 721% greater than the overall U.S. average.	25
○ There will be significant loss of topsoil due to the development. The loss of topsoil and the replacement with impermeable surface will increase the urban runoff that tends	26

<p>to pick up gasoline, motor oil, heavy metals, trash and other pollutants from sidewalks, roadways, and parking lots. The impervious cover in a typical urban area limits groundwater percolation and causes five times the amount of runoff generated by a typical woodland of the same size. A 2008 report by the United States National Research Council identified urban runoff as a leading source of water quality problems. In addition, both concrete and asphalt are the primary contributors to what is known as the urban heat island effect and contributes to climate change.</p>	<p>26 CONT</p>
<ul style="list-style-type: none"> • 5-8 Greenhouse Gas Emissions: <ul style="list-style-type: none"> ○ The project will generate greenhouse gas emissions directly during construction and indirectly with the traffic that will be created. Since the traffic generation analysis used incomplete data collected prior to the opening of other developments in the area, the Green Gas Emissions Study impact is inaccurate as well. ○ Receptors were not installed near the schools to collect accurate assessments of current and projected emissions. ○ There will be significant loss of topsoil due to the development. The loss of topsoil and the replacement with impermeable surface will increase the urban runoff that tends to pick up gasoline, motor oil, heavy metals, trash and other pollutants from sidewalks, roadways, and parking lots. ○ There are no water recycling systems proposed. ○ There are no mitigations in place to reduce greenhouse gas emissions. 	<p>27 28 29 30</p>
<ul style="list-style-type: none"> • 5-9 Hazards and Hazardous Materials: <ul style="list-style-type: none"> ○ The schools should be informed of how hazardous materials will be used during construction. ○ No hazards and hazardous materials should be stored at the project site since the project is immediately adjacent to the Grove School. 	<p>31</p>
<ul style="list-style-type: none"> • 5-10 Hydrology and Water Quality: <ul style="list-style-type: none"> ○ The project will deplete groundwater supplies and interfere substantially with groundwater recharge since acres of topsoil will be replaced with impermeable surfaces. ○ The project will alter the existing drainage pattern of the area since it will build next to the Morey Arroyo canal. This will increase significantly runoff water, which may exceed the capacity of existing drainage systems and will add substantial additional sources of polluted runoff. Since the schools are downstream from the proposed development, this increases risk of flooding. ○ The project will substantially degrade water quality. We request that the project reduce water runoff by using permeable surfaces where possible. 	<p>32</p>
<ul style="list-style-type: none"> • 5-11 Land Use and Planning: <ul style="list-style-type: none"> ○ The project may physically divide the established community and increase the safety risks for established schools by adding traffic that will go through their campuses. ○ The project conflicts with the City of Redlands Section 2.4 of the development plan, which clearly states that there is a desire to maintain, encourage, and possibly expand citrus groves. 	<p>33 34</p>

<ul style="list-style-type: none"> ○ The project is close to historic sites like the Barton Villas, the Asistencia San Bernardino, the Barton Mansion, Barton School House, and Heritage Park. 	35
<ul style="list-style-type: none"> ● 5-12 Noise Impacts: <ul style="list-style-type: none"> ○ The project will generate substantial temporary and permanent increase in ambient noise due to construction and new traffic. ○ Since the traffic generation analysis used old inaccurate data, the Noise Impacts study is inaccurate as well. ○ Sensitive receptors must be installed in all the schools during construction. ○ For the proposed multi-family (low rise) attached residential dwelling units located adjacent to Orange Avenue, windows facing or with a line of sight of Orange Street should have an STC rating of at least 28 to meet the interior noise standard of 45 dBA CNEL. The same windows should be installed in the school by the developer. ○ The use of vibratory rollers, drillers, and other noise equipment should be restricted during school hours. 	36
<ul style="list-style-type: none"> ● 5-13 Population and Housing impacts: <ul style="list-style-type: none"> ○ The project will induce substantial population growth in the area with the removal of low-density housing and citrus groves. 	37
<ul style="list-style-type: none"> ● 5-14 Public Services impacts: <ul style="list-style-type: none"> ○ The proposed density or height increase will require substantial expansion of public infrastructure, facilities, and services to offer acceptable service ratios, response times, or other performance objectives for any of the public services: Fire protection, police protection, schools, parks, sewer system, drainage system, water supply, garbage collection. ○ We have additional concerns about narrow roads as well as the age of the sewer system and water lines. 	38
<ul style="list-style-type: none"> ● 5-15 Recreation impacts: <ul style="list-style-type: none"> ○ The project will increase the use of existing neighborhood parks such that the physical deterioration of the facilities will be substantially accelerated. 	39
<ul style="list-style-type: none"> ● 5-16 Transportation/Traffic impacts: <ul style="list-style-type: none"> ○ Traffic counts were collected in November 2017. During November 2017, large industrial distribution warehouses along Alabama were just being completed, and housing developments west of Nevada on Orange Avenue were not yet built and not yet impacting traffic. We request the traffic analysis should be re-done to reflect current traffic conditions. 	40
<ul style="list-style-type: none"> ○ Table 10 (page 111) shows that afternoon Peak-hour for Alabama Street at Orange Avenue level of service will change to F. Measure U, Section 5 states that no development project shall be approved if the level of service is below the level of service C. However, the IS/MND says that no additional improvements are recommended beyond the required implementation of MM TRANS-1. ○ Tables 8 and 9 show how that afternoon Peak-hour F level of services from several intersections will degrade from B to C. However, it is stated “the proposed project is forecast to result in no significant traffic impacts for Opening Year (2020) with Project conditions.” 	41

- It is not clear if the proposed traffic mitigations would address the impacts identified in Tables 7 and 8. Additional analysis is requested to verify that mitigation measures prevent degradation in levels of service. 42
- The Cumulative Development Trip Generation grossly underestimates the traffic generated by Montessori in Redlands and The Grove Schools by grouping both schools together into a single, small building. However, it is stated that “the proposed project is forecast to result in no significant traffic impacts for Existing Plus Project Conditions.” 43
- Afternoon peak traffic analysis was studied from 4 PM to 6 PM. However, school pick up and drop off times differ, with peak traffic from 8:15 to 9:15 in the morning and 2:45 to 3:45 in the afternoon. We request the traffic analysis be re-done to capture peak traffic conditions associated with these pick-up and drop-off times. Observed peak hours for traffic from the neighboring community would increase significantly due to the proposed project. 44
- There are no mitigations for pedestrians and bicycles in and around the school area. This should be included considering three high schools in close proximity: The Grove School, Arrowhead Christian Academy Middle and Upper School, and Barbara Parks High School. 45
- The current location of the development entrances and exits will increase traffic on Orange Avenue and will jeopardize the safety of children and families. 46
- 5-17 Utilities and Service Systems:
 - The developer should be required to expand the drainage facilities, improve sewer systems, and utilize recycled water lines for irrigation in order to accommodate significantly increased usage. 47
 - Redlands is still under water restrictions. The Bunker Hill Basin is the City’s primary groundwater source, accounting for nearly 50% of all water served. While water storage in this basin has fluctuated in past years, the last 5 years of drought has shown the most significant impact, and it is currently at the second lowest level recorded to fill the basin. We would need several winters like the one we just had to bring our storage levels back to pre-drought levels. About 75% of water in Redlands is used outdoors on landscaping. Please help to ensure we have a sustainable groundwater supply by adhering to watering restrictions.
 - There is no mention if the impact of the project on the City of Redlands landfill capacity. 48
- 5-18 Mandatory Findings of Significance:
 - The project has impacts that are individually limited, but cumulatively considerable. The project will substantially degrade the safety of the community, as well as the air and water quality. 49
 - The project will have environmental effects that will cause substantial adverse effects on the families and children of Redlands, either directly or indirectly. Motor-vehicle exhaust contains high concentrations of chemicals that can be harmful, including cancer-causing compounds and respiratory irritants. Concentrations of traffic pollutants can be substantially higher near busy roads. Recent scientific studies from

Europe and the United States have found that children living near busy roads have increased asthma symptoms and bronchitis. (Air Pollution from Nearby Traffic and Children’s Health: Information for Schools, Oct 18, 2004).

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CONT

- 5-19 Wildfire
 - The proximity of power lines to trees is considered a fire hazard; therefore, SCE has been trimming or removing trees. Instead of the City incurring the cost of constantly trimming trees or suffering the environmental effects of removing trees close to the line, the City could require developers to work with SCE to move electrical lines underground to avoid fire hazard conditions.

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VI. **THE IS/MND SHOULD ALSO HAVE THE FOLLOWING DISCRETIONARY APPROVALS:**

1. **Citrus Preservation Commission:** The orange groves Demolition should be listed under Section 1.4 Discretionary Approvals. The Citrus Preservation Commission should review the demolition of the Orange Groves.
2. **Street Tree Committee:** Since there are old, big established trees in the proposed development area, the Street Tree Committee should be reviewing the IS/MND.
3. **Historic and Scenic Preservation Commission:** The first farm in Redlands was located in this area. The project is close to historic sites like the Barton Villas, the Asistencia San Bernardino, the Barton Mansion and Heritage Park. The area used to be agricultural, and the local school campuses are based in a farm environment. Heritage Park was originally part of Rancho San Bernardino. In 1842, the Lugo family bought the land and it became the first fixed-settler civilization in the area. The parcels also include the Morey Arroyo Canal and Mill Creek Zanja, which both are significant parts of the history of Redlands but not included here. During the summer of 1891, Redlands was struck with an unexpected thunderstorm that wreaked havoc throughout the downtown and residential southwest side. In the aftermath of the storm, citizens called for a storm water meeting with community leaders on Sept. 11, 1891. In response, Mayor Edward Judson suggested the city develop a system of storm water ditches. The last major SWD project was the Morey Arroyo SWD. Water for this ditch originates from Alessandro, Center Street, San Mateo, and Redlands Heights. This ditch is the widest and the deepest of all the SWD system of 1892. The Mill Creek Zanja is a historic irrigation canal. The Serrano people dug the canal in 1819 to provide water from Mill Creek for their farms east of the city.

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Montessori in Redlands (MIR)

Response to MIR-1

Comment noted. Please refer to Master Responses 1—General Opposition and 6—Previous Comments.

Response to MIR-2

Comment noted. The City notes that in addition to the original public comment period from June 5 to July 5, 2019, the Recirculated IS/MND was widely available to the public for review and comment from August 1, 2019, through August 30, 2019, and there was adequate time for comments to be submitted during that period. Please refer to Master Response 6—Previous Comments.

Response to MIR-3

The public hearing date and time have been changed. The public hearing for the project is currently scheduled for September 30, 2019, at 6:00 p.m..

Response to MIR-4

Please refer to Response to Heidelberg-1.

Response to MIR-5

Comment noted. Impacts related to wildfire are discussed in Section 2.2 of the Recirculated Draft IS/MND. Impacts related to air quality are discussed in Section 2.3 of the Recirculated Draft IS/MND. Based on the analysis in the IS/MND, the project would not have any significant and unavoidable impacts to any resource identified in this comment.

Response to MIR-6

Please refer to Response to AMEF-4, which addresses the baseline information used in the traffic impact analysis. As noted in Section 3—Existing Conditions of the TIA, existing traffic volumes used as the baseline for the traffic impact analysis were developed based on measured traffic counts conducted in November 2017 during the AM peak period (7:00 a.m.–9:00 a.m.) and the PM peak period (4:00 p.m.–6:00 p.m.) on the surrounding streets. Therefore, traffic volumes associated with existing developments at the time the traffic counts were collected, including The Grove School, are adequately accounted for in the existing traffic volumes, since both schools were in session at the time traffic counts were conducted. It is not common practice to mention every operational land use by name in a traffic study, which is why each school was not individually listed in the TIA. Nevertheless, the operational activities of both schools were accounted for in the analysis.

Response to MIR-7

As noted in Response to AMEF-6, the need to mitigate project-related impacts has been assessed in accordance with the thresholds of significance established by the City of Redlands. Based on the findings of the TIA, project-related significant impacts are adequately mitigated with implementation of MM TRANS-1 through MM TRANS-4.

In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. No additional mitigation is warranted or required under CEQA.

Roadway safety monitoring is typically part of a larger City-wide effort coordinated between the school districts and police departments. The City development review and approval process ensures all roadway and traffic improvements are designed to the appropriate roadway and safety standards. For CEQA analysis, the City does not have an established threshold specifically for evaluating safety impacts; however, an increase in traffic alone is not considered a significant impact nor is an increase in traffic in and of itself considered a safety risk.

The project is forecast to add a relatively small number of trips along this segment of Orange Avenue (21 trips during the AM peak-hour, or approximately one trip every 3 minutes). Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, sidewalk improvements along Orange Avenue, and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact in this area as documented in the TIA. Additionally, there is a pedestrian activated flashing beacon across Orange Avenue to allow for the safe travel of pedestrians in the project area. The suggested mitigation to close Orange Avenue between Iowa and Nevada Streets is infeasible and would result in significant impacts to circulation within the City. There is no identified significant impact that would be reduced by closing Orange Avenue as a result of the proposed project. Furthermore, closing Orange Avenue would be in conflict with the City's General Plan. No additional mitigation is warranted or required.

Response to MIR-8

The comment states that the TIA does not accurately count current vehicle trips per day but does not specify any particular inaccuracies in the TIA. As explained in Response to AMEF-3, the traffic analysis was prepared in accordance with standard industry practice and guidelines established by both the San Bernardino County Congestion Management Program and City of Redlands, and it takes into account the operational activities of the existing schools in the project vicinity, as well as other projects contemplated but not constructed at the time the TIA was produced, pursuant to standard TIA practices. The project trip generation forecast is based on trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017). Please refer to Response to MIR-44 regarding anticipated project traffic during school drop off and pick up times.

The March 8, 2019, AQ-GHG analysis (AQR) analyzed project-related emissions from traffic sources based on the trip generation rate given in the project-specific TIA. The scoping agreement for the TIA was approved by the City. The AQR for the current project analyzed impacts from the project on a regional and local level. The commenter is incorrect that the Recirculated IS/MND does not propose mitigation to prevent or decrease air pollution, as the Recirculated IS.MND requires several air quality-related mitigation measures to be implemented. For example, MM AQ-1 requires that architectural coatings applied to project buildings be limited to 30 grams per liter volatile organic compounds (VOC) content. MM AQ-2 requires the project applicant to ensure that the construction contractor use construction equipment that has Tier 3 engines or better for any on-site construction activities to reduce pollution during project construction (see page 41 of the Recirculated Draft IS/MND). The project also requires the planting of 230 new trees on-site (see pages 68 and 69 of the Recirculated Draft IS/MND).

As stated on page 1 of the AQR, “[f]or the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain at the location for 24 hours. SCAQMD also considers land uses such as schools, child care centers, athletic facilities, and playgrounds to be sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are present for shorter periods of time, such as eight hours.” It is common industry practice for an air quality analysis to focus on the nearest sensitive receptor to a project site, as any receptor located further away would have lesser impacts than the nearest receptor. As stated on page 38 of the Recirculated IS/MND:

[t]he nearest sensitive receptors to the project site are the existing residential uses located immediately adjacent and to the north, south, east, and west of the proposed project site. Additionally, there are single-family detached residential dwelling units located approximately 65 feet east (across Alabama Street) and 50 feet west (across Iowa Street) of the project site, while multi-family attached residential dwelling units are located approximately 100 feet east (across Alabama Street). All of these residential sensitive receptors are located closer to the project site than the existing schools, the nearest of which is The Grove Farm School Campus, at 106 feet from the project site (measured from the nearest edge of the property line of the project site to the nearest edge of property line of the subject school property). Other nearby schools, including Barton Road Kindercare, Montessori in Redlands, Grove High School, and the Barton House Playschool are located 528 to 1,267 feet from the project site, respectively (see Table 1). Because all of the nearby schools are located further away than the nearest sensitive receptors (the existing residential uses located immediately adjacent to the project boundary), and because air emissions decrease with distance, any and all of the existing school uses in the project vicinity would be less impacted by emissions sourced from the project site.

Because the project would not exceed any air quality thresholds at the nearest sensitive receptors to the project site, per South Coast Air Quality Management District (SCAQMD) methodology, the health-related impacts on receptors located farther away (including schools and the children attending them) that are located further away, would also be less than significant.

Response to MIR-9

MM TRANS-2 requires that a construction work site traffic control plan be submitted to the City for review and approval prior to the issuance of a grading permit or start of any construction work. It is standard practice for such plans to avoid peak commute periods, route heavy trucks along major arterials (such as Alabama Street), and coordinate with school schedules and utility providers as necessary, as well as comply with State and federal traffic control standards outlined in the Manual on Uniform Traffic Control Devices.² It is standard practice for the documents to be in the form of an

² U.S. Department of Transportation Federal Highway Administration. 2019. Manual on Uniform Traffic Control Devices (MUTCD). May 3. Website: <https://mutcd.fhwa.dot.gov/>. Accessed September 18, 2019.

active traffic control program during construction with dynamic adjustments occurring as the project proceeds.

Response to MIR-10

Please refer to Response to AMEF-4, which explains that existing traffic associated with schools in the project vicinity were accounted for in the analysis. As noted in Section 3—Existing Conditions of the TIA, existing traffic volumes used as the baseline for the traffic impact analysis were developed based on measured traffic counts conducted in November 2017 during the AM peak period (7:00 a.m.–9:00 a.m.) and the PM peak period (4:00 p.m.–6:00 p.m.) for the surrounding streets.

Therefore, traffic volumes associated with existing developments at the time the traffic counts were collected, including The Grove School, are adequately accounted for in the existing traffic volumes. The TIA reference to a school use totaling 2,000 square feet refers to the proposed expansion of the existing school facility and the traffic associated with the cumulative future trips. Relatedly, other developments in the area that have been constructed since 2017 are accounted for in the other development trips and area-wide growth discussed in response to AMEF-5 and in Section 5 of the TIA.

Response to MIR-11

As noted in Response to AMEF-6, the need to mitigate project-related impacts has been assessed in accordance with the thresholds of significance established by the City of Redlands. Based on the findings of the TIA, project-related significant impacts are adequately mitigated with implementation of MM TRANS-1 through MM TRANS-4. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. No additional mitigation is warranted or required. Please refer to Response MIR-7 regarding the proposal to close Orange Avenue. As noted in Response to MIR-7, no additional mitigation is warranted or required. Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, and construction of sidewalk improvements along Orange Avenue and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact in this area as documented in the TIA.

Response to MIR-12

Impacts to public services, including police, schools and fire, are discussed in Section 2.15 of the Recirculated Draft IS/MND. Hydrology and water is discussed in Section 2.10 of the Recirculated Draft IS/MND. Solid waste is discussed in Section 2.19 of the Recirculated Draft IS/MND. Impacts related to air quality are discussed in Section 2.3 of the Recirculated Draft IS/MND. Pursuant to the requirements of CEQA, impacts on public services, hydrology and water, sewer, solid waste, and air quality were found to be less than significant.

Response to MIR-13

Per City and Title 24 Building requirements, the installation of EV infrastructure is required. However, as shown in Table 11 on page 51 of the AQR, none of the project's operational emissions (including those from project-related traffic) will exceed applicable regional thresholds of significance established by the SCAQMD. Furthermore, project operational-source emissions would not result in or cause a significant localized air quality impact as discussed in the Operations-Related Local Air

Quality Impacts section of the AGR (see Section 7, page 49, of the AQR). No operational mitigation is warranted or required under CEQA.

Response to MIR-14

The project incorporates California Mission style architecture, which incorporates features similar to the structures listed in this comment. Trees on-site are not required to be maintained under City codes or regulations, and their removal is not considered a significant environmental impact under the requirements of CEQA. The Morey Arroyo is discussed in the Biological Resources section of the Recirculated IS/MND. This feature is avoided by the project and will not be impacted. Further, the project will incorporate perimeter fencing along its northern edge, further protecting the arroyo. The Mill Creek Zanja is discussed in the Cultural Resources section of the Recirculated IS/MND. Mitigation measures are included requiring the establishment of a 50-foot buffer along the project's southern edge to avoid disturbance of the Zanja. See also Response to BLACKBURN-8.

Response to MIR-15

Please refer to Master Response 5—Citrus Tree Removal.

Response to MIR-16

As stated on page 1 of the AQR, "For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain at the location for 24 hours. SCAQMD also considers land uses such as schools, child care centers, athletic facilities, and playgrounds to be sensitive receptors. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are present for shorter periods of time, such as eight hours." As stated on page 38 of the Recirculated IS/MND:

[t]he nearest sensitive receptors to the project site are the existing residential uses located immediately adjacent and to the north, south, east, and west of the proposed project site. Additionally, there are single-family detached residential dwelling units located approximately 65 feet east (across Alabama Street) and 50 feet west (across Iowa Street) of the project site, while multi-family attached residential dwelling units are located approximately 100 feet east (across Alabama Street). All of these residential sensitive receptors are located closer to the project site than the existing schools, the nearest of which is The Grove Farm School Campus, at 106 feet from the project site (measured from the nearest edge of the property line of the project site to the nearest edge of property line of the subject school property). Other nearby schools, including Barton Road Kindercare, Montessori in Redlands, Grove High School, and the Barton House Playschool are located 528 to 1,267 feet from the project site, respectively (see Table 1). Because all of the nearby schools are located further away than the nearest sensitive receptors (the existing residential uses located immediately adjacent to the project boundary), and because air emissions decrease with distance, any and all of the existing school uses in the project vicinity would be less impacted by emissions sourced from the project site.

Similarly, the Blossom Grove Alzheimer's Special Care Center is also located further from the project site than the nearest sensitive receptors. Per the analysis (based on SCAQMD-approved methodology) performed to determine the localized significance thresholds (LST) guidance methodology, as emission do not exceed the significance thresholds at the nearest sensitive receptor to the project site, the health-related impacts to other nearby receptors located further away from the nearest receptors (including children) would also be less than significant.

Response to MIR-17

The list of project-related construction equipment is detailed in Recirculated Draft IS/MND Appendix A, in the AQR page Apx-13.

Response to MIR-18

Please refer to Response to MIR-13.

Response to MIR-19

As required by MM TRANS-4, the proposed development is required to build along their frontage in manner that would satisfy City-mandated building standards. The Recirculated Draft IS/MND is required to identify and focus on the significant environmental impacts of the project on the environment and is not required to identify mitigation for existing conditions. As discussed on pages 39 and 40 of the Recirculated IS/MND, the project does not exceed any local emissions thresholds. Therefore, "sidewalk connections to the closest bus station to incentivize use of public transit" would not be required to reduce local emissions. However, as stated on page 134 of the Recirculated IS/MND, "[s]ite adjacent roadways shall be constructed or repaired at their ultimate half section width including roadway improvements, sidewalks, street lighting, bicycle lanes, transit stops and landscaping in conjunction with development, or as otherwise required by the City of Redlands Municipal Utilities and Engineering Department." Therefore, the project includes improvements that would facilitate pedestrian modes of transport and access to public transit. No additional mitigation is warranted or required for purposes of CEQA.

Response to MIR-20

A supplemental memorandum from Lilburn Corporation, dated September 10, 2019, is included as Appendix B in Section 4, Errata, of this Final IS/MND. As stated in this memorandum, no wetlands were identified in the study area and if temporary and/or permanent impacts would occur to Morey Arroyo Canal, the project could require authorizations from the U.S. Army Corps of Engineers, Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). According to the site plan provided, impacts to Morey Arroyo Canal would be completely avoided. Therefore, no further action is required in terms of regulatory permitting. Please refer to Master Response 5—Citrus Tree Removal for a response to the comment regarding citrus groves.

Response to MIR-21

The noted properties mentioned are located off-site and are not directly impacted by construction or implementation of the proposed project. Section 2.4, Biological Resources, of the Recirculated Draft IS/MND discusses the Morey Arroyo. The project completely avoids the Arroyo and no impacts to the Arroyo would occur. Therefore, no mitigation is required.

Response to MIR-22

The City and current Title 24 Standards do not currently require projects to install solar panels, solar batteries, or Energy Vehicle (EV) stations and the installation of such is not required, as the project does not need to reduce emissions to meet SCAQMD air quality emissions thresholds. The only mitigation required is during construction and is detailed on page 41 of the Recirculated IS/MND.

Response to MIR-23

All plumbing fixtures within the project are required to comply with the 2016 California Green Building Standards Code, which requires water conserving plumbing fixtures and fittings. There is no industry, regional, or local requirement for residential projects in Redlands to provide rainwater collection devices. This would be unnecessary mitigation as there is no identified impact regarding water consumption. However, the project will be required to install water efficient landscaping consistent with the requirements of the City of Redlands Municipal Code Section 15.54 (Water Efficient Landscape Standards).

Response to MIR-24

With the incorporation of MM AQ-1 and MM AQ-2, as listed on Recirculated Draft IS/MND page 41, Section 2.3, Air Quality, all impacts related to project construction-source emissions, Localized Significance Thresholds, and project operation-sourced emissions would not exceed applicable thresholds as established by SCAQMD. Additionally, project-related trips will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO 'hotspots'). Project-related greenhouse gas (GHG) emissions will also be less than significant and will not conflict with the goals of Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), or the City of Redlands Climate Action Plan (CAP).

Response to MIR-25

All structures will be designed in accordance with the current California Building Code to resist seismic disturbance. This is standard practice for residential development in the City and in the State of California to protect against strong seismic ground shaking in earthquake-prone areas.

Response to MIR-26

Hydrology and water quality are analyzed in Section 2.10 of the Recirculated Draft IS/MND. This section of the Recirculated Draft IS/MND analyzes water quality standards and waste discharge requirements, groundwater, drainage patterns, erosion, flooding, and the potential for polluted runoff. All potential impacts related to hydrology and water quality were found to be less than significant when evaluated against established thresholds of significance.

A Water Quality Management Plan will be required which would effectively capture the "first flush" allowing for infiltration of the initial rain events. The project landscaping exceeds the City's required design standards.

Furthermore, over 500 trees are proposed to be planted on site after development, many of which will be within parking areas and adjacent to paved areas. These trees will provide shading to alleviate heat islands. See also Response to Blackburn-7.

Response to MIR-27

As discussed on pages 68 and 69 of the Recirculated Draft IS/MND, project-related GHG emissions were found to be less than significant and will meet the Tier 4 SCAQMD Target Service Population emissions threshold of 4.8 metric tons (MT) carbon dioxide equivalent (CO₂e)/year for the year 2020 (project buildout year); the emissions were also compared to the year 2035 City of Redlands CAP per capita emissions target and the project will also be below the City's GHG emissions target.

Furthermore, in the case of global climate change, the proximity of the project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to the California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." Moreover, although the State requires Metropolitan Planning Organizations (MPOs) and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently no established non-speculative method to assess the cumulative impact of proposed independent private-party development projects. The air quality analysis prepared for the proposed project followed accepted industry protocol for analyzing impacts and their significance, as articulated in the AQR, and the project was found to have no significant impacts related to air quality. While the commenter mentions the installation of "receptors" near schools, there is no such requirement for the City to install air quality monitoring devices at the schools, as they were twice the distance from the project as the nearest sensitive receptors. A "sensitive receptor" is not something that is installed; rather, a sensitive receptor is defined as "an area where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants." The nearest sensitive receptors to the project site are the single-family detached residential dwelling units located adjacent to the north, south, east, and west of the project site. In addition, single-family detached residential dwelling units are located approximately 65 feet east (across Alabama Street) and 50 feet west (across Iowa Street), while multi-family attached residential dwelling units are located approximately 100 feet east (across Alabama Street). Because impacts at the nearest sensitive receptors were found to be less than significant under CEQA, impacts at more distant receptors (i.e., schools) are reasonably anticipated to also be less than significant.

Response to MIR-28

Please refer to Response MIR-26.

Response to MIR-29

The project is required to install "dry non-potable" water lines within the public rights-of-way adjacent to the site. These lines are installed "dry" in anticipation of future connection. Currently, non-potable water is not available in the project area.

The project is required to install "dry non-potable" water lines within the public rights-of-way adjacent to the site in anticipation of non-potable service in the area. These lines will be installed "dry" in anticipation of future connection. Currently, non-potable water is not available in the project area.

Additionally, a Water Quality Management Plan is required to be prepared which would effectively capture the "first flush" allowing for infiltration of the initial rain events. The project landscaping exceeds the City's required design standards.

Currently, non-potable water is not available in the project area. However, the project's landscape irrigation system will be designed such that in the event non-potable water becomes available to this site in the future, the irrigation systems can be configured and connected to the non-potable water source. The entire system would be efficiently designed so that water would be used only when and where it is needed with minimal waste. In addition, pursuant to the stormwater management requirements, a Water Quality Management Plan (WQMP) has been prepared for the proposed project and has been approved by the City of Redlands Municipal Utilities and Engineering Department. See also Response to Blackburn-7.

Response to MIR-30

As discussed in Section 2.8 of the Recirculated Draft IS/MND, potential impacts related to GHG emissions are reduced to below a level of significance with the incorporation of MM AQ-1 and MM AQ-2. No further mitigation is required or warranted to reduce project-related GHG emissions. Please refer to Response MIR-27 for additional information.

Response to MIR-31

The demolition of structures on-site would be conducted in strict compliance with all applicable federal, State, and local regulations for the abatement, handling, and disposal of hazardous materials, including but not limited to the South Coast Air Quality Management District's Rule 1403 for abatement and the implementation of OSHA regulations for the handling and disposal of hazardous materials. As stated on Recirculated Draft IS/MND page 74, the construction of the project would temporarily increase the transport, use, and disposal of small quantities of various hazardous and potentially hazardous materials such as gasoline, diesel fuel, petroleum-based products, degreasers, solvents, and fertilizers, herbicides, and pesticides. Operationally, the residential use proposed for the site would not involve the handling, transport, or emission of hazardous materials. However, gasoline, diesel fuel, petroleum-based products, degreasers, solvents, and fertilizers, herbicides, and pesticides may be used for routine maintenance and landscaping during project operation. The transport, use, and disposal of these and other similar hazardous and potentially hazardous materials is controlled and regulated by federal and State regulations, and these materials would be handled and disposed of in accordance with these regulations. The notification of the schools in the area is not required or necessary when standard industry practices are followed.

Response to MIR-32

Please refer to Response to MIR-26.

A Water Quality Management Plan will be required which effectively captures the "first flush" allowing for infiltration of the initial rain events. The project landscaping exceeds the City's required design standards. Furthermore, the City's Urban Water Management Plan (UWMP) demonstrates that this development will not negatively impact the Utilities' ability to provide service to any of its customers. See also Response to Blackburn-7.

Response to MIR-33

As discussed on page 84 of the Recirculated Draft IS/MND, Section 2.11, Land Use and Planning, the physical division of an already established community typically refers to the construction of a linear

feature, such as an interstate highway, railroad tracks, or the removal of a means of access, such as a bridge, which would impact mobility within an existing community and/or an outlying area. The proposed project does not propose to construct any roadway, flood control channel, or other structure that would physically divide any portion of the community. Roadways traversing the project area already exist.

Response to MIR-34

Please refer to Master Response 5—Citrus Tree Removal.

Response to MIR-35

Comment Noted. There is no evidence of any potentially significant impact from the project on any of the listed sites.

Response to MIR-36

Similar to Response to MIR-27 pertaining to air quality, for the purposes of the noise analysis, a “sensitive receptor” is not something that is installed; rather, a sensitive receptor is defined as an area where the occupants are more susceptible to the adverse effects of exposure to noise. Per recent updates to the CEQA Appendix G Checklist Questions concerning noise, a substantial increase in ambient noise levels is identified as increases that “are in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.” City of Redlands General Plan Measure 9.0v states that an impact may be significant if it results in 1) an increase in exposure of 4 dB or more if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in Tables 1 and 2, or 2) any increase of 6 dB or more, due to potential for adverse community response. Measure U policy 9w recommends that the hours of construction or demolition work where site-related noise is audible beyond the site boundary should be limited. Noise associated with construction noise is exempt from City noise standards provided such activities take place between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. The City ordinance also requires that all motorized equipment used in such activity shall be equipped with functioning mufflers. Project construction activities will be conducted in compliance with the City’s Municipal Code limiting the hours of operation for construction activities; and the use of functioning mufflers has been included as a mitigation measure. Noise levels associated with project generated vehicle traffic have calculated and updated in the latest noise study to match the latest traffic study. Table 8 of Recirculated Draft IS/MND Appendix G, Noise Study, shows that all modeled roadway segments are anticipated to change the noise a nominal amount (approximately 0.01 to 1.5 A-weighted decibel [dBA] community noise equivalent level [CNEL]). Therefore, a change in noise level would not be audible at any sensitive receptors, including nearby schools, and because noise-related impacts are considered less than significant, no mitigation is required. Regarding the STC comment, the proposed project is not responsible for build-out traffic noise levels along Orange Avenue because this is not a project-generated impact.

Regarding the suggested limitation on the use of vibratory equipment, as stated on page 7 of the Noise Study, the only receptors that could possibly be affected by groundborne vibration are the homes located immediately adjacent to the project site, if a vibrator roller is utilized within 25 feet of

a structure or if a large bulldozer is utilized within 15 of a structure. Therefore, given the distance of the school facilities, there is no justification to limit the use of vibratory rollers during school hours.

Response to MIR-37

As discussed on page 96 of the Recirculated Draft IS/MND, Section 2.14, Population and Housing, the project would create housing for approximately 862 residents. The recently approved City of Redlands General Plan 2035 anticipates this area of the City to be Medium Density Residential (MDR). Additionally, the 2017 Annual Element Progress Report of the Housing Element of the 2035 General Plan identifies a need for an additional 2,065 housing units in the City. This project proposes to construct 328 housing units on the site, which is zoned as MDR by the General Plan. Therefore, the project as proposed is consistent with the anticipated population growth of the General Plan, assists the City in meeting the anticipated need for housing, and is consistent with the Housing Element of the General Plan.

Response to MIR-38

Impacts related to public services, including fire protection, police protection, schools and parks, are discussed in Section 2.15 of the Recirculated Draft IS/MND. Additionally, under CEQA's definition of environmental impacts, an increase in demands on public facilities, services, and utilities that will result from a project are not, in and of themselves, environmental impacts that must be evaluated in an environmental document. See *City of Hayward v Board of Trustees of Cal. State Univ.* (2015) 242 CA4th 833 (increased demand for emergency services not environmental impact requiring mitigation).

Response to MIR-39

As discussed on page 101 of the Recirculated Draft IS/MND, Section 2.16, Recreation, the City of Redlands General Plan 2035 standard is to provide 5 acres of parkland per every 1,000 residents. Current parkland exceeds this standard with a ratio of 6 acres for every 1,000 residents. Even with project implementation, the City would continue to exceed the standard. Furthermore, the project will develop recreational amenities for the residents on-site, including a clubhouse with a gym, yoga and Pilates studio and game room, as well as outdoor recreational amenities, including a 1,920-square-foot outdoor swimming pool, an 87-square-foot hot tub, an outdoor fireplace, a walking trail, and an outdoor lounge and BBQ area. These on-site amenities would reduce impacts on public recreational amenities.

Response to MIR-40

Please refer to Response to AMEF-4 and Response to AMEF-6.

Response to MIR-41

As stated in Section 2—Methodology of the TIA, “[t]he (City of Redlands) General Plan states that peak hour intersection operations of Level of Service C or better are generally acceptable. Therefore, any intersection operating at Level of Service D to F will be considered deficient.” Mitigation is required if the addition of project-generated trips deteriorates the Level of Service from C or better to Level of Service D or worse. For intersections operating at Level of Service D or worse prior to the addition of project trips, the project must provide mitigation that would maintain the pre-project condition. A change from Level of Service B to Level of Service C is not a significant impact based on

the City's established criteria. The significant project impact forecast to occur under future year 2040 conditions is adequately mitigated with implementation of MM TRANS-1, which requires project payment of the proportionate share of costs for the identified improvements that would improve intersection operations to a Level of Service B.

Response to MIR-42

As noted in Response to MIR-41, a change from Level of Service B to Level of Service C is not a significant impact. The project impact forecast to occur under future year 2040 conditions is adequately mitigated with implementation of MM TRANS-1, which requires project payment of the proportionate share of costs for the identified improvements that would improve intersection operations to a Level of Service B, pursuant to City requirements.

Response to MIR-43

Please refer to Responses to AMEF-4 and MIR-10.

Response to MIR-44

Analysis of the AM peak-hour between 7:00 a.m. and 9:00 a.m. and the PM peak-hour between 4:00 p.m. and 6:00 p.m. is consistent with other studies in the region and complies with traffic impact study policies and methodologies established by both the San Bernardino County Congestion Management Program and the City of Redlands. These peak-hour times are reflective of the morning and evening commute hours when the roadway network is generally experiencing peak demand. The morning drop-off time of the surrounding schools coincides with the AM peak period of the existing traffic counts that were collected and because schools were in session at the time traffic counts were conducted, the traffic associated with existing schools is adequately reflected in the traffic counts and the related analysis.

The proposed project will not contribute significant trips during the afternoon school peak-hour, as residents of the proposed development will typically leave and return to the complex based on weekday work hours and not school-based hours. Therefore, analysis of the PM peak-hour between 4:00 p.m. and 6:00 p.m. is appropriate since this generally coincides with both the PM peak-hour of project-generated trips and the evening commute peak-hour. Based on time-of-day distribution data contained in the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017), which is the industry standard for such analyses, multi-family land uses generate approximately 6.25 percent of the daily trips during the 2:45 p.m. to 3:45 p.m. time period, which is less than the 7.7 percent of daily trips analyzed during the peak-hour between 4:00 p.m. and 6:00 p.m.. Therefore, the project is forecast to generate fewer trips during the school afternoon pick up period than currently analyzed during the PM peak-hour between 4:00 p.m. and 6:00 p.m. No further analysis is warranted.

Response to MIR-45

As noted in Responses to AMEF-5 and AMEF-6, the need to mitigate project-related impacts has been assessed in accordance with the thresholds of significance established by the City of Redlands. Based on the findings of the TIA, project-related significant impacts are adequately mitigated with implementation of MM TRANS-1 through MM TRANS-4. In accordance with CEQA, the project is not

responsible for remediating off-site issues when there is no corresponding project-related significant impact. No additional mitigation is warranted or required.

As noted in Response to AMEF-5, existing pedestrian and bicycle facilities are documented in Section 3—Existing Conditions of the TIA, and additional review of proposed crosswalk improvements is provided in Section 8 of the TIA. As noted in MM TRANS-4, the proposed project shall construct roadways along the project frontage, including sidewalks and parkway improvements, to their ultimate half-section width. The project will construct new sidewalks along the project frontage and a crosswalk across Orange Avenue at the eastern leg of the Orange Avenue and Iowa Street intersection, as shown in the conceptual striping plan in Appendix K of the TIA, which will facilitate local pedestrian mobility near the project.

Response to MIR-46

Please see Response to MIR-7. The City development review and approval process ensures all roadway and traffic improvements are designed to the appropriate roadway and safety standards.

Response to MIR-47

Development Impact Fees satisfy the developers' obligation for expansion of facilities. See prior comment regarding the City's UWMP. Improvements along the drainage channel are not required. The project is not encroaching into the channel area and there is no practicable way for the developer to construct half of a channel. The developer will be required to pay storm drain development impact fees which the City accumulates to construct regional projects.

The project is required to provide utilities to serve the project and pay fees toward any incremental improvements that may be necessary. The Recirculated Draft IS/MND analyzes impacts related to the potential need for expansions overall utility systems. The project is consistent with the General Plan, which anticipates this type of growth. The 2015 San Bernardino Valley Regional UWMP, amended in June 2017, was prepared for the City of Redlands and accounts for the water usage that would be attributed to development of the project site, consistent with its existing land use designation and zoning classification. The UWMP concludes that the City has adequate supplies to meet projected demands under multiple dry year scenarios, taking into account the recent prolonged drought. The proposed project will have sufficient water supplies available to serve the project from existing entitlements and resources.

Response to MIR-48

Recirculated Draft IS/MND page 123, Section 2.19, Utilities and Services Systems, discusses the California Street Landfill and the San Timoteo Sanitary Landfill in extensive detail.

The California Street Landfill has a maximum capacity of 10,000,000 cubic yards, with a remaining capacity of 6,800,000 cubic yards. The California Street Landfill accepts a maximum of 829 tons per day. The San Timoteo Sanitary Landfill has a maximum capacity of 20,400,000 cubic yards, with a remaining capacity of 11,402,000 cubic yards. The San Timoteo Sanitary Landfill accepts a maximum of 2,000 tons per day.

Considering the availability of landfill capacity, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest and optional, more distant, landfills.

Response to MIR-49

As discussed in Recirculated Draft IS/MND Section 2.21, Mandatory Findings of Significance, mitigation measures have been identified to reduce project-related impacts to a less than significant level, and the applicant has agreed to implement these measures. In addition, it was determined in Section 2.3, Air Quality, of the Recirculated Draft IS/MND that the project would have less than significant cumulative impacts related to air quality with the implementation of mitigation. The proposed use is consistent with the existing City of Redlands General Plan 2035 land use designation and zoning. Therefore, development of the proposed project would be consistent with the assumptions of current long-range planning for the provision of utilities, service systems and public services in the City of Redlands. As described in the responses above and throughout the Recirculated Draft IS/MND, there is no evidence that the project will have cumulatively considerable significant and unavoidable impacts. Please refer to Response to Comment MIR-7 regarding safety of the community. Response to Comment MIR-16 addresses the concerns regarding motor-vehicle exhaust and the findings of the referenced general studies in the United States and Europe. The project will not result in significant and unavoidable impacts to air or water quality as discussed in Sections 2.3 and 2.10 of the Recirculated Draft IS/MND and in Responses to MIR-27 and -32.

Response to MIR-50

As a standard condition of approval for tentative tract maps and other large projects, all utilities under 66Kv are required to be undergrounded. The project will be required to underground all applicable utilities.

Response to MIR-51

Please refer to Master Response 5—Citrus Tree Removal. The Citrus Preservation Commission does not provide recommendations or approvals related to private property. The Citrus Preservation Commission provides recommendations on City owned groves to the City Council. No discretionary approval from this Commission would be appropriate or required. The Street Tree Committee is responsible for trees within parkways and City owned streetscapes. Existing trees within the project area would not fall within the purview of the Street Tree Committee.

Response to MIR-52

This comment is informational in nature and provides no comment on the analysis or conclusions of the Recirculated Draft IS/MND. No further response is necessary.

August 29, 2019

Mr. Mitchell Tsai
Attorney At Law PC
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Orange Avenue Luxury Apartment Project IS/MND Noise Impact Review, City of Redlands

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise and vibration impacts from the Orange Avenue Luxury Apartment Project (hereinafter referred to as project), located in the City of Redlands, California. This review is based on the information provided in the Orange Avenue Luxury Apartment Project Initial Study/Mitigated Negative Declaration, prepared by FirstCarbon Solutions, July 31, 2019 (hereinafter referred to as IS/MND) and the Appendix G Noise Analysis, prepared by Ganddini Group, Inc., July 24, 2019 (hereinafter referred to as Noise Study).

According to the IS/MND, the proposed project site encompasses 21.84 acres and is located on the west side of Alabama Street and is bisected by Orange Avenue. The project spans the north and south sides of Orange Avenue between Alabama Street and Iowa Street and consists of 10 separate parcels. The proposed project would develop a 328-unit low-rise luxury apartment complex spanning the northern and southern portions of the project site. The apartment complex would include six new 3-story apartment buildings and a clubhouse (with a total building area of 169,835 square feet).

The purpose of this letter is to review the IS/MND and Noise Study from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

RK has over 50 years of combined experience in environmental acoustics and has prepared hundreds of noise impact analyses for public agencies and developers in the State of California, and we are fully aware of the complexity of data gathering, modeling, and the possibility for error within these technical documents.

Noise Comments

1. Construction Noise Impacts.

The IS/MND does not adequately disclose all potential noise impacts from the construction of the proposed project and it fails to provide sufficient mitigation measures to reduce the noise exposure of adjacent sensitive land uses. Further details highlighting the shortcomings and inadequacies of the construction noise analysis are provided below.

1

- a. Page 90 of the IS/MND states, "For the purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction, as described by the City's Municipal Code in Section 8.06.120 (G)." This statement is inaccurate and conceals the full impact of construction noise from being disclosed in the environmental document.

2

While the City's municipal code may exempt construction noise from being cited as unlawful during the permissible daytime hours, it does not preclude construction noise from being evaluated for substantial temporary increases above ambient conditions under CEQA.

3

Measure U, Policy 9.0v, in the Redlands General Plan states that an increase in exposure of four or more dB should be considered possibly significant if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in GP Table 9.1 [Table 7-10] and GP Table 9.2 [Table 7-11].

4

As it pertains this analysis, the clearly compatible noise level for a residential use would be less than 60 dB CNEL, and the existing ambient noise levels at the surrounding residential properties are reported as ranging from 56.6 dBA Leq to 66.3 dBA Leq during daytime hours. Construction is shown to generate up to 86.4 dBA Leq; thus resulting in at least a 20 decibel increase in ambient noise.

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A 20 dB increase in noise, by almost any measure, is considered a substantial increase. Therefore, seeing that the City's noise impact criteria established under Measure U considers a noise level increase of only 4 dB to be considered significant, the construction noise levels generated by this project should clearly be identified as causing a substantial temporary increase above ambient conditions. As result, additional mitigation measures should be provided to try and mitigate the impact to the maximum extent feasible.

5 CONT.

- b. The IS/MND claims that the two (2) mitigation measures described on Pages 94-95 will adequately reduce Project impacts to be less than significant. While RK agrees that the measures can help reduce construction noise levels, substantial evidence has not been provided to demonstrate noise levels will be fully reduced to levels that would be considered less than significant. While such things as mufflers and equipment placement can help with reducing off-road equipment noise, there are many other contributing factors to construction noise; such as hammering, drilling, sawing, load drops, people yelling, etc. that are not accounted for.

6

Hence, it can be very difficult to fully mitigate construction noise. Physical noise barriers are often infeasible and/or inadequate to provide the necessary noise reduction and shielding (especially for second floor dwellings) from the many different sources of construction noise. As a result, the adjacent sensitive receptors could remain exposed to significant noise impacts.

- c. Page 90 of the IS/MND states that demolition activities are expected to produce the highest sustained construction noise levels and a worst-case construction noise scenario was modeled. However, upon examining the Noise Study, Appendix G, RCNM Noise Modeling Output sheets, the analysis only provides the results of the demolition phase of construction and does not report impacts during subsequent phases. Therefore, it is impossible to conclude that demolition is in fact the worst case. Furthermore, upon examining the equipment list utilized in the Air Quality analysis, the Noise Study does not account for the combined noise impact from all equipment expected to be utilized by the project. For example, the Air Quality analysis shows a total of 6 pieces of equipment in use during demolition, while the noise study only models 5 pieces of equipment. Additionally, looking at other phases of construction, there would be 8 pieces of heavy equipment utilized during grading and 11 pieces of heavy equipment during building construction. This is

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considerably more equipment usage than what was modeled for demolition; thus other phases may produce louder combined noise levels.

7 CONT.

- d. Upon further examination of the Appendix G, RCNM Noise Modeling Output sheets shown in the Noise Study, it appears that the distances in which equipment was modeled from the receptor varies substantially--raising the question of whether a worst case conditions was in fact modeled. For example, one excavator is modeled at 25 feet from the receptor while a dozer is modeled 200 feet from the receptor. Looking at the site plan, improvements are planned right next to and abutting residential property, thus making it highly probable the equipment will be in operation right at the property line. For a worst case assessment, construction equipment should be modeled at the appropriate distance to the sensitive receptors.

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2. Project Generated On-Site Operational Noise

The IS/MND does not adequately disclose all potential noise impacts from the operation of the proposed project and it fails to provide sufficient mitigation measures to reduce the noise exposure of adjacent sensitive land uses. Further details highlighting the shortcomings and inadequacies of the operational noise analysis are provided below.

9

- a. Page 92 of the IS/MND states, "for purposes of this analysis, an increase of greater than 5 dBA above existing ambient noise levels would be considered a substantial permanent increase in ambient noise levels." This statement conflicts with the City of Redlands established polices of Measure U, Policy 9.0v, which considers an increase in exposure of four (4) or more dB to be considered possibly significant if the resulting noise level would exceed that described as clearly compatible for the affected land use. Since ambient noise levels are shown to currently exceed the clearly compatible levels for residential use (greater than 60 dBA CNEL), the IS/MND should be revised to reflect the appropriate significance criteria.
- b. Page 92 of the IS/MND states, "on-site noise sources associated with development of the proposed project will include typical noises associated with residential land uses, including vehicles starting and stopping, passenger loading and unloading, refuse trucks, occasional car alarm activation, landscape maintenance, children playing, and mechanical ventilation equipment operation. Noise associated with proposed park uses will include people talking and socializing along the proposed

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trails and at the shaded rest areas. These instantaneous or short-term noise events would range between 55 dBA and 70 dBA Lmax at 50 feet from the noise source. Normal conversation is typically 65 dBA as measured at 3 feet from the source.”

The IS/MND goes on to state on Page 93, “On-site stationary operational noise sources, events, and conversation would not occur frequently enough or close enough to the adjacent sensitive receptors to exceed City of Redlands stationary noise standards/thresholds or result in a substantial increase in the ambient average (Leq) noise levels in the project vicinity.”

The entire premise of this evaluation is flawed. First, upon review of the Noise Study, a quantifiable analysis of operational noise impacts was not performed. Therefore, the finding that noise levels would range between 55 dBA and 70 dBA has not been supported with substantial evidence. Second, overall operational noise levels from a residential project are not considered short term, infrequent or instantaneous. This project will result in the continuous long term operation of 328 multi-family dwelling units, with a 653 space parking lot, and recreational facilities. On-site noise will be generated 24-hours a day at this site. Lastly, the project will generate noise directly adjacent to and abutting existing residential properties, making it highly probable that some noise impacts would occur.

The IS/MND and Noise analysis should be updated to provide a quantitative analysis of on-site project generated noise. Of particular concern would be parking lot noise, truck delivery/loading activities, HVAC equipment noise, pool/spa equipment noise, and outdoor recreational noise (particularly at the pool/clubhouse area). The analysis should consider the impact at all nearby sensitive receptors (including residential and church uses).

Conclusions

Based upon this review, the Orange Avenue Luxury Apartment Project IS/MND, dated July 31, 2019 does not adequately address all potential noise impacts from the proposed project. Additional analysis and mitigation measures should be provided to ensure the project does not adversely affect the surrounding noise sensitive land uses.

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CONT.

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If you have any questions regarding this study, or would like further review, please do not hesitate to contact us at (949) 474-0809.

Sincerely,
RK ENGINEERING GROUP, INC.



Bryan Estrada, AICP, PTP
Senior Associate

Attachments

BE:sl/rk15499.doc

JN:2828-2019-05

RK Engineering Group (RKE1)

Response to RKE1-1

There are several acceptable methodologies to estimate construction noise impacts. In consideration of the issues raised by this commenter, construction noise was re-evaluated using an alternate methodology (modeling all of the equipment at the center of the site). In addition, all phases of project construction were modeled, rather just the worst-case scenario. While the results of this informative analysis have been summarized in a revised noise study for the project, the findings of this alternative analysis did not change the levels of impact, significance conclusions, or the required mitigation measures noted in the original noise study and Recirculated Draft IS/MND. As stated on page 6 of the revised noise study, the alternative analysis found that construction noise levels would range between 52.8 and 77.5 dBA equivalent sound level (L_{eq}) at sensitive receptors in the project area. The City of Redlands General Plan EIR found that impacts associated with development projects that are consistent with the General Plan would be less than significant with compliance with Section 8.06.120 of the City of Redlands Municipal Code incorporated. Section 8.06.120 allows construction noise that exceeds the City's Noise Ordinance to occur between the between the hours of 7:00 a.m. and 6:00 p.m. on weekdays and Saturdays, with no activities taking place at any time on Sundays or federal holidays. Project construction will adhere to this code and MM LUP-1, MM NOI-1, and MM NOI-2 presented in the Recirculated Draft IS/MND will be implemented. No further mitigation is required pursuant to CEQA.

Response to RKE1-2

As presented in the technical noise study prepared for the project, construction noise is expected to range between 52.8 and 77.5 at nearby sensitive receptors. Project construction activities will not occur outside the hours of 7:00 a.m. and 6:00 p.m., Monday through Saturdays. Construction noise emitted during these hours is exempt from the City's noise ordinance. Recent changes to the CEQA Appendix G Guidelines state that the determination of whether or not a project results in a substantial increase in ambient noise levels is to be considered in light of existing applicable General Plan Policies and Ordinances. Per the City of Redlands General Plan EIR (2019), a substantial temporary increase in ambient noise levels from construction noise is considered less than significant if construction activities comply with the City's Noise Control Ordinance in the Municipal Code, Section 8.06.090. In addition to complying with this ordinance, MM LUP-1, MM NOI-1, and MM NOI-2 are provided to minimize project generated construction noise.

Response to RKE1-3

Please see Response to RKE1-2.

Response to RKE1-4

Please see Response to RKE1-2.

Response to RKE1-5

Please see Response to RKE1-2.

Response to RKE1-6

Please see Response to RKE1-2. Additionally, barriers are not required when a project complies with existing local noise standards with implementation of prescribed mitigation.

*Responses to Written Comments**Response to RKE1-7*

Please see Response to RKE1-1.

Response to RKE1-8

Because construction equipment is generally mobile and moves around the project site, the construction analysis was conducted by projecting the noise source of all of the equipment from the acoustical center of the closest project parcel. This is acceptable industry methodology. Further, it would be unreasonable to assume that all construction equipment would be operating at the property line simultaneously.

Response to RKE1-9

Please see Response to RKE1-2.

Response to RKE1-10

The noise report has been updated and is included as Appendix G, Section 4, Errata, of this Final IS/MND. The change does not result in new previously unidentified impacts.

Response to RKE1-11

A qualitative discussion of operational noise was provided in the noise study prepared for the project. The proposed project is consistent with the General Plan designation of the project site. As stated in the City of Redlands General Plan EIR, operational noise impacts associated with buildout of the project, including potential long-term (operational) noise impacts from stationary non-transportation sources are regulated by Section 8.06.070, Exterior Noise Limits, and Section 8.06.080, Interior Noise Standards, of the City's Municipal Code.

Response to RKE1-12

Based on Response to RKE1-1 through Response to RKE1-11, no further analysis or mitigation measures are warranted or required.



August 27, 2019

Mr. Mitchell Tsai
Mitchell M. Tsai, Attorney at Law, PC
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: SD Homes Redlands Apartments Project Traffic Study Review

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to submit this review of the Traffic Study and transportation documentation for the proposed SD Homes Redlands apartment project. The proposed project is located on an 18.9-acre project site located on both sides of Orange Avenue between Iowa Street and Alabama Street in the City of Redlands. The proposed project involves construction of a gated apartment complex with 328 multi-family (low rise) attached residential dwelling units. Access is proposed at two driveways on Orange Avenue and an emergency only access on Alabama Street. The proposed project is anticipated to be built in one continuous phase. For purposes of the Traffic Study, it was assumed that the project would be fully constructed and operational by Opening Year 2020.

The SD Homes Redlands Apartment Project Traffic Study was prepared for the project by Ganddini Group, Inc. dated April 1, 2019. An Initial Study and Mitigated Negative Declaration was also prepared for the project. The Traffic Study was prepared pursuant to an approved Scoping Agreement dated February 26, 2019. Although the Traffic Study follows the approved Scoping Agreement, RK has identified a number of issues with both the design of the project and the traffic information included in the Traffic Study. The following major issue items have been identified with the project with respect to traffic and transportation:

1. The project has a significant impact to the intersection of Alabama Street at Orange Avenue (#5) for General Plan Buildout Year 2040 conditions. According to the City of Redlands' significance requirements (page 7 of the Traffic Impact Analysis) the project should be responsible for 100% of the improvements at this intersection as a result of the Level of Service and significant increase in delay caused by the project.

2. There are a number of project design issues that need to be changed to meet the design standards and requirements of the Traffic Study and City standards.

This includes the spacing of the westerly driveway with respect to the existing Cottage Lane driveway. The City design standards require a separation of 150-feet between driveways, whereas, the current site plan indicates a spacing of less than 100-feet.

In addition, there is a lack of turnaround at the two entry gates on the site plan included in the Traffic Study. And, there is a need for two entry lanes per the recommendations of the Traffic Study.

There is also a need to widen Orange Avenue between Alabama Street and the easterly project driveway, and a need to accommodate a left turn lane, parking and a bike route. The Traffic Study recommendation for a 40-foot curb to curb section on Orange Avenue between Alabama Street at the easterly driveway does not have sufficient width to also accommodate the left turn lane, a bike route and parking which typically is provided for collector streets in the City of Redlands.

3. There is no calculation to prove that the construction traffic would not have a significant impact to the area. A construction trip generation evaluation needs to be provided to ensure that construction traffic would not have an adverse impact to the study area.

4. There appears to be a mathematical error in the total AM and PM cumulative project trips shown in the report. It is not known whether this affects the cumulative traffic impacts analyzed in the Traffic Study. This needs to be further evaluated.

5. In many cases, the General Plan Build Out (Year 2040) PM peak hour traffic volumes with the project at several intersections are less than the PM peak hour volumes for Year 2020 with project. This does not make sense. This needs to be further evaluated. It would appear that growth in the area from the Year 2020 to Year 2040 would increase all of the traffic movements.

6. The cost to improve the Alabama Street at Orange Avenue (#5) of \$20,000 appears to be significantly too low. It does not appear that the cost has included all elements of construction including modification of the existing traffic signal at Alabama Street and Orange Avenue, widening Orange Avenue both west/east of Alabama Avenue on Orange Avenue and other factors that need to be considered in the cost estimate.

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Comments

RK offers the following detailed comments on the Traffic Study dated April 1, 2019.

1. Page ES-2: In order to provide an acceptable level of service for the General Plan Buildout (Year 2040) With Project Conditions at the intersection of Alabama Street at Orange Avenue (#5), additional improvements are necessary as indicated in the Traffic Study. Based upon City of Redlands' significance requirements the project should be responsible for these improvements. The project would have a significant impact by increasing the delay for Year 2040 conditions substantially for an intersection not meeting the City's LOS (level of service) standards. 7
 2. Page ES-3: The Traffic Study indicates that the proportional share for the improvements to the intersection of Alabama Street at Orange Avenue (#5) would be \$3,867. Based upon the City's significance criteria, it appears that the project does increase the delay at that intersection for Year 2040 conditions; therefore, should be responsible for 100% of the improvement costs. 8
 3. Page 1 (Project Access): The project's westerly access on Orange Avenue is too close to the existing driveway at the Cottage Lane development on the south side of Orange Avenue. The separation between these two driveways should be a minimum of 150-feet, pursuant to the City's Standard Plans. Although a scaled site plan is not provided in the Traffic Study, it appears that the spacing on the Site Plan is actually less than 100-feet. 9
 4. Figure 2 (Site Plan): As previously noted, the spacing between the westerly driveway on Orange Avenue and the existing Cottage Lane driveway does not meet the City's standards. This needs to be modified to provide spacing at least 150-feet. The Site Plan also does not appear to show the required turn-arounds at the gated entries to the project, both north and south of Orange Avenue. As recommended in the Traffic Study, the turn-arounds plus two entry lanes are recommended for each of entry gates. 10
- In addition, the required eastbound and westbound left turn lane on Orange Avenue at Alabama Street will require additional width to also accommodate a bike route and/or parking between Alabama Avenue and the easterly project driveway. The amount of width provided in the Site Plan and the concept striping plan does not appear to be adequate to accommodate all of these design features. 11
5. Page 7: According to the Traffic Study, a significant impact occurs, if the pre-project Level of Service is D or worse and if the project increases the delay of the intersection which previously operated at Level of Service D or worse. The project shall provide improvements at a minimum to the pre-project delay. This is the case 12

- for the intersection of Alabama Street at Orange Avenue for Buildout Conditions (Year 2040) with the project. The project does increase a deficient intersection by a significant amount of delay; and therefore, the project should make this improvement. | 12
CONT.
6. Page 7. The existing daily roadway volumes identified in Traffic Study have been determined by applying a factor of 11.5 x the PM peak hour (approach volume + exiting volume) to determine the ADT (average daily traffic) on each roadway segment. While this appears to be a reasonable factor, no documentation as to how it was calculated is included in the Traffic Study. | 13
7. Page 28: The other development for (Opening Year) conditions is identified as Year 2022 in the fourth paragraph. It is assumed that this is a typo and should be year 2020? | 14
8. Page 29: The Traffic Study needs to show that the construction traffic volumes are less than or equal to the project traffic volumes. Although this may appear to be intuitive, no calculations were included to make this determination. | 15
9. Page 31 - Table 3 (4 of 11): The total peak hour trips indicated at the bottom of this table do not appear to add up to the inbound and outbound volumes for both AM and PM peak hours. It is not known if this is a typo or whether there are errors in the cumulative project trip generation. This should be verified whether the actual AM/PM inbound and outbound traffic volumes were assigned for the other development traffic AM and PM peak hour volumes included in Figures 20 & 21. This could affect the entire analysis if this was not done accurately. | 16
10. Page 50 - Figure 36: For the General Plan Buildout (Year 2040) PM peak hour volumes there are several cases for Intersections #2, #3, #4, and #5 where the traffic volumes in Figure 36 are less than the Opening Year (Year 2020) with project conditions shown in Figure 30. The attached Appendix A highlights in yellow, those traffic movements that are lower than the Year 2020 conditions with the project. This does not make sense, since this period represents growth of 20 years, whereas traffic volumes are shown to be reduced rather than increased. This needs to be verified and evaluated for accuracy. | 17
11. Page 51 (General Plan Buildout (Year 2040) with Project Conditions): The Traffic Study indicates that there is a need to restripe the eastbound and westbound approach of the intersection of Alabama Street at Orange Avenue (#5) to accommodate left turn lanes in an eastbound and westbound direction. This would require additional widening than shown in the Site Plan and Conceptual Striping Plan to accommodate the proposed bike route and/or parking along Orange Avenue | 18

- adjacent to the project. Furthermore, this will require modifications to the existing traffic signal at this location to accommodate these changes. | 18
CONT.
12. Page 56 (Project Design Features): As previously noted, the project westerly driveway at Orange Avenue is too close to the existing driveway on the south side of Orange Avenue at the Cottage Lane driveway. A minimum spacing of 150-feet is required, pursuant to the City's Roadway Design Standards. | 19
13. Page 57 (Gated Access Consideration): The traffic consultant has recommended an adequate turn-around area be provided at both of the gated entries both north and south of Orange Avenue. Based upon a review of the Site Plan shown on page 4 (Figure 2), it does not appear that there is an adequate turnaround area for each of these gates. | 20
14. Page 63 (Pedestrian Midblock Crossing Enhancements): Proposed curb extensions are proposed at the project's easterly driveway at Orange Avenue. The City's General Plan indicates that Orange Avenue is to have a bike route in this location. How will the bike route be accommodated with the proposed curb extension? Furthermore, collector streets are also required to accommodate parking which would be required between Alabama Avenue and the curb extensions at the midblock crossing. | 21
15. Page 68 - Table 9 (Project Intersection Trip Contribution): For the intersection of Alabama Street and Orange Avenue (#5), a construction cost of \$20,000 was included in the Traffic Study. It does not appear that this cost is sufficient to include all of the elements required to provide the eastbound and westbound left turn lanes on Orange Avenue. Both eastbound and westbound left turn lanes must be provided at the intersection. Furthermore, there needs to be a modification to the traffic signal to accommodate the widening to provide the left turn lanes. Additional items such as minor items (10%) mobilization (10%) and contingency (25%) need to be added to the cost for these improvements. The cost estimate needs to be substantially expanded. | 22
16. Page 71 - Table 10: In regards to the intersection of Alabama Street at Orange Avenue (#5), Table 10 clearly shows that for General Plan Buildout with Project Conditions there is a significant increase in the delay from 53.7 to 82.4 seconds. Since this PM peak hour Level of Service is D (which is less than the City standard), the project would have a significant impact at this intersection and should be responsible for the full improvements. | 23
17. Page 73 - Figure 39: Many of the previous comments should be incorporated into the circulation recommendations included in this Figure. This includes the spacing of the westerly driveway with respect to the Cottage Lane driveway, requirements for the turnaround, two entering lanes both north/south of Orange Avenue and | 24

Mitchell M. Tsai, Attorney at Law, PC
RK 15482
Page 6

additional widening of Orange Avenue east of the easterly driveway, and traffic signal modifications at the intersection of Alabama Street at Orange Avenue.

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CONT.

Conclusions

RK Engineering Group, Inc. has reviewed the revised April 1, 2019 *SD Homes Redlands Apartment Project Traffic Study* prepared by Ganddini Group, Inc which was also incorporated into the Initial Study and Mitigated Negative Declaration for the project. Based upon this review, there are several design and traffic analysis items that need further review and clarification before it can be considered finalized.

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RK Engineering Group, Inc appreciates this opportunity to work with Mitchell Tsai, Attorney at Law. If you have any questions regarding our review or need additional analysis, please call me at (949) 474-0809.

Respectfully submitted,
RK ENGINEERING GROUP, INC.



Robert Kahn, P.E.
Principal

Registered Civil Engineer 20285
Registered Traffic Engineer 0555

Attachment
RK:sl/rk15482.doc
JN:2828-2019-06



XC: Chelsea Linsley

RK Engineering Group (RKE2)

Response to RKE2-1

General Plan Buildout (Year 2040) conditions is a cumulative conditions scenario; therefore, project payment of its proportionate share of the cost as identified in MM TRANS-1 adequately mitigates the project share of the impact. Typically, fair share payment through the City of Redlands Development Impact Fee (DIF) program is considered appropriate mitigation for significant impacts forecast to occur under General Plan Buildout. As identified in MM TRANS-1, the applicant is required to pay the project's fair share towards the following mitigation measures at Alabama Street (NS) at Orange Avenue (EW)—No. 5 :

- Restripe the eastbound approach to provide a dedicated left turn lane.
- Restripe the westbound approach to provide a dedicated left turn lane

As shown in Table 9—Project Intersection Trip Contribution of the TIA, the proposed project contributes 19.3 percent (not 100 percent) of the new trips at the Alabama Street at Orange Avenue intersection. Additionally, the significant impact does not occur under Existing Plus Project or Opening Year With Project conditions; therefore, the project should not be responsible for 100 percent of the cost of improvements necessary to mitigate deficient Levels of Service forecast to occur only under General Plan Buildout (Year 2040) conditions.

Response to RKE2-2

The City of Redlands Standard Specification and Detail Drawings, page DS-1, states, “[t]he continuation of a street through an intersection shall be perfectly aligned across the intersection, or if this is not possible, centerlines shall be offset by not less than 150 feet.” The project's proposed western driveway is not a street or major driveway for which the statement would apply to this driveway offset. The City will have ample opportunity to review and comment on the proposed layout of the street improvements, which will be provided to the City for approval on a separate full-size roadway plan set.

The conceptual site plan for which the technical documents have used to illustrate the project on Figure 2, page 4, shows a break in the median, which could allow vehicles to turn around on-site prior to the gate. The TIA recommends following recommend gate access practices (see page 57 of the TIA). The project must adhere to the City of Redland requirements regarding turning movements and access.

Gate queueing analysis is based on one lane as shown in Appendix I of the TIA calculation sheets (page APX-478 and 479) and stated on Page 59. Page 58 incorrectly makes reference to two lanes and should read “[t]hese queue lengths do not assume the presence of a by-pass lane as one lane is shown on the site plan.”

For smaller local/collector roadway cross-sections (36 to 40 feet), it is typical that the shoulder and/or lanes are reduced in width to provide widening for a left-turn lane when necessary. The City of Redlands collector standard section shows 12-foot travel lanes with an 8-foot parking or bike lane. At intersections, parking is generally eliminated to provide greater visibility and to allow for a defacto

right turn lane. Similarly, approaching an intersection bike routes, can be either terminated through the intersection or “sharrows” pavement marking added for the right lane.

Response to RKE2-3

As stated on page 29 of the TIA, the construction traffic volumes are expected to be significantly less than the trip generation when the project is fully developed. The project is estimated to haul 59 cubic yards of import during grading, which is 20 hauling trips over the length of the grading phase of construction (see page 40 of the AQR). This is significantly less than the project peak-hour trips of 138 AM peak-hour and 167 PM peak-hour (see TIA, Table 2, page 22). Construction impacts will be less than full development.

Response to RKE2-4

So noted and evaluated. Table 3 (Page 2 of 2) does have a formatting typo regarding a development project in the City of Loma Linda (see page 31 of the Traffic Impact Analysis). The corrected AM peak-hour total is 5,617 (not 5,620). The corrected PM peak-hour total is 7,473 (not 7,540). The corrected daily total is 102,781 (not 99,931). The actual AM and PM peak-hour totals are lower than the analysis peak-hour totals. This report analysis is slightly over-conservative for the cumulative traffic impacts for intersection No. 2 Redlands and Alabama (only). These corrections are shown in Section 4, Errata, of this Final IS/MND.

Response to RKE2-5

As stated in Section 5—Future Volume Forecasts, volume forecasts for Opening Year (2020) and General Plan Buildout (Year 2040) were developed using two similar but slightly different methodologies. Opening Year (2020) volume projections have been developed by interpolating Year 2040 model growth projections to the project opening year and adding cumulative trips. General Plan Buildout (Year 2040) forecasts were determined using a growth increment approach with the San Bernardino Transportation Analysis Model (SBTAM) Year 2012 and Year 2040 travel demand model plots. Since the SBTAM model projections include buildout of undeveloped land in accordance with the City of Redlands General Plan, cumulative trips were not manually added to forecasts as this would result in double counting of future traffic. In some cases, this results in a slightly more conservative approach at certain individual turning movements for the Opening Year (2020) forecasts.

While there are differences in individual turning movement values, the total volume entering each intersection does increase between Opening Year and Year 2040 conditions. Furthermore, additional analysis was performed and confirms that no additional significant impacts would occur if the greater volume for each individual movement were used.

In further support of this response, the General Plan Buildout (Year 2040) scenario was re-run with adjustments to ensure traffic volumes for each individual movement increased over 2020 forecasts.

The additional analysis is included in Appendix H, Section 4, Errata, of this Final IS/MND. The additional analysis confirms that the suggested approach by the commenter does not change the findings of significance or the required mitigation.

Response to RKE2-6

It is not anticipated that roadway widening is necessary for General Plan Buildout (2040) traffic conditions. Project improvements include roadway widening to 40 feet with a typical cross-section of one 12-foot lane and 8-foot shoulder in each direction. For smaller local/collector roadway cross-sections (36 to 40 feet), it is typical that the shoulder and/or lanes are reduced in width to accommodate a left-turn lane when necessary. A striping concept plan showing that the transition from two lanes undivided to two lanes divided is shown in Appendix K of the TIA (page APX-483). The proposed striping change on the same roadway cross-section was estimated as \$20,000.

Response to RKE2-7

Utilizing standard City and CEQA methodologies and analysis, the project does not create a significant impact for Opening Year 2020 or an un-mitigated significant impact for 2040. Mitigation for Alabama Street at Orange Avenue for General Plan Buildout 2040 is provided on page 51 of the TIA and in MM TRANS-1. The project impact does not occur for Existing Plus Project or Opening Year conditions. Since the impact only occurs with the additional of General Plan buildout traffic, the impact is considered cumulative, for which fair share payment is appropriate. That the project will contribute to this cumulative impact is stated on pages ES-2, ES-3, 6, 52, 68 and 69 of the TIA.

Response to RKE2-8

Please refer to Response to RKE2-1.

Response to RKE2-9

Please refer to Response to RKE2-2.

Response to RKE2-10

Please refer to Response to RKE2-2.

Response to RKE2-11

Please refer to Response to RKE2-2.

Response to RKE2-12

Please refer to Response to RKE2-7.

Response to RKE2-13

The 11.5 factor is generally accepted factor that has been used throughout the region for estimated daily traffic volumes based on the peak-hour volume. The Highway Capacity Manual (6th Edition, Chapter 3) contains data indicating the K-factor (daily to peak-hour) for many rural and urban highways falls between 0.09 and 0.10 (i.e., 10 to 11.1 peak-hour to daily); therefore, 11.5 is a relatively conservative estimate.

Response to RKE2-14

Comment noted. 2022 is a typo on page 28. The correct year is 2020. This correction is made in Section 4, Errata, of this Final IS/MND.

Response to RKE2-15

Please refer to Response to RKE2-3.

Responses to Written Comments

Response to RKE2-16

Please refer to Response to RKE2-4.

Response to RKE2-17

The attached Appendix A referenced in the comment letter was missing from the transmittal to City of Redlands. Please see Response to RKE2-5.

Response to RKE2-18

Please refer to Response to RKE2-2. Additionally, the Eastbound-Westbound permissive phasing does not require the additional signalization modifications which are discussed in the comment.

Response to RKE2-19

Please refer to Response to RKE2-2.

Response to RKE2-20

Please refer to Response to RKE2-2.

Response to RKE2-21

The City of Redlands bicycle master plan identifies Orange Avenue as a bicycle route. This does not require a striped/dedicated bicycle lane and can be accommodated through bicycle route signage and/or “sharrow” lane markings. The proposed design along Orange Avenue can accommodate on-street parking between the traffic calming bulb-outs.

Response to RKE2-22

Please refer to Response to RKE2-6. Additionally, the Eastbound-Westbound permissive phasing does not require the additional signalization modifications which are discussed in the comment. The traffic signal will not need to be modified since the improvements will not require more widening than shown on the site plan.

Response to RKE2-23

Please refer to Response to RKE2-7.

Response to RKE2-24

Please refer to Response to RKE2-2.

Response to RKE2-25

This comment contains conclusory remarks. Based on Responses to RKE1-1 through RKE1-24, the noted items have been addressed as appropriate. No further review is required.

From: [Mitchell Tsai](#)
To: [Sean Reilly](#)
Subject: Comments Regarding the Recirculated Draft Initial Study / Mitigated Negative Declaration for the Orange Avenue Luxury Apartments Project
Date: Friday, August 30, 2019 11:56:21 PM
Attachments: [20190830 SRCC Redlands\[OrangeAvenue\] CommLtr Final.pdf](#)

Please see attached.

--

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VIA U.S. MAIL & E-MAIL

August 30, 2019

Sean Reilly, Senior Planner
City of Redlands Development Services Department
35 Cajon Street, Suite 20
Redlands, CA 92370
Em: sreilly@cityofredlands.org

RE: Comments Regarding the Recirculated Draft Initial Study / Mitigated
Negative Declaration for the Orange Avenue Luxury Apartments Project

Dear Mr. Reilly:

On behalf of Southwest Regional Council of Carpenters and Jacob Kleespies (Collectively “**Commenters**” or “**Southwest Carpenters**”), my Office is submitting these comments on the City of Redlands’s (“**City**” or “**Lead Agency**”) Mitigated Negative Declaration (“**MND**”) (SCH No. 2019069016) for the Orange Avenue Luxury Apartments Project (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states, including in southern California, and has a strong interest in well-ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters include Jacob Kleespies (“**Mr. Kleespies**”). Mr. Kleespies lives, works and recreates in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserve the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporate by reference all comments raising issues regarding the MND submitted prior to certification of the MND for the Project. *Citizens for Clean Energy v*

City of Woodland (2014) 225 CA4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenters request that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq.*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

1 CONT.

I. **EXPERTS**

This comment letter includes comments from a scientific and technical expert Robert Kahn concerning the DEIR. His comments, attachments, and Curriculum Vitae (“CV”) are attached hereto and are incorporated herein by reference.

Robert Kahn, P.E., (“Mr. Kahn”) has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his bachelor’s degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. He developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

2

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering

services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

In addition, this comment letter includes comments from a scientific and technical expert Bryan Estrada, AICP, PTP, (“Mr. Estrada”) concerning the DEIR. His comments, attachments, and CV are attached hereto and are incorporated herein by reference.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout the community.

Mr. Estrada’s experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders. Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan,

2 CONT.

Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

2 CONT.

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

II. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations (“**CCR**” or “**CEQA Guidelines**”) § 15002(a)(1). “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.) The EIR has been described as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal. App. 4th 1344, 1354 (“*Berkeley Jets*”); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.)

3

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. (CEQA Guidelines § 15002(a)(2) and (3); *see also, Berkeley Jets*, 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal.3d 376, 400.) The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to “identify ways that environmental damage can be avoided or significantly reduced.” (CEQA Guidelines § 15002(a)(2).) If the project has a significant effect on the environment, the agency may

approve the project only upon finding that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns” specified in CEQA section 21081. (CEQA Guidelines § 15092(b)(2)(A–B).)

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” (*Berkeley Jets, supra*, 91 Cal.App.4th 1344, 1355 [emphasis added, quoting *Laurel Heights*, 47 Cal.3d at 391, 409 fn. 12]. Drawing this line and determining whether the EIR complies with CEQA’s information disclosure requirements presents a question of law subject to independent review by the courts. (*Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal.App.4th 48, 102, 131.) As the court stated in *Berkeley Jets, supra*, 91 Cal. App. 4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR’s function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. (*Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 [quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449–450].)

B. Initial Studies & The Fair Argument Standard Under The California Environmental Quality Act

“If no EIR has been prepared for a nonexempt project, but substantial evidence in the record supports a fair argument that the project may result in significant adverse impacts, the proper remedy is to order preparation of an EIR.” *Communities for a Better*

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CONT.

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Environment v. South Coast Air Quality Management Dist. (2010) 48 Cal. 4th 310, 319-320 (citing *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 88; *Brentwood Assn. for No Drilling, Inc. v. City of Los Angeles* (1982) 134 Cal. App. 3d 491, 504–505); “The ‘foremost principle’ in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Communities for a Better Environment v. Calif. Resources Agency* (2002) 103 Cal. App. 4th 98, 109.

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CONT.

C. Recirculation Standards for Initial Studies / Mitigated Negative Declarations

If substantial revisions are made to a proposed mitigated negative declaration after having been circulated to the public (e.g., new information, project changes, and new or modified mitigation measures), recirculation of the mitigated negative declaration is required. PRC, § 21080; CEQA Guidelines, § 15073.5.

5

D. The City’s Environmental Review is Inadequate.

1. CEQA Bars the Deferred Development of Environmental Mitigation Measures

CEQA mitigation measures proposed and adopted into an environmental impact report are required to describe what actions that will be taken to reduce or avoid an environmental impact. (CEQA Guidelines § 15126.4(a)(1)(B) [providing “[f]ormulation of mitigation measures should not be deferred until some future time.”].) While the same Guidelines section 15126.5(a)(1)(B) acknowledges an exception to the rule against deferrals, but such exception is narrowly proscribed to situations where “measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.” (Id.) Courts have also recognized a similar exception to the general rule against deferral of mitigation measures where the performance criteria for each mitigation measure is identified and described in the EIR. (*Sacramento Old City Ass’n v. City Council* (1991) 229 Cal.App.3d 1011.)

6

Impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 [city improperly deferred mitigation to butterfly habitat by failing to provide standards or guidelines for its

management]; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 671 [EIR failed to provide and commit to specific criteria or standard of performance for mitigating impacts to biological habitats]; see also *Cleveland Nat'l Forest Found. v San Diego Ass'n of Gov'ts* (2017) 17 Cal.App.5th 413, 442 [generalized air quality measures in the EIR failed to set performance standards]; *California Clean Energy Comm. v City of Woodland* (2014) 225 Cal.App.4th 173, 195 [agency could not rely on a future report on urban decay with no standards for determining whether mitigation required]; *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 740 [agency could not rely on future rulemaking to establish specifications to ensure emissions of nitrogen oxide would not increase because it did not establish objective performance criteria for measuring whether that goal would be achieved]; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1119 [rejecting mitigation measure requiring replacement water to be provided to neighboring landowners because it identified a general goal for mitigation rather than specific performance standard]; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 794 [requiring report without established standards is impermissible delay].)

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CONT.

2. The MND Impermissibly Defers Development of Hydrology and Water Quality Mitigation Measures

The MND found that there would be a less than significant impact in creation or contribution of “runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff” and “no impact” or no conflict with or obstruction to implementation of a water quality control plan or sustainable groundwater management plan, on the basis that A separate WQMP will be prepared for the project. The MND states:

7

The City of Redlands requires a project proponent to submit a “preliminary project specific” WQMP in the appropriate template as early in the entitlement process as possible. The “preliminary project specific” WQMP shall address the project’s quality and quantity of stormwater runoff. It gives the Applicant a chance to illustrate that Low Impact Development (LID) concepts have been utilized, the basic design is sound and any assumptions made for the project are valid. The proposed project will develop a WQMP to address the project’s quality and quantity of stormwater runoff and provide BMPs for the construction and operation of the project to ensure compliance with the General Stormwater Permit.

This is not only deferred mitigation but deferred analysis as well. The city may not address the project’s quality and quantity of stormwater runoff based on a future study or analysis. The city must provide adequate analysis and “specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.”

7 CONT.

3. The MND Impermissibly Defers Development of Transportation Mitigation Measures

The MND found that there would be “less than significant impacts with mitigation” in the area of transportation, in part on the basis of the Mitigation Measure TRANS-2, which requires delayed approval of final project site plans by the City which show the “location of any roadway, sidewalk, bike route, bus stop, or driveway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties.” These measures are inappropriately deferred, as they are to be created based on analysis of future plans, and merely allude to potential mitigation measures, without committing to specific performance standards.

8

E. The MND Fails to Disclose Significant and Unmitigated Transportation Impacts, Requiring Revision and Recirculation

The MND fails to disclose and provide adequate mitigation for the Project’s significant and unavoidable transportation impacts.

9

1. The MND Does Not Disclose or Mitigate For the Project’s Significant Impact on Traffic at the Intersection of Orange Avenue and Alabama Street

According to Mr. Kahn:

The project has a significant impact to the intersection of Alabama Street at Orange Avenue (#5) for General Plan Buildout Year 2040 conditions. According to the City of Redlands’ significance requirements (page 7 of the Traffic Impact Analysis) the project should be responsible for 100% of the improvements at this intersection as a result of the Level of Service and significant increase in delay caused by the project.

10

.....

There is also a need to widen Orange Avenue between Alabama Street and the easterly project driveway, and a need to accommodate a left turn lane,

parking and a bike route. The Traffic Study recommendation for a 40-foot curb to curb section on Orange Avenue between Alabama Street at the easterly driveway does not have sufficient width to also accommodate the left turn lane, a bike route and parking which typically is provided for collector streets in the City of Redlands.

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CONT.

(Kahn at 1 – 2.) According to Mr. Kahn, the Project’s proposed payment for traffic mitigations are insufficient, as “[t]he cost to improve the Alabama Street at Orange Avenue (#5) of \$20,000 appears to be significantly too low. It does not appear that the cost has included all elements of construction”

2. The Project’s Design Does Not Conform with City Design Standards or the MND’s Traffic Study’s Mitigation Recommendations

According to Mr. Kahn:

There are a number of project design issues that need to be changed to meet the design standards and requirements of the Traffic Study and City standards.

11

This includes the spacing of the westerly driveway with respect to the existing Cottage Lane driveway. The City design standards require a separation of 150-feet between driveways, whereas, the current site plan indicates a spacing of less than 100-feet.

In addition, there is a lack of turnaround at the two entry gates on the site plan included in the Traffic Study. And, there is a need for two entry lanes per the recommendations of the Traffic Study.

(Kahn at 2.)

3. The MND Does Not Analyze the Project Construction Traffic

According to Mr. Kahn:

There is no calculation to prove that the construction traffic would not have a significant impact to the area. A construction trip generation evaluation needs to be provided to ensure that construction traffic would not have an adverse impact to the study area.

12

(Kahn at 2.)

4. The MND Does Not Adequately Analyze the Project’s Operational AM and PM Cumulative Project Trips

According to Mr. Kahn:

There appears to be a mathematical error in the total AM and PM cumulative project trips shown in the report. It is not known whether this affects the cumulative traffic impacts analyzed in the Traffic Study. This needs to be further evaluated.

13

In many cases, the General Plan Build Out (Year 2040) PM peak hour traffic volumes with the project at several intersections are less than the PM peak hour volumes for Year 2020 with project. This does not make sense. This needs to be further evaluated. It would appear that growth in the area from the Year 2020 to Year 2040 would increase all of the traffic movements.

(Kahn at 2.)

F. The MND Fails to Disclose Significant and Unmitigated Noise Impacts, Requiring Revision and Recirculation

The MND fails to adequately analyze or mitigate for the Project’s significant construction and operational noise impacts.

14

1. The MND Fails to Disclose or Mitigate for the Project’s Construction Activities

According to Mr. Estrada, the Project’s MND “does not adequately disclose all potential noise impacts from the construction of the proposed project and it fails to provide sufficient mitigation measures to reduce the noise exposure of adjacent sensitive land uses.” (Estrada at 2.)

15

Mr. Estrada concludes that “the construction noise levels generated by this project should clearly be identified as causing a substantial temporary increase above ambient conditions.” According to Mr. Estrada:

As it pertains this analysis, the clearly compatible noise level for a residential use would be less than 60 dB CNEL, and the existing ambient

noise levels at the surrounding residential properties are reported as ranging from 56.6 dBA Leq to 66.3 dBA Leq during daytime hours. Construction is shown to generate up to 86.4 dBA Leq; thus resulting in at least a 20 decibel increase in ambient noise.

A 20 dB increase in noise, by almost any measure, is considered a substantial increase. Therefore, seeing that the City’s noise impact criteria established under Measure U considers a noise level increase of only 4 dB to be considered significant, the construction noise levels generated by this project should clearly be identified as causing a substantial temporary increase above ambient conditions. As result, additional mitigation measures should be provided to try and mitigate the impact to the maximum extent feasible.

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CONT.

(Estrada at 2 – 3.)

2. The MND Does Not Adequately Analyze the Effectiveness of the Project’s Noise Mitigation Measures

According to Mr. Estrada:

“substantial evidence has not been provided to demonstrate noise levels will be fully reduced to levels that would be considered less than significant. While such things as mufflers and equipment placement can help with reducing off-road equipment noise, there are many other contributing factors to construction noise; such as hammering, drilling, sawing, load drops, people yelling, etc. that are not accounted for.

16

(Estrada at 3.)

3. The MND Does Not Adequately Analyze the Project’s Construction Activities, Only Analyzing the Demolition Phase of the Project

According to Mr. Estrada:

Page 90 of the IS/MND states that demolition activities are expected to produce the highest sustained construction noise levels and a worst-case construction noise scenario was modeled. However, upon examining the Noise Study, Appendix G, RCNM Noise Modeling Output sheets, the analysis only provides the results of the demolition phase of construction

17

and does not report impacts during subsequent phases. Therefore, it is impossible to conclude that demolition is in fact the worst case. Furthermore, upon examining the equipment list utilized in the Air Quality analysis, the Noise Study does not account for the combined noise impact from all equipment expected to be utilized by the project. For example, the Air Quality analysis shows a total of 6 pieces of equipment in use during demolition, while the noise study only models 5 pieces of equipment. Additionally, looking at other phases of construction, there would be 8 pieces of heavy equipment utilized during grading and 11 pieces of heavy equipment during building construction. This is considerably more equipment usage than what was modeled for demolition; thus other phases may produce louder combined noise levels.

(Estrada at 3 – 4.)

4. The MND Improperly Models Demolition Noise

According to Mr. Estrada:

Upon further examination of the Appendix G, RCNM Noise Modeling Output sheets shown in the Noise Study, it appears that the distances in which equipment was modeled from the receptor varies substantially--raising the question of whether a worst case conditions was in fact modeled. For example, one excavator is modeled at 25 feet from the receptor while a dozer is modeled 200 feet from the receptor. Looking at the site plan, improvements are planned right next to and abutting residential property, thus making it highly probable the equipment will be in operation right at the property line. For a worst case assessment, construction equipment should be modeled at the appropriate distance to the sensitive receptors.

(Estrada at 4.)

5. The MND Fails to Disclose Significant Operational Noise Impacts

According to Mr. Estrada:

Page 92 of the IS/MND states, “for purposes of this analysis, an increase of greater than 5 dBA above existing ambient noise levels would be considered a substantial permanent increase in ambient noise levels.” This

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statement conflicts with the City of Redlands established polices of Measure U, Policy 9.0v, which considers an increase in exposure of four (4) or more dB to be considered possibly significant if the resulting noise level would exceed that described as clearly compatible for the affected land use. Since ambient noise levels are shown to currently exceed the clearly compatible levels for residential use (greater than 60 dBA CNEL), the IS/MND should be revised to reflect the appropriate significance criteria

(Estrada at 4.)

6. The MND Improperly Models Operational Noise

According to Mr. Estrada:

The entire premise of this evaluation is flawed. First, upon review of the Noise Study, a quantifiable analysis of operational noise impacts was not performed. Therefore, the finding that noise levels would range between 55 dBA and 70 dBA has not been supported with substantial evidence. Second, overall operational noise levels from a residential project are not considered short term, infrequent or instantaneous. This project will result in the continuous long term operation of 328 multi-family dwelling units, with a 653 space parking lot, and recreational facilities. On-site noise will be generated 24-hours a day at this site. Lastly, the project will generate noise directly adjacent to and abutting existing residential properties, making it highly probable that some noise impacts would occur.

(Estrada at 5.)

G. The City's Cumulative Impact Analysis is Inadequate

The MND includes a cursory statement on page 128 regarding cumulative impacts, as follows:

The project would result in potentially significant impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, noise, transportation and traffic, and tribal cultural resources. However, mitigation measures have been identified that reduce impacts to a less than significant level, as described above. In addition, it was determined in Section 3, Air Quality, that the project would have less than significant cumulative impacts related to air quality

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with the implementation of mitigation. The proposed use is consistent with the existing City of Redlands General Plan 2035 land use designation and zoning. Therefore, development of the proposed project would be consistent with the assumptions of current long-range planning for the provision of utilities, service systems and public services in the City of Redlands. Overall, in combination with past, present and reasonably foreseeable growth, the proposed project would not result in cumulatively considerable impacts.

This statement is conclusory and does not provide adequate analysis of cumulative impacts as required by CEQA. In particular, any analysis of cumulative impacts to Utilities and Service Systems, Hydrology and Water Quality, and Population and Housing is entirely lacking.

III. THE PROJECT VIOLATES THE STATE PLANNING AND ZONING LAW AS WELL AS THE CITY'S GENERAL PLAN

A. Background Regarding the State Planning and Zoning Law

Each California city and county must adopt a comprehensive, long-term general plan governing development. (*Napa Citizens for Honest Gov. v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 352, citing Gov. Code §§ 65030, 65300.) The general plan sits at the top of the land use planning hierarchy (*see DeVita v. County of Napa* (1995) 9 Cal.4th 763, 773), and serves as a “constitution” or “charter” for all future development. (*Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540.)

General plan consistency is “the linchpin of California’s land use and development laws; it is the principle which infused the concept of planned growth with the force of law.” (*See Debottari v. Norco City Council* (1985) 171 Cal.App.3d 1204, 1213.)

State law mandates two levels of consistency. First, a general plan must be internally or “horizontally” consistent: its elements must “comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” (*See Gov. Code § 65300.5; Sierra Club v. Bd. of Supervisors* (1981) 126 Cal.App.3d 698, 704.) A general plan amendment thus may not be internally inconsistent, nor may it cause the general plan as a whole to become internally inconsistent. (*See DeVita*, 9 Cal.4th at 796 fn. 12.)

Second, state law requires “vertical” consistency, meaning that zoning ordinances and other land use decisions also must be consistent with the general plan. (*See Gov.*

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Code § 65860(a)(2) [land uses authorized by zoning ordinance must be “compatible with the objectives, policies, general land uses, and programs specified in the [general] plan.”]; *see also Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184.) A zoning ordinance that conflicts with the general plan or impedes achievement of its policies is invalid and cannot be given effect. (*See Lesher*, 52 Cal.3d at 544.)

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CONT.

State law requires that all subordinate land use decisions, including conditional use permits, be consistent with the general plan. (See Gov. Code § 65860(a)(2); *Neighborhood Action Group*, 156 Cal.App.3d at 1184.)

A project cannot be found consistent with a general plan if it conflicts with a general plan policy that is “fundamental, mandatory, and clear,” regardless of whether it is consistent with other general plan policies. (*See Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 782-83; *Families Unafraid to Uphold Rural El Dorado County v. Bd. of Supervisors* (1998) 62 Cal.App.4th 1332, 1341-42 [“FUTURE”].)

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Moreover, even in the absence of such a direct conflict, an ordinance or development project may not be approved if it interferes with or frustrates the general plan’s policies and objectives. (*See Napa Citizens*, 91 Cal.App.4th at 378-79; *see also Lesher*, 52 Cal.3d at 544 [zoning ordinance restricting development conflicted with growth-oriented policies of general plan].)

B. The Socio-Economic Cost-Benefit Analysis Should Have Been Included in the Environmental Review Documents.

The Redlands General Plan and Municipal Code Section 16.02.030 requires that:

Every private development proposal subject to the city's voter approved 1997 general plan amendment commonly known as "measure U" and which requires a general plan amendment, zoning amendment, specific plan or preannexation agreement for outside city utility connections to noncontiguous property, and every private development proposal requiring a conditional use permit, commission review and approval or other discretionary permit for a structure and/or related outdoor use greater than five thousand (5,000) square feet, shall make application to the city for a socioeconomic analysis and cost/benefit study, **which shall also be included in the environmental documents prepared for the development proposal**, to the extent permitted by law. The

24

socioeconomic analysis and cost/benefit study shall identify the source of funding for necessary public infrastructure necessary to serve the development proposal and reflecting the effect of the development proposal on the city. The socioeconomic analysis and cost/benefit study shall also address the effect of the development proposal on public school facilities and resources and, to the extent permitted by law, recommend proposed mitigation measures for any identified adverse impacts on school facilities. (Emphasis added.)

The MND acknowledges that a Socio-Economic Cost-Benefit Study is required, however, this study was not conducted concurrently with the environmental analysis and was not included in the environmental documents prepared for the development proposal, as required by the General Plan and Municipal Code.

1. The City’s Parking Analysis is Vague and Confusing

The City’s MND recognizes that the East Valley Corridor Specific Plan requires the provision of 1 parking space per unit for studio apartments, 1.5 parking spaces per unit for one-bedroom apartments, and each additional bedroom requires 0.5 parking spaces per unit, as well as 0.25 guest parking spaces per bedroom or sleeping quarters.

However, the MND misstates the requirement for covered parking spaces. The Redlands Municipal Code, section 18.164.090 requires that multiple residential projects have a minimum of the following number of covered parking spaces:

No bedroom and 1 bedroom unit: 1

2 bedroom units: 1.5

3 or more bedroom units: 2

The project states, generally, that “a total of 653 parking spaces would be available within the complex, including both covered and uncovered spaces.” This fails to indicate whether the number of covered parking spaces required under the municipal code has been met.

Further, there is no analysis or information as to whether the additional requirements under Municipal Code section 18.164.090 have been met. This provision further requires that:

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B. Individually owned dwelling units, such as within condominium or cooperative multiple-family residential projects, shall have a minimum of two (2) covered parking spaces per dwelling unit. ...

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CONT.

C. In addition, all multiple residential projects containing more than two (2) units per lot of record shall provide one uncovered off street parking space for each two (2) units or fraction thereof. (Ord. 1829 § 2, 1983; Ord. 1000 § 39.20(B), 1955)

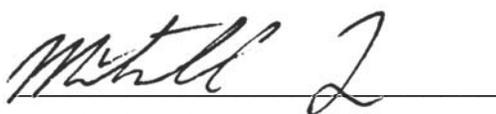
The MND lacks sufficient information to determine whether these provisions have been met and should be supplemented accordingly.

IV. CONCLUSION

Commenters request that the City revise and recirculate the Project's environmental impact report to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office.

26

Sincerely,



Mitchell M. Tsai
Attorneys for Southwest Regional
Council of Carpenters

Attached:

Robert Kahn Resume (Exhibit A);

Letter from Robert Kahn to Mitchell M. Tsai, Attorney At law PC RE: SD Homes Redlands Apartments Project Traffic Study Review (Exhibit B);

Bryan Estrada Resume (Exhibit C); and

Letter from Bryan Estrada to Mitchell M. Tsai, Attorney At Law PC RE: Orange Avenue Luxury Apartment Project IS/MND Noise Impact Review, City of Redlands.

EXHIBIT A

Robert Kahn, P.E., T.E

Founding Principal

Areas of Expertise

Traffic Engineering
Transportation Planning
Transportation Solutions
Traffic Impact Analysis
Circulation Systems for Planned Communities
Traffic Control Device Warrants
Traffic Calming
Traffic Safety Studies
Bicycle Planning
Parking Demand Studies
Transportation Demand Management
Traffic Signal, Signing and Striping Plans
Traffic Control Plans
Parking Lot Design
Acoustical Engineering
Noise Impact Studies
Expert Witness / Legal Services

Professional History

RK Engineering Group, Inc., Founding Principal
2001-Present
RKJK & Associates, Inc., Principal, 1990-2000
Robert Kahn and Associates, Inc., Principal, 1988-1990
Jack G. Raub Company,
Vice President Engineering Planning, 1977-1988
The Irvine Company, Program Engineer, 1972-1977
Caltrans CA Division of Highways, Assistant Engineer, 1968-1972

Representative Experience

Robert Kahn, P.E., has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his Bachelors degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. Mr. Kahn developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

Robert Kahn, P.E., T.E

Founding Principal

Education

University of California, Berkeley, M.S., Civil Engineering, 1968

University of California, Berkeley, B.S., Civil Engineering, 1967

University of California, Los Angeles, Graduate Courses in Transportation Systems, 1970

Registrations

California Registered Civil Engineer
No. 20285 – April 1971

California Registered Professional Engineer
Traffic, No. 0555 – June 1977

Colorado Professional Engineer
No. 22934, November 1984

Nevada Professional Engineer Civil
No. 10722 – March 1994

County of Orange, California Certified Acoustical Consultant
No. 201020 - 1984

Affiliations

Institute of Transportation Engineers (ITE)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

Orange County Traffic Engineers Council (OCTEC)

Teaching

UCI Graduate Urban Design Studio Class – Guest Instructor

ITS Berkeley – Tech Transfer
Fundamentals of Traffic Engineering – Instructor

UCI Senior Civil Engineering Mentoring Program (CE181)

Mr. Kahn has been an innovator in developing and implementing traffic calming techniques. Over twenty years ago, Mr. Kahn refined the design and implementation standards for speed humps for use in local neighborhoods. Most recently, he has been involved in the development of modern roundabouts in lieu of traffic signals or other traffic control devices at intersections. Mr. Kahn previously presented the use of traffic calming devices in newly developing communities to the Institute of Transportation Engineers Traffic Calming Conference in Monterey, California.

Mr. Kahn has been involved in the design of traffic signal systems, signing and striping plans on hundreds of projects for both the public and private sector. Most recently, he has completed the design of several traffic signals which will serve the renovated Shops at Mission Viejo Mall. Mr. Kahn was in charge of a major ITS project for the City of Irvine, which provided fiberoptic interconnect and closed circuit TV along Barranca Parkway, Alton Parkway and Lake Forest Drive.

Mr. Kahn has been involved in acoustical engineering since 1978. He was in responsible charge of the Aliso Viejo Noise Monitoring Program which redefined the 65 CNEL noise contours for MCAS El Toro. He has also developed computer applications of the FHWA Noise Model.

Mr. Kahn has prepared numerous noise impact reports in the Aliso Viejo, Mission Viejo, Foothill Ranch, Santa Margarita, Ladera and Talega Planned Communities. Noise impacts from stationery sources including car washes, loading docks, air conditioning compressors, drive-thru speakers and other sources have been evaluated in the Aliso Viejo Auto Retail Center Noise Study, Albertsons Store 606 Noise Study-Rancho Cucamonga, Pro Source Distribution Building Final Noise Study in Ontario. Major specific plan and zone change noise studies have been prepared for the Summit Heights Specific Plan in Fontana, Lytle Creek Land and Resources Property in Rialto, Tamarack Square in Carlsbad, California, International Trade and Transportation Center in Kern County, California, and Sun City/Palm Springs.

Mr. Kahn founded the firm of Robert Kahn and Associates in 1988, which was the predecessor to RKJK & Associates, Inc. in 1990. He has made presentations to the ITE and the California Public Works Conference. Mr. Kahn has published numerous articles on traffic impact assessment, traffic calming, striping and the status of Bicycle Sharing in the USA. He was awarded the Wayne T property award in 2011-2012. Mr. Kahn has been a mentor and advisor to the UCI Senior Civil Engineering Project (CE181) for the past several years. He provides students the opportunity to develop a real life transportation project for the program.

Robert Kahn, P.E., T.E.

Principal

Robert Kahn has been involved in numerous legal cases as an expert witness and providing legal assistance in the area of traffic and environmental engineering. This has included traffic/parking impact analysis, traffic/circulation/parking impacts of ROW takes, traffic engineering design review, traffic safety studies and noise/vibration impact assessments. A sampling of these projects include the following cases:

- Tustin Avenue/Rose Drive Grade Separation Impact to Del Cerro Mobile Estates, City of Placentia
- 9582 Chapman Avenue – ULI Shared Parking, City of Garden Grove
- Plantation Apartments Norwalk 12809 Kalnor Avenue I-5 Construction Noise Monitoring Assessment
- City of Huntington Beach vs. Alvarez, et al, Traffic Review of ROW taking
- Gene Autry Way Extension – Impacts to Anaheim Holiday Inn and Staybridge Suites Hotel, Anaheim
- UCSD Student Center Traffic and Parking Impact Review, City of San Diego
- Palma De La Reina Traffic Impact Analysis Review
- Newport Tech Center Traffic Study Review, Newport Beach
- City of Irvine Planning Area 18, 34 and 39 DEIR Traffic Impact Review, City of Irvine
- City of San Diego Big Box Ordinance, City of San Diego
- City of Yucaipa Big Box Ordinance, City of Yucaipa
- Electra Real Estates USA Mid Coast Corridor Transit Project Traffic/Circulation and Parking Impact Review, City of San Diego
- Rancho El Revino Specific Plan Traffic Impact Study Review
- President Hotel Santa Ana parking lot dispute
- Caceres vs. City of Fontana, represented City in an Intersection (Production at Santa Ana Ave.) Accident
- Corona vs. City of Fontana, represented City in an Intersection (Sierra Ave. and Summit Ave.) Accident
- Sunset and Gordon Mixed Use Site Traffic Review
- Baldwin Hills Crenshaw Plaza EIR and Traffic Study Review
- Saint Mary's University Wellness Pavilion EIR and Traffic Study Review
- 15 Degree South Residential Project Traffic Review
- Review of the OCTA Tustin Avenue Rose Drive Grade Separation Representing the Del Cerro Mobile Estates
- OCTA State College Blvd Grade Separation Representing the Fullerton Commerce Center and Fullerton Industrial Park

EXHIBIT B



August 27, 2019

Mr. Mitchell Tsai
Mitchell M. Tsai, Attorney at Law, PC
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: SD Homes Redlands Apartments Project Traffic Study Review

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to submit this review of the Traffic Study and transportation documentation for the proposed SD Homes Redlands apartment project. The proposed project is located on an 18.9-acre project site located on both sides of Orange Avenue between Iowa Street and Alabama Street in the City of Redlands. The proposed project involves construction of a gated apartment complex with 328 multi-family (low rise) attached residential dwelling units. Access is proposed at two driveways on Orange Avenue and an emergency only access on Alabama Street. The proposed project is anticipated to be built in one continuous phase. For purposes of the Traffic Study, it was assumed that the project would be fully constructed and operational by Opening Year 2020.

The SD Homes Redlands Apartment Project Traffic Study was prepared for the project by Ganddini Group, Inc. dated April 1, 2019. An Initial Study and Mitigated Negative Declaration was also prepared for the project. The Traffic Study was prepared pursuant to an approved Scoping Agreement dated February 26, 2019. Although the Traffic Study follows the approved Scoping Agreement, RK has identified a number of issues with both the design of the project and the traffic information included in the Traffic Study. The following major issue items have been identified with the project with respect to traffic and transportation:

1. The project has a significant impact to the intersection of Alabama Street at Orange Avenue (#5) for General Plan Buildout Year 2040 conditions. According to the City of Redlands' significance requirements (page 7 of the Traffic Impact Analysis) the project should be responsible for 100% of the improvements at this intersection as a result of the Level of Service and significant increase in delay caused by the project.

2. There are a number of project design issues that need to be changed to meet the design standards and requirements of the Traffic Study and City standards.

This includes the spacing of the westerly driveway with respect to the existing Cottage Lane driveway. The City design standards require a separation of 150-feet between driveways, whereas, the current site plan indicates a spacing of less than 100-feet.

In addition, there is a lack of turnaround at the two entry gates on the site plan included in the Traffic Study. And, there is a need for two entry lanes per the recommendations of the Traffic Study.

There is also a need to widen Orange Avenue between Alabama Street and the easterly project driveway, and a need to accommodate a left turn lane, parking and a bike route. The Traffic Study recommendation for a 40-foot curb to curb section on Orange Avenue between Alabama Street at the easterly driveway does not have sufficient width to also accommodate the left turn lane, a bike route and parking which typically is provided for collector streets in the City of Redlands.

3. There is no calculation to prove that the construction traffic would not have a significant impact to the area. A construction trip generation evaluation needs to be provided to ensure that construction traffic would not have an adverse impact to the study area.
4. There appears to be a mathematical error in the total AM and PM cumulative project trips shown in the report. It is not known whether this affects the cumulative traffic impacts analyzed in the Traffic Study. This needs to be further evaluated.
5. In many cases, the General Plan Build Out (Year 2040) PM peak hour traffic volumes with the project at several intersections are less than the PM peak hour volumes for Year 2020 with project. This does not make sense. This needs to be further evaluated. It would appear that growth in the area from the Year 2020 to Year 2040 would increase all of the traffic movements.
6. The cost to improve the Alabama Street at Orange Avenue (#5) of \$20,000 appears to be significantly too low. It does not appear that the cost has included all elements of construction including modification of the existing traffic signal at Alabama Street and Orange Avenue, widening Orange Avenue both west/east of Alabama Avenue on Orange Avenue and other factors that need to be considered in the cost estimate.

Comments

RK offers the following detailed comments on the Traffic Study dated April 1, 2019.

1. Page ES-2: In order to provide an acceptable level of service for the General Plan Buildout (Year 2040) With Project Conditions at the intersection of Alabama Street at Orange Avenue (#5), additional improvements are necessary as indicated in the Traffic Study. Based upon City of Redlands' significance requirements the project should be responsible for these improvements. The project would have a significant impact by increasing the delay for Year 2040 conditions substantially for an intersection not meeting the City's LOS (level of service) standards.
2. Page ES-3: The Traffic Study indicates that the proportional share for the improvements to the intersection of Alabama Street at Orange Avenue (#5) would be \$3,867. Based upon the City's significance criteria, it appears that the project does increase the delay at that intersection for Year 2040 conditions; therefore, should be responsible for 100% of the improvement costs.
3. Page 1 (Project Access): The project's westerly access on Orange Avenue is too close to the existing driveway at the Cottage Lane development on the south side of Orange Avenue. The separation between these two driveways should be a minimum of 150-feet, pursuant to the City's Standard Plans. Although a scaled site plan is not provided in the Traffic Study, it appears that the spacing on the Site Plan is actually less than 100-feet.
4. Figure 2 (Site Plan): As previously noted, the spacing between the westerly driveway on Orange Avenue and the existing Cottage Lane driveway does not meet the City's standards. This needs to be modified to provide spacing at least 150-feet. The Site Plan also does not appear to show the required turn-arounds at the gated entries to the project, both north and south of Orange Avenue. As recommended in the Traffic Study, the turn-arounds plus two entry lanes are recommended for each of entry gates.

In addition, the required eastbound and westbound left turn lane on Orange Avenue at Alabama Street will require additional width to also accommodate a bike route and/or parking between Alabama Avenue and the easterly project driveway. The amount of width provided in the Site Plan and the concept striping plan does not appear to be adequate to accommodate all of these design features.

5. Page 7: According to the Traffic Study, a significant impact occurs, if the pre-project Level of Service is D or worse and if the project increases the delay of the intersection which previously operated at Level of Service D or worse. The project shall provide improvements at a minimum to the pre-project delay. This is the case

for the intersection of Alabama Street at Orange Avenue for Buildout Conditions (Year 2040) with the project. The project does increase a deficient intersection by a significant amount of delay; and therefore, the project should make this improvement.

6. Page 7. The existing daily roadway volumes identified in Traffic Study have been determined by applying a factor of 11.5 x the PM peak hour (approach volume + exiting volume) to determine the ADT (average daily traffic) on each roadway segment. While this appears to be a reasonable factor, no documentation as to how it was calculated is included in the Traffic Study.
7. Page 28: The other development for (Opening Year) conditions is identified as Year 2022 in the fourth paragraph. It is assumed that this is a typo and should be year 2020?
8. Page 29: The Traffic Study needs to show that the construction traffic volumes are less than or equal to the project traffic volumes. Although this may appear to be intuitive, no calculations were included to make this determination.
9. Page 31 - Table 3 (4 of 11): The total peak hour trips indicated at the bottom of this table do not appear to add up to the inbound and outbound volumes for both AM and PM peak hours. It is not known if this is a typo or whether there are errors in the cumulative project trip generation. This should be verified whether the actual AM/PM inbound and outbound traffic volumes were assigned for the other development traffic AM and PM peak hour volumes included in Figures 20 & 21. This could affect the entire analysis if this was not done accurately.
10. Page 50 - Figure 36: For the General Plan Buildout (Year 2040) PM peak hour volumes there are several cases for Intersections #2, #3, #4, and #5 where the traffic volumes in Figure 36 are less than the Opening Year (Year 2020) with project conditions shown in Figure 30. The attached Appendix A highlights in yellow, those traffic movements that are lower than the Year 2020 conditions with the project. This does not make sense, since this period represents growth of 20 years, whereas traffic volumes are shown to be reduced rather than increased. This needs to be verified and evaluated for accuracy.
11. Page 51 (General Plan Buildout (Year 2040) with Project Conditions): The Traffic Study indicates that there is a need to restripe the eastbound and westbound approach of the intersection of Alabama Street at Orange Avenue (#5) to accommodate left turn lanes in an eastbound and westbound direction. This would require additional widening than shown in the Site Plan and Conceptual Striping Plan to accommodate the proposed bike route and/or parking along Orange Avenue

adjacent to the project. Furthermore, this will require modifications to the existing traffic signal at this location to accommodate these changes.

12. Page 56 (Project Design Features): As previously noted, the project westerly driveway at Orange Avenue is too close to the existing driveway on the south side of Orange Avenue at the Cottage Lane driveway. A minimum spacing of 150-feet is required, pursuant to the City's Roadway Design Standards.
13. Page 57 (Gated Access Consideration): The traffic consultant has recommended an adequate turn-around area be provided at both of the gated entries both north and south of Orange Avenue. Based upon a review of the Site Plan shown on page 4 (Figure 2), it does not appear that there is an adequate turnaround area for each of these gates.
14. Page 63 (Pedestrian Midblock Crossing Enhancements): Proposed curb extensions are proposed at the project's easterly driveway at Orange Avenue. The City's General Plan indicates that Orange Avenue is to have a bike route in this location. How will the bike route be accommodated with the proposed curb extension? Furthermore, collector streets are also required to accommodate parking which would be required between Alabama Avenue and the curb extensions at the midblock crossing.
15. Page 68 - Table 9 (Project Intersection Trip Contribution): For the intersection of Alabama Street and Orange Avenue (#5), a construction cost of \$20,000 was included in the Traffic Study. It does not appear that this cost is sufficient to include all of the elements required to provide the eastbound and westbound left turn lanes on Orange Avenue. Both eastbound and westbound left turn lanes must be provided at the intersection. Furthermore, there needs to be a modification to the traffic signal to accommodate the widening to provide the left turn lanes. Additional items such as minor items (10%) mobilization (10%) and contingency (25%) need to be added to the cost for these improvements. The cost estimate needs to be substantially expanded.
16. Page 71 - Table 10: In regards to the intersection of Alabama Street at Orange Avenue (#5), Table 10 clearly shows that for General Plan Buildout with Project Conditions there is a significant increase in the delay from 53.7 to 82.4 seconds. Since this PM peak hour Level of Service is D (which is less than the City standard), the project would have a significant impact at this intersection and should be responsible for the full improvements.
17. Page 73 - Figure 39: Many of the previous comments should be incorporated into the circulation recommendations included in this Figure. This includes the spacing of the westerly driveway with respect to the Cottage Lane driveway, requirements for the turnaround, two entering lanes both north/south of Orange Avenue and

additional widening of Orange Avenue east of the easterly driveway, and traffic signal modifications at the intersection of Alabama Street at Orange Avenue.

Conclusions

RK Engineering Group, Inc. has reviewed the revised April 1, 2019 *SD Homes Redlands Apartment Project Traffic Study* prepared by Ganddini Group, Inc which was also incorporated into the Initial Study and Mitigated Negative Declaration for the project. Based upon this review, there are several design and traffic analysis items that need further review and clarification before it can be considered finalized.

RK Engineering Group, Inc appreciates this opportunity to work with Mitchell Tsai, Attorney at Law. If you have any questions regarding our review or need additional analysis, please call me at (949) 474-0809.

Respectfully submitted,
RK ENGINEERING GROUP, INC.



Robert Kahn, P.E.
Principal

Registered Civil Engineer 20285
Registered Traffic Engineer 0555

Attachment
RK:sl/rk15482.doc
JN:2828-2019-06

XC: Chelsea Linsley



EXHIBIT C

Bryan Estrada, AICP, PTP

Senior Associate

Areas of Expertise

Transportation and Environmental Planning
Transportation Demand Management
Traffic Impact Studies
Parking Studies
Air Quality Analysis
Greenhouse Gas/Global Climate Change Analysis
Environmental Acoustics/Noise Analysis
CEQA Compliance
Synchro Traffic Analysis Software
California Emissions Estimator Model (CalEEMod)
FHWA Noise Modeling
SoundPLAN Software
AutoCAD

Education and Training

University of California, Irvine, B.A., Urban Studies
California Air Resources Board, Air Quality Training Program
Geo Instruments Vibration Monitoring Short Course

Professional History

RK Engineering Group, Inc.
Senior Associate
2007 - Present

Certificates and Affiliations

American Institute of Certified Planners (AICP)
Professional Transportation Planner (PTP)
American Planning Association
Association of Environmental Professionals

Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine, School of Planning, Policy and Design where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their environmental impacts within urban areas. Mr. Estrada is committed to sustainable development practices, transportation demand management, and global climate change awareness.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout the community.

Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

EXHIBIT D

August 29, 2019

Mr. Mitchell Tsai
Attorney At Law PC
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Orange Avenue Luxury Apartment Project IS/MND Noise Impact Review, City of Redlands

Dear Mr. Tsai:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise and vibration impacts from the Orange Avenue Luxury Apartment Project (hereinafter referred to as project), located in the City of Redlands, California. This review is based on the information provided in the Orange Avenue Luxury Apartment Project Initial Study/Mitigated Negative Declaration, prepared by FirstCarbon Solutions, July 31, 2019 (hereinafter referred to as IS/MND) and the Appendix G Noise Analysis, prepared by Ganddini Group, Inc., July 24, 2019 (hereinafter referred to as Noise Study).

According to the IS/MND, the proposed project site encompasses 21.84 acres and is located on the west side of Alabama Street and is bisected by Orange Avenue. The project spans the north and south sides of Orange Avenue between Alabama Street and Iowa Street and consists of 10 separate parcels. The proposed project would develop a 328-unit low-rise luxury apartment complex spanning the northern and southern portions of the project site. The apartment complex would include six new 3-story apartment buildings and a clubhouse (with a total building area of 169,835 square feet).

The purpose of this letter is to review the IS/MND and Noise Study from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

RK has over 50 years of combined experience in environmental acoustics and has prepared hundreds of noise impact analyses for public agencies and developers in the State of California, and we are fully aware of the complexity of data gathering, modeling, and the possibility for error within these technical documents.

Noise Comments

1. Construction Noise Impacts.

The IS/MND does not adequately disclose all potential noise impacts from the construction of the proposed project and it fails to provide sufficient mitigation measures to reduce the noise exposure of adjacent sensitive land uses. Further details highlighting the shortcomings and inadequacies of the construction noise analysis are provided below.

- a. Page 90 of the IS/MND states, "For the purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction, as described by the City's Municipal Code in Section 8.06.120 (G)." This statement is inaccurate and conceals the full impact of construction noise from being disclosed in the environmental document.

While the City's municipal code may exempt construction noise from being cited as unlawful during the permissible daytime hours, it does not preclude construction noise from being evaluated for substantial temporary increases above ambient conditions under CEQA.

Measure U, Policy 9.0v, in the Redlands General Plan states that an increase in exposure of four or more dB should be considered possibly significant if the resulting noise level would exceed that described as clearly compatible for the affected land use, as established in GP Table 9.1 [Table 7-10] and GP Table 9.2 [Table 7-11].

As it pertains this analysis, the clearly compatible noise level for a residential use would be less than 60 dB CNEL, and the existing ambient noise levels at the surrounding residential properties are reported as ranging from 56.6 dBA Leq to 66.3 dBA Leq during daytime hours. Construction is shown to generate up to 86.4 dBA Leq; thus resulting in at least a 20 decibel increase in ambient noise.

A 20 dB increase in noise, by almost any measure, is considered a substantial increase. Therefore, seeing that the City's noise impact criteria established under Measure U considers a noise level increase of only 4 dB to be considered significant, the construction noise levels generated by this project should clearly be identified as causing a substantial temporary increase above ambient conditions. As result, additional mitigation measures should be provided to try and mitigate the impact to the maximum extent feasible.

- b. The IS/MND claims that the two (2) mitigation measures described on Pages 94-95 will adequately reduce Project impacts to be less than significant. While RK agrees that the measures can help reduce construction noise levels, substantial evidence has not been provided to demonstrate noise levels will be fully reduced to levels that would be considered less than significant. While such things as mufflers and equipment placement can help with reducing off-road equipment noise, there are many other contributing factors to construction noise; such as hammering, drilling, sawing, load drops, people yelling, etc. that are not accounted for.

Hence, it can be very difficult to fully mitigate construction noise. Physical noise barriers are often infeasible and/or inadequate to provide the necessary noise reduction and shielding (especially for second floor dwellings) from the many different sources of construction noise. As a result, the adjacent sensitive receptors could remain exposed to significant noise impacts.

- c. Page 90 of the IS/MND states that demolition activities are expected to produce the highest sustained construction noise levels and a worst-case construction noise scenario was modeled. However, upon examining the Noise Study, Appendix G, RCNM Noise Modeling Output sheets, the analysis only provides the results of the demolition phase of construction and does not report impacts during subsequent phases. Therefore, it is impossible to conclude that demolition is in fact the worst case. Furthermore, upon examining the equipment list utilized in the Air Quality analysis, the Noise Study does not account for the combined noise impact from all equipment expected to be utilized by the project. For example, the Air Quality analysis shows a total of 6 pieces of equipment in use during demolition, while the noise study only models 5 pieces of equipment. Additionally, looking at other phases of construction, there would be 8 pieces of heavy equipment utilized during grading and 11 pieces of heavy equipment during building construction. This is

considerably more equipment usage than what was modeled for demolition; thus other phases may produce louder combined noise levels.

- d. Upon further examination of the Appendix G, RCNM Noise Modeling Output sheets shown in the Noise Study, it appears that the distances in which equipment was modeled from the receptor varies substantially--raising the question of whether a worst case conditions was in fact modeled. For example, one excavator is modeled at 25 feet from the receptor while a dozer is modeled 200 feet from the receptor. Looking at the site plan, improvements are planned right next to and abutting residential property, thus making it highly probable the equipment will be in operation right at the property line. For a worst case assessment, construction equipment should be modeled at the appropriate distance to the sensitive receptors.

2. Project Generated On-Site Operational Noise

The IS/MND does not adequately disclose all potential noise impacts from the operation of the proposed project and it fails to provide sufficient mitigation measures to reduce the noise exposure of adjacent sensitive land uses. Further details highlighting the shortcomings and inadequacies of the operational noise analysis are provided below.

- a. Page 92 of the IS/MND states, "for purposes of this analysis, an increase of greater than 5 dBA above existing ambient noise levels would be considered a substantial permanent increase in ambient noise levels." This statement conflicts with the City of Redlands established polices of Measure U, Policy 9.0v, which considers an increase in exposure of four (4) or more dB to be considered possibly significant if the resulting noise level would exceed that described as clearly compatible for the affected land use. Since ambient noise levels are shown to currently exceed the clearly compatible levels for residential use (greater than 60 dBA CNEL), the IS/MND should be revised to reflect the appropriate significance criteria.
- b. Page 92 of the IS/MND states, "on-site noise sources associated with development of the proposed project will include typical noises associated with residential land uses, including vehicles starting and stopping, passenger loading and unloading, refuse trucks, occasional car alarm activation, landscape maintenance, children playing, and mechanical ventilation equipment operation. Noise associated with proposed park uses will include people talking and socializing along the proposed

trails and at the shaded rest areas. These instantaneous or short-term noise events would range between 55 dBA and 70 dBA Lmax at 50 feet from the noise source. Normal conversation is typically 65 dBA as measured at 3 feet from the source.”

The IS/MND goes on to state on Page 93, “On-site stationary operational noise sources, events, and conversation would not occur frequently enough or close enough to the adjacent sensitive receptors to exceed City of Redlands stationary noise standards/thresholds or result in a substantial increase in the ambient average (Leq) noise levels in the project vicinity.”

The entire premise of this evaluation is flawed. First, upon review of the Noise Study, a quantifiable analysis of operational noise impacts was not performed. Therefore, the finding that noise levels would range between 55 dBA and 70 dBA has not been supported with substantial evidence. Second, overall operational noise levels from a residential project are not considered short term, infrequent or instantaneous. This project will result in the continuous long term operation of 328 multi-family dwelling units, with a 653 space parking lot, and recreational facilities. On-site noise will be generated 24-hours a day at this site. Lastly, the project will generate noise directly adjacent to and abutting existing residential properties, making it highly probable that some noise impacts would occur.

The IS/MND and Noise analysis should be updated to provide a quantitative analysis of on-site project generated noise. Of particular concern would be parking lot noise, truck delivery/loading activities, HVAC equipment noise, pool/spa equipment noise, and outdoor recreational noise (particularly at the pool/clubhouse area). The analysis should consider the impact at all nearby sensitive receptors (including residential and church uses).

Conclusions

Based upon this review, the Orange Avenue Luxury Apartment Project IS/MND, dated July 31, 2019 does not adequately address all potential noise impacts from the proposed project. Additional analysis and mitigation measures should be provided to ensure the project does not adversely affect the surrounding noise sensitive land uses.

Mitchell Tsai, Attorney At Law PC
RK 15499

If you have any questions regarding this study, or would like further review, please do not hesitate to contact us at (949) 474-0809.

Sincerely,
RK ENGINEERING GROUP, INC.



Bryan Estrada, AICP, PTP
Senior Associate

Attachments

BE:sl/rk15499.doc

JN:2828-2019-05

Mitchell M. Tsai, Attorney At Law (TSAI)

Response to TSAI-1

This comment provides general background information and does not raise any environmental issues. The comment further suggests that Southwest Carpenters may “supplement” their comments at an unspecified later date. The City notes that the Recirculated Draft IS/MND was widely available to the public for review and comment from August 1, 2019, through August 30, 2019, and that there was adequate time for comments to be submitted during that period. CEQA does not require that an agency respond to late comments (PRC § 21091(d)(1)). Nor is a lead agency required to delay the review process to prepare responses to late comments (14 California Code of Federal Regulations [CFR] § 15207).

Response to TSAI-2

This comment provides general background information and does not raise any environmental issues.

Response to TSAI-3

These comments provide a general summary and interpretation of CEQA and do not include any specific allegations regarding this project or the Recirculated Draft IS/MND. Because these comments do not raise any environmental issues or present a fair argument that the project will result in any significant, adverse, unmitigated impacts, no further response is necessary. For a discussion of the appropriate level of CEQA documentation for this project, please refer to Response to AMEF-1.

Response to TSAI-4

These comments provide a general summary and interpretation of CEQA and do not include any specific allegations regarding this project or the Recirculated Draft IS/MND. Because these comments do not raise any environmental issues or present a fair argument that the project will result in any significant, adverse, unmitigated impacts, no further response is necessary. For a discussion of the appropriate level of CEQA documentation for this project, please refer to Response to AMEF-1.

Response to TSAI-5

These comments provide a general summary and interpretation of CEQA and do not include any specific allegations regarding this project or the Recirculated Draft IS/MND. Because these comments do not raise any environmental issues or present a fair argument that the project will result in any significant, adverse, unmitigated impacts, no further response is necessary. The City acknowledges that a Recirculated Draft IS/MND was prepared and circulated for the project in accordance with and pursuant to the requirements of CEQA.

Response to TSAI-6

These comments provide a general summary and interpretation of CEQA and do not include any specific allegations regarding this project or MND. Because these comments do not raise any environmental issues or present a fair argument that the project will result in any significant, adverse, unmitigated impacts, no further response is necessary.

Response to TSAI-7

A Preliminary WQMP for the project was prepared by Transtech Engineers, Inc. and included as Appendix F-2 of the Recirculated Draft IS/MND. This document was made available during the public review period and prior to public hearing and no mitigation or analysis has been deferred. The project site will include design features identified in the preliminary WQMP to avoid detrimental effects, and no mitigation measures are required. The Preliminary WQMP follows a template that the City of Redlands, along with 16 other cities, the County of San Bernardino, and the County of San Bernardino Flood Control District, developed to meet the requirements of the current General Stormwater Permit. This template has been reviewed and approved for use by the State Water Quality Control Board.

As explained on page 82 of the Recirculated Draft IS/MND, a WQMP will be required which effectively captures the “first flush” allowing for infiltration of the initial rain events. Improvements along the drainage channel are not required. The project is not encroaching into the channel area and there is no practicable way for the developer to construct half of a channel. The developer will be required to pay storm drain development impact fees which the City accumulates to construct regional projects.

Response to TSAI-8

Construction Traffic Control Plans are outside the scope of CEQA; however, the requirement to prepare such plans for City review prior to construction is noted and addressed in MM TRANS-2. It is standard practice for the applicant and contractor to prepare and submit these documents and plans to the lead agency (the City of Redlands) prior to construction. The Municipal Utilities and Engineering Department review and approval process will ensure all roadway improvements and construction procedures are designed to the appropriate roadway and safety standards. Therefore, the mitigation is not deferred since the project would not be allowed to begin construction without City approval of an adequate construction traffic control plan that satisfies the appropriate roadway and safety standards and meets all relevant regulatory requirements.

Response to TSAI-9

This is a general introductory statement of opposition. Please refer to Response RKE2-7.

Response to TSAI-10

Please refer to Responses to RKE2-1, RKE2-2, and RKE2-7.

Response to TSAI-11

Please refer to Response to RKE2-2.

Response to TSAI-12

Please refer to Response to RKE2-3.

Response to TSAI-13

Please refer to Response to RKE2-4 and Response to RKE2-5.

Response to TSAI-14

Based on Responses to RKE1-1 through RKE1-11, no further analysis or mitigation measures are warranted or required.

Response to TSAI-15

Please refer to Response to RKE1-2.

Response to TSAI-16

Please see Response to RKE1-2.

Response to TSAI-17

Please see Response to RKE1-1

Response to TSAI-18

The equipment was staggered from the property line in order to re-create a realistic construction scenario based on field visits and standard industry practices. Please see Response to RKE1-1 for additional information.

Response to TSAI-19

Please see Response to RKE1-11

Response to TSAI-20

Please see Response to RKE1-11

Response to TSAI-21

Cumulative impacts are addressed throughout the Recirculated Draft IS/MND. As stated on page 48 of the AQR, “[c]umulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the project’s air quality must be generic by nature.

The project area is out of attainment for both ozone and PM₁₀. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the SCAB. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. However, with respect to long-term emissions, this project would create a less than significant cumulative impact.” Please see Response to MIR-27 for discussion on cumulative GHG impacts.

Regarding Noise, the City of Redlands General Plan (Interim 2019) addresses cumulative environmental impacts associated with buildout of the City of Redlands. The City of Redlands General Plan EIR found noise impacts associated with construction to be less than significant with compliance with Section 8.06.120 of the City of Redlands Municipal Code, which allows construction noise that exceeds the City's Noise Ordinance to occur between the between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. As discussed throughout the Recirculated Draft IS/MND, the Project is consistent with the General Plan and General Plan EIR requirements. Project construction will adhere to this code and additional mitigation measures presented in the technical noise study will be implemented. Legal noise limits presented in the City's Noise Ordinance do not apply to the project as long as construction activities are consistent with the above hours of operation.

Response to TSAI-22

This comment restates, summarizes, and interprets various land use and planning laws. However, the comment does not explain the relevance of this summary to the Project nor does it specify any allegations regarding which, if any, fundamental, mandatory, and clear General Plan policy the Project conflicts with. As discussed in the Recirculated Draft IS/MND, the project is designed to be consistent with the requirements of the City of Redlands General Plan. The Project will change the current zoning designations of EV/AP and EV3000/RM to a single designation of EV2500/RM. These amendments will bring the project into conformity with the General Plan, as EV2500/RM allows for Multi-Family Residential development. Therefore, as discussed in Section 11 of the Recirculated Draft IS/MND, the Project is consistent with the current General Plan land use designation of MDR. Consequently, the project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Recirculated Draft IS/MND correctly concludes that the Project is consistent with the General Plan and impacts would be less than significant. This comment does not provide substantial evidence in support of a fair argument that the Project would have a significant impact on the environment.

Response to TSAI-23

Please refer to Response to TSAI-22.

Response to TSAI-24

The City notes that the Socio-Economic Cost-Benefit Analysis is included in the City's staff report for informational purposes as the project is in compliance with the City Municipal Code. A project's economic and social effects alone are not treated as significant effects on the environment under CEQA. As discussed in the Socio-Economic Cost-Benefit Analysis, the economic and social effects of the project will not result in any significant changes to the physical environment. Accordingly, the project's economic and social effects are not treated as effects on the environment pursuant to CEQA and no further discussion is required (14 CCR § 15131(a)).

Response to TSAI-25

As noted in the comment, the project is located within the East Valley Corridor Specific Plan (EVCSP). The parking standards of the EVCSP apply to the project rather than those of the Municipal Code. Specifically, the EVCSP requires that one covered parking space shall be provided for every unit. In

accordance with that requirement, the project would develop a 328-unit low-rise luxury apartment complex and will provide 328 covered parking stalls. Within the northern portion of the project, 224 covered spaced are provided with 151 carports and 73 garages. In the southern portion of the project, 104 covered parking spaces are provided 64 of these spaces are carports and 40 spaces are within garages.

The project is not a condominium project and the project provides guest parking in compliance with the EVCSP.

Response to TSAI-26

This is a conclusory statement requesting recirculation. As discussed in the preceding responses, there is no new information that requires recirculation of the previously Recirculated Draft IS/MND. Based on the entire record before it, the City finds that no new significant effects have been identified and no new information has been provided that would require recirculated pursuant to the requirements of CEQA. Additionally, the City finds that the mitigation measures and project revisions originally included in the Recirculated Draft IS/MND fully and adequately reduce all potentially significant impacts to a level of insignificance, and no new mitigation measures or project revisions are required.

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From: [Kent Black](#)
To: [Sean Reilly](#)
Cc: [Emily Black](#); margaret@thearcher.com
Subject: LuxView Development
Date: Wednesday, August 28, 2019 2:21:09 PM

Dear Mr. Reilly; As a Redlands resident whose daughter attends Montessori in Redlands, I am greatly disturbed by the proposed project between Alabama and Iowa Streets.

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I will not take your time by cutting and pasting Ms. Davidson's main points in her letter to you. These are all valid points and have been insufficiently addressed by the City. I urge you and other city officials to carefully consider them.

I will, however, make a less quantifiable point about livability. I know that for my family and many, many others whom we've come to know since moving here that the attraction to this community lies in its livability. We considered many towns from Palm Springs to Claremont, but settled on Redlands because it felt like a manageable town where people actually got to know each other as neighbors, where after just a short time, you could be on a first name basis with shop workers and owners, where you could leave the car in the garage and bike or walk the town to do your errands.

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2

How many thousands more people will live in the city after the development is finished and occupied north of the ten? How many more will be added if plans go ahead for the LuxView Development? At one point are we elbow to elbow and the livability of this community declines irretrievably?

One last point. I find it interesting that in this season of global forest fires when the world is up in arms about deforestation that the City of Redlands would actually condone the eradication of more orange groves to accommodate a grotesque apartment complex. These groves are not just symbolic; they are part of the indelible fabric of this community.

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3

More oranges, sir, less people.

Sincerely,

Kent Black
121 Franklin Avenue
Redlands, Ca. 92373

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Individuals

Kent Black (BLACK)

Response to BLACK-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis or the content of the Recirculated Draft IS/MND. Responses to the form letter are addressed in Section 2 of this Final IS/MND, within Master Responses 1-7.

Response to BLACK-2

Comment noted. This comment provides background information and states the commenters' reasons for moving to the area. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to BLACK-3

Comment noted. Impacts related to wildfire risk are discussed in Section 2.20 of the Recirculated Draft IS/MND. The Recirculated Draft IS/MND also adequately analyzed impacts related to agriculture. All impacts were found to be less than significant. The avocado and citrus trees on-site are not currently used for agricultural production and are not located in an area designated for any type of agricultural production. Please refer to Master Response 5—Citrus Tree Removal for a discussion of the removal of citrus trees on-site.

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Allie Blackburn
951 Sunset Hills Lane
Redlands, Ca 92373

August 22, 2019

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, Ca 92373

RE: Public comments regarding the Orange Avenue Luxury Apartments Project

Dear Mr. Reilly, as well as members of the Redlands City Council and Planning Commission,

I'm writing to submit my concerns related to the Luxury Apartment Complex project planned for Orange Avenue, between Alabama and Iowa streets, as a public comment. I've attended several of the City Council meetings in which this project has been discussed. This is not the construction of a single building or house, but an extremely large project involving 7 buildings and 328 apartment units, in a location which has up until now been citrus groves, a nursery, and open space with only three houses on it. It is going to represent a huge change in the character of the area, and is going to impact the neighborhood in significant ways, which I would like to see addressed by the City before the project is allowed to move forward.

1

Increasing traffic in the region is a huge concern of mine. My children currently attend the Montessori in Redlands, and this school as well as the Grove Farm School and the Grove High School are also located within a block of the proposed site. There are also a significant number of single family homes on the same block of Orange Avenue. The addition of 650 cars to that block is going to cause a huge increase in the traffic on this very small street, which will affect the residents of the single family homes as well as attendees of the schools. The Initial Study and Mitigated Negative Declaration specifies that Orange Avenue will be one of the primary access routes to the site. I'm very concerned because the buildings for the schools are separated by Orange Avenue, and children at the Farm and Grove Schools must cross Orange Avenue when moving between classes, which will become very dangerous if the traffic increases significantly. This school has been present at this location for over 40 years, and was built there partially because of the isolated nature of the site nestled in citrus groves, so in the past the crossing of the small, lightly used street by the children was never an issue. In addition, I'm concerned about the impact on families reaching the schools during drop off and pick up times for the children, both during construction and after occupants have moved into these units. There is no bus service to these schools, so all children must be dropped off and picked up by caregivers. Finally, the emissions of all of these additional cars traveling through the area will pose a significant health concern for the children at the school; the negative effects of traffic emissions on children are well documented. I would like to see some commitment either by the City or by the developer to adding safety features in the area of the school to discourage use of this street by construction vehicles and the commuting down this street by the project residents and to decrease the likelihood of accidents, such as speed bumps, or even a pedestrian bridge to allow the children to cross the street safely. Even better, the City could restrict access through this part of the street by making it a non-thoroughfare. These safety concerns are being raised in advance, and if the

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City fails to address them they risk being held liable for accidents related to school children on this block of Orange Avenue.

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Another concern of mine is the protection of the Morey Arroyo, which runs along the northern side of the proposed site. Although the Initial Study and Mitigated Negative Declaration for the project notes that there are no protected species inhabiting the arroyo, it is an important and protected home for water creatures such as frogs, vegetation, and a relatively protected home and water source for local wildlife. It also provides a “highway” for wildlife to pass through the region without needing to enter human areas. In addition, it is an important channel for rain runoff. According to the report, there are plans to “completely avoid this area and all construction and staging areas will be located away from the northern boundary of the project site where the Morey Arroyo Channel is located.” However, this applies only to the construction phase of the project. After construction is completed, 328 families will be moving into the buildings, translating into 600-1000 people. These people will be exploring and utilizing the land around them, and will certainly encroach upon and explore the Morey Arroyo, disturbing and damaging the waterway and the plants and animals associated with it. I would like to know that some permanent fixture, probably a sturdy and attractive wall or fence, will be placed in such a way to protect the arroyo.

4

There is a small citrus grove on the project site, as well as multiple very large and old trees. According to the report, these will be removed by the developer. Trees are extremely valuable in the urban environment, and removal of trees should be minimized. Ideally, the larger trees should be protected from removal. If trees are to be removed, I would like some assurance that the developer will be replacing at least the same number of trees, and that larger trees will be used to replace the large, older trees which are being removed, instead of replacing them with tiny, young trees which will take decades to reach a similar height and size.

5

The report specifies that infrastructure will be provided in the new buildings for installation of solar panels as well as power supply for electric vehicles. However, there appear to be no actual plans for the installation of these energy-saving and climate-friendly items. It seems likely that they never will be, and that simply providing the “infrastructure” gets the developer a pass. Allowing this is a ridiculous concession by the City. This is going to be an extremely large complex adding 600-1000 people and up to 650 cars to the area, and will be a huge energy sink. I would like to see the installation of the solar panels and the EV power sources be a requirement for the project.

6

Another environmental concern for me relates to loss of dirt and shrubbery which and the effect of this on the resorption of rainwater. Most of the project site is about to be converted from dirt and shrubbery (which can allow resorption of rainwater back into the ground) to concrete, on which rainwater runs off, is directed into catch basins, and is returned to the ocean, where it does us no good. There has been a discussion of “landscaping” which will be part of the project, but no specifics. I think the specifics of how much land will be landscaped and how is important, as is a discussion of how rainwater will be handled at the site. In addition, there should be some commitment by the developer to use non-potable or recaptured water for irrigation on the site, since water has become a scarce resource in our area.

7

A rocky channel extends through part of the southern part of the proposed site. This is thought to possibly represent part of the historic Mill Creek Zanja, according to the report. This possibility was discussed at a recent meeting of the Historic and Scenic Preservation Commission, and concern was raised by two of the committee members that enough was not being done to investigate and protect

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this possible historic site from being affected by the construction. Of particular concern to me, two committee members requested that additional time be provided to prior to approving the demolition request for the home at that location to address this issue, but were told by other members of the committee present that this was not possible because planning commission meetings for the project were “too soon” and could not be delayed. I was quite alarmed to see that the City is so eager for development that the time table of a developer has become more important than preservation of locations of historic and cultural significance in the City of Redlands.

9

I understand that the area of the project is zoned for medium-density housing and industrial purposes, and the overall city plan for Redlands calls for development of this region as part of the overall East Valley Corridor Specific Plan. However, I would really like the leadership in Redlands to keep in mind the character of our historic town. For years, development in Redlands was kept to minimum, and while the City leadership seems to see this as having “set us back” in comparison to other cities, a lot of us living here see it as having preserved Redlands as a charming, family-oriented, non-congested community while the rest of the Inland Empire has become progressively noisy and crowded. Projects like the one in question on Orange Avenue are appropriate near the transportation corridor, for example the many apartment buildings being erected along Lugonia, but are not appropriate a mile away from the freeway in a town such as ours. If this type of development continues, Redlands as we know it will cease to exist, and we’ll be living in a replica of Orange County or Rancho Cucamonga. We have been told at City Council meetings that projects like this one are important to attract young professionals to the area. My husband and I are both physicians in our 40s, so I believe we fit the description of who the City is trying to attract, and we were specifically attracted to Redlands as a place to settle and raise our children over places like Rancho Cucamonga because of the quiet, charming nature of this town. I grew up in Orange County, and I live in Redlands for a reason. If Redlands continues this direction of development, my family will consider moving elsewhere.

10

In summary, I beg of you to set aside the interests of the developer and concentrate on the good of our community and on preserving the character of Redlands. I think three-story apartment buildings at this site are highly inappropriate, but if they must be built, then either the City or the developer should commit to specific devices for traffic mitigation and the protection of pedestrians and school children from cars and emissions along Orange Avenue. There should be requirements for the developer to be responsible about preserving the Morey Arroyo, and requirements for them to either preserve the large trees on the property or to replace the trees that they destroy during development with ones of comparable size. There should be a requirement for some investigation into the Mill Creek Zanja prior to demolition and construction, and if the formation in question on the site does represent the Zanja, a requirement of a guarantee that it will be protected. Finally, the developer should be required to install climate-friendly solar panels and power sources for electric vehicles and to use non-potable or recaptured water for irrigation.

Thank you for your attention and consideration.

Sincerely,

Allie Blackburn, MD
Redlands, California

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Allie Blackburn (BLACKBURN)

Response to BLACKBURN-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis. Please refer to Master Response 5—Citrus Tree Removal for a discussion of the removal of citrus trees on-site.

Response to BLACKBURN-2

As noted in Response to AMEF-3, reference to the “addition of 650 cars” appears to be drawn from the number of the parking spaces required for the proposed project. While somewhat related, the number of parking spaces does not directly equate to the number of trips generated by a development. As noted in Section 4—Project Trip Forecasts of the TIA, the proposed project is forecast to result in approximately 109 net new trips leaving the project site during the AM peak-hour and 108 net new trips entering the project site during the PM peak-hour as residents generally leave for and return from work. In accordance with standard industry practice and guidelines established by both the San Bernardino County Congestion Management Program and City of Redlands, the project trip generation forecast is based on trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (10th Edition, 2017). The majority of the project trips are forecast to travel to/from the east to Alabama Street (the nearest major arterial providing freeway access) and away from the school. East of Iowa Street, the project is only forecast to contribute approximately 21 to 26 additional trips during the peak-hours.

Please see Response to AMEF-5 regarding project improvements to pedestrian facilities.

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance and Response to MIR-7 regarding project impacts on roadway safety. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, and the construction of sidewalk improvements along Orange Avenue and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact with implementation of MM TRANS-1 through MM TRANS-4. No additional mitigation is warranted or required.

The Air Quality/Greenhouse Gas impact analysis for the project adequately evaluates the significance of project-related traffic emissions in accordance with applicable State, regional, and local thresholds.

Response to BLACKBURN-3

Please refer to Master Response 4—Construction Mitigation regarding construction mitigation.

Please refer to Response to MIR-7 regarding project impacts to roadway safety and closure of Orange Avenue.

*Responses to Written Comments**Response to BLACKBURN-4*

Please refer to Response to MIR-20. Additionally, the project will provide 6-foot-tall decorative metal fencing surrounding the project site.

Response to BLACKBURN-5

See Response to MIR-15. Over 40 percent of the project is open space and landscaping. The project is required to provide landscaping that is consistent with the requirements of the East Valley Corridor Specific Plan. As proposed, the project provides over 500 trees within the project area.

Response to BLACKBURN-6

The City and current Title 24 Standards do not currently require projects to install solar panels, solar batteries, or Energy Vehicle (EV) stations and the installation of such is not required, as the project does not need to reduce emissions to meet SCAQMD air quality emissions thresholds. GHG emissions are also less than significant and meet both the Tier 4 SCAQMD Target Service Population emissions of 4.8 MT CO₂e/year for the year 2020 (project buildout year) and the year 2035 City of Redlands (CAP per capita emissions target. Mitigation is not warranted or required. The comment contains inaccurate references, and the allusion to “650 cars” needs clarification (refer to Response to Blackburn-2). As noted on page 66 of the Recirculated Draft IS/MND, the project is expected to generate 862 new residents based on industry-accepted metrics for calculating population.

Response to BLACKBURN-7

According to City of Redlands ordinances, residential projects must include landscaping equivalent to a minimum of 35percent of the project site. This project incorporates “California Friendly” landscaping on approximately 47.1 percent of the project site, which exceeds the required standards by approximately 12 percent. A variety of trees, shrubs, and other plants will be incorporated into the project landscaped areas to optimize infiltration rates on the project site. These landscaped areas will provide decorative “dry stream beds” and native grass lined bioswales to encourage the resorption of any excess rainwater into the natural groundwater basins. All of the shrub beds will be covered with stone mulches that allow percolation of rainwater into the soils and eliminate any soil erosion. Currently, non-potable water is not available in the project area. However, the project’s landscape irrigation system will be designed such that in the event non-potable water becomes available to this site in the future, the irrigation systems can be configured and connected to the non-potable water source. The entire system would be efficiently designed so that water would be used only when and where it is needed with minimal waste. In addition, pursuant to the stormwater management requirements, a WQMP has been prepared for the proposed project and has been approved by the City of Redlands Municipal Utilities and Engineering Department.

Response to BLACKBURN-8

A widely dispersed scatter of non-native river rocks near the southern project boundary was found during the field inspection, which may have once lined the Mill Creek Zanja but have since been displaced. The conclusion in the Cultural Resources Report, which was included as Appendix C of the Recirculated Draft IS/MND, was that these rocks, in conjunction with the formation of mature domestic trees nearby, lend further evidence that the Zanja used to run along the southern boundary of Assessor’s Parcel Number (APN) 0292-168-22. The exact location of the Zanja at this location, in fact, was quite apparent from historical records and old maps. The legal descriptions of

the parcels around this location, for example, state clearly that the southern boundaries of APN 0292-168-22 and the adjacent parcel to the east, APN 0292-168-07, and the northern boundary of the adjacent parcel to the south, 0292-168-23, run precisely along the former center line of the Zanja. Additionally, at the August 1, 2019, Historic and Scenic Preservation Commission meeting, the project was conditioned to provide additional information regarding the presence of the Mill Creek Zanja. In response, a memorandum was prepared by CRM Tech to provide additional information related to the Zanja. This additional memorandum includes mapping and images of the project area, surroundings, and the features which were likely the former course of the Mill Creek Zanja. The centerline of the Mill Creek Zanja's alignment is described as being the parcel boundary of APN 0292-168-22 (the project's southernmost parcel). A Department of Parks and Recreation Form DPR 523 was included in the supplemental memorandum.

As documented in Appendix C, Cultural Resources Report, of the Recirculated Draft IS/MND, the Zanja was abandoned from its original function after the City of Redlands built the B Contract pipeline along its course in 1926, and the lower reach of the Zanja was subsequently buried, including the segment along the project boundary. The Zanja is now a subsurface archaeological site instead of a built-environment feature. Implementation of MM CUL-1 from the Recirculated Draft IS/MND will ensure that the establishment of a 50-foot buffer along the project's southern edge to avoid disturbance of the Zanja.

Notably, the southern portion of the project nearest the Zanja does not include buildings or other standing structures, nor would any subsurface excavation occur near the southern boundary of the project. The southernmost portion of the project would be a community park with a circular walkway. Landscaping planted in this area would be planted on fill material laid on top of the current ground surface, effectively capping portions of the Mill Creek Zanja within the project area. The supplemental memorandum concludes that the proposed project would not "cause a substantial adverse change in the significance" of this "historical resource" (see Final IS/MND Appendix C).

Response to BLACKBURN-9

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to BLACKBURN-10

With regard to the Morey Arroyo, please refer to Response to MIR-20. Issues related to the Zanja are addressed in Response to BLACKBURN-8.

Additionally, the City and current Title 24 Standards do not currently require projects to install solar panels, solar batteries, or Energy Vehicle (EV) stations and the installation of such is not required, as the project does not need to reduce emissions to meet SCAQMD air quality emissions thresholds. GHG emissions are also less than significant and meet both the Tier 4 SCAQMD Target Service Population emissions of 4.8 MT CO₂e/year for the year 2020 (project buildout year) and the year 2035 City of Redlands CAP per capita emissions target. The project is required to comply with California Green Building code requirements regarding water efficiency and water use for landscape irrigation (Section 4.304.1). Mitigation is not warranted or required.

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From: [Dave and Kate Condon](#)
To: [Sean Reilly](#)
Subject: Public comment re: Lux View Apartment project
Date: Friday, August 30, 2019 9:19:27 PM

August 29, 2019

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration of the Orange Avenue Luxury Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study/Mitigated Negative Declaration.

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My ongoing concerns are as follows:

1. Incomplete list of Schools in Project Vicinity - Table 1, on page 11 of your report, shows 5 schools within 1500 feet of the project. Your report fails to show that just outside of that limit, with access on Orange Ave, at about 2000 feet from the proposed project, is Arrowhead Christian Academy, and just around the corner on Tennessee St, around 2900 feet is Redlands Adventist Academy. Although these schools may not be within 1500 feet, many of those parents and students use Orange Ave during peak hours on weekdays. The impact of this project should not be overlooked as it pertains to those schools either.
2. Incomplete Traffic Impact Analysis - Your study shows the traffic data used was from Nov 2017. And though it states data was gathered while school was in session, I did not see mention of Grove School or MIR drop-off/pick-up patterns or numbers, nor any mention of how many of our students and families use the crosswalk during those peak times. According to Table 1 (p.11) in the report, the Grove School Farm Campus is 106 feet from the proposed project, and MIR and Grove High School are less than a quarter of a mile away. The impact of an additional 650-772 vehicles traveling during peak hours needs to be addressed.
3. Traffic and Safety Concerns - The project plans call for parking for 653 parking spaces, with the ability to increase that number to 772 spaces as needed (p. 23). I have no frame of reference for what this many vehicles looks like, so I did some research of local facilities. It is roughly the equivalent of Loma Linda University Medical Center's new P3 multi-story parking structure on Campus Street (745 spaces), yet your Project Trip Generation analysis (p. 107) predicts that only 138 of these trips would likely occur during morning peak, and 167 during the evening peak. I feel this may be a gross underestimate of morning peak trips, as most of the 653 (potentially 772) vehicles would be traveling to work/school during peak time, many along Orange Ave (the only project access) at the same time as our Grove School and MIR students. The addition of this much vehicular traffic on Orange Ave during

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school drop-off/pick-up times will undoubtedly increase risk for our students, many of whom walk and bike to/from school. I am concerned that I don't see mention of plans to slow traffic, speed bumps, crossing guards, signage and maybe even police visibility during peak times for speed enforcement. How will our city keep our students safe from this increase in traffic? Are you invested in the safety of our children?

4
CONT

4. Construction Concerns - According to this report, City hours of construction are 7:00 am to 6:00 pm. Please consider how this construction will interfere with the education of our kids. By your own report, there are 5 schools in close proximity (plus the 2 mentioned above) to this project. What plans are in place to consider the safety of heavy construction equipment/trucks that close during regular school hours, especially given that many of our students walk/bike to and from school? What consideration is being given to the noise disruption this project will cause during the school day? I would ask that consideration be given to eliminating construction hauling routes around MIR and the Grove School during school hours. I would ask that consideration be given to eliminating construction related street closures during peak drop-off/pick-up, and utility interruptions not happen during school hours.

5

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands students and families.

6

Thank you,

Kate Condon
Redlands resident
Grove School parent

Kate Condon (CONDON)

Response to CONDON-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis. The City notes that a Recirculated Draft IS/MND was prepared and circulated for the project in accordance with CEQA requirements.

Response to CONDON-2

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to CONDON-3

Please refer to Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes.

Please refer to Response to MIR-44 regarding school drop off and pick up times.

Please refer to Response to Blackburn-2 regarding the number of project trips generated and Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance.

Response to CONDON-4

Please see Response to Blackburn-2 regarding the number of project trips generated.

Please see Response to AMEF-5 regarding project improvements to pedestrian facilities and Response to MIR-7 regarding project impacts to roadway safety.

Response to CONDON-5

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations and ensure applicable roadway safety standards are provided.

Response to CONDON-6

Please refer to Master Response 3—Traffic and Safety and Master Response 7—Request Not to Approve.

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From: [Pamela J Ford](#)
To: sreilly@cityofredlands.org
Subject: LuxView Apartment Development Public Comment
Date: Friday, August 30, 2019 12:28:26 PM

Dear Sean Reilly,

I am writing to encourage the city to wait for the corrected information about the Grove School, current traffic patterns, and the addition of traffic from new warehouses and the proposed new apartment before it approves the development. Please be sure the city addresses the community concerns previously expressed.

1

Our youngsters attended the two affected schools. We still participate in activities on both campuses and in Heritage Park. We support the idea of development in the region and especially favor housing over retail or over more warehouses. So We want this to be resolved appropriately.

2

Please get the correct traffic information, including start and end times for the two schools as well as their pick-up and drop-off traffic patterns.

3

Please be certain that the best strategies for maintaining student safety are in place. Students walk between campuses on a regular basis so crosswalks, curbs, and any necessary lights should be in place before construction begins on the structures.

4

The process of building always takes longer than expected, and involves a zillion deliveries of equipment and supplies. These deliveries and removals should not be allowed to affect the schools' operations. If there are scheduled power outages, they should not interrupt school hours because 1) that's just rude on the part of the builder, but 2) that affects whether students are getting the education that our public dollars are paying for (ADA) and that parent dollars pay for at MIR.

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If there are any tree removals, we expect the city will require the developer to offset the loss of the trees in the manner indicated by the existing General Plan.

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Thank you so much for your attention to these matters.

Sincerely,

Pamela Ford and Kenneth Alford
1049 W Fern Ave
Redlands, CA 92373
909-792-0942

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Pamela Ford & Kenneth Alford (FORD)

Response to FORD-1

Please see Response to AMEF-4 regarding school traffic patterns, which were accounted for in the existing traffic volumes, and Response to AMEF-5 regarding the inclusion of other completed developments since the existing traffic counts were collected within the existing TIA.

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance. Please also see Master Response 6-Previous Comments.

Response to FORD-2

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to FORD-3

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

Response to FORD-4

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations and ensure applicable roadway safety standards are provided.

Response to FORD-5

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to FORD-6

The project is required to provide landscaping that is consistent with the requirements of the EVCSP. As proposed, the project provides over 500 trees within the project area and meets the City's requirements for landscaping.

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From: [Russ Harris](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 2:39:49 PM

Dear Mr. Reilly,

I am aware the City of Redlands is in the process of reviewing a proposed housing development to be built on both sides of Orange Ave. between Alabama and Iowa streets. This project, called the "LuxViewApartments," will comprise 328 rental units and related parking spaces. This email serves as my opposition of this development as it is my determination the project will negatively impact school operations for both Montessori in Redlands (MIR) and the Grove School. In addition, I am in opposition of the current traffic study which I have also determined will negatively impact both schools and the surrounding neighborhoods.

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Respectfully,

Russ Harris

1315 Alessandro Road

Redlands, CA.

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Russ Harris (HARRIS)

Response to HARRIS-1

Please refer to Master Response 1–General Opposition.

Response to HARRIS-2

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance and Response to MIR-7 regarding project impacts to roadway safety. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, and the construction of sidewalk improvements along Orange Avenue and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact with implementation of MM TRANS-1 through MM TRANS-4. No additional mitigation is warranted or required.

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Comments presented at City of Redlands Historic and Scenic Preservation Commission (HSPC) meeting on August 1, 2019 at City of Redlands City Hall, 25 Cajon Street, Redlands, CA 92373.

HSPC requests that this is received as a formal submittal commenting on the Recirculated Draft IS/MND "Orange Avenue Luxury Apartments Project, City of Redlands, San Bernardino County, California, State Clearing House Number 2019069016", and that they are included in the Final Initial Study with responses.

The Initial Study and supporting documentation for cultural studies gives inadequate review of the Site SBR 8092H (Mill Creek Zanja):

1. There is no map characterizing the project footprint vs. the parcel boundaries, and there is no map showing the study area, Area of Direct Impact (ADI), or Area of Potential Effects (APE). This gives little foundation for analysis of the project's potential to cause any adverse change on historic resources.

1

A study area map should be prepared to show the project footprint including any areas that may result from indirect impacts.

2. The Mill Creek Zanja (Site SBR 8092H) segment identified during the pedestrian survey is not identified on any map in the cultural studies or in the Initial Study. The only description of its location is in the vague statement that it is near the southern project boundary.

2

The Zanja segment identified, as well as any other resources identified during the study, should be included in the study area map. If the map scale is such that detail of the resources is not clear, a separate map should be prepared.

3. A Department of Parks and Recreation Form DPR 523 needs to be prepared to record the findings of the Mill Creek Zanja during the pedestrian survey.

3

4. From Mitigation Measure MM CUL-1: "**A 50-foot buffer shall be established** along the southern boundary of the additional project areas, to be landscaped in the future but strictly avoided during construction."

4

The "buffer" should be maintained with protective fencing for the duration of the project to ensure protection of the resource.

5. From page 12 of the IS/proposed MND: "The **project would include** 346,064 square feet of landscaping area, plus 19,156 square feet of landscaping area within parking areas." From Mitigation Measure MM CUL-1: "A 50-foot buffer shall be established along the southern boundary of the additional project areas, **to be landscaped in the future** but strictly avoided during construction. The linear depression and stone alignment shall be left undisturbed. If any

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disturbances to these features become necessary, a systematic archaeological testing program shall be required to ascertain the nature, extent, and condition of what remains of the Zanja at this location, both above and below the ground surface.”

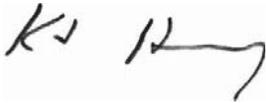
Landscaping is part of this project and the measures in the Initial Study should provide for its potential to impact environmental resources. You can't just “deal with it” later. Landscaping is very much a ground-disturbing activity and in this setting can very likely cause adverse change to the Zanja. Measure MM CUL-1 and the other measures do not adequately protect resources during landscaping activities. The Mill Creek Zanja segment should be recorded and evaluated so that protective measures can be adequately prepared and included in the Final Initial Study.

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CONT

6. Measure MM CUL-3 states that “The monitor shall be present during all ground-disturbing activities...” then later, “b. A rotating or simultaneous monitoring schedule based on the scope of work during all ground related activities, including but not limited to, all site preparation/construction/demolition based activities, testing and data recovery on the project site. The monitoring plan shall include scheduling, safety requirements, duties, scope of work, and a discussion of the monitor’s authority to stop and redirect grading activities.”

6

Removing the first sentence from item b would make the direction clearer.



Kurt Heidelberg
Chairman, Redlands Historic and Scenic Preservation Commission

8/1/19

Kurt Heidelberg (HEIDELBERG)

Response to HEIDELBERG-1

Refer to Response to Blackburn-8. At the August 1, 2019, Historic and Scenic Preservation Commission meeting, the project was conditioned to provide additional information regarding the presence of the Mill Creek Zanja. A memorandum was prepared by CRM Tech to provide additional information related to the Zanja and to respond to public (and Mr. Heidelberg's) comments. This memorandum is provided in Appendix I, Section 4, Errata, of this Final IS/MND. The responses focus on three main issues: (1) the absence of an area of indirect effects for the project; (2) the precise location of the Mill Creek Zanja in relation to the proposed project; and (3) the potential impact to the Mill Creek Zanja. The memorandum includes mapping and images of the project area, surroundings and the features which were likely the former course of the Mill Creek Zanja. The centerline of the Mill Creek Zanja's alignment is described as being the parcel boundary of APN 0292-168-22 (the project's southernmost parcel). A Department of Parks and Recreation Form DPR 523 was included in the memorandum. The southern portion of the project nearest the Zanja does not include buildings or other standing structures nor would any subsurface excavation occur near the southern boundary of the project. The southernmost portion of the project would be used as a community park with a circular walkway. Landscaping planted in this area would be planted on fill material laid on top of the current ground surface effectively capping portions of the Mill Creek Zanja within the project area. The memorandum concludes that the proposed project would not "cause a substantial adverse change in the significance" of this "historical resource." Therefore, based on the expert analysis and all available evidence in the record, there are no potentially significant impacts associated with the project as it relates to the Mill Creek Zanja.

Response to HEIDELBERG-2

Please refer to Response to Heidelberg-1.

Response to HEIDELBERG-3

Please refer to Response to Heidelberg-1.

Response to HEIDELBERG-4

Please see the response to Heidelberg-1.

Response to HEIDELBERG-5

Please refer to Response to Heidelberg-1.

Response to HEIDELBERG-6

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon St, Suite 20
Redlands, CA 92373

August 30, 2019

Dear Mr Reilly,

I am writing you in concern over the proposed construction of the LuxView apartment development between Iowa and Alabama streets on Orange avenue and how it may negatively affect both The Grove and The Farm Campuses in relationship to their location to this proposed development.

I have been a native to Redlands for more than 45 years. Both my children have been brought up within the Redlands School District, One currently attending Cope Middle School and the other one attending Grove High School as a tenth grader. Our Family attended the first public meeting on the proposed Luxview development on July 24th, where it was apparent that the environmental impact DID NOT include the Grove or the proposed 700 ADDITIONAL DRIVERS added to the already congested and narrow streets if the LuxView development takes place.

Please take into account when considering this proposed development, that the reason many of the families chose The Farm and Grove campuses for our kids to go was based on how OPEN these campuses are. Both Farm and Grove students work together as a community walking between campuses on a regular basis on the streets which will be affected by additional traffic if the LuxView apartments are approved. Also of concern is the general appearance and esthetics of The Farm and Grove's location in relationship to The LuxView apartments. We have slowly been encroached upon by development in the surrounding areas, industrial building and high density living areas ...making our two campuses a smaller microcosm of what's left of a rural Redlands among industrial growth. We all need to think progressively towards how we perceive ourselves as a people and how we connect the past with the future in keeping with our Redlands heritage and strong sense of community.

Sincerely,
Michael Holden

Michael Holden
425 Walnut Ave.
Redlands, Calif.

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Michael Holden (HOLDEN1)

Response to HOLDEN1-1

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes.

Please see Response to Blackburn-2 regarding the number of project trips generated and Response to AMEF-6 regarding the assessment of project impacts relative to City-established thresholds of significance.

Response to HOLDEN1-2

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance.

Response to HOLDEN1-3

Comment noted. Impacts related to aesthetics are discussed in Section 2.1 of the Recirculated Draft IS/MND. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon St, Suite 20
Redlands, CA 92373

August 30, 2019

Dear Mr. Reilly,

I am writing to express my concerns about the proposed Orange Avenue Luxury Apartment Project that is proposed for land near historic groves, the Assistencia, the Barton House, Heritage Park, and most importantly within 100 feet of The Grove School's Farm campus and just one block away from the main Grove School campus and the Montessori in Redlands campus. As a parent of a Grove School student, I am very concerned.

1

It does not appear that a proper analysis of the traffic has occurred. The traffic analysis must include the area during school drop-off and pick-up times and throughout the school day as students cross Orange Ave. mid-block throughout the day. It must include all the areas surrounding the three campuses. It must also take into consideration very recent construction around the area (warehouses near Iowa and housing developments along California). Recent changes have already increased traffic in the area. My son regularly rides his bike to school and this increase in traffic concerns me.

2

At the planning meeting I attended on July 24, planners of this project mentioned that there will be over 700 parking spaces in the new development. The amount of traffic that this will create within feet of the schools and the functioning farm will have a major impact on the quality of the school programs and the safety of all of the students and staff. Major traffic mitigations are going to be necessary. It does not appear that enough considerations have been made in this area.

3

The construction itself will adversely affect traffic, safety, and the quality of the school environment as well. Strict considerations need to be in place to ensure that none of these things are compromised during any construction.

4

I believe that the city needs to look again at the damage being done by this development to the groves and trees that will have to be removed for this project. What is being done to offset this loss? Will the three campuses be the only natural green/open space in the neighborhood?

5

There are many problems with the initial study and the revisions that need to be addressed before anything can go forward. But I believe that the Planning Commission and the City really need to reconsider the entire project. Obviously I do not believe that they have thoroughly considered this project and the impact it will have in this area of Redlands. I cannot imagine anyone who has been on any of the three campuses would believe that this kind of massive project fits this neighborhood. While I know housing needs to be built and many of the large properties in Redlands are undergoing development, there are better ways to develop this particular land so that it does not so negatively impact this area.

6

Another comment made by the planners of this project at the planning meeting in July was that the design of the complex was based on projects near Victoria Gardens and in Irvine. I do not understand how this is a positive thing as Redlands has a unique historical character that neither of those places have. In fact, the Grove School itself is a unique part of Redlands, being one of just a few secondary Montessori based

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secondary schools in the country. The physical environment of the school is central to the educational mission of the school. If this is adversely affected, another unique part of Redland's current character will be lost.

8
CONT

Thank you for reading my concerns. I hope that there will be further discussions about this project. I will be interested to hear them at the public hearing in September.

Sincerely,



Pamela Holden

425 Walnut Ave.
Redlands, CA 92373
909-747-4954

Pamela Holden (HOLDEN2)

Response to HOLDEN2-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to HOLDEN2-2

Please refer to Master Response 2—Traffic Data regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

Please see Response to AMEF-5 regarding other completed developments since the existing traffic counts were collected and roadway improvements along the project frontage, including sidewalk and parkway improvements, which will facilitate local pedestrian mobility near the project.

Response to HOLDEN2-3

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance and Response to MIR-7 regarding project impacts to roadway safety. In accordance with CEQA, the project is not responsible for remediating off-site issues when there is no corresponding project-related significant impact. Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, and the construction of sidewalk improvements along Orange Avenue and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact with implementation of MM TRANS-1 through MM TRANS-4. No additional mitigation is warranted or required.

Response to HOLDEN2-4

Regarding construction traffic control, please refer to Master Response 4—Construction Mitigation. Additionally, the applicant and the contractor will be required to provide plans to the City for review prior to construction.

Response to HOLDEN2-5

Over 40 percent of the project is open space and landscaping. The project is required to provide landscaping that is consistent with the requirements of the EVCSP. As proposed, the project provides over 500 trees within the project area.

Response to HOLDEN2-6

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to HOLDEN2-7

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to HOLDEN2-8

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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Sean Reilly

From: Nancy Holland <njcholland@gmail.com>
Sent: Wednesday, July 31, 2019 7:19 PM
To: Sean Reilly
Subject: Re: Comment on Environmental Documents for the Orange Aenue Luxury Apts - TTM 20244 / CUP 1108

The traffic study does not mention the Grove School with a middle school and farm in the southwest corner fo the intersectoin of Iowa and Orange.
Why not?

Nancy

On Jul 31, 2019, at 5:31 PM, Sean Reilly <sreilly@cityofredlands.org> wrote:

Ms. Holland,
Please see the attached notice and link to the Recirculated Mitigated Negative Declaration.
<https://www.cityofredlands.org/post/environmental-documents>

Sean Reilly

Senior Planner
City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 2
Fax 909.792.8715

From: Nancy Holland [<mailto:njcholland@gmail.com>]
Sent: Monday, July 01, 2019 2:04 PM
To: Sean Reilly
Subject: Comment on Environmental Documents for the Orange Aenue Luxury Apts - TTM 20244 / CUP 1108

Mr. Reilly,

Thank you for considering my comments regarding what I perceive as the incompleteness of the environmental documents.

I searched the initial study, the traffic appendix and the noise appendix. None of these documents mentioned the middle school campus in the Southwest corner of the intersection of Iowa Street and Orange Avenue. It is part of the Grove School, a public charter school. The main office is at 200 Nevada Street. Phone number (909) 798-7831. I am not sure of the current hours.

This campus would be within 500' of the proposed project. Since it was not identified, the noise analysis required for schools within 500' was not performed. Since it was not identified, the traffic analysis did not include analysis of the traffic situation during school closing time or during the Saturday morning Farmers Market held on the campus. Additionally there was probably no consideration of maintaining a safe route to and from school during the construction of the proposed project.

I believe the additional analyses and reports should be completed and the environmental documents amended to include any mitigation or recommendations that result from the analyses.

Thank you.

Nancy Holland
10671 Jasper Avenue
Redlands, CA 92374
(909) 553-2273

<Redlands Orange NOI_FINAL_073119.pdf>

Nancy Holland (HOLLAND1)

Response to HOLLAND1-1

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

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Sean Reilly

From: Nancy Holland <njholland@gmail.com>
Sent: Wednesday, July 31, 2019 7:31 PM
To: Sean Reilly
Subject: Re: Comment on Environmental Documents for the Orange Aenue Luxury Apts - TTM 20244 / CUP 1108

I checked and the noise study and ISMND mention the Grove School and its campus less than 110' from the project site, but the traffic study does not mention it.

The traffic to and from the Grove School and Farm will be impacted during construction and once the apartments are open. Safety precautions are needed during construction and after the apartments are open are needed to prevent conflicts that result in injuries or deaths.

I hope the City monitors the project's implementation of the traffic control plan during construction.

Nancy

On Jul 31, 2019, at 5:31 PM, Sean Reilly <sreilly@cityofredlands.org> wrote:

Ms. Holland,
Please see the attached notice and link to the Recirculated Mitigated Negative Declaration.
<https://www.cityofredlands.org/post/environmental-documents>

Sean Reilly

Senior Planner
City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 2
Fax 909.792.8715

From: Nancy Holland [<mailto:njholland@gmail.com>]
Sent: Monday, July 01, 2019 2:04 PM
To: Sean Reilly
Subject: Comment on Environmental Documents for the Orange Aenue Luxury Apts - TTM 20244 / CUP 1108

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Thank you for considering my comments regarding what I perceive as the incompleteness of the environmental documents.

I searched the initial study, the traffic appendix and the noise appendix. None of these documents mentioned the middle school campus in the Southwest corner of the intersection of Iowa Street and

Orange Avenue. It is part of the Grove School, a public charter school. The main office is at 200 Nevada Street. Phone number (909) 798-7831. I am not sure of the current hours.

This campus would be within 500' of the proposed project. Since it was not identified, the noise analysis required for schools within 500' was not performed. Since it was not identified, the traffic analysis did not include analysis of the traffic situation during school closing time or during the Saturday morning Farmers Market held on the campus. Additionally there was probably no consideration of maintaining a safe route to and from school during the construction of the proposed project.

I believe the additional analyses and reports should be completed and the environmental documents amended to include any mitigation or recommendations that result from the analyses.

Thank you.

Nancy Holland
10671 Jasper Avenue
Redlands, CA 92374
(909) 553-2273

<Redlands Orange NOI_FINAL_073119.pdf>

Nancy Holland (HOLLAND2)

Response to HOLLAND2-1

Please see Response to AMEF-4, which addresses the baseline information used in the traffic impact analysis.

Response to HOLLAND2-2

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations and ensure applicable roadway safety standards are provided.

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From: [Nancy Holland](#)
To: [Sean Reilly](#)
Subject: Orange Avenue Luxury Apartments, 20190696016
Date: Thursday, August 29, 2019 9:35:59 PM

Attn: Sean Reilly, Senior Planner

Mr. Reilly,

After the comments on the previous analysis, I was surprised to see that the traffic analysis included as Appendix H (not as Appendix G as stated in the Initial Study/Mitigated Negative Declaration) still did not mention the Grove School Farm Campus. The Farm Campus is in the northwest corner of the intersection of Iowa and Orange and is within 106 feet of the project site.

But all of the traffic analysis was aimed toward the Montessori in Redlands School at the corner of Nevada and Orange.

This seems like a major oversight to me, especially as:

- a) the Grove School Farm Campus had been pointed out during a previous public review period,
- b) the Initial Study/Mitigated Negative Declaration and noise studies had been changed to address the proximity of the Grove School Farm Campus.

Several pieces of information are missing since there is a school so close to the project.

1. Daily counts (12 - 24 hour) on Iowa, south of Orange and

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on Orange (east and west of Iowa) to identify the peak volume times of the school traffic.

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CONT

2. Turning movement traffic counts at the intersections and driveways near the school during the peak volume times of the school traffic.

3

3. Counts of bicyclists and pedestrians during the peak volume times of the school traffic. This is particularly important for as the report implies that people will use public transit to get within 0.5 miles of the area and then walk or bike the rest of the way.

4

4. Study should have at least mentioned the Farmer's Market on Saturday morning at the Grove School Farm Campus.

5

Please if you have any questions about my concerns.

Nancy J. Holland, PE
(909) 553-2273

Nancy Holland (HOLLAND3)

Response to HOLLAND3-1

The Table of Contents for the Recirculated Draft IS/MND states that the TIA is included as Appendix H. References to the TIA as Appendix G within the body of the Recirculated Draft IS/MND are typos and are corrected in the Errata section of this Final IS/MND. Please see Response to AMEF-4 regarding the baseline traffic analysis and the appropriate inclusion of existing school traffic in the TIA. Please refer to Response to MIR-7 regarding project impacts to roadway safety. The project is forecast to add a relatively small amount of trips along this segment of Orange Avenue (21 trips during the AM peak-hour, or approximately one trip every 3 minutes). Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, and the construction of sidewalk improvements along Orange Avenue and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact in this area as documented in the TIA and Recirculated Draft IS/MND. There is no need to close Orange Avenue as a result of the proposed project. Furthermore, closing Orange Avenue would conflict with the City's General Plan. No additional mitigation is warranted or required.

Please see Response to AMEF-5 regarding roadway improvements along the project frontage, including sidewalk and parkway improvements, which will facilitate local pedestrian mobility near the project.

Response to HOLLAND3-2

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

Response to HOLLAND3-3

Please see Response to MIR-44 regarding school drop off and pick up times. The general purpose of the performance standards established by the City of Redlands is to maintain an acceptable level of mobility throughout the City. The study intersections were selected based on key intersections, typically defined as intersections of two collector or higher classification roadways per the City of Redlands General Plan, at which the project is forecast to contribute a substantial number of trips.

Furthermore, as noted in Response to MIR-7, the project is forecast to add a relatively small amount of trips along this segment of Orange Avenue (21 trips during the AM peak-hour, or approximately one trip every 3 minutes). Based on the Level of Service analysis, relatively low number of project-generated trips forecast to travel along Orange Avenue past the schools east of Iowa Street, sidewalk improvements along Orange Avenue, and a new crosswalk at Orange Avenue/Iowa Street, the project will not result in a significant impact in this area as documented in the TIA.

Response to HOLLAND3-4

Standard City of Redlands policy does not require bicycle and pedestrian counts. Please see Response to AMEF-5 regarding analysis parameters for pedestrians and project frontage improvements that will facilitate pedestrian mobility.

Response to HOLLAND3-5

Please see Response to MIR-44 regarding the analysis of weekday AM and PM peak-hours in accordance with policy established by both the San Bernardino County Congestion Management Program and the City of Redlands. Based on these policies and standard impact analysis practices, mentioning the Farmer's Market by name is not necessary for an accurate project description and would not alter the findings of significance or the related mitigation measures.

From: [Mike Larrance](#)
To: [Sean Reilly](#)
Subject: Proposed Luxview Apartment Development - Draft ISMND
Date: Saturday, August 31, 2019 4:00:34 PM

Dear Mr. Reilly,

As a Grove school parent, I'd like to register my view that the Initial Study/ Mitigated Neg Dec does not sufficiently address cumulative impact and safety issues associated with the proposed amendment to the EVC Specific Plan and the Luxview project itself. Therefore I urge the city to require an EIR that fully addresses these issues, and that the Planning Commission decline to finalize the recirculated Draft ISMND accordingly.

1

My principal concerns are as follows:

—Safety resulting from increased density and rush hour traffic along local routes that host numerous schools. The traffic study does not sufficiently address the nature of traffic during rush hour when parents line up out into the streets to drop off and pick up their children. Also, the study does not mention Arrowhead Christian Academy two blocks to the east of the project on Orange (or Redlands Adventist Academy across Tennessee from ACA). Likewise, likely routing of cars to Tennessee (to go to ESRI) and west along Orange to California to avoid traffic and lights on Barton (to go to Loma Linda) are not sufficiently addressed. Timing and routing of the additional traffic matter, and could impact the safety of kids arriving and departing their campuses, and in the case of Grove, walking across the street between campuses during the school day.

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—Cumulative impact that may result from changing to denser zoning of the project site when there are so many adjacent and nearby empty lands that will presumably be similarly developed. The cumulative impact of potential development on all those lands needs to be examined in the context of the Luxview review.

6

I request that you postpone decision-making on this project until these issues can be fully considered in an EIR.

7

Thank you for your consideration,

Mike Larrance
1881 Rossmont Drive
Redlands, California 92374
(909) 538-6417

Sent from my iPhone

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Mike Larrance (LARRANCE)

Response to LARRANCE-1

Please refer to Response to AMEF-1.

Response to LARRANCE-2

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times.

Response to LARRANCE-3

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times. The TIA accounted for and included traffic associated with all schools in operation in November 2017, as discussed in these responses.

Response to LARRANCE-4

Project traffic assignment is based on the trip distribution patterns shown on Figures 13 and 14 of the TIA, which were developed in coordination with City of Redlands staff and review of existing volume data, surrounding land uses, and the local and regional roadways in the project vicinity. Traffic tends to flow to major arterial roadways, such as Alabama Street, which allow for faster speeds as they are intended to prioritize vehicular circulation and connect to other major arterials and/or freeways. Accordingly, the majority of project trips are forecast to travel north or south along Alabama Street. The project is forecast to add fewer than 50 peak hour trips along Orange Avenue towards Tennessee Street or east of Iowa Street; therefore, no further analysis is warranted.

Response to LARRANCE-5

Please see Response to MIR-7 regarding project impacts to roadway safety.

Response to LARRANCE-6

Please see Response to AMEF-5 regarding cumulative developments and area-wide growth.

Response to LARRANCE-7

Please refer to Response to AMEF-1 and Master Response 7.

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From: [Mary Moore](#)
To: sreilly@cityofredlands.org
Subject: LuxView Apts Study and MND
Date: Friday, August 30, 2019 11:17:50 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my serious concerns about the completeness and accuracy of the Initial Study / Mitigated Negative Declaration for the proposed LuxView apartments on Orange Avenue. My daughter just started 7th grade at the Grove School and if the project goes ahead as currently planned, I believe it will negatively impact her and all of the school's students, as well as residents of the area.

1

Firstly, the Traffic Impact Analysis used in the study did not include Grove School families or analyze Grove School drop-off or pick-up times, and it was completed before some new industrial warehouses and housing developments were built nearby. Therefore it cannot properly determine which mitigations should be required, and an updated traffic study is needed.

2

To ensure the safety of Grove students and other pedestrians and bicyclists in the area, a number of traffic mitigations will be needed, including (1) curb extensions and high-visibility crosswalk markings where Iowa and Nevada streets intersect with Orange Ave.; (2) an additional curb extension on the North side of the mid-block crosswalk on Orange Ave. plus warning signs, speed bumps, and roadway lighting; and (3) other traffic calming solutions to minimize the speed and volume of additional vehicles on Orange Ave. (or possibly close Orange to through traffic).

3

To minimize the impact on school families during construction of this project, please do **not** allow (1) construction equipment and hauling routes while students are in school, (2) street closures during peak pick-up and drop-off hours (7-9am and 3-5pm), or (3) interruption of the regular flow of traffic while school is in session. Also, please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

4

As with so many new projects, I am sad to see that a citrus grove and other mature trees will be removed. To reduce the loss of our citrus heritage as well as the benefits trees provide our community, please

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uphold the General Plan and require that the loss of these groves is offset with an equal or greater number of trees in adjacent areas.

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CONT

Lastly, please address community members' ongoing concerns about the impact this development will have on our local environment. Redlands is a wonderful place to live, and we should do everything we can to keep it that way.

6

Please do not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study have been updated to address the above concerns.

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Thank you,

Mary K Moore
1618 Deanna Way
Redlands, CA 92374

Mary K. Moore (MOORE)

Response to MOORE-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to MOORE-2

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times. Please see Response to AMEF-5 regarding other completed developments since the existing traffic counts were collected.

Response to MOORE-3

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance, Response to MIR-7 regarding project impacts to roadway safety, and Response to AMEF-5 regarding project frontage improvements that will facilitate pedestrian mobility.

Response to MOORE-4

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations and ensure applicable roadway safety standards are provided.

Response to MOORE-5

Please refer to Master Response 5—Citrus Tree Removal, for a discussion of the removal of citrus trees on-site.

Response to MOORE-6

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to MOORE-7

Comment noted. Please refer to Master Response 1—General Opposition. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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From: emelieneher@roadrunner.com
To: [Sean Reilly](#)
Subject: Grove School and Montessori In Redlands reply to LuxView Apartments
Date: Saturday, August 31, 2019 5:28:13 PM

To: Sean Reilly, Senior Planner, City of Redlands, CA.

I am the grandmother of 3 grandchildren who have been and currently are attending Montessori In Redlands, and the Grove School (charter school with the Redlands School District, for the past 20 years, and will be for the next 8 years.

1

I also attended the July 24, 2019 meeting of the Planning Division, and was shocked to hear that Grove was excluded from the traffic study. As you know, Grove also includes the Farm as its middle school campus, which is closest to the proposed development. The curriculum includes many outdoor activities, raising animals, agriculture, outdoor theatre, and environmental concerns. Many students and parents spoke to these concerns, and especially the lack of a complete traffic study at that meeting.

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I request respectfully that the city of Redlands does not adapt the mitigated negative declaration until the traffic analysis and initial study are updated to address the community concerns and sufficient mitigation are requested for the safety of Redlands families.

3

Sincerely,
Emelie Neher

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Emelie Neher (NEHER)

Response to NEHER-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to NEHER-2

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes. This comment only refers to environmental concerns generally; specific environmental concerns have been addressed in previous responses.

Response to NEHER-3

Please refer to Master Response 3—Traffic and Safety. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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From: [Trevor Norton](#)
To: [Sean Reilly](#)
Cc: [trevor](#)
Subject: LuxView Apartments Public Comment
Date: Saturday, August 31, 2019 5:24:59 PM

Dear Mr. Reilly,

I am writing to you to express my concerns regarding the Orange Avenue Luxury Apartments - specifically at this time the proposed adoption of a mitigated negative declaration. It is clear that the developer has knowingly attempted to push through a traffic study that purposefully ignores the very existence of a public school that is less than 100 feet away. To have a traffic study that specifically ignores the pick-up and drop-off times is so transparently manipulative that its laughable. Or it would be laughable if children's' lives were not at stake. First of all, the traffic study should be more current than 2017, but even the 2017 data used is a joke because they attempt to ignore time times when literally hundreds of car-trips happen - 5 days a week - 2 times a day. One can only assume that they are trying to hide the truth. Why else would they do this? How than the city counsel, the planners, and the citizens of this town stand for this?

1

There are many other concerns - certainly construction mitigations that take the existence of the schools in to account, and of course the lack of citrus trees. Other developments in the area are now being required to have a few rows of groves remain between the street and the development. Why not this one?

2

As a citizen, it is within my right and the rights of others to demand a response to our already expressed concerns. We have a developer pushing through inaccurate and incomplete information regarding a development which is improperly placed in the city in the first place. This is an enormous, three story complex better suited to the transportation corridor.

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Please, do not adopt the mitigated negative declaration until further traffic analysis is complete and the initial study is updated to address community concerns, and sufficient mitigations are implemented for the safety of Redlands families.

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Sincerely
Trevor Norton

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Trevor Norton (NORTON)

Response to NORTON-1

Please see Response to AMEF-4 regarding school traffic accounted for in the existing traffic volumes and Response to MIR-44 regarding school drop off and pick up times. Please see Response to AMEF-5 regarding other completed developments since the existing traffic counts were collected.

The project-related impacts for both traffic and related air quality/GHG emissions, have been adequately assessed in accordance with standard industry practice and applicable thresholds of significance for the region.

Response to NORTON-2

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations. “Lack of citrus trees” is not a CEQA issue. Specific development projects with the City are required to provide avocado or citrus. These developments are Planned Residential Developments (PRD) as defined by the City of Redlands Municipal Code. PRDs are required to provide a minimum amount of open space which may also require citrus. The proposed project is not a PRD and there is no requirement for the project to provide citrus trees. Please refer to Master Response 5—Citrus Tree Removal for a discussion of the removal of citrus trees on-site.

Response to NORTON-3

This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to NORTON-4

The project site is located on Alabama Street and Orange Avenue, which are identified as a major arterial and collector street in the City of Redlands General Plan, respectively. Both of these streets are intended as transportation corridors.

Response to NORTON-5

Please refer to Master Response 3—Traffic and Safety. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

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From: [Jessica Sculuca](mailto:Jessica.Sculuca@cityofredlands.org)
To: sreilly@cityofredlands.org
Subject: Concerns about LuxView Apartment IS/MND
Date: Thursday, August 29, 2019 8:47:43 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the

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completeness and accuracy of the Recirculated Draft IS/MND.

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CONT

As a parent of Montessori and a resident of Cottage Lane, I get the opportunity to walk my son to school on most days. The experience can be hairy, to say the least. At the intersection of Orange and Iowa, which is a four way stop sign intersection, I have seen numerous drivers not stop all the way in an effort to go before I enter the crosswalk. We repeatedly see people speeding down Orange Avenue. At the lighted crosswalk to enter the Montessori school grounds, I have observed cars honking at other cars that are waiting for children to walk across and I have witnessed cars blowing through the crosswalk when the lights are going off and a handful of children are waiting on the side to cross. It's almost a daily occurrence. With parking spaces for more than 600 cars going into the Lux View plan, I only see the situation getting worse. I am encouraging that the city to please consider speed bumps or the closure of Orange Avenue to through traffic for the safety of our children. In addition, we bought our house because of the beautiful views of the mountains, which will ultimately be taken away from us.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

9

Jessica Sculuca
Parent of Montessori
Resident of Cottage Lane

Jessica Sculuca (SCULUCA)

Response to SCULUCA-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to SCULUCA-2

Please refer to Master Response 2—Traffic Data.

Response to SCULUCA-3

Please refer to Master Response 3—Traffic and Safety.

Response to SCULUCA-4

Please refer to Master Response 4—Construction Mitigation.

Response to SCULUCA-5

Please refer to Master Response 5—Citrus Tree Removal.

Response to SCULUCA-6

Please refer to Master Response 6—Previous Comments.

Response to SCULUCA-7

Comment noted. Please refer to Master Response 3—Traffic and Safety.

Response to SCULUCA-8

Comment noted. Impacts related to aesthetics are discussed in Section 2.1 of the Recirculated Draft IS/MND. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to SCULUCA-9

Please refer to Master Response 7—Request Not to Approve.

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From: christianstaack@gmail.com
To: sreilly@cityofredlands.org
Subject: Concerns about the LuxView Apartments Project
Date: Friday, August 30, 2019 5:50:44 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly and members of the Redlands City Council and Planning Commission,

Since our daughter is attending the Montessori School, I am writing to express my concerns about the planned LuxView Apartments Project on Orange Avenue, between Alabama and Iowa streets and the proposed adoption of a mitigated negative declaration for this project as public comments.

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Neighbors to this property have already expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration, which I am sharing.

The potential construction of this large project involving 7 buildings and 328 apartment units, in a location which has up until now been citrus groves, a nursery, and open space with only three houses on it, represent a huge change in the character of the area, and is going to impact the neighborhood in significant ways.

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That's why it's important to have our ongoing concerns addressed by the city before the project is allowed to move forward.

Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** The school buildings are separated by Orange Avenue, and children at the Farm and Grove Schools must cross Orange Avenue when moving between classes, which will become very dangerous if the traffic increases significantly. This school has been present at this location for over 40 years, and was built there partially because of the isolated nature of the site nestled in citrus groves, so in the past the crossing of the small, lightly used street by the children was never an issue. I therefore request that traffic mitigations for student safety at least include:
 - curb extensions and high-visibility crosswalk markings where Iowa and Nevada

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intersect with Orange Ave.

- Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk.
- Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave.
- Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk.

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However, the easiest solution to this issue would be the closure of Orange Ave to through traffic and to create a Cul de Sac on the Nevada Street side of Orange Street allowing for school drop-off and pickup on the first half of Orange Street. This would eliminate potential liability issues in case of an accident for the city and developer as it seems that a lot of parties expressed concerns regarding children safety.

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- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). Additionally, there should be:

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- noise monitoring to ensure that the construction noise stays within legal limits
- dust mitigation, by regularly watering the dirt and construction debris to prevent dust from blowing all over development.

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- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. Additionally, the developer should be required to use non-potable water for irrigation and use drip irrigation techniques for watering of landscapes.

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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Best regards,

The Staack Family
Redlands, California

Stack Family (STAACK)

Response to STAACK-1

Comment noted. The comment consists of introductory remarks that do not raise any questions about the environmental analysis.

Response to STAACK-2

Comment noted. This comment will be provided to the City decision makers for their review and consideration in determining whether to approve the project.

Response to STAACK-3

Please refer to Master Response 2—Traffic Data.

Response to STAACK-4

Please see Response to MIR-7 regarding project impacts to roadway safety. As discussed in the TIA and Recirculated Draft IS/MND, the proposed project is not expected to significantly increase traffic.

Response to STAACK-5

Please see Response to MIR-7 regarding project impacts to roadway safety and why closure of Orange Avenue is not warranted.

Response to STAACK-6

Please refer to Master Response 4—Construction Mitigation.

Response to STAACK-7

A technical noise study was conducted for the project. Construction noise impacts were found to be less than significant with the implementation of recommended mitigation measures. Additionally, the project is consistent with the City of Redlands General Plan (Interim 2019), which addresses cumulative environmental impacts associated with buildout of the City of Redlands. The City of Redlands General Plan EIR found noise impacts associated with construction to be less than significant with compliance with Section 8.06.120 of the City of Redlands Municipal Code, which allows construction noise that exceeds the City's Noise Ordinance to occur between the between the hours of 7:00 a.m. and 6:00 p.m. on weekdays, including Saturdays, with no activities taking place at any time on Sundays or federal holidays. Project construction will adhere to this code and additional mitigation measures presented in the technical noise study will be implemented. Legal noise limits presented in the City's Noise Ordinance do not apply to the project as long as construction activities are consistent with the above hours of operation. If the City so chooses, they can require that the implementation of those measures are monitored. This requirement can be added as a condition of approval. Regarding dust, project construction will be required to comply with SCAQMD Rule 403 in order to control dust emissions during construction and operation activities. As stated in the AQR, compliance with this rule will be achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Compliance with Rule 403 is required and is enforced.

Responses to Written Comments

Response to STAACK-8

Please refer to Master Response 5—Citrus Tree Removal.

Response to STAACK-9

The project is required to install “dry non-potable” water lines within the public rights-of-way adjacent to the site in anticipation of non-potable service in the area. These lines will be installed “dry” in anticipation of future connection. Currently, non-potable water is not available in the project area. The project is required to install and provide Water efficient landscaping and irrigation in conformance with Section 15.54 of the Redlands Municipal Code.

Response to STAACK-10

Please refer to Master Response 6—Previous Comments.

Response to STAACK-11

Please refer to Master Response 2—Traffic Data.

From: [Robin Stevens](#)
To: [Sean Reilly](#)
Subject: Luxview and Grove
Date: Wednesday, August 28, 2019 1:45:16 PM

Dear Mr. Reilly,

I write to you as a concerned parent of a Grove student as well as a Montessori student. With one child in high school and one in kindergarten, I am extremely worried by this proposed complex.

It seems that moving forward without specifically assessing Grove is somewhat disingenuous, given its proximity to the proposed development and certainty of being impacted by the increase in traffic and distracted drivers around children which will certainly occur with new residents to the immediate area. I would like to strongly encourage you to do a study of these issues, and if this project moves forward, to take every step to increase the safety of student pedestrians and families that commute to school. Without hyperbole, the current plan reads like a guarantee of accidents, and I hope that you will take every measure possible to ensure student safety rather than pretend that constructing apartments right next to a high school full of teenagers who walk, bike, drive and are driven to and from school, as well as walking across the street during school hours simply isn't a factor. I personally drive to and from the school three times a day on a normal school day (twice in the morning for each child, and afternoon pickup) and frequently more often.

I am happy to discuss my concerns further with you. I'm sure you don't want any tragic accidents to occur as a result of oversight of the existing circumstances, and I hope that you take very seriously the concerns of Grove School and its administrators and parents in considering all factors as plans are considered.

Respectfully,
Sara Robin Stevens

Sent from my iPhone

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Sara Robin Stevens (STEVENS)

Response to STEVENS-1

Regarding the school information “not” in analysis, please refer to Response to Ford-3.

Utilizing standard City and CEQA methodologies and analysis, the project does not create an unmitigated significant impact.

The existing school traffic is included in the traffic counts, and further additional analysis is not required.

Regarding pedestrian and bicycle traffic, please refer to Response to AMEF-7.

Regarding additional non-peak traffic counts, please refer to Response to Holden2-1 and Response to Holland3-2.

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From: [Nicol Watanabe](#)
To: sreilly@cityofredlands.org
Date: Thursday, August 29, 2019 11:49:13 AM

Dear Mr. Reilly,

As a Grove School parent, I am writing to express my concern regarding the proposed adoption of a mitigated negative declaration for the Orange Avenue luxury apartments project. It has come to my attention that the traffic study prepared for this project is incomplete, inaccurate and outdated. It does not include Grove School drop-off and pick-up times, nor does it take into account nearby industrial warehouses and housing developments. Use of this flawed data will negatively affect our community, specifically the Grove School farm campus, our outdoor theatre, and the movement of our students between the middle and high school campuses.

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The safety and security of the students at both Grove School campuses, as well as MIR, is paramount therefore traffic and construction mitigations must be responsibly addressed by the developer. Additionally, please consider the integrity of the learning environments of both schools, which construction and increased traffic are sure to compromise.

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Finally, in order to accommodate this project there will be a loss of a citrus grove and other mature trees. The city must ensure that the developer offsets the loss of these trees with an equal or greater number in an adjacent area.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are up to date to address the community concerns, and sufficient mitigations are required to safeguard the families of Redlands.

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Sincerely,

Nicol Watanabe

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Nicol Watanabe (WATANABE)

Response to WATANABE-1

Please see Response to MIR-44 regarding school drop off and pick up times.

Please see Response to AMEF-5 regarding other developments since the existing traffic counts were collected and future area-wide growth.

Please refer to Response to AMEF-5 and AMEF-6 regarding pedestrian safety.

Response to WATANABE-2

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance.

Response to WATANABE-3

Please see Response to MIR-9 regarding implementation of a construction work site traffic control plan in accordance with MM TRANS-2 that would consider school operations and ensure applicable roadway safety standards are provided.

Response to WATANABE-4

Please see Response to AMEF-6 regarding assessment of project impacts relative to City-established thresholds of significance.

Response to WATANABE-5

The project is required to provide landscaping that is consistent with the requirements of the EVCSP. As proposed, the project provides over 500 trees within the project area. Please refer to Master Response 5—Citrus Tree Removal.

Response to WATANABE-6

Please refer to Master Response 2—Traffic Data.

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Brittany Hagen <bhagen@fcs-intl.com>

FW: Concerns about LuxView Apartment IS/MND

1 message

Cecilia So <cso@fcs-intl.com>
To: Brittany Hagen <bhagen@fcs-intl.com>

Wed, Aug 28, 2019 at 3:03 PM

Cecilia So
Project Manager

From: Young Kim [mailto:younghee412@yahoo.com]
Sent: Wednesday, August 28, 2019 1:10 PM
To: Sean Reilly <sreilly@cityofredlands.org>
Subject: Concerns about LuxView Apartment IS/MND

Dear Mr. Reilly,

Please do not file this email as a cookie cutter email written to flood your inbox regarding the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. The inaccuracies in the analysis is unprofessional and alarming and frankly make the city and the developers vulnerable to litigation. There have already been a traffic accident that resulted in a death (near the Iowa and Orange intersection) because of the current congestion, that if there were any in the future, especially with an inaccurate analysis, I would hold the city accountable. Very often, the air quality in Redlands is flagged as "unhealthy air quality for sensitive groups" on most weather apps and weather sites. We love this city and love the Montessori in Redlands/the Grove schools, and this LuxView Apartment development is threatening to harm the air quality and safety of both. I have written to you before and asked that you/the decision makers drive through the area between 8:15-9:15AM and 2:45PM - 4PM to understand the existing congestion let alone adding thousands of more people to it.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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The ongoing concerns and inaccurate analysis, which are below for your reference:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development. 5
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic. 6
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). 7
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. 8
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND. 9

Regards,

Younghee Wong

Younghee Wong (WONG)

Response to WONG-1

This comment does not identify specific inaccuracies; however, commonly perceived inaccuracies have been addressed in other responses.

Based on a search of collision records on the Transportation Injury Mapping System (UC Berkeley), the comment may be referring to a fatal motorcycle collision that occurred on January 25, 2018, at 7:57 a.m. (Case ID 8404925). The collision occurred on Iowa Street, approximately 200 feet north of Barton Road. The motorcycle was travelling north on Iowa Street when a southbound vehicle failed to yield before making a left turn (presumably to access the driveway for the building on the northeast corner of Iowa and Barton) and resulted in fatal head on collision. Motorcycles are well-known to be substantially more likely to be involved in a collision because they are often harder for other drivers to see and/or are unexpected. The January 25, 2018, collision appears to be an isolated case resulting from an error on the part of another driver. Collisions can be the result of many factors aside from an increase in traffic.

As noted in Response to MIR-7, roadway safety monitoring is typically part of a larger City-wide effort coordinated between the engineering and police departments. The City development review and approval process ensures all roadway and traffic improvements are designed to the appropriate roadway and safety standards. Furthermore, the project is forecast to add a relatively small amount of trips along this segment of Iowa Street (14 trips during the AM peak-hour, or approximately one trip every four minutes). Based on the Level of Service analysis and relatively low number of project-generated trips forecast to travel along this segment of Iowa Street, the project itself is not expected to worsen congestion such that it would substantially contribute to future accidents.

Response to WONG-2

With the incorporation of MM AQ-1 and MM AQ-2, as listed on Recirculated Draft IS/MND page 41, Section 2.3, Air Quality, project construction-source emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. For localized emissions, the project will not exceed applicable Localized Significance Thresholds (LSTs) established by the SCAQMD. Project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. Project operational-source emissions would not result in or cause a significant localized air quality impact as discussed in the Operations-Related Local Air Quality Impacts section of this report. Additionally, project-related trips will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO 'hotspots'). SCAQMD air quality (AQ) thresholds are in place to determine whether projects would cause air quality-related impacts. As the project would not exceed the SCAQMD's AQ thresholds for project-related daily emissions, the development of the project would not harm the air quality in Redlands. Impacts are less than significant with incorporation of mitigation.

Response to WONG-3

As noted in Section 3—Existing Conditions of the TIA, existing conditions are documented based on field surveys of the area and measured traffic counts obtained during the AM and PM peak periods. Please see Response to MIR-44 regarding school drop off and pick up times.

Responses to Written Comments

Response to WONG-4

Please refer to Master Response 2—Traffic Data.

Response to WONG-5

Please refer to Master Response 2—Traffic Data.

Response to WONG-6

Please refer to Master Response 3—Traffic and Safety.

Response to WONG-7

Please refer to Master Response 4—Construction Mitigation.

Response to WONG-8

Please refer to Master Response 5—Citrus Tree Removal.

Response to WONG-9

Please refer to Master Response 6—Previous Comments.

Form Letter Comments

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From: [Tawney Schmitt](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Thursday, August 29, 2019 9:30:41 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

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- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). This point is very important to me because a smooth transition to and from school and a quality learning environment during school is a key to my family's quality of life.
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. Please hold developers to a high standard to incorporate green space and tree replacement as it is part of the city's heritage and will again maintain a community

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standard and increase quality of life around the new construction. I am always deeply saddened to see another grove lost to a shallow track housing development or warehouse.

- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Thank you for this consideration,

Tawney Armantrout

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From: [Cecilia Barrett](#)
To: [Sean Reilly](#)
Subject: My concerned parent
Date: Wednesday, August 28, 2019 3:05:37 PM
Attachments: [PattonSharp@dsh.ca.gov_20190828_145632.pdf](#)

Good afternoon Mr. Reilly,

I am a parent of a student at The Grove School and I've attached my letter of concern about the LuxView apartment development.

Thank you for your time,
Cecilia C. Barrett, CHC

BELIEVE in your abilities.

Aug 28, 2019

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Orange Avenue Luxury Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration.

Ongoing concerns include:

1. **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
2. **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
3. **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
4. **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
5. **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Sincerely,
Cecilia Barrett

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From: [Jennifer Brainerd](#)
To: [Sean Reilly](#)
Subject: LuxView Apartment Development - Public Comment
Date: Saturday, August 31, 2019 5:28:44 PM

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Orange Avenue Luxury Apartments Projects. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. As a member of The Grove School community and concerned parent, I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families. Ongoing concerns include:

1. Incomplete and Dated Traffic Impact Analysis: Traffic data used in the study did not include Grove School families or an analyses of Grove School drop-off or pick-up times. I can attest that drop-off and pick-up times have significantly more traffic than at other times of the day and include new teen drivers. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should include the Grove School, as well as analysis of pedestrian and bicycle usage around the development. Many of the middle school and high school students walk or ride bicycles to and from school.
2. Traffic and Safety for Families: Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk marking where Iowa and Nevada intersect with Orange Ave. Students will be safer with an additional curb extension on the North side of the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic where students cross between campuses.
3. Construction Mitigations: The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that the street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
4. Citrus and Tree Removal: A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
5. Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration: The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

Thank you for your consideration.

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-Jennifer Brainerd, Parent at The Grove School

From: [Diva Chan](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 3:02:32 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
[35 Cajon Street, Suite 20](#)
[Redlands, CA 92373](#)

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours ([7-9am](#) and [3-5pm](#)), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours ([7am-6pm](#)).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative**

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Declaration: The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Thank you for your consideration.
Sincerely,
Diva Chan

From: [Lisi](#)
To: sreilly@cityofredlands.org
Subject: Concerns with Lux View apartments
Date: Thursday, August 29, 2019 10:17:14 AM
Attachments: [image1.jpeg](#)

Mr. Reilly,

Attached is a letter I deeply hope you take into account. I encourage you to consider the children and staff at Montessori in Redlands and the Grove school. As a parent of two Grove students, I am extremely concerned with the lack of care the city of Redlands (a City I have lived in and loved for over 35 years) has taken to ensure proper safety measures have been addressed with this new construction plan. You are in charge of planning for the safety and well-being of hundreds of students and others. Please do the right thing.

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Regards,
Elisa Crocker

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Orange Avenue Luxury Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration.

Ongoing concerns include:

1. **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
2. **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
3. **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
4. **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
5. **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Linda McCasland

From: Deng DING <dengding06@gmail.com>
Sent: Wednesday, August 28, 2019 11:10 PM
To: Sean Reilly
Subject: Concerns about LuxView Apartment IS/MND

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

Incomplete and Dated Traffic Impact Analysis: Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.

Traffic and Safety for Families: Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

Construction Mitigations: The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

Citrus and Tree removal: A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.

Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration: The city has not yet responded to several concerns expressed from

parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Best wishes,

Deng Ding

From: [kimberly.gerrard](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 1:37:54 PM

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours ([7-9am](#) and [3-5pm](#)), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours ([7am-6pm](#)).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the

Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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CONT

Kim Gerrard

Sent from my iPhone

From: [Eleanor Haire](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 3:27:38 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the

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completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Eleanor Haire

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From: [Margaretann Harrison](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Thursday, August 29, 2019 2:36:31 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Lux View Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The

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city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Sincerely,
Margaretann Harrison

From: [Jessica A. Hehman](#)
To: [Sean Reilly](#)
Subject: Lux View Apartments Project
Date: Thursday, August 29, 2019 5:05:13 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents

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and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Sincerely,

Jessica A. Hehman-Schniter



City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Orange Avenue Luxury Apartments Project. Many in the community have significant concerns about the completeness and accuracy of the Initial Study / Mitigated Negative Declaration. These concerns include:

1. **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND. 1
2. **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development. 2
3. **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic. 3
4. **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). 4
5. **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. 5

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families. 6

A handwritten signature in blue ink, appearing to read "Michael Howo".

Michael Howo 7

From: [Nichoelk](#)
To: [Sean Reilly](#)
Subject: LuxView Apartments Project
Date: Wednesday, August 28, 2019 2:23:47 PM

- Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration.

My child attends Montessori in Redlands and has been there for four years. MIR is a community that we plan to be apart of for years to come. Learning about the LuxView Apartments Project has brought concerns up regarding the safety of our children at MIR and The Grove schools. I am disappointed to learn that the studies that impact our children's safety and health have not been accurate. Unfortunately it appears that these studies are being used to push this project through without truly working to protect the children at MIR and The Grove. This fact is unacceptable and must be appropriately handled in order to sufficiently protect the children at these schools and the campuses that house them.

MIR and The Grove schools are the only schools in the area that will be impacted by this project. MIR is a private school and is not apart of RUSD, therefore any funds given to RUSD by the developer do not benefit MIR or The Grove. All possible options to support the schools during this immense change and inconvenience need to be considered.

Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling

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routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

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- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Sincerely,

Nichoel Kimmerle

Please be aware that e-mail communications can be intercepted in transmission or misdirected. Please consider communicating any sensitive information by telephone, fax, or mail. The information contained in this message may be privileged and confidential. If you are NOT the intended recipient, please notify the sender immediately with a copy to nichoelk@aol.com and destroy this message.

From: [Pixo Logics](#)
To: [Sean Reilly](#)
Subject: Concerns about the LuxView Apartments Project development and its impact on traffic and environment
Date: Saturday, August 31, 2019 8:53:06 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express our concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development. 1
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic. 2
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). 3
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. 4
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents 5

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and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Concerned residents from the beautiful city of Redlands. Hope the city of Redlands takes the best course of action in favor of public interest.

From: [Mohsen Mabudian](#)
To: sreilly@cityofredlands.org
Subject: LuxView Apartments Project
Date: Friday, August 30, 2019 12:15:09 AM

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
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- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Mohsen Mabudian, MD
Allergy and Immunology
Beaver Medical Group

From: [Newbold, Shanna M.D.](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 1:36:01 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

1

Incomplete and Dated Traffic Impact Analysis: Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.

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Traffic and Safety for Families: Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

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Construction Mitigations: The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

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Citrus and Tree removal: A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.

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Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration: The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

7

Shanna Newbold

From: [Julio Ochoa](#)
To: sreilly@cityofredlands.org
Subject: Redlands Development
Date: Thursday, August 29, 2019 8:52:07 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed before the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the Northside of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provides a crossing guard for the mid-block crosswalk or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. To minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents

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and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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CONT

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Thanks,

Julio Ochoa

From: [Adrienne Ortega](#)
To: [Sean Reilly](#)
Date: Monday, September 02, 2019 12:06:49 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. As a parent of children at both Montessori in Redlands the the Grove School, we have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take

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place outside of school hours (7am-6pm).

- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Thank you.

Randy & Adrienne Ortega

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August 29, 2019

City of Redlands, Planning Division
Attn. Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. As long-term citizens in our beautiful town, we would like to request the cooperation of the City of Redlands in protecting and preserving the space for our future generations.

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Our concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. As a citizen to our town I have noticed that traffic has noticeably increased in the past year or so. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

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- **Construction Mitigations:** The City should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). 4
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas. The mostly green and open MIR surroundings have been ideal for the location of this outstanding school in which generations have been successfully raised. This world-renowned school with its rich history is one of the hallmarks of our city. We really hope that the City will enforce maintaining a green and serene looking area for our kids and the future of our town. 5
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The City has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND. 6

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families. 7

Sincerely yours,



Albert Quan

From: [Mike Redpath](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Wednesday, August 28, 2019 1:24:33 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community

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members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Mike Redpath
1019 W. Fern Ave.
Redlands, CA
92373-5740
(909) 255-6871
mike_redpath@hotmail.com



City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Re: LuxView Apartments Project-non support

Dear Mr. Reilly,

I am writing to express my vehement **nonsupport** of the for the LuxView Apartments Project. There are many problems with the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. These concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
- **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.
- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Respectfully,

Russell and Sandra Rice
Redlands, CA

Stephanie Shepard

From: Cecilia So
Sent: Thursday, September 19, 2019 4:19 PM
To: Stephanie Shepard
Subject: FW: Concerns about LuxView Apartment IS/MND

Can you PDF and bracket this letter? Thanks!

Cecilia So
Project Manager

From: Sean Reilly [mailto:sreilly@cityofredlands.org]
Sent: Thursday, September 19, 2019 4:18 PM
To: Cecilia So <cso@fcs-intl.com>
Subject: FW: Concerns about LuxView Apartment IS/MND

Cecilia,
I have attached late letter below.
This is the one we discussed on the phone.

Sean Reilly

Senior Planner
City of Redlands
35 Cajon St., Ste. 20/P.O. Box 3005
Redlands, CA 92373
Office 909.798.7555 ext. 2
Fax 909.792.8715

From: Jessica Sabo DDS DABDSM FAACP [mailto:sabosmiles@gmail.com]
Sent: Monday, September 16, 2019 12:34 PM
To: Sean Reilly
Subject: Concerns about LuxView Apartment IS/MND

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

Incomplete and Dated Traffic Impact Analysis: Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.

Traffic and Safety for Families: Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

Construction Mitigations: The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

Citrus and Tree removal: A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.

Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration: The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

--
Jessica Wagner Sabo DDS INC
Jessica Sabo DDS, DABDSM, FAACP
701 Highland Springs Ave #12
Beaumont, CA 92223
hsdentalcare.com tmjandsleepapnea.com babylaser.com



Brittany Hagen <bhagen@fcs-intl.com>

FW: Concerns about LuxView Apartment IS/MND

1 message

Cecilia So <cso@fcs-intl.com>
To: Brittany Hagen <bhagen@fcs-intl.com>

Wed, Aug 28, 2019 at 3:03 PM

Cecilia So
Project Manager

From: Alexandra Schreur [mailto:alexandraschreur@gmail.com]
Sent: Wednesday, August 28, 2019 1:10 PM
To: Sean Reilly <sreilly@cityofredlands.org>
Subject: Concerns about LuxView Apartment IS/MND

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND. 6

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families. 7

Sincerely,

Alexandra Schreur

(909)963-9734



Brittany Hagen <bhagen@fcs-intl.com>

FW: Concerns about LuxView Apartment IS/MND

1 message

Cecilia So <cso@fcs-intl.com>
To: Brittany Hagen <bhagen@fcs-intl.com>

Wed, Aug 28, 2019 at 3:03 PM

Cecilia So
Project Manager

From: Christopher Schreur [mailto:dr.schreur@gmail.com]
Sent: Wednesday, August 28, 2019 1:11 PM
To: Sean Reilly <sreilly@cityofredlands.org>
Subject: Concerns about LuxView Apartment IS/MND

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm). 4
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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND. 6

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families. 7

Respectfully,

Christopher Schreur, M.D.

From: [Jodi Silsbee](#)
To: sreilly@cityofredlands.org
Subject: Concerns about LuxView Apartment IS/MND
Date: Friday, August 30, 2019 12:19:51 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
[35 Cajon Street, Suite 20](#)
[Redlands, CA 92373](#)

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours ([7-9am](#) and [3-5pm](#)), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours ([7am-6pm](#)).
- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Thanks,
Jodi Silsbee

From: [Ichen Velasco](#)
To: [Sean Reilly](#)
Subject: Concerns about LuxView Apartment IS/MND
Date: Monday, September 02, 2019 5:18:24 PM

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

Sincerely,

Ichen Le

951-552-3099



Brittany Hagen <bhagen@fcs-intl.com>

FW: Concerns Regarding the LuxView Apartments Project

Cecilia So <cso@fcs-intl.com>
To: Brittany Hagen <bhagen@fcs-intl.com>

Wed, Aug 28, 2019 at 2:53 PM

Hi Brittany,

Please save this to the project folder.

Cecilia So
Project Manager

From: Sean Reilly [mailto:sreilly@cityofredlands.org]
Sent: Wednesday, August 28, 2019 11:43 AM
To: Kerri Tuttle <ktuttle@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>
Subject: FW: Concerns Regarding the LuxView Apartments Project

Kerri and Cecilia,

Please see the attached comment letter on the Luxview project.

-Sean Reilly

From: Lacy&Nathan Walls [mailto:coupleofwalls@gmail.com]
Sent: Wednesday, August 28, 2019 11:33 AM
To: Sean Reilly
Subject: Concerns Regarding the LuxView Apartments Project

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
[35 Cajon Street, Suite 20](#)
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.
- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

I oppose this project as presented.

Thank you for the work that you do and support for our community.

Lacy Walls



Brittany Hagen <bhagen@fcs-intl.com>

FW: Concerns about LuxView Apartment IS/MND

Cecilia So <cso@fcs-intl.com>
To: Brittany Hagen <bhagen@fcs-intl.com>

Wed, Aug 28, 2019 at 2:56 PM

Please save this to the project folder also. Thanks!

Cecilia So
Project Manager

From: Sean Reilly [mailto:sreilly@cityofredlands.org]
Sent: Wednesday, August 28, 2019 1:08 PM
To: Kerri Tuttle <ktuttle@fcs-intl.com>; Cecilia So <cso@fcs-intl.com>
Subject: FW: Concerns about LuxView Apartment IS/MND

Kerri and Cecilia,

I believe that this is the same letter as one of the previous emails.

It is a different sender though.

Sean Reilly

Senior Planner

City of Redlands

[35 Cajon St., Ste. 20](#)/P.O. Box 3005

Redlands, CA 92373

Office 909.798.7555 ext. 2

Fax 909.792.8715

From: Stephanie Wertman [mailto:sgil8365@gmail.com]
Sent: Wednesday, August 28, 2019 12:58 PM
To: Sean Reilly
Subject: Concerns about LuxView Apartment IS/MND

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Respectfully,

Bradley & Stephanie Wertman

(909) 262-4343 / (909) 915-4335

From: teresa@cencomfut.com
To: [Sean Reilly](#)
Subject: LuxView Apartments Project
Date: Wednesday, August 28, 2019 1:21:34 PM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly:

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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CONT
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Thank you,

Teresa K. Wickstrom
teresa@cencomfut.com

From: [Melanie Wong Randall](#)
To: sreilly@cityofredlands.org
Subject: Concerns about LuxView Apartment IS/MND
Date: Friday, August 30, 2019 9:00:16 AM

City of Redlands, Planning Division
Attn: Sean Reilly, Senior Planner
35 Cajon Street, Suite 20
Redlands, CA 92373

Dear Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the LuxView Apartments Project. Neighbors to this property have expressed ongoing concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

- **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.
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- **Concerns about inaccuracies in the Initial Study / Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents

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CONT

I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Melanie Wong Randall, MD
melanie.w.randall@gmail.com
mrandall@llu.edu

Assistant Professor of Emergency Medicine, Loma Linda University Medical Center
Associate Medical Director, Pediatric Emergency Medicine, Loma Linda University Health -
Murrieta

From: [STACIE ZIEGLER](#)
To: sreilly@cityofredlands.org
Subject: Orange Luxury Lease Project
Date: Thursday, August 29, 2019 8:06:55 AM

Mr. Reilly,

I am writing to express my concerns about the proposed adoption of a mitigated negative declaration for the Orange Avenue Luxury Apartments Project. Neighbors to this property have expressed on-going concerns about the accuracy and completeness of the Initial Study / Mitigated Negative Declaration. Ongoing concerns include:

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1. **Incomplete and Dated Traffic Impact Analysis:** Traffic data used in the Study did not include Grove School families or an analysis of Grove School drop-off or pick-up times. The data used in the study came from a 2017 report, which was completed prior to the addition of nearby industrial warehouses and housing developments. An updated Traffic Impact Analysis should be completed to establish what mitigations should be required. The updated study should include the Grove School as well as analysis of pedestrian and bicycle usage around the development.

2

2. **Traffic and Safety for Families:** Requested traffic mitigations for student safety include curb extensions and high-visibility crosswalk markings where Iowa and Nevada intersect with Orange Ave. Students crossing will be safer with an additional curb extension on the North side of the mid-block crosswalk on Orange Ave as well as warning signs, speed bumps, and roadway lighting around the mid-block crosswalk. Any additional traffic calming practices will help minimize the speed and volume of additional vehicles on Orange Ave. Other safety solutions could include a requirement that the developer provide a crossing guard for the mid-block crosswalk, or the closure of Orange Ave to through traffic.

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3. **Construction Mitigations:** The city should not allow construction equipment and hauling routes around Montessori in Redlands and the Grove School while students are in school. In order to minimize the impact on families, please require that street closures not occur during peak pick-up and drop-off hours (7-9am and 3-5pm), and that regular flow of traffic is not interrupted while school is in session. Please require that any utility service shutdowns for construction take place outside of school hours (7am-6pm).

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4. **Citrus and Tree removal:** A citrus grove and other mature trees will be removed to accommodate the project. I hope that the city will uphold the General Plan and require the developer to offset the loss of these groves with an equal or greater number of trees in the adjacent areas.

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5: **Concerns about inaccuracies in the Initial Study/ Mitigated Negative Declaration:** The city has not yet responded to several concerns expressed from parents and community members about the impact on our local environment. I have ongoing concerns about the completeness and accuracy of the Recirculated Draft IS/MND.

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I respectfully request that the city does not adopt the mitigated negative declaration until the Traffic Analysis and Initial Study are updated to address community concerns, and sufficient mitigations are required for the safety of Redlands families.

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Stacie Ziegler
Grove High School Parent
English TOA
Grand Terrace High School
21810 Main Street
Grand Terrace CA 92313

909-580-5006 x4939

[FAQ](#)

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SECTION 4: ERRATA

The following are revisions to the Recirculated Draft IS/MND for the Orange Avenue Luxury Apartments Project.

These revisions represent minor modifications and clarifications to the document and do not change the significance of any of the environmental issue conclusions made within the Recirculated Draft IS/MND. None of the revisions included in this Errata, or elsewhere in the administrative record for this project, represent substantial revisions to the recirculated Draft IS/MND within the definitions of CEQA (14 Cal Code Regs §15073.5(a)). None of the minor modifications identify a new, avoidable significant effect, mitigation measure, or project revision. None of the revisions provide substantial evidence that the mitigation measures and project design features originally included in the Recirculated Draft IS/MND will not reduce potentially significant impacts to a level of insignificance, or demonstrate a need for new mitigation measures or project revisions.

The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

4.1 - Changes in Response to Specific Comments

Section 3.17, Transportation

Page 109, Paragraph 1

In response to comment RKE2-14, the following correction has been made with regard to the incorrect opening year.

To account for trips generated by future development, trips generated by pending or approved other development projects in the County of San Bernardino and the Cities of Redlands and Loma Linda were added to the study area. In addition to other development trips, the Opening Year (2020) ~~and Year 2022~~ projections have been interpolated by utilizing a portion of the growth between existing and San Bernardino Transportation Analysis Model data to project future Horizon Year (2040) traffic volumes.

Page 103, Paragraph 1

In response to comment Holland3-1, the following correction has been made with regard to referencing the wrong appendix for the Traffic Impact Analysis. Appendix G and H were included in the documents available for public review during the public comment period.

The analysis in this section is based on the SD Homes Redlands Apartments Traffic Impact Analysis prepared by Ganddini Group, Inc. on March 4, 2019, revised April 1, 2019. The TIA Report has been included in this document as Appendix ~~G~~H. Traffic counts were performed by Counts Unlimited on Wednesday, November 1, 2017, and are appended to the TIA Report (see Appendix ~~G~~H, Appendix C). November 1, 2017, was Parent Observation day at The Grove School.

Page 103, Paragraph 3

In response to comment Holland3-1, the following correction has been made with regard to referencing the wrong appendix for the Traffic Impact Analysis.

Less than significant impact with mitigation incorporated. In the City of Redlands General Plan 2035, the definition of an intersection deficiency states that peak-hour intersection operations of Level of Service (LOS) C or better are generally acceptable. Therefore, any intersection operating at LOS D to LOS F will be considered deficient. Appendix ~~GH~~, Table 1 shows that the study intersections currently operate within acceptable LOS (C or better) during peak hours for Existing conditions.

Page 133, Paragraph 6

In response to comment Holland3-1, the following correction has been made with regard to referencing the wrong appendix for the Traffic Impact Analysis.

The project fair share is based on the proportion of project peak hour traffic volume contributed to the improvement location relative to the total new peak hour traffic volume for General Plan Buildout (Year 2040) With Project conditions. The project proportional trip contributions have been calculated (as shown in Table 9 of Appendix ~~GH~~) and the project fair share cost estimate is \$3,867.

Appendix B: Biological Resources Assessment Proposed SD Homes Complex—Alabama and Orange Avenue City of Redlands, CA

In response to comment MIR-20, a supplemental memorandum prepared by Lilburn Corporation, dated September 10, 2019, is added to Appendix B.

Appendix C: Cultural Resources Memorandum

In response to HEIDELBERG-1, CRM Tech prepared a memorandum with additional information about Mill Creek Zanja. The memorandum concludes that the proposed project would not cause a substantial adverse change in the significance of the Mill Creek Zanja. The memorandum is included in Appendix C.

Appendix G: Noise Supporting Information

In response to RKE1-10, for informational purposes, the noise report has been updated and is included as Appendix G. The change does not result in new previously unidentified impacts or mitigation measures, but rather clarifies the information provided with additional explanation.

Appendix H: SD Homes Redlands Apartments Traffic Impact Analysis

In response to RKE2-5, the General Plan Buildout (Year 2040) analysis was re-run with adjustments to ensure traffic volumes increased over 2020 forecasts. The analysis confirms that the approach that was suggested by the commenter does not result in any changes to the findings of significance or mitigation. The additional traffic analysis is included in Appendix H, for clarification purposes only.

Page 31, Table 3, Cumulative Other Development Trip Generation

In response to RKE2-4, the following correction is made to the "TOTAL" line of Table 3, Cumulative Other Development Trip Generation.

TOTAL	3,129	2,687	5,620 5,617	3,797	10,557	7,540 7,473	99,934 102,781
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Page 58, Paragraph 8

In response to RKE2-1, the following correction is made regarding the number of by-pass lanes shown on the site plan.

These queue lengths have been calculated based on the trip generation/distribution for the currently proposed development. These queue lengths do assume the presence of a by-pass lane as ~~two~~one lanes are shown on the site plan. The vehicle stacking area is measured from the gate to the edge of sidewalk or flowline of the adjacent street.

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