ATTACHMENT 1

Council Bill R-2005-55 -
Certification of the Final Program Environmental Impact Report

Exhibits:

A. Final Program Environmental Impact Report (Draft EIR, Response to Comments, and Mitigation Monitoring Program)
   - CD

B. Findings of Fact for the Loma Linda General Plan and Related Actions (June 13, 2006)

C. Statement of Overriding Considerations for the Loma Linda General Plan and Related Actions (June 13, 2006)

RESOLUTION NO. _____

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOMA LINDA ADOPTING THE FINDINGS FOR STATEMENTS OF OVERRIDING CONSIDERATION, CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT AND APPROVING THE MITIGATION MONITORING PLAN FOR THE GENERAL PLAN UPDATE PROJECT

SECTION I. RECITALS

WHEREAS, the City Council adopted the General Plan for the City of Loma Linda by Resolution No. 105 on September 11, 1973; and

WHEREAS, in May 2001, the City determined that the General Plan Update Project required the preparation of an Environmental Impact Report due to the size and scope of the project, and the potential environmental effects that could result from implementation of a new General Plan; and

WHEREAS, on May 10, 2001, the City Council approved an Agreement for Professional Services between the City and LSA Associates, Inc. for the preparation of the General Plan and Program Environmental Impact Report (EIR) for the General Plan Update Project; and

WHEREAS, on October 30, 2003, the City released the Notice of Preparation (NOP) of a Program EIR to the public, responsible agencies and other interested persons for their concerns and comments, opened a thirty (30) day public review period from November 3, 2003 to December 3, 2003, and held a public scoping meeting on November 12, 2003 to solicit public comments on the preparation of the Draft EIR; and

WHEREAS, the City's Administrative Review Committee (the "ARC") reviewed the General Plan Update Project and NOP at many meetings from June 2001 through January 2004; and

WHEREAS, on January 27, 2004 the ARC forwarded the General Plan Update Project to the Planning Commission with recommendations for approval; and

WHEREAS, a Draft Program EIR was prepared to address the potential environmental impacts of the General Plan Update Project and the Notice of Completion and Availability (NOC/A) of the DEIR

was released on March 22, 2004 for the commencement of a forty-five (45) day public review period that ended on May 6, 2004, and made available to the public, responsible agencies and other interested persons for their review and comment as required by CEQA; and

WHEREAS, oral and written comments were received on the DEIR during the NOC period and these comments were responded to both orally and in writing as required by CEQA; and

WHEREAS, the Planning Commission conducted noticed public hearings on February 11, 2004, March 3, 2004, March 17, 2004, March 31, 2004, April 7, 2004, April 28, 2004, May 5, 2004, May 19, 2004, June 23, 2004, July 21, 2004, August 4, 2004, August 25, 2004, September 15, 2004, September 29, 2004, October 20, 2004, and November 10, 2004 in order to review the DEIR and General Plan Update Project; and

WHEREAS, the Planning Commission reviewed the proposed Mitigation Monitoring Plan and found it to be in compliance with CEQA; and

WHEREAS, the Planning Commission, after receiving public testimony, recommended to the City Council the preparation and adoption of Findings for Statements of Overriding Consideration, Certification of the Final Program EIR, and approval of the Mitigation Monitoring; and

WHEREAS, the City Council conducted noticed public hearings on October 12, 2004; November 16, 2004; December 7, 2004; December 14, 2004; January 11, 2005; February 1, 2005; February 8, 2005; February 22, 2005; March 8, 2005; April 12, 2005; April 26, 2005; May 17, 2005; June 7, 2005, June 28, 2005; July 26, 2005; August 16, 2005; October 11, 2005, October 25, 2005, November 8, 2005, November 15, 2005, December 6, 2005, January 10, 2006, January 24, 2006, February 28, 2006, April 18, 2006, May 23, 2006, and June 13, 2006 in order to fully review and consider the DEIR, Response to Comments, Mitigation Monitoring Plan, Findings for Statements of Overriding Consideration, Planning Commission Staff Reports, and Planning Commission and staff recommendations.

SECTION II. ENVIRONMENTAL IMPACT REPORT

NOW, THEREFORE BE IT RESOLVED, FOUND AND DETERMINED THAT THE CITY COUNCIL OF THE CITY OF LOMA LINDA HEREBY CERTIFIES:

A. The Program Environmental Impact Report for the General Plan Update Project has been completed in compliance with the California Environmental Quality Act. The FEIR (including the DEIR, Response to Comments, Mitigation Monitoring Plan) and all the evidence and information referenced herein and attached as Exhibit A;

B. The Traffic Impact Analysis (TIA), prepared for the General Plan Update Project as part of the DEIR, is in compliance with the Regional Congestion Management Plan and was approved by the San Bernardino Associated Governments (SANBAG) on May 11, 2004 and certified by the City Council on October 11, 2005 as the City's Master TIA;

C. The FEIR was presented to the City Council who reviewed and considered the information in the FEIR prior to approving the General Plan Update Project, which includes the General Plan text and maps, and Existing Setting Report;

D. The analysis in the FEIR is a worst case analysis in that the residential densities throughout the planning area (City and Sphere of Influence) have been significantly reduced by the City Council during the public hearing process as indicated by the General Plan Build Out Housing Estimate of Total Dwelling Units, which was reduced from 17,231 to 15,052;

E. The FEIR has identified all significant environmental effects of the General Plan Update Project in the 6092.81acre planning area;

F. Although the FEIR identifies certain significant environmental effects that would result if the General Plan Update Project is implemented and future development occurs within the planning area, all significant effects that can feasibly be avoided or mitigated will be avoided or mitigated by the implementation of the mitigation measures as set forth in the

Mitigation Monitoring Plan for the FEIR. The Mitigation Monitoring Plan and all information contained therein is included in the FEIR and incorporated herein by reference;

G. Potential mitigation measures and other project alternatives not incorporated into or adopted as part of the General Plan Update Project, and project area were rejected as infeasible, based on specific economic, social, and/or other considerations as set forth in the Findings for a Statement of Overriding Considerations (referenced herein and attached as Exhibit B, Findings Of Fact For The Loma Linda General Plan And Related Actions, and Exhibit C, Statement Of Overriding Considerations For the Loma Linda General Plan And Related Actions). The Findings for a Statement of Overriding Considerations, and the FEIR, and all the evidence and information contained therein also are on file in the City Clerk's Office;

H. Careful consideration has been given to the significant unavoidable adverse environmental impacts. The significant unavoidable adverse impacts are clearly outweighed by the economic, social, cultural and other benefits of the General Plan Update Project for the planning area, a 6092.81 acre area that includes the City of Loma Linda legal limits and Sphere of Influence, as set forth in the Findings for a Statement of Overriding Considerations.

I. The findings contained in the Findings for a Statement of Overriding Considerations with respect to the significant impacts identified in the FEIR are true and correct, and are based upon substantial evidence in the record, including documents comprising the FEIR.

J. The Final Program Environmental Impact Report (which includes the DEIR, Response to Comments, and Mitigation Monitoring Plan), and the Findings for a Statement of Overriding Considerations reflect the independent review, analysis and judgment of the City of Loma Linda.

SECTION III. CERTIFICATION OF THE ENVIRONMENTAL IMPACT REPORT

NOW, THEREFORE BE IT RESOLVED, FOUND AND DETERMINED by the City Council of City of Loma Linda that the Final Program Environmental Impact Report is certified, the Findings for a Statement of Overriding Consideration are adopted, and the Mitigation Monitoring Plan is approved.

SECTION IV. NOTICE OF DETERMINATION

The Community Development Department, Planning Division is hereby directed to file a Notice of Determination with the County of San Bernardino Clerk of the Board of Supervisors certifying the City's compliance with the California Environmental Quality Act in preparing, adopting, and certifying the Final Program Environmental Impact Report and Findings for a Statement of Overriding Consideration, and approving the Mitigation Monitoring Plan. A copy of the Notice of Determination will be forwarded to the State Clearinghouse.

PASSED, APPROVED AND ADOPTED this 13th day of June 2006 by the following vote:

Ayes:
Noes:
Abstain:
Absent

Floyd Peterson, Mayor

ATTEST:

Pamela Byrnes-O'Camb, City Clerk

Final Program Environmental Impact Report
(Draft EIR, Response to Comment and Mitigation Monitoring Program)

CD

EXHIBIT B: FINDINGS OF FACT FOR THE LOMA LINDA GENERAL PLAN AND RELATED ACTIONS

1.0 INTRODUCTION

Section 15091 of the California Environmental Quality Act (CEQA) Guidelines provides that:

> "No public agency shall approve or carry out a project for which an Environmental Impact Report (EIR) has been completed and which identified one or more significant environmental effects for the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rational for each finding."

The *Loma Linda General Plan Update EIR* (State Clearinghouse #2003101159) identified significant or potential significant environmental impacts which, prior to mitigation, may occur as the result of implementation of the proposed General Plan. Therefore, in accordance with the provisions of the CEQA Guidelines, findings are enumerated in Section 3.0, below.

2.0 BACKGROUND FINDINGS

2.1 Initial Study/Notice of Preparation

To further the basic purposes of CEQA, the environmental review process requires the preparation and public circulation of several documents in addition to the General Plan Program EIR, which includes a Notice of Preparation (NOP) and an Initial Study. An NOP is a brief notice that the Lead Agency (in this case, the City of Loma Linda) plans to prepare an EIR for a project. The purpose of the NOP is to solicit guidance form agencies and individuals as to the scope and content of the environmental information to be included in the EIR. An Initial Study is used to determine if a project may have a significant effect on the environment and is used to determine what type of CEQA environmental documentation is appropriate (i.e., Negative Declaration, Mitigated Negative Declaration, EIR, etc.). CEQA Guidelines Section 15063(a) states "If the lead agency can determine that an EIR will clearly be required for the project, an initial study is not required but may still be desirable." In this case, the City of Loma Linda opted to not prepare an Initial Study since it was clear that the *Loma Linda General Plan Update* would require the preparation of an EIR.

The City of Loma Linda formally initiated the environmental process with circulation of an NOP, which was sent to responsible agencies and interested individuals for a 30-day review period from October 30 to December 3, 2003. The NOP identified that implementation of the proposed *City of Loma Linda General Plan Update* may have potentially significant environmental impacts on aesthetics, air quality, biological resources, cultural resources, geology and soils, hazardous materials, water resources, land use and agriculture resources, flooding hazards, noise, population and housing, public services and utilities (fire protection, police protection, public educational facilities, library services, wastewater, solid waste, energy resources), transportation and circulation, and parks and recreation. The NOP determined that potential impacts associated with the aforementioned issues required further evaluation in the Program EIR for the proposed General Plan. In addition, it was determined that an evaluation of the potential cumulative impacts resulting from implementation of the proposed General Plan be included in the EIR.

Within 30 days after receiving the NOP, responsible agencies are to provide the Lead Agency with specific detail about the scope and content of the environmental information related to the responsible agency's area of statutory responsibility. This information must be included in the draft Program EIR. The NOP and the responses to the NOP from agencies and individuals are included in Appendix A of the Final EIR.

Scoping Process

In compliance with *State CEQA Guidelines*, the City of Loma Linda has taken steps to maximize opportunities for individuals, parties, and agencies to participate in the environmental process. During the preparation of the Draft EIR, various federal, State, regional and local government agencies, and other interested parties were contacted to solicit comments and to inform the public of the proposed General Plan. A public scoping meeting was held to solicit public comment on the General Plan EIR. This meeting was held on November 12, 2003, at the Loma Linda Senior Center, 25571 Barton Road, Loma Linda, California.

2.2 Draft EIR

The Draft EIR was prepared according to CEQA requirements to evaluate the potential environmental impacts associated with the implementation of the proposed *City of Loma Linda General Plan Update*. It also discussed alternatives to the proposed General Plan and proposed mitigation measures that will offset, minimize, or otherwise avoid significant environmental impacts. The EIR was prepared in accordance with CEQA, California Resources Code Section 21000 *et seq.*; the *Guidelines for California Environmental Quality Act* (California Code of Regulations, Title 14, Chapter 3); and the rules, regulations, and procedures for implementing CEQA as adopted by the City of Loma Linda.

The EIR assumes full realization of the proposed General Plan policies through a build out year estimated to be 2030. The objective of the EIR is to inform City of Loma Linda decision-makers, representatives of other affected/responsible agencies, the public, and other interested parties of the potential environmental consequences that may be associated with the approval and implementation of the proposed General Plan. The EIR also examines various alternatives to the proposed General Plan and describes potential impacts relating to a wide variety of environmental issues and methods in which these impacts can be mitigated or avoided.

A Notice of Completion of a Draft Program EIR was filed with the State Clearinghouse along with the required number of copies of the document for circulation to various State agencies. Copies of the Draft Program EIR (Draft EIR) were also mailed directly to local agencies, groups, and individuals for review. The Draft EIR was properly noticed and distributed and was available to the public at the City of Loma Linda Planning Department and the City Library for the required 45-day public review period (March 22 - May 6, 2004).

The primary objective and purpose of the EIR public review process is to obtain comments on the adequacy of the analysis of environmental impacts, the mitigation measures presented, and other analyses contained in the report. Responses were received via mail only. No e-mailed comments were received. A total of nine comment letters was received. Eight of the comment letters received were from State, regional, or local agencies. One comment letter was received from an individual.

2.3 Public Hearing Process

The City's Administrative Review Committee (the "ARC"), which is comprised of staff representatives from the City Administration, Community Development Department, Public Works Department, Fire Department, Information Systems Department, Redevelopment Agency, reviewed the General Plan Update Project and provided input to the Consultant at many meetings from June 2001 through January 2004.

The City and Consultant conducted 18 public workshops from July 2001 through April 2004 to obtain public input on the development of the Land Use Plan and Land Use Element, Circulation Master Plan and Transportation and Circulation Element, California Housing requirements and the Housing Element, and other mandatory and optional general plan elements.

In May 2003, the City made the first Draft General Plan (and all subsequent drafts) available to the public, local jurisdictions and counties, government agencies and other interested persons for their concerns and comments.

The Planning Commission conducted six study sessions of the Draft General Plan Land Use (2.0) and Community Design (3.0) Elements (May 2003) in open public meetings on July 7, 2003, August 6, 2003, August 20, 2003, September 10, 2003, October 1, 2003, and October 7, 2003 in an effort to comprehensively review the document and provide constructive comments to staff and the Consultant.

On January 27, 2004 the ARC forwarded the General Plan Update Project to the Planning Commission with recommendations for approval and adoption. The Planning Commission conducted noticed public hearings on February 11, 2004, March 3, 2004, March 17, 2004, March 31, 2004, April 7, 2004, April 28, 2004, May 5, 2004, May 19, 2004, June 23, 2004, July 21, 2004, August 4, 2004, August 25, 2004, September 15, 2004, September 29, 2004, October 20, 2004, and November 10, 2004 in order to review the Draft General Plan (various editions) and solicit public testimony and comments on the General Plan Update Project and related environmental documents.

The Planning Commission forwarded the bulk of the General Plan Update Project to the City Council on September 15, 2005, and forwarded the Draft Hillside Designation and Special Planning Areas Designations to the City Council on November 10, 2004, with recommendations for approval and adoption of the Draft General Plan (October 2005).

The City Council conducted noticed public hearings on October 12, 2004; November 16, 2004; December 7, 2004; December 14, 2004; January 11, 2005; February 1, 2005; February 8, 2005; February 22, 2005; March 8, 2005; April 12, 2005; April 26, 2005; May 17, 2005; June 7, 2005, June 28, 2005; July 26, 2005; August 16, 2005; October 11, 2005, October 25, 2005, November 8, 2005, November 15, 2005, December 6, 2005, January 10, 2006, January 24, 2006, February 28, 2006, April 18, 2006, May 23, 2006, and June 13, 2006 in order to fully review and consider the General Plan Update Project, which included the Draft General Plan (October 2004), Draft Program EIR, Response to Comments, Mitigation Monitoring Plan, Congestion Management Plan Traffic Impact Analysis (CMP TIA), Findings for Statements of Overriding Consideration, Planning Commission Staff Reports, Planning Commission and staff recommendations, and public testimony.

The City Council directed staff to hold a Joint Workshop of the City's Commissions, Committees, and Boards on March 12, 2006 to consider and evaluate three alternatives for inclusion in the Draft General Plan to address land use, open space, and development in the South Hills.

The results of the March 12, 2006 Workshop were presented to the City Council on April 18, 2006.

The City Council found that many of the proposed residential and mixed-use designations described in the Draft General Plan, Land Use Plan text and shown on the Land Use Plan Map would allow higher densities than usual for Loma Linda and directed that staff revise the plan to reduce densities throughout the 6,092.81 acre planning area that includes the City of Loma Linda legal limits and Sphere of Influence.

2.4 Final EIR

For the purposes of CEQA, and findings herein set forth, the administrative record for the Final EIR consists of the following documents:

- The Draft Program Environmental Impact Report for the Loma Linda General Plan and Technical Appendices (SCH No. 2003101159).
- All comments submitted by agencies or members of the public during the 45-day comment period on the Draft EIR (March 22, 2003 through May 6, 2004) and responses to those comments (June 21, 2004 and June 5, 2006).

The official custodian of the Final EIR is the City of Loma Linda Community Development Department:

City of Loma Linda
Community Development Department
25541 Barton Road
Loma Linda, California 92354
Phone: (909) 799-2830

2.5 Mitigation Monitoring Program

The mitigation monitoring program has been prepared for use in implementing the mitigation measures contained in the Final EIR for the Loma Linda General Plan. The program has been prepared in compliance with State law by the City of Loma Linda.

The California Environmental Quality Act requires adoption of a reporting or monitoring program for those measures placed on a project to mitigate or avoid adverse effects on the environment. (Public Resource Code Section 21081.6) The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation.

The monitoring program contains the following elements:

1. The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.

2. A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.

3. The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations of those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

Section 5.0 of the Final EIR includes the mitigation monitoring program (MMP) prepared for the proposed General Plan. As required by State law (Public Resources Code, Section 21081.6), the MMP has been prepared to ensure compliance with the mitigation measures adopted for the proposed General Plan by the City of Loma Linda. Section 21081.6 of the Public Resources Code requires the adoption of a reporting or monitoring program for those conditions placed on a project to mitigate or avoid adverse effects on the environment.

2.6 Program EIR

The EIR for the Loma Linda General Plan is a "Program EIR," which evaluates the broad-scale impacts of the proposed General Plan. Program EIRs are typically prepared for an agency plan program, or series of actions that can be characterized as one large project, such as a general plan. Tiering refers to the concept of a multilevel approach to preparing environmental documents (*CEQA Guidelines*, Section 15152). A General Plan EIR, addressing the impacts of countywide and local policy decisions, can be thought of as a "first tier" document. It evaluates the large-scale impacts on the environment that can be expected to result from the adoption of the General Plan, but does not necessarily address the site-specific impacts that each of the thousands of individual development projects that will follow and implement the General Plan may have. CEQA requires each of those subsequent development projects be evaluated for their particular site-specific impacts. These site-specific analyses are typically encompassed in second-tier documents, such as Project EIRs, Focused EIRs, or Negative Declarations on individual development projects subject to the General Plan, which typically evaluate the impacts of a single activity undertaken to implement the overall plan.

According to the *CEQA Guidelines* (Section 15168(a)), a State or local agency should prepare a Program EIR, rather than a Project EIR, when the lead agency proposes the following:

- Series of related actions that are linked geographically;
- Logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or
- Individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

In this case, the Program EIR will address the General Plan, which is the proposed project. This EIR considers a series of actions needed to achieve the implementation of the proposed General Plan. Further actions or procedures required to allow implementation of the proposed General Plan include the processing of zoning plans, specific plans, tentative tract maps, site design plans, building permits, and grading permits.

In a Program EIR, CEQA allows the general analysis of broad environmental effects of the program with the acknowledgment that subsequent site-specific environmental review may be required for particular aspects of portions of the program at the time of project implementation.

The Program EIR will serve a valuable purpose as a first-tier environmental analysis. The Program EIR can be incorporated by reference into subsequently prepared environmental documents to address issues, such as cumulative impacts and growth inducing impacts, allowing the subsequent documents to focus on new or site-specific impacts (*CEQA Guidelines*, Section 151168(d)).

Although the legally required contents of a Program EIR are the same as those of a Project EIR, in practice there are considerable differences in level of detail. Program EIRs are typically more

conceptual and abstract. They contain a more general discussion of impacts, alternatives, and mitigation measures. The analysis in this Program EIR is not intended to be site-specific (e.g., determining impacts of projects on the level of service for specific intersections within the City or the impacts of future development projects on specific biological resources), but is a more broad analysis. For example, the biological resources analysis determines the cumulative impacts that will occur to biological resources with the implementation of the General Plan, but is not based on the detailed site-specific surveys that would be expected of subsequent development projects.

Overall, the Program EIR will help determine the need for subsequent environmental documentation. Parameters by which a lead agency can determine the need for additional environmental documentation are contained in the *CEQA Guidelines* (Sections 15160 to 15170).

2.7 Growth Inducement

CEQA requires a discussion of the ways in which the proposed general Plan could be growth inducing. CEQA Guidelines Section 15126.2(d) identifies a project as growth inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees from commercial and industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Examples of development that would indirectly facilitate growth include the installation of new roadways or the construction or expansion of water delivery/treatment facilities.

2.8 Cumulative Impacts

"Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines, § 15355(b)). Section 15130 of the CEQA Guidelines requires that an EIR include a discussion of the potential cumulative impacts of a proposed project. Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines, § 15355). "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable or probable future projects" (CEQA Guidelines, § 15355(b)).

The determination of a project's cumulative effects involves the identification of the following:

- Direct and indirect effects of the proposed action;
- Which resources, ecosystems, and human communities are affected; and
- Whether these effects are cumulatively important.

In a general sense, all impacts on affected resources are cumulative; however, it is the goal of this analysis to narrow the important issues to those of national, regional, or local significance.

An assessment of the cumulative impacts is done qualitatively since it is difficult to predict timing and density of future projects. Most future projects will be the subject of separate environmental studies.

Due to the broad project objectives associated with the implementation of the proposed General Plan, the cumulative analysis presented in this Program EIR does not evaluate the site-specific impacts of individual projects. Project-level analysis will be prepared on a project-by-project basis. The proposed General Plan addresses cumulative growth anticipated to occur in Loma Linda and its General Plan

study area resulting from build out of the proposed General Plan in combination with growth throughout San Bernardino County.

The cumulative impact analysis is based on the anticipated population growth within San Bernardino County. Population growth is a major factor contributing to direct impacts on habitat, housing, job markets, transportation, and development. Additionally, these direct impacts can cause secondary impacts to biological resources, air quality, density, and the overall quality of life within Loma Linda. For this reason, using population growth as a measure to determine cumulative impacts is applicable when examining a large-scale policy action such as a General Plan.

2.9 Significant Irreversible Effects

Implementation of the proposed General Plan would result in the introduction of residential, commercial, industrial, and institutional uses to lands that are currently undeveloped. Substantial development would occur within each of the General Plan mixed-use areas, and lands within the southern portions of the General Plan Study Area. These areas are currently characterized by low-density development and open space. The development of these areas would commit the City to sustaining relatively higher intensity uses within existing developed areas, providing new affordable housing, creation of transit-oriented development, and upgrading and revitalization of underutilized commercial areas. The General Plan would result in the infill of commercial and employment-generating uses, primarily within the mixed-use areas. General Plan implementation would also result in irreversible commitment of land to development within south hills. Development of these currently underutilized areas would provide significant housing and employment opportunities, assisting the City in meeting its future housing need, provide for transit-oriented development, and assist in providing mixed-use development opportunities that are not now available within Loma Linda.

Implementation of the proposed General Plan would result in the development of existing undeveloped and underdeveloped lands. Irreversible environmental changes that would result from such development would include potential degradation of existing biological and cultural resources, loss of aesthetic resources, and the installation of utility and roadway infrastructure. Although it is unlikely that a major hazardous waste release would occur in Loma Linda as a result of implementation of the proposed General Plan, such a release would also constitute a significant irreversible change from an environmental action. The mitigation measures outlined in Chapter 4 of the Draft EIR address these impacts and would reduce such irreversible or nearly irreversible effects to less than significant levels.

Consumption of nonrenewable resources includes nonrenewable energy use. The implementation of proposed General Plan policies contained in the Public Services and Facilities Element would promote development proposals designed to reduce energy consumption. Maintaining sufficient local housing and employment opportunities, along with development of transit-oriented development would result in the conservation of fossil fuels. Therefore, the proposed General Plan would result in the efficient use of nonrenewable energy sources.

2.10 Consistency with Regional Plans

CEQA Guidelines, Section 15125(d), requires that any inconsistencies between a regionally significant project and regional plans be discussed. Southern California Association of Governments (SCAG) regional plans cover the proposed General Plan area and five other counties in Southern California. SCAG's regional plans that require a consistency discussion are the Regional Comprehensive Plan and the Regional Transportation Plan administered by SCAG. These are discussed below. Consistency with applicable Air Quality Management Plans and Air Quality

Attainment Plans, as well as the air quality State Implementation Plan, is discussed in the Draft EIR Section 4.3. Consistency with applicable Habitat Conservation Plans and Natural Community Conservation Plans is discussed in the Draft EIR Section 4.5.

3.0 FINDINGS OF THE LOMA LINDA GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

As a result of the public hearing process (refer to Section 2.3 of these Findings), the General Plan was revised to reduce densities. The Draft EIR evaluated a more intense version of land uses and therefore evaluates the impacts of a worst case scenario. The Draft EIR evaluated the impacts of 17,231 dwelling units and 17,564 jobs. The proposed General Plan is currently proposing 15,052 dwelling units and 26,167 jobs. The Findings reflect this change in land use densities and the resulting dwelling units, population and employment.

3.1 Independent Judgment Finding

The City of Loma Linda retained LSA Associates, Inc., to prepare the EIR. The EIR was prepared under the direction and supervision of the City of Loma Linda Community Development Department, Planning Division with input from other City departments.

Finding: The Final EIR reflects the City's independent judgment. The City has exercised its independent judgment in accordance with Public Resources Code Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in preparation of the Final EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

4.0 ALTERNATIVES

CEQA requires that an EIR evaluate a reasonable range of alternatives to a project, or to the location of the project, which: (1) offer substantial environmental advantages over the project proposal, and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social and technological factors involved. An EIR must only evaluate reasonable alternatives to a project which could feasibly attain most of the project objectives, and evaluate the comparative merits of the alternatives. In all cases, the consideration of alternatives is to be judged against a rule of reason. The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative does not provide substantial advantages over the project and (1) through the imposition of mitigation measures the environmental effects of a project can be reduced to an acceptable level, or (2) there are social economic, technological or other considerations which make the alternative infeasible.

The primary goal of the proposed General Plan is to provide residents of the City with a "blueprint" for future public and private development and for management of the community's natural environment. The proposed General Plan will act as the foundation upon which City leaders will make growth and land use-related decisions. The proposed General Plan expresses the community's goals with respect to human-made and natural environments and sets forth the policies and implementation measures to achieve them. The objective of the proposed General Plan is to achieve the vision of the City residents in conformance with State planning law. Loma Linda's vision is detailed in Chapter 2.0 of the proposed General Plan.

The analysis provided in Chapter 4.0 of the Draft EIR determined that air quality, loss of open space, biological resources, water supply and traffic/circulation impacts would remain significant after implementation of the proposed General Plan polices and mitigation. The alternatives analysis discusses how each alternative would avoid, reduce, or exacerbate the environmental effects of the proposed General Plan. It also discusses other, less than significant, impacts. The analysis of alternatives includes the assumption that all applicable goals, policies or mitigation measures associated with the proposed General Plan would be implemented with the proposed alternatives analyzed in this section. The No Project/Existing General Plan would assume build out under policies and implementing strategies of the current General Plan.

Where a significant impact can be substantially lessened (i.e., mitigated to an "acceptable level") solely by the adoption of the project and mitigation measures, the lead agency, in drafting its findings, has no obligation to consider the feasibility of alternatives with respect to that impact, even if the alternative would mitigate the impact to a greater degree than the proposed project (Public Resources Code, § 21002; *Laurel Hills Homeowners Association, supra*, 83 Cal.App.3d at p. 521; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 691, 730-731; and *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 400-403).

The Draft EIR and the Final EIR examined a reasonable range of alternatives to the project to determine whether any of these alternatives could meet most or all of the project's objectives, while avoiding or substantially lessening its significant, unavoidable impacts (Draft EIR, p. 6-1).

Four alternatives that could potentially meet the project objectives were considered as part of the environmental review for the project:

- **No Project/No Build Alternative.** With this alternative, the proposed General Plan would not be adopted, and no further building would occur within the City of Loma Linda. This prohibition would compel any subsequent development to occur in surrounding cities and unincorporated areas of the County, resulting in any incremental growth in population, housing, or employment opportunities to occur in those areas. The No Project/No Build alternative represents a baseline against which the impacts of the proposed General Plan can be measured.

- **No Project/Existing General Plan Alternative.** Section 15126 (d)(4) of *CEQA Guidelines* states that the "No Project" alternative must discuss existing conditions, as well as what would reasonably be expected to occur in the foreseeable future under current existing plans. It is not reasonable to assume that no further development would take place in the Planning Area. Therefore, this alternative assumes build out under the existing City of Loma Linda General Plan.

- **Reduced Residential Hillside Density Alternative.** Under the Reduced Residential Hillside Density Alternative, the City would continue to grow; however, development in the South Hills would be restricted to Estate Residential (0-1du/ac). Residential densities would be increased in the areas outside the South Hills. Out of the 6,092.18-acre General Plan area, 64 percent is residential, 10 percent mixed-use, 8.7 percent conservation, 6 percent institutional/business park, 4 percent public/quasi-public uses, 4 percent commercial, 3 percent office/medical office, and 0.3 percent industrial. The Mixed-Use-designated area of 542.12 acres was assumed to include 20 percent residential, 10 percent commercial and 70 percent office. The intent of the alternative was to reduce impacts to the South Hills and to concentrate the residents closer to the employment centers. This alternative would also designate hillside areas for conservation.

- **Increased Residential Alternative.** The Increased Residential Alternative would eliminate the mixed-use category and redistribute the 899.04 acres of mixed-use under the proposed General Plan to low-density residential, business park, recreation, and conservation land use designations. Under this alternative 73 percent of the City would be designated for residential development, 10 percent for conservation, 6 percent for institutional/business park, 5 percent for public/quasi-public, 4 percent for commercial, and 2 percent for office/medical office. As with the Reduced Hillside Residential Alternative, this alternative would designate 10 percent of the City as conservation/open space.

4.1 No Project/No Build Alternative

Under No Project/No Build Alternative, public views and view corridors would not be impacted by grading or by the placement of new structures on previously developed land since no new development would occur. In addition, the additional development proposed by the proposed General Plan would not occur; therefore the existing visual quality would not degrade. No Project/No Build Alternative is considered environmentally superior to the proposed General Plan with respect to potential aesthetic impacts. Aesthetic impacts to scenic vistas, scenic resources, loss of open space and visual quality impacts are considered less than significant with this alternative.

Under the No Project/No Build Alternative, future development within the City and Sphere of Influence would not occur. There would, therefore, be no growth in population, housing, or employment opportunities. In the absence of population increases or the employment growth, air pollution emissions resulting from the project would not occur. Under this alternative, all of the air quality impacts associated with the proposed project, which remain significant and unavoidable after mitigation, would not occur.

Under this alternative, no development within the City would occur. There would be no direct disturbance of California gnatcatcher or San Bernardino kangaroo rat critical habitat within the City associated with future development. There would be no direct impact to riparian habitat; Federal or State listed, endangered, or threatened species; species of concern; or fragmentation of habitat or wild life corridors. The proposed General Plan would allow development within the South Hills. This area of the City contains sensitive habitat, and may contain sensitive plants, animals, and/or wildlife corridors. The No Project/No Build Alternative would not allow further development in the southern portion of the City, and, therefore, no direct disturbance of sensitive habitats.

The potential degradation or loss of historic, archaeological, and paleontological resources would not occur with this alternative since new development would not occur, and the urban area would not be expanded. The No Project/No Build Alternative is considered environmentally superior to the proposed General Plan with respect to cultural resources. However, with implementation of the policies and mitigation measures, development under the proposed General Plan is anticipated to result in a less than significant impact to cultural resources.

As no development would occur under this alternative, impacts such as an increase in the number of structures and people potentially exposed to substantial adverse effects associated with the rupture of a known earthquake fault or severe ground shaking would not occur. Build out of the proposed General Plan would result in an increase in both population and new development. Therefore, the No Project/No Build Alternative is considered environmentally superior to the proposed General Plan. However, after compliance with regulations, policies and associated implementation programs, all geologic and seismic impacts associated with the proposed General Plan are considered less than significant.

Under the No Project/No Build Alternative no new development would occur; therefore, there would be no increase in the use, transportation, and disposal of hazardous materials and the potential risk of exposure to these hazards would not increase. Build out of the proposed General Plan would result in an increase in new development, which would lead to an increase in the potential exposure to hazardous materials. Therefore, the No Project/No Build Alternative is considered environmentally superior to the proposed General Plan. After implementation of the proposed General Plan policies in conjunction with compliance with local, State, and Federal regulations hazardous materials impacts associated with both the No Project/No Build Alternative and the proposed General Plan are considered less than significant.

This Alternative would disallow future development within the City and sphere of influence. By prohibiting development within the City, additional growth in population, housing, or employment opportunities beyond those which presently exist would not occur. In the absence of population increases or the growth of employment-generating development, increases to the amount of water required to adequately service the City would not occur. Under this alternative, all local, State, and Federal policies and regulations pertaining to surface water and groundwater resources would remain in effect. Because no development would occur within the City, further alteration to or hydrologic interruption of surface and groundwater resources within City would not occur. Compared to the proposed project, water supply impacts associated with this alternative will be reduced.

By prohibiting development within the City, additional growth in population, housing, or employment opportunities beyond those which presently exist would not occur. In the absence of population increases or the growth of employment-generating development, additional increases in the amount land for development or the conversion of agricultural uses to non-agricultural uses over and above existing conditions would not occur. Under this alternative, all of the land use and agricultural associated with the proposed project would remain less than significant.

Because no development would occur within the City under this alternative, the number of persons or structures exposed to potential flood hazards would not increase. Currently, the City adheres to City, San Bernardino County Flood Control District (SBCFCD), and Federal Emergency Management Agency (FEMA) programs and standards to reduce the significance of potential flood-control hazards. These programs and standards would remain in effect.

The proposed General Plan includes a number of includes policies and mitigation to reduce potential flood-related impacts to a less than significant level. Additionally, a measure prohibiting the unmitigated development of structures within 100-year flood inundation areas has been identified. Because no development will occur, the number and of persons and structures within the City (compared to the proposed General Plan) is reduced under this alternative; therefore, potential flood-hazard impacts under this alternative are similarly reduced.

In the absence of population increases or the employment growth, noise impacts associated with new noise-generating sources or activities or location of new land uses next to existing noise-generating sources would not occur. Under this alternative, no noise impacts would occur.

Under this alternative, development of new residential units within the City of Loma Linda would not occur. Population growth within San Bernardino County would occur in the other cities or the unincorporated areas of the County. Because the development of housing, employment opportunities, or a corresponding population increase would not occur, conditions within the City would be similar to those which currently exist. However, under this alternative, the City would not be able to meet the existing and future housing needs of its residents as determined by SCAG, nor would the City be able to meet future housing obligations to provide a fair share of housing for all economic segments of the

community. This alternative is considered environmentally inferior to the proposed General Plan with regard to population and housing.

By prohibiting development within the City, additional growth in population and of structures would not occur. In the absence of population increases or of new structures, the demand for fire and police services over and above existing conditions would not occur. Under this alternative, fire-related impacts would remain significant as the City currently is in need of second fire station to serve the South Hills area which is located in a Hazardous Fire Area, is distant from the existing headquarters station, and because of the existing increase in calls for service.

Under this alternative, no new development would occur; thus, no new students would be introduced into the school system other than children reaching school age from existing residences within the City of Loma Linda. Development would occur in areas outside the City within the boundaries of both the Redlands Unified School District and the Colton Joint Unified School District which, in compliance with State law, impose school mitigation fees that are collected at the time of development. Thus, while both school districts are operating at, or near capacity, as provided for by Government Code Section 65996(a) and (b) which specifies that the method of mitigating school facilities is to pay the maximum school fees, such fees are deemed to provide full and complete school facilities mitigation. Therefore, with no new development within the City and growth occurring outside of the City, the impacts to schools will be less than significant.

Existing library services are adequate to meet the needs of the community. With no new development and no change in the population, no additional library services would be added under this alternative. Therefore, the impacts to library services will be less than significant.

Under the No Project/No Build Alternative, expansion of or improvement to the existing public services and utilities would not occur. Existing wastewater services within the City are adequate in providing for the community; the City currently utilizes less than half of its assigned allotment for wastewater discharge. Increased demands upon existing wastewater services would not occur with this alternative since future development in the Planning Area would not occur. Therefore, implementation of this alternative with respect to wastewater services is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to wastewater services.

Under the No Project/No Build Alternative, expansion of or improvement to the existing public services and utilities related to solid waste would not occur. Existing solid waste services within the City are adequate in providing for the community. Increased demands upon existing solid waste disposal services would not occur with this alternative since future development in the Planning Area would not occur. Therefore, implementation of this alternative, with respect to solid waste disposal, is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to solid waste services.

Under the No Project/No Build Alternative, expansion of or improvement to the existing public gas and electric utilities would not occur. Existing electricity and natural gas services within the City are adequate in providing for the community. Future development in the Planning Area would not occur, so an increased demand upon existing electricity and natural gas services would not occur with this alternative. Therefore, implementation of this alternative, with respect to electricity and natural gas services, is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to electricity and natural gas services.

Under the No Project/No Build Alternative there will be no additional vehicular traffic on area roadways because no additional construction would be allowed. This alternative would not have a cumulative effect on the freeway mainlines and interchanges. This alternative is considered environmentally superior to the proposed General Plan with regard to traffic generation.

In the absence of population increases, additional increases in the amount of land for recreational purposes over and above existing conditions would not occur. Under this alternative, all of the parks and recreational impacts would remain significant as the City currently does not have adequate parkland for the existing population.

Findings. In rejecting this alternative as infeasible and failing to meet project objectives, the City Council makes the following findings:

- The proposed General Plan provides for a comprehensive and updated plan with policies which are internally consistent and cover the City's entire sphere of influence. The City's sphere of influence could be built under the County of San Bernardino General Plan and zoning irrespective of what the City of Loma Linda desires for its sphere of influence.
- The proposed General Plan incorporates a Housing Program which conforms to State Law and is consistent with the remainder of the General Plan. The No Project/No Build alternative is not in compliance with State Law.
- The proposed General Plan is based on the most recent data available to the City and reflects the current policy of the City Council. The No Project/No Build would not allow the City Council to implement its current policies.
- The No Project/No Build alternative will not substantially reduce any remaining significant impacts associated with the proposed General Plan and will constrain the City's ability to achieve housing and economic objectives.

4.2 No Project/Existing General Plan Alternative

The existing General Plan contains elements which were approved at various times from 1973 to 1993. The existing General Plan encompasses the same Planning Area as the proposed General Plan; however, a large portion of the Planning Area within the City limits has no land use designation and only a portion of the land area within the sphere of influence has a land use designation in the existing General Plan. Therefore, the analysis of this alternative assumed no development will occur on land where land use is not designated. Land Uses designated under the existing General Plan are provided in the Draft EIR Table 6.A.

Implementation of this alternative assumes that ultimate build out of the existing General Plan would occur. The existing General Plan anticipates that 43 percent of City will be built out with residential land uses, 14 percent with public uses, 7 percent with institutional and office uses, 6 percent industrial, and 5 percent commercial. Twenty-five percent of the City has no land use designation. Under the No Project/Existing General Plan Alternative, the City's population and jobs would increase consistent with development allowed under the existing General Plan and would be consistent with SCAG projections.

Implementation of the No Project/Existing General Plan would result in 53,818 jobs and 13,921 dwelling units at build out compared to 26,167 jobs and 15,052 housing units at build out[1] of the proposed General Plan (refer to the Draft EIR Table 6.B). This difference is due to inclusion of residentially designated land uses in all the hillside areas and the sphere of influence. Additionally, the proposed General Plan has more mixed-use areas which permit residential uses at higher densities than the existing General Plan. These anticipated future conditions resulting from the No Project/Existing General Plan Alternative are different from the analysis contained throughout Section 4.0 of the Draft EIR, which compares the proposed project to existing conditions as they were at the time the Notice of Preparation for the EIR was posted. Here, the No Project/Existing General Plan Alternative examines a future condition that is trended forward from today, on the basis of the earlier (but still operative) General Plan.

New development would occur throughout the City as permitted by the existing General Plan and subject to existing applicable design regulations. The existing General Plan provides less direction for new development and the General Plan policies are much less clear than the policies in the proposed General Plan. Therefore, impacts created by development design would be greater under this alternative because the existing General Plan does not provide as much direction as the proposed General Plan. However, impacts to view sheds created by hillside development would be less in this alternative as many of the hillside areas are designated for conservation or have no land use designation. The No Project/Existing General Plan Alternative is neither environmentally superior nor inferior to the proposed General Plan as planned development would have better guidelines under the proposed General Plan while less development would occur in the view sheds under the existing General Plan.

Development as permitted under the existing General Plan would continue, thereby increasing population and employment-generating uses within the City. With such growth, a corresponding increase in air pollution emissions would occur. Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day to approximately 315,000 trips per day. This represents a slight increase in daily trips in comparison to the proposed General Plan, which would produce approximately 287,817 trips per day.

Although air emissions from stationary sources also produce air emissions, the primary factor is the quantity of trips produced citywide. Consequently, the No Project/Existing General Plan Alternative would produce similar impacts associated with air pollution emissions. However, air quality impacts under this alternative would remain significant and unavoidable since the emissions would exceed AQMD thresholds and the emissions would be emitted into an air basin which is currently designated as "non-attainment" or worse for ozone and particulate matter, constituting a cumulative impact to air quality.

As with the proposed General Plan, the loss of natural lands due to projected growth would occur with this alternative and locations where sensitive plant and animal species are known and/or expected to occur would be impacted by new development. However, the existing General Plan does not include planned urban development of a large portion of the South Hills area. Therefore, less development would exist in the southern end of the City at build out. Because this area of the City would not have urban development planned, the loss of sensitive habitats would be less than what would result from implementation of the proposed General Plan. The No Project/Existing General Plan Alternative is considered environmentally superior to the proposed General Plan.

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[1] The General Plan build out numbers have changed since finalization of the EIR. They have been reduced. The EIR evaluated the worst case scenario for the number of residential units (17,261 dwelling units) and employment (27,564 employees).

The potential degradation or loss of historic, archaeological, and paleontological resources would occur with this alternative since the urban area would be expanded. However, the existing General Plan does not include land use designations for a large portion of the Planning Area within the City limits and for a portion of the land area within the sphere of influence. Therefore, less development would exist in these areas of the City at build out. Because these areas of the City would not have urban development, the loss of cultural resources would be less than what would result from implementation of the proposed General Plan. The No Project/Existing General Plan Alternative is considered environmentally superior to the proposed General Plan with respect to cultural resources. However, with implementation of the General Plan policies and mitigation measures, development under both this alternative and the proposed General Plan would result in a less than significant impact to cultural resources.

The proposed General Plan provides updated information regarding geology and soils within the Planning Area. However, due to the nature of geologic conditions, and the time scale at which they are measured, this information is largely unchanged from the existing General Plan. The existing General Plan does not include land use designations for a large portion of the Planning Area within the City limits and for a portion of the land area within the sphere of influence. Therefore, less development would exist in these areas of the City at build out. Because these areas of the City would not have urban development, this alternative's impacts relative to the exposure of structures and people to substantial adverse effects associated with faulting, severe ground shaking, liquefaction, landslides, slope instability, erosion, or expansive soils would be less than what would result from implementation of the proposed General Plan. Therefore, the No Project/Existing General Plan Alternative is considered environmentally superior to the proposed General Plan in this regard.

Under the No Project/Existing General Plan alternative, population and employment generating uses within the City would continue to grow. With an increase in population and employment generating uses, the potential for the increased use, transportation, and disposal of hazardous materials would occur. The potential risk of exposure to these hazardous materials would increase with increased development. A similar increase in population and employment generating uses would occur under the proposed General Plan. Therefore, implementation of this alternative, with respect to hazardous materials, is considered neither environmentally superior nor inferior to the proposed General Plan. With implementation of policies in both the existing General Plan and the proposed General Plan, along with compliance of with local, State, and Federal regulations hazardous materials impacts associated with the this alternative and the proposed General Plan are considered less than significant.

Development, as permitted under the existing General Plan would continue, thereby increasing population and employment-generating uses within the City. With such growth, a corresponding increase in the demand for water would occur. Under this alternative, build out of the City per the existing General Plan would increase the average daily water demand from 4.49 million gallons per day (mgd) to 8.80 mgd Table 6.D of the Draft EIR. The development of structures, facilities, and paved surfaces necessary to accommodate growth within the City may affect the volume, velocity, direction, or quality of stormwater runoff, which, in turn, may affect the quality and quantity of recharged water. Furthermore, the intensified utilization of groundwater and/or generation of wastewater flows may affect the quantity and quality of the groundwater basins from which the City withdraws its water supply.

While average day demand could be met by existing water resources, the maximum daily demand would exceed current water supplies. Although the magnitude of impact under this alternative would be reduced from that associated with the proposed General Plan, because an adequate source or supply of water has not yet been identified to satisfy the projected demand, water supply impacts remain significant and unavoidable.

Under the No Project/Existing General Plan Alternative, land uses in Loma Linda would change consistent with the City's existing General Plan. The existing General Plan does not provide detailed policy direction for the hillside areas except to require Specific Plans and safe, consistent and complementary development. Land use density is only given for the Hillside Conservation area of the southern hills and much of the South Hills area is designated conservation or has no land use designation at all. Under State planning law all land areas must have an assigned use as well as density/intensity standards. Additionally, the existing General Plan has two land use sections making it difficult to determine the appropriate land uses that are designated. Implementation of this alternative would maintain existing conditions of land with no use designation which does not meet current planning law. In this regard, the No Project/Existing General Plan Alternative is considered environmentally inferior to the proposed General Plan.

Compared to the proposed General Plan, the existing General Plan permits fewer residential units, but more non-residential development. Such growth would be expected to increase the number of persons exposed to potential flood hazards. Additionally, the construction of structures, facilities, and paved surfaces necessary to accommodate residential and non-residential development growth within the City may affect the volume, velocity, and/or direction of stormwater runoff, which, in turn, may affect the path, intensity, or volume of flood events.

Under this alternative, existing flood hazard mitigation programs implemented or administered by the City, SBCFCD, and/or FEMA would remain in effect. Under the existing General Plan, the City's build out population has been estimated at 31,740 persons (compared to 32,890 persons under the proposed General Plan). The increased amount of non-residential development permitted under the existing General Plan (31,914,000 square feet versus 22,029,808 square feet) and the number of jobs created (58,818 jobs versus 26,167 under the proposed General Plan) indicates that more persons would most probably be present in the City during a normal work day. Any decrease in the severity of flood hazards brought about by the reduced number of dwellings and decreased population under this alternative is substantially offset by the increase in the amount of non-residential development and the number of persons working within the City that may be exposed to potential flood hazards. Therefore, under this alternative, potential flood hazards to persons and property would greater than those associated with the proposed General Plan.

Noise impacts associated with the introduction of sensitive land uses developing next to existing or future noise generators, such as the railroad line, would potentially be created under this alternative, as was identified for the proposed General Plan. The proposed General Plan policies and additional mitigation measures associated with such impacts would be needed to ensure that such impacts would be mitigated to less than significant. However, traffic noise levels under this alternative would be less than the proposed General Plan, due to the relative reduction in daily trip ends estimated for the alternative. However, implementation of the proposed General Plan policies and mitigation measures for traffic noise impacts would render such impacts less than significant.

The No Project/Existing General Plan Alternative would result in approximately 13,225 households by 2025, fewer than what would be developed as part of the proposed General Plan (14,300 households). Population growth that would occur as part of the No Project/Existing General Plan Alternative would be consistent with existing population patterns in the City, and would not qualify as unanticipated population growth. Although development that would occur as part of the No Project/Existing General Plan Alternative could enable the City to meet its "fair share" housing allocation in the near term, the long-term construction of sufficient housing would be less likely under the No Project/Existing General Plan Alternative due to the lower number of housing units constructed at build out (compared to the proposed General Plan).

Under this alternative, fire-related impacts would remain significant as the City currently is in need of second fire station to serve the South Hills area which is located in a Hazardous Fire Area, is distant from the existing headquarters station, and because of the existing increase in calls for service.

At the present time, the City is able to provide adequate police services. However, as the population continues to grow there will be a need in the future to provide additional police personnel and potentially police facilities. Presently, the City averages a response to calls for services of 3.25 minutes. In the future, as the City grows as permitted under the existing General Plan, the Police Department will have to determine whether it can continue to provide adequate police services to maintain the established response times. Under this alternative, all of the police-related impacts would remain less than significant because the City's police provider is able to currently maintain an average 3.25-minute response time.

The No Project/Existing General Plan Alternative would result in approximately 13,225 households by 2025, fewer than what would be developed as part of the proposed General Plan. Population growth that would occur as part of the No Project/Existing General Plan Alternative would be consistent with existing population patterns in the City, and would not qualify as unanticipated population growth. Development would continue to occur resulting in new students being added to the school population. In compliance with State law, both the Redlands Unified School District and the Colton Joint Unified School District, which serve portions of the City, impose school mitigation fees that are collected at the time of development. Thus, while both school districts are operating at, or near capacity, and the school population will occur as new development occurs, as provided for by Government Code Section 65996(a) and (b) which specifies that the method of mitigating school facilities is to pay the maximum school fees, such fees are deemed to provide full and complete school facilities mitigation. Therefore, even with new development within the City as permitted by the existing General Plan, the impacts to schools will be less than significant.

At the present time, library services within the City are adequate to meet the needs of the community. The population of the Planning Area under the No Project/Existing General Plan Alternative would be less than the proposed General Plan; however, additional library services will be required with an increase in population. Impacts to library services would be less than significant under this alternative.

The No Project/Existing General Plan Alternative would permit development consistent with the existing General Plan, which would result in 53,818 jobs and 13,921 dwelling units at build out. The City of San Bernardino provides wastewater treatment services to Loma Linda as part of a Joint Powers Agreement. Presently, the City of Loma Linda utilizes less than half of its assigned allotment. Increased demands upon existing wastewater services caused by the addition of approximately 27,651 jobs in the No Project/Existing General Plan Alternative are not expected to cause the City to reach it assigned allotment. Therefore, implementation of this alternative, with respect to wastewater services, is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to wastewater services.

Development under this alternative would create more jobs and fewer residential units than the proposed General Plan. While decreases in the amount of solid waste will result from decreases in the number of residential units, the amount of solid waste generated by the increased number of jobs in the Planning Area would substantially increase the total amount of solid waste generated. Implementation of the No Project/Existing General Plan Alternative would result in a significant impact to solid waste services compared to the less than significant impact caused by the proposed General Plan. The City would need to continue its efforts to reduce the solid waste stream. Therefore, the No Project/Existing General Plan Alternative is considered environmentally inferior to the proposed General Plan in this regard.

With the No Project/Existing General Plan Alternative, development would occur throughout the City as permitted by the existing General Plan. At the present time, natural gas and electrical services are adequate to meet the needs of the Planning Area. However, as the population and the workforce continue to grow, there will be a need in the future to provide additional natural gas and electrical facilities. Implementation of the No Project/Existing General Plan Alternative is considered neither environmentally superior nor inferior to the proposed General Plan, since both will require continued development of natural gas and electrical facilities to meet the needs of the growing population and workforce of the Planning Area. The impacts associated with the No Project/Existing General Plan Alternative would not significantly differ from the impacts associated with the proposed General Plan in regard to energy resources.

Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day (existing) to approximately 315,000 trips per day. This represents a slight increase in daily trips in comparison to the proposed General Plan, which would produce approximately 263,672 trips per day. However, as with the proposed General Plan, the City of Loma Linda cannot ensure that the improvements needed to maintain level of service standards in surrounding communities or at freeway interchanges will actually be completed, even if developments in Loma Linda provide fair share contributions. In addition, there are no mechanisms in place, nor are any contemplated to be available in the foreseeable future, that would provide for developer contributions to improvements along freeway mainlines. Thus, implementation of the Existing General Plan will not ensure mitigation for traffic along freeway mainlines, and a significant unavoidable impact will remain.

By allowing development consistent with this alternative within the City, additional growth in population would create a demand for increased parks and recreation opportunities. The City currently does not meet its goal of five acres of parkland for each 1,000 residents and new development would generally provide Park Development Impact Fees based on its own demand of parkland. Under this alternative, all of the parks and recreation impacts associated with this alternative would remain significant as the City currently does not have adequate parkland for the existing population.

Findings. In rejecting this alternative as infeasible and failing to meet project objectives, the City Council makes the following findings:

- The proposed General Plan provides for a comprehensive and updated plan with policies which are internally consistent and cover the City's entire sphere of influence. The current City's General Plan in internally inconsistent.
- The proposed General Plan incorporates a Housing Program which conforms to State Law and is consistent with the remainder of the General Plan. The No Project/Existing General Plan alternative is not in compliance with State Law.
- The proposed General Plan is based on the most recent data available to the City and reflects the current policy of the City Council. The No Project/ Existing General Plan would not allow the City Council to implement its current policies.
- The proposed General Plan will allow the City to upgrade its infrastructure systems providing new and improved services and facilities consistent with development policies that protect the hillsides and open space resources. Transportation corridors will be improved and traffic diverted away from neighborhoods maintaining the pedestrian-friendly quality of the community. The community's streets will be improved and maintained on a regular basis. Polices will be implemented that provide beautiful shaded, pedestrian-friendly streets with bike trails. New lighting throughout the City will improve the feeling of safety for local residents, and encourages evening strolls and visiting among neighbors.

- The No Project/Existing General Plan alternative would allow more residential building in the South Hills than with the proposed General Plan; therefore, affecting open space, the view shed and biological resources. This increased building in the hillsides will expose additional residents and structures to wildfire hazards.
- The No Project/Existing General Plan alternative will not substantially reduce any remaining significant impacts associated with the proposed General Plan and will constrain the City's ability to achieve housing and economic objectives.

4.3 Reduced Residential Hillside Density Alternative

Under the Reduced Residential Hillside Density Alternative, aesthetic impacts would be similar to the proposed General Plan, with the exception that the residential densities in the South Hills would be reduced. Development within the City would occur subject to applicable design regulations. With development at a reduced intensity, a reduction in light and glare impacts will result. In addition, scenic vistas and view corridors would be less impacted due to the reduction in hillside development. In regard to aesthetic impacts, this alternative is considered environmentally superior to the proposed General Plan.

Under this alternative, the number of residential units permitted to develop within the City and sphere of influence would be reduced by nearly 29 percent (15,052 dwelling units under the proposed General Plan versus 10,736 dwelling units under this alternative). Additionally, the amount of land devoted to commercial uses, business park, and office uses would increase approximately 61 percent (532.57 acres versus 335.63 acres). With the exception of recreation uses, the acreage devoted to other land uses would generally be reduced from the acreage cited for the proposed General Plan. With such growth, a corresponding increase in air pollution emissions would occur. Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day to approximately 255,809 trips per day. This represents a significant reduction in daily trips in comparison to the proposed General Plan, which would produce approximately 263,672 trips per day.

Although air emissions from stationary sources also produce air emissions, the primary factor is the quantity of trips produced citywide. Consequently, the Reduced Residential Hillside Density Alternative would produce fewer impacts associated with air pollution emissions. However, air quality impacts under this alternative would remain significant and unavoidable since the emissions would exceed AQMD thresholds and the emissions would be emitted into an air basin which is currently designated as "non-attainment" or worse for ozone and particulate matter, constituting a cumulative air quality impact.

This alternative would reduce the number and density of dwelling units in the South Hills area. Development on vacant property north of the South Hills area would occur as planned in the proposed General Plan. The proposed General Plan allows for clustering of development within the South Hills to avoid and protect native habitat and sensitive species. This alternative would reduce density in the hillsides; however, development of residences on 1-acre lots would be allowed. Development of 1-acre lots in the hillsides would have a greater impact on biological resources than the proposed General Plan. A greater number of acres of critical habitat will be disturbed or lost with this alternative than with the proposed General Plan. Wildlife corridors would be fragmented, residential development in the hillsides would introduce domestic animals (cats and dogs) that would adversely impact native wildlife.

Implementation of this alternative would not reduce the significant, unavoidable adverse impact on critical habitat and would have a greater impact on habitat fragmentation and possibly Federal and State endangered and threatened plant and wildlife species.

Potential degradation or loss of historic, archaeological, and paleontological resources would occur with this alternative since the urban area would be expanded in the same geographical area as the proposed General Plan. Since the protection of cultural resources would be provided, impacts would be similar to the proposed General Plan. The Reduced Residential Hillside Density Alternative is considered neither environmentally superior nor inferior to the proposed General Plan with respect to cultural resources. Development under both this alternative and the proposed General Plan would result in a less than significant impact to cultural resources.

When compared to the proposed General Plan, there would be a reduction in residential structures on the hillsides and the intensity of development would be less. However, the square footage of non-residential land uses is increased over that proposed by the General Plan. Thus, this alternative's impacts relative to the exposure of structures and people to substantial adverse effects associated with faulting, severe ground shaking, liquefaction, landslides, slope instability, erosion, or expansive soils, would be similar to the proposed General Plan.

When compared to the proposed General Plan, more employment-generating land uses would be developed under the Reduced Residential Hillside Density Alternative. The increase of employment-generating development would incrementally increase the use, generation, and transport of Hazardous Materials. The dumping of household hazardous materials would be expected to decrease due to both the reduced number of residential dwelling units under this alternative and due to the reduced amount of unimproved land under this Alternative. The reduction in the dumping of household hazardous materials is not likely to offset the increased use, generation, and transport of hazardous materials caused by the increase in employment-generating land uses. The Reduced Residential Hillside Density Alternative is considered environmentally inferior to the proposed General Plan in regard to hazards and hazardous materials. Thus, this Alternative's impacts relative to hazards and hazardous materials would have a greater impact than the proposed General Plan.

Under this alternative, the number of residential units permitted to develop within the City and sphere of influence would be reduced by nearly 29 percent. Additionally, the amount of land devoted to commercial uses, business park, and office uses would increase approximately 61 percent (532.57 acres versus 335.63 acres). With the exception for recreation uses, the acreage devoted to other land uses would generally be reduced from the acreage cited for the proposed General Plan. Under this alternative, the average daily water demand would increase from 8.8 mgd to 11.057 mgd. The average daily demand for water under this alternative could be met from current well capacities. In the absence of any new supply capacity, the maximum daily demand would exceed the existing supply capacity. In light of this deficiency, water supply impacts associated with this alternative are significant and unavoidable.

Because an adequate source or supply of water has not yet been identified to satisfy the projected demand, the magnitude of impact on water supply under this alternative would increase from that associated with the proposed General Plan and water supply impacts remain significant and unavoidable.

Under the Reduced Residential Hillside Density Alternative, land use impacts would be similar to the proposed General Plan. The land use pattern would change as the number of dwelling units in the South Hills area would be reduced. Minimum parcel size in the area would be 1 du/ac and more land has been designated for conservation purposes. Additionally, the residential densities in the remaining areas would be increased and concentrated closer to the employment centers. The overall reduction of dwelling units proposed in the City under this alternative would be approximately 38 percent less than the proposed General Plan. The proposed reduction of dwelling units allowed in the hillside areas would be a positive benefit; in addition although an increase in residential densities in the remaining portions of the community will occur, the impacts will still be less than significant

because residential development currently exists in these areas and services are generally available to serve the increase in the number of residents located near the City's employment centers. Policies have been included in the General Plan which ensure that new developments are compatible with existing neighborhoods and that the new development construct the necessary infrastructure and provide for open space or construct the recreational facilities in order to reduce the public costs for such uses. These policies will remain in effect under this alternative and will continue to exacerbate the housing-to-jobs balance within the City. Land use impacts will remain less than significant.

Under the Reduced Residential Hillside Density Alternative, the City would continue to grow; however, development in South Hills would be restricted to one dwelling unit per acre, while residential densities in areas outside the South Hills would increase. The overall number of dwelling units and, correspondingly, the number of persons residing in the City under this alternative would be reduced from that associated with the proposed General Plan. The amount of non-residential development and the number of employment-generating uses would increase over that associated with the proposed General Plan.

The intent of this alternative is to restrict development in the South Hills and concentrate residents closer to employment centers. As much of the land designated for employment-generating uses is located within areas subject to an increased risk of flooding (northern portions of the City), this alternative would increase the number of residents, workers, and property exposed to flooding hazards. While the policies and measures identified in the proposed General Plan and General Plan EIR to mitigate potential flood hazards within the City would remain effect, compared to the proposed General Plan, there is an increased potential for significant flood-hazard impacts associated with this alternative.

Noise impacts associated with the introduction of sensitive land uses developing next to existing or future noise generators, such as the railroad line, would potentially be created under this alternative, as was identified for the proposed General Plan. The proposed General Plan policies and additional mitigation measures associated with such impacts would be needed to ensure that such impacts would be mitigated to less than significant. Traffic noise levels under this alternative would be less than the proposed General Plan, due to the relative reduction in daily trip ends estimated for the alternative. However, implementation of the proposed General Plan policies and mitigation measures for traffic noise impacts would render such impacts less than significant.

The Reduced Residential Hillside Density Alternative would result in fewer dwelling units at build out compared to the proposed General Plan. The reduction in development that would occur as part of the Reduced Residential Hillside Density Alternative would make affordable housing more difficult to produce and may make it difficult for the City to meet its "fair share" housing allocation in the future. In regard to population and housing impacts, the Reduced Residential Hillside Density Alternative is considered environmentally inferior to the proposed General Plan. Development under this alternative would result in a significant impact on housing.

This alternative would reduce the number of dwelling units by nearly 29 percent primarily by reducing the number of units permitted in the South Hills area. Under this alternative, all of the fire-related impacts associated with the proposed project would remain non-significant because the policies contained in the General Plan include provisions to provide for an adequate number of fire stations, personnel, and equipment to protect the residents and businesses in the community as well as reviewing discretionary plans to ensure that the specified response time can be met. The reduction in development permitted in the hillside area recognizes the difficulty in providing fire services to the South Hills area by reducing the density in the area. The increase in density near the employment centers will continue to require fire services, but their location nearer the existing fire station will provide for acceptable response times and the overall calls for service will be reduced as the number

of residents structures will be less than those envisioned in the proposed General Plan. The current trend for fire services shows an average increase of approximately 5 percent which would be adequate in light of an overall reduction in residential dwelling units; therefore, under this alternative, the impacts to fire services would remain less than significant.

The number of minor and major crimes in the community has risen between 5 percent and 10 percent during the past five years. However, the reduction in development density especially in the South Hills area, which is located on the periphery of the community, will have a positive impact in reducing the need for police services in this portion of the community. Additionally, the increase in residential densities nearer the City's employment centers will not have an impact on police services because policies contained in the General Plan include provisions to provide for an adequate police force, to continue to strive to meet a 3.25-minute response to calls for services, increasing neighborhood watch programs, and utilizing defensible space techniques in new development. Therefore, under this alternative, police-related impacts would remain less than significant.

The Reduced Residential Hillside Density Alternative would result in fewer dwelling units at build out compared to the proposed General Plan. However, new development would continue to occur resulting in new students being added to the school population. Both the Redlands Unified School District and the Colton Joint Unified School District, which serve portions of the City, are operating at or near capacity. However, as permitted by State law, both Districts impose school mitigation fees that are collected at the time of development. Therefore, even though there will be a decrease in the number of students generated under this alternative, as provided for by Government Code Section 65996(a) and (b), the method of mitigating school facilities is to pay the maximum school fees, such fees are then deemed to provide full and complete school facilities mitigation. Therefore, even with new development occurring and the overall reduction in new students, the impacts to schools will continue to be less than significant.

The public services provided by libraries are based upon population numbers. Under the Reduced Residential Hillside Density Alternative, the population would be much less than the proposed General Plan. The number of needed library facilities would also be less. Therefore, under the Reduced Residential Hillside Density Alternative, the impacts to library services will continue to be less than significant.

The Reduced Residential Hillside Density Alternative reduces the number of dwelling units in the Planning Area. The population of the Planning Area would also be significantly reduced under this plan alternative. The City of San Bernardino provides wastewater treatment services to Loma Linda as part of a Joint Powers Agreement. Presently, the City of Loma Linda utilizes less than half of its assigned allotment. The demand for wastewater treatment services will be reduced greatly by the 29 percent decrease in the number of dwelling units. The increased demand caused by the addition of approximately 17,000 jobs in the Planning Area is not expected to cause the City to reach it assigned allotment. Therefore, implementation of this alternative, with respect to wastewater services, is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to wastewater services.

With the Reduced Residential Hillside Density Alternative, fewer dwelling units would be developed. With fewer portions of the Planning Area designated as residential, jobs will increase significantly in the Planning Area. Even with a reduction in dwelling units, the level of solid waste generation will increase due to the higher number of jobs. The need for solid waste services and facilities will increase along with development. With this alternative, potential impacts to solid waste services would be greater than those associated with the proposed General Plan. The Reduced Hillside Density Alternative is environmentally inferior to the proposed General Plan.

With the Reduced Residential Hillside Density Alternative, development would occur throughout the Planning Area, but development in the South Hills area would be restricted to Estate Residential (0-1 du/ac). Residential densities would increase, but the total number of dwelling units would be reduced. With residential densities increased, the delivery of energy to residential areas will become more efficient. The Reduced Residential Hillside Density Alternative may require continued growth of electrical and natural gas services, but it will require growth at a lesser extent than the proposed General Plan. Implementation of the Reduced Residential Hillside Density Alternative is considered environmentally superior to the proposed General Plan.

Under this alternative, the number of residential units permitted to develop within the City and sphere of influence would be reduced by nearly 29 percent (15,052 dwelling units under the proposed General Plan versus 10,736 dwelling units under this alternative). Additionally, the amount of land devoted to commercial uses, business park, and office uses would increase approximately 61 percent (532.57 acres versus 335.63 acres). With the exception of recreation uses, the acreage devoted to other land uses would generally be reduced from the acreage cited for the proposed General Plan. Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day (existing) to approximately 255,809 trips per day. This represents a reduction in daily trips in comparison to the proposed General Plan, which would produce approximately 263,672 trips per day. However, as with the proposed General Plan, the City of Loma Linda cannot ensure that the improvements needed to maintain level of service standards in surrounding communities or at freeway interchanges will actually be completed, even if developments in Loma Linda provide fair share contributions. Thus, implementation of the Existing General Plan will not ensure mitigation for traffic along freeway mainlines, and a significant unavoidable impact will remain.

The Reduced Residential Hillside Density Alternative would reduce the number of dwelling units by nearly 29 percent primarily by reducing the number of units permitted in the South Hills area. The reduction in density would decrease the demand for additional recreational land and facilities. In addition, because of the reduction in development permitted in the hillside areas, more land for both passive and active park uses would be available. The reduction in density in the hillside areas and the increase in residents nearer the employment centers will not alter or otherwise affect the policies in the General Plan regarding parks and recreation. This Alternative would continue to allow the City to retain its ability to collect Park Development Impact Fees as well as pursuing State Parks and Recreation and other grants, and pursuing joint use opportunities with the local school districts. As a result of reduction in residential density and the aforementioned policies, the impacts to parks under this alternative will remain less than significant.

Findings. In rejecting this alternative as infeasible and failing to meet project objectives, the City Council makes the following findings:

- The Reduced Hillside Density Alternative would reduce the number of dwelling units under the proposed General Plan by 29%. The City of Loma Linda is considered a "jobs rich" community as the number of jobs available in the City totaled 14,733 in 2000 (as determined by the 2001 RTP Growth Forecast) while the number of employed persons over the age of 16 living within the City totaled 8,679 (according to the 2000 Census). By reducing the number of dwelling units the City will continue to perpetuate the "jobs rich/housing poor" situation that currently exists.

- The Reduced Hillside Density Alternative would not guarantee public open space in conjunction with the reduced residences in the hillside. In addition, this alternative would not meet other objectives as outlined in the proposed General Plan.

4.4 Increased Residential Alternative

Under the Increased Residential Alternative, aesthetic impacts would be similar to the proposed General Plan, with the exception that there would be additional areas set aside for conservation in this alternative. Development within the hillside areas and throughout the City would occur subject to applicable design regulations. Development would continue to have light and glare impacts. Scenic vistas and view corridors would be slightly less impacted due to the increase in conservation areas. In regard to aesthetic impacts, this alternative is considered to have similar impacts as the proposed General Plan.

Under this alternative, the number of residential units permitted within the City and sphere of influence would be increased by approximately 17 percent (from 15,052 dwelling units to 18,157 dwelling units). The amount of land devoted to commercial, business park, and office uses would total more than 199 acres more than that under the proposed General Plan. Compared to the proposed General Plan, recreation and industrial uses would increase, while institutional and public facility uses would decrease. With such growth, a corresponding increase in air pollution emissions would occur. Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day to approximately 287,817 trips per day. This represents more daily trips in comparison to the proposed General Plan, which would also produce approximately 263,672 trips per day.

Consequently, the Increased Residential Alternative would produce slightly more air quality impacts as the proposed General Plan. As was identified for the proposed General Plan, air quality impacts under this alternative would remain significant and unavoidable since the emissions would exceed AQMD thresholds and the emissions would be emitted into an air basin which is currently designated as "non-attainment" or worse for ozone and particulate matter, constituting a cumulative air quality impact.

The same number of acres would be developed under this alternative as under the proposed General Plan. As with the proposed General Plan, this alternative would have an impact on sensitive plant and wildlife species, critical habitat, riparian habitat, and fragmentation of wildlife corridors.

Implementation of the policies and mitigation measures in the proposed General Plan will reduce impacts on biological resources to less than significant, with the exception of the loss of critical habitat. The Increased Residential Alternative will have the same impacts on biological resources as the proposed General Plan.

Potential degradation or loss of historic, archaeological, and paleontological resources would occur with this alternative since new development will occur. Future development will require the disturbance of vacant land potentially containing cultural resources. However, the area of physical disturbance of vacant land would be the same under this alternative as the proposed General Plan. The Increased Residential Alternative is considered to have similar impacts as the proposed General Plan with respect to cultural resources. Development under both this alternative and the proposed General Plan would result in a less than significant impact to cultural resources.

Compared to the proposed General Plan, an increase of residential building areas and dwelling units would be developed under this alternative. Thus, this alternative's impacts relative to the exposure of structures and people to substantial adverse effects associated with faulting, severe ground shaking, liquefaction, landslides, slope instability, erosion, or expansive soils would be greater than the proposed General Plan. Therefore, the Increased Residential Alternative is considered environmentally inferior to the proposed General Plan in this regard.

When compared to the proposed General Plan, more employment-generating land uses would be developed under the Increased Residential Alternative. The increase of employment-generating development would incrementally increase the use, generation, and transport of Hazardous Materials. The increase of residential units developed under this alternative would also incrementally increase the potential exposure to hazardous materials caused by the illegal dumping of household hazardous materials. The Increased Residential Alternative is considered environmentally inferior to the proposed General Plan in regard to hazards and hazardous materials. This Alternative's impacts relative to hazards and hazardous materials would have a greater impact than the proposed General Plan.

The amount of land devoted to commercial, business park, and office uses would total more than 199 acres than that under the proposed General Plan. Compared to the proposed General Plan, recreation and industrial uses would increase, while institutional and public facility uses would decrease. Under this alternative, the average daily water demand in the City at build out would be 17.622 mgd (35.245 mgd for maximum daily demand.)

The magnitude of impact under this alternative would exceed that associated with existing conditions, development per the existing General Plan, the proposed General Plan, and the Reduced Residential Hillside Density Alternative. Because an adequate source or supply of water has not yet been identified to satisfy the projected demand, water supply impacts remain significant and unavoidable.

The amount of land devoted to commercial, business park, and office uses would total more than 199 acres than that under the proposed General Plan. Compared to the proposed General Plan, recreation and industrial uses would increase, while institutional and public facility uses would decrease. The magnitude of impact under this alternative would exceed that associated with existing conditions, development per the existing General Plan, the proposed General Plan, and the Reduced Residential Hillside Density Alternative. However, with the continued implementation of policies in the General Plan that require both commercial and industrial uses to be compatible with adjacent uses, buffered from residential uses, be pedestrian-friendly, utilize good siting techniques, etc., the impacts to land use and agricultural resources will remain less than significant.

The Increased Residential Alternative would eliminate the mixed-use land use classification from the proposed General Plan and, instead, allow the development of an increased amount of residential and non-residential development. Under this alternative, the number of residential units and residents would increase. Additionally, the amount of non-residential development and the number of jobs created within the City would increase.

Much of mixed-use land eliminated under this alternative is located within areas (northern portions of the City) more susceptible to flooding. While the policies and measures identified in the proposed General Plan and General Plan EIR to mitigate potential flood hazards within the City would remain effect, compared to the proposed General Plan, there is an increased potential for significant flood-hazard impacts associated with this alternative.

Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day to approximately 287,817 trips per day. This represents more daily trips as the proposed General Plan, which would also produce approximately 263,672 trips per day.

Noise impacts associated with the introduction of sensitive land uses developing next to existing or future noise generators, including railroad lines, would potentially be created under this alternative, as was identified for the proposed General Plan. The proposed General Plan policies and additional mitigation measures associated with such impacts would be needed to ensure that such impacts would be mitigated to less than significant. Traffic noise levels under this alternative would be the

same as under the proposed General Plan. However, implementation of the proposed General Plan policies and mitigation measures for traffic noise impacts would render such impacts less than significant.

The Increased Residential Alternative would result in an increased number of dwelling units and an increased population at build out compared to the proposed General Plan. Development that would occur as part of the Increased Residential Alternative could enable the City to meet its "fair share" housing allocation due to the higher number of housing units constructed at build out (compared to the proposed General Plan). In regard to population and housing impacts, the Increased Residential Alternative is considered to have similar impacts on housing and population as the proposed General Plan.

Under the Increased Residential Alternative, the number of residential units permitted within the City and sphere of influence would be increased by approximately 17 percent (from 15,052 dwelling units to 18,157 dwelling units). The amount of land devoted to commercial, business park, and office uses would total more than 199 acres over that under the proposed General Plan. Compared to the proposed General Plan, recreation and industrial uses would increase, while institutional and public facility uses would decrease. The magnitude of impact under this alternative would exceed that associated with existing conditions, development per the existing General Plan, the proposed General Plan, and the Reduced Residential Hillside Density Alternative. However, with the continued implementation of policies in the General Plan that require both commercial and industrial uses to be compatible with adjacent uses, be buffered from residential uses, be pedestrian-friendly, utilize good siting techniques, etc., the impacts to fire services will remain less than significant.

As discussed above, the residential density and commercial, office and business park land uses within the City will be increased over those proposed in the General Plan. Most of the development will occur in the core of the community where not only are police services more generally available, but the location is in an area where more residents and visitors can provide additional surveillance. However, with the continued inclusion of policies contained in the General Plan which include provisions to provide for an adequate police force, to continue to strive to meet a 3.25-minute response to calls for services, increasing neighborhood watch programs, and utilizing defensible space techniques in new development, the impacts to police services will remain less than significant.

The Increased Residential Alternative would result in an increased number of dwelling units and an increased population at build out compared to the proposed General Plan resulting in new students being added to the school population. Both the Redlands Unified School District and the Colton Joint Unified School District, which serve portions of the City, are operating at or near capacity. However, as permitted by State law, both Districts impose school mitigation fees that are collected at the time of development. Therefore, even though there will be an increase in the number of students generated under this alternative, as provided for by Government Code Section 65996(a) and (b), the method of mitigating school facilities is to pay the maximum school fees, such fees are then deemed to provide full and complete school facilities mitigation. Therefore, even with new development occurring and the overall increase in new students, the impacts to schools will continue to be less than significant.

Under the Increased Residential Alternative, the population and number of dwelling units within the Planning Area at build out is increased. The Increased Residential Alternative will have a greater impact on library services than the proposed General Plan. Therefore, the Increased Residential Alternative is considered environmentally inferior to the proposed General Plan in this regard.

The number of residential units permitted within the Planning Area is increased by approximately 17 percent under the Increased Residential Alternative. The increase in total population is minimal in comparison to the proposed General Plan. The City of San Bernardino provides wastewater

treatment services to the City of Loma Linda. At build out of the proposed General Plan, the City of Loma Linda is still within its 7 mgd allotment. At build out of the Increased Residential Alternative, the City is not expected to exceed its allotment for wastewater treatment. Therefore, implementation of this alternative, with respect to wastewater services, is considered neither environmentally superior nor inferior to the proposed General Plan. Development under both this alternative and the proposed General Plan would result in a less than significant impact to wastewater services.

The impacts to solid waste under the Increased Residential Alternative would be greater at build out than those under the proposed General Plan. The number of housing units, people, and employment opportunities would be higher under the Increased Residential Alternative than under the proposed General Plan. Therefore, the amount of solid waste generated would be higher. With the increase of solid waste generation, the services and facilities that dispose of the solid waste must also be increased. The increase in landfill capacity or the creation of a new landfill will cause greater impacts than those created by the proposed General Plan. With policies included in the proposed General Plan, solid waste impacts would be reduced to less than significant. The Increased Residential Alternative will have significant impact on solid waste services. Therefore, the Increased Residential Alternative is considered environmentally inferior to the proposed General Plan in this regard.

Build out of the City under the Increased Residential Alternative will result in an increase in total population, residential structures, non-residential structures, and workforce in the Planning Area. The demand for energy and the level of consumption will be greater than that of the proposed General Plan. Energy facilities will need to be constructed or expanded to accommodate this increased future energy demand. Implementation of the Increased Residential Alternative is considered neither environmentally superior nor inferior to the proposed General Plan, since both will require continued development of natural gas and electrical facilities to meet the needs of the growing population and work force of the Planning Area. The impacts associated with the Increased Residential Alternative would not significantly differ from the impacts associated with the proposed General Plan in regard to energy resources.

Under this alternative, the number of residential units permitted within the City and sphere of influence would be increased by approximately 17 percent (from 15,052 dwelling units to 18,157 dwelling units). The amount of land devoted to commercial, business park, and office uses would total more than 199 acres more than that under the proposed General Plan. Compared to the proposed General Plan, recreation and industrial uses would increase, while institutional and public facility uses would decrease. Under this alternative, trip ends (productions and attractions) would increase from approximately 170,000 trips per day to approximately 287,817 trips per day. This represents the a greater number of trips in comparison to the proposed General Plan, which would also produce approximately 263,672 trips per day. This alternative would have the same impact on traffic as the proposed General Plan, which is significant and unavoidable.

The increase in total population with this alternative is minimal; therefore, the demand for additional recreational land and opportunities would also be minimal. The increase in residential density will not alter or otherwise affect the policies in the General Plan regarding parks and recreation and will continue to allow the City to retain its ability to collect Park Development Impact Fees as well as pursuing State Parks and Recreation and other grants and pursuing joint use opportunities with the local school districts. As a result of reduction in residential density, and the aforementioned policies the impacts to parks under this alternative will remain less than significant.

Findings. In rejecting this alternative as infeasible and failing to meet project objectives, the City Council makes the following findings:

- The Increased Residential Alternative will increase the number of residential units and population as compared to the proposed General Plan. This will increase the exposure of structures and people to substantial adverse effects associated with faulting, severe ground shaking, liquefaction, landslides, slope instability, erosion, or expansive soils compared to the proposed General Plan.

- The Increased Residential Alternative will increase employment-generating land uses as compared to the proposed General Plan. This will incrementally increase the use, generation, and transport of hazardous materials and incrementally increase the potential exposure to hazardous materials caused by the illegal dumping of household hazardous materials in comparison to the proposed General Plan.

- The Increased Residential Alternative will increase the potential for significant flood hazard impacts as compared to the proposed General Plan.

- The Increased Residential Alternative will increase the population as compared to the proposed General Plan, thereby increasing impacts on library services.

- The Increased Residential Alternative will increase the number of dwelling units, population, and employment opportunities as compared to the proposed General Plan resulting in increased solid waste generation. This will increase impacts to solid waste services. The increase in landfill capacity or the creation of a new landfill will cause greater impacts than those created by the proposed General Plan.

4.5 Environmentally Superior Alternative

CEQA requires that the EIR identify the environmentally superior alternative to the proposed project (CEQA Section 15126.6). If the environmentally superior alternative is determined to be the No Build Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives, if the analysis indicates that significant impacts can be avoided by one or more alternatives. Following is a description and a comparative environmental evaluation of the impacts identified for the proposed General Plan and for each alternative.

Table 6.E in the Draft EIR (page 6-27) compares the potential impacts of the proposed General Plan with each of the alternatives. The proposed General Plan had significant unavoidable adverse impacts on aesthetics/visual resources (loss of open space), biological resources, air quality, water supply, and transportation. A side-by-side comparison of the issues as evaluated in the EIR is provided in Table 6.E of the Draft EIR for each of the General Plan alternatives. For example, for the No Project/Build Alternative, the impacts of loss of open space are less than the impacts of the proposed General Plan on aesthetics/visual resources.

The proposed General Plan will have significant unavoidable adverse impacts on the loss of open space, air quality, loss of critical habitat, availability of a long-term water supply, and traffic impacts to the mainline of I-10. All other effects of the proposed General Plan were reduced to less than significant through the implementation of General Plan policies or in a combination of policies and mitigation measures.

Of the four project alternatives evaluated, one would result in no physical changes to the environment on the General Plan Planning Area (No Project/No Build Alternative) and one would allow the development according to the density established in the existing General Plan (No Project/Existing General Plan Alternative). Relocating the proposed project to an alternative site is not feasible, as the

proposed General Plan covers the entire Loma Linda City limits and sphere of influence. Therefore, no alternative site was considered. As shown in Table 6.E in the Draft EIR, each of the four alternatives would result in a combination of similar, avoided or decreased, and increased environmental impacts as compared to the proposed General Plan.

The No Project/No Build Alternative would result in greater impacts to population and housing. Impacts under all other categories would be reduced compared to the proposed General Plan. However, this alternative is not feasible, as it fails to accommodate current and projected growth within the City, and has been rejected as environmentally inferior to the proposed General Plan.

The No Project/Existing General Plan Alternative would result in greater impacts related to design, land use and agricultural uses, flooding hazards, population and housing, fire protection, solid waste generation, transportation and circulation, and parks and recreation compared to the proposed General Plan. Impacts related to light and glare, short-term construction air quality, long-term regional air quality emissions, long-term stationary and railroad noise, cultural and paleontological resources, hazardous materials, water resources, police protection, wastewater, and gas and electric facilities and services would be the same as the proposed General Plan under this alternative. There would be less of an impact on visual resources, biological resources, and seismic hazards since more of the hillside area would remain in open space. Because of the decrease in housing and population with the existing General Plan, there would be less of an impact on schools and libraries and less of an effect on sensitive resources from construction and long-term vehicular traffic.

Impacts under the remaining two alternatives would be similar to the proposed General Plan with regard to community design, cultural resources, air quality impacts, construction and stationary noise, and wastewater generation.

The Reduced Residential Hillside Density Alternative would transfer the densities within the hillside and concentrate that development to the north of the hillsides but would also increase non-residential uses in the City and its sphere of influence. Thus, under this alternative, impacts to and from hazardous materials, exposure of structures to flooding hazards, an increase in jobs over housing, and an increase in solid waste generation would be greater than under the proposed General Plan. Average water demand (and the water supply impacts) under this alternative would be increased over that identified for the proposed General Plan. Additionally, because this alternative would permit a greater number of acres to be disturbed or lost in the South Hills (due to the development of residential uses on 1-acre lots), impacts on biological resources would be increased. Because of a decrease in residential units, there would be a decrease in transportation and circulation impacts and associated vehicular noise impacts with this alternative. Impacts related to loss of open space and aesthetics and visual resources would be reduced because there would be less building allowed in the hillsides. The need for public services and facilities and utilities would be less under this alternative with a decrease in population, with the exception of solid waste generated by an increase in non-residential land uses.

Transportation and circulation impacts associated with the Increased Residential Alternative would be greater than those anticipated for the proposed General Plan. This alternative would accommodate about three thousand more residential units and a population increase of approximately 5,000 than the proposed General Plan. Compared to the proposed General Plan, the increase residential units and other development would expose greater numbers of persons to natural and man-made disasters; as well as generate a higher demand on water, energy, library, recreation, and school providers.

Impacts related to; aesthetics and visual resources; light and glare; construction, stationary, long-term vehicular, and railroad noise; construction and long-term air quality; land use and agriculture;

population and housing; biological resources and cultural/paleontological resources; and police, fire, and wastewater would be similar to those under the proposed General Plan.

Findings. Overall, the Reduced Residential Hillside Density Alternative would result in similar or reduced impacts compared with the proposed General Plan (with the exception of land use impacts, population, fire protection, and solid waste). All other feasible alternatives would result in greater impacts or the similar impacts compared to the proposed General Plan. Thus, the Reduced Residential Hillside Density Alternative is the Environmentally Superior Alternative. The Reduced Residential Hillside Density Alternative would also meet the objectives of the proposed General Plan, which are to maintain and conserve the unique natural assets (the hillsides) and small-town atmosphere of the community; provide a range of community design options in response to varied lifestyle choices; improve present traffic flow and provide easy and convenient access to all areas of the community; establish areas for high-tech industries to complement the existing medical institutions; expand local employment opportunities; and broaden choices of transportation systems.

5.0 FINDINGS OF THE LOMA LINDA GENERAL PLAN AND RELATED ACTIONS ENVIRONMENTAL IMPACT REPORT

5.1 Aesthetics and Visual Resources

Potential Impacts. Implementation of the Loma Linda General Plan would increase development of urban uses resulting in the loss of open space and aesthetic resources. The existing and future public views will be altered. Increased residential densities, mixed-use developments, and business park developments may be incongruous with the City's existing character and visual qualities. In addition, new development within the General Plan study area would increase the effects of light and glare upon existing residential uses. In addition, the implementation of the General Plan would result in conversion of open space areas to urban land use.

Findings. While the City of Loma Linda has no officially designated scenic views or vistas, existing views and landforms within the planning area are an important element of the City as evidenced by the 1993 Hillside Preservation Initiative. The 1993 Hillside Preservation Initiative was passed in order to preserve significant natural hillside amenities. The General Plan Update policies recognize the importance of these views and their contribution to the image of Loma Linda and provide for protection of the City's natural landforms and scenic vistas. The implementation of the proposed General Plan polices with respect to impacts to views and unique landforms would be reduced to less than significant.

The General Plan polices set the design standards for new development which ensures compatibility with existing development. These design standards detail development guidelines for all types of uses to ensure that development does not impact adjacent uses. When implemented, these design policies would ensure that aesthetic impacts relating to design and existing community character would be less than significant.

The proposed General Plan recognizes the impact of light and glare on sensitive receptors and sets standards for the screening and the location of new lighting sources to protect these sensitive receptors. Future development projects will be required to take part in site development review on a site-specific basis to ensure compliance with light and glare standards. Therefore, the proposed policies along with project-specific design review by the City will reduce lighting and glare impacts to a less than significant level.

While the proposed General Plan policies address the aesthetic impacts of new development, no mitigation is available to address the conversion of open space to urban land uses. This impact is significant and unavoidable.

Facts in Support of Findings. Build out of the proposed General Plan would result in a substantial increase in urban uses throughout the Planning Area. The new development could alter surrounding visual resources through increased densities and intensities. Any new development that may cause destruction of natural resources and open space areas, including potential grading and construction activity without attention to natural slope contours or preservation of biological resources, would degrade visual quality. However, the development of structures and facilities would occur on vacant parcels and would be consistent with the policies outlined in the proposed General Plan (Policies 2.2.3.1.c, 2.2.3.1.j, 2.2.3.1.m, 2.2.3.1.q, 9.2.9.1, 9.2.9.1.a, 9.2.9.1.e, 3.1.9.2, 3.1.9.2.a-d, 3.1.9.2.h, 3.1.9.1.l). Specifically, the General Plan states in Policy 2.2.3.1.m that new development shall be located so as to maximize the permanent preservation of large blocks of unbroken open space and to minimize the loss of habitat, wildlife, and watershed resources. Also General Plan Policy 3.1.9.1.a states that dwellings and other structures shall be designed to best fit with the hillside's contours, to correlate with the form of the terrain, and to limit visibility of the structure from the Loma Linda valley floor to the greatest extent feasible. Therefore, the implementation of the proposed General Plan policies would reduce the impacts on views and unique landforms to less than significant.

Many of the structures located within the City, including the multiple historic structures, contribute to the City's sense of character. The proposed General Plan allows for more development in all land uses, including business park, commercial, and residential. The visual quality of older neighborhoods could be degraded by the introduction of new development that does not respect the architectural styles and massing of existing structures. However, the proposed General Plan polices address the City's architectural styles and massing of existing structures in General Plan Polices 2.2.5.4.b., 3.1.6.1., 3.1.6.1.a-c., 3.1.6.1.e-i., 3.1.7.1, 3.1.7.1.c., 3.1.7.1.f., 3.1.8.1., 3.1.8.1.d., 3.1.9.1., 3.1.9.1.l. Specifically, Policy 3.1.9.1.l states that where residential infill development is proposed, ensure that the scale and massing of dwellings as well as the architectural character of new development is compatible with the existing residential neighborhood. In addition, an evaluation of potential impacts of development with respect to the view sheds within the City will be conducted on a project-by-project basis. With the aforementioned design policies and the review conducted on a project-by-project basis, the aesthetic impacts relating to design and existing community character would be less than significant.

Light and glare would be created by development with the implementation of the proposed General Plan. The most significant impacts would occur from new development occurring adjacent to undeveloped land as well as the development of commercial, industrial, and public facility uses adjacent to residential areas. However, the General Plan Update includes policies which address light and glare (Polices 2.2.5.4.a, 3.1.7.1.c, 3.1.1.1.q, and 3.1.9.2.m) and set the standards for screening of new lighting sources. Specifically, General Plan Policy 3.1.7.1.c states that new development shall avoid impacts to adjacent sensitive uses (e.g., residences, hospitals) through proper design that limits effects from noised and glare (i.e., through site layout building orientation, circulation/parking layout, noise attenuation, landscape buffering, and lighting design/location). In addition, future development projects will be required to take part in site development review on a site-specific basis to ensure compliance with light and glare standards. With the proposed General Plan policies and required site-specific review, the impacts of light and glare will be reduced to less than significant.

The City currently contains approximately 2,450 acres of open space and undeveloped parcels in the hillsides. The conversion of open space to urban uses would contribute to the loss of visual character as well as loss of open space in the City. The proposed General Plan contains many polices that address development in open space areas (Policies 2.2.3.1.c, 2.2.3.1.j, 2.2.3.1.m, 2.2.3.1.q,

3.1.9.2.d, 9.2.9.2, and 9.2.9.2.a-i). However, there are currently no policies available to address the conversion of open space to urban land uses. It is further found that there are no feasible mitigation measures or alternatives that could be adopted at this time which would reduce this impact of the loss of open space to a less than significant level. To the extent that this adverse impact will not be eliminated or lessened to a less than significant level, it is found that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the project as modified, despite unavoidable residual impacts. For additional discussion regarding the project's impacts to open space and aesthetics, see Draft EIR, Section 4.2.

5.2 Air Quality

Potential impacts. Air quality impacts would occur during construction-related activities associated with individual projects including grading and equipment exhaust. Major sources of fugitive dust are a result of grading and site preparation during construction by vehicles and equipment. Fugitive dust is generated by construction vehicles and equipment traveling over exposed surfaces, as well as by soil disturbances from grading and filling. Blowing dust is also of concern in dry weather conditions where PM_{10} standards are exceeded by soil disturbance during grading and vehicular travel over unpaved roads.

Development associated with implementation of the proposed General Plan will result in an overall increase in mobile source emissions within the City which may exceed SCAQMD Air Quality Standards. Long-term air emission impacts will occur from stationary sources related to the estimated development proposed through implementation of the proposed General Plan. Implementation of the proposed General Plan Update could conflict or obstruct implementation of the South Coast Air Quality Management Plan (AQMP) or the Regional Comprehensive Plan (RCP) of the Southern California Association of Governments (SCAG).

Findings. During construction of the projects permitted under the proposed General Plan, generation of fugitive dust (PM_{10}) will occur. As opposed to an individual project with project-specific construction information available for emissions estimate, it is not feasible to accurately quantify the proposed General Plan related construction emissions because these air quality construction impacts would be a result of a number of different development projects that might occur at any given time throughout the City. The City will require individual development projects to comply with all applicable regional rules, which would assist in reducing the short-term air pollutant emissions. Fugitive dust from a construction site must be controlled with best available control measures so that the dust generated does not remain visible in the atmosphere beyond the property line of the emission source. Dust suppression techniques will be implemented to prevent fugitive dust from creating a nuisance off-site. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM_{10} component) by 50 percent or more. The City will require all projects to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Compliance with these rules would reduce impacts on nearby sensitive receptors. However, citywide construction emissions would remain significant and unavoidable after implementation of the proposed General Plan and all feasible mitigation measures.

Although not specifically identified with land uses and their corresponding vehicular trips, mobile source emissions from vehicle use associated with the proposed General Plan can be estimated from VMT at the particular average speed projected within the project study area. Table 4.3.H in the General Plan Draft EIR presents emissions of CO, ROC, NO_X, and PM_{10} for the build out of the proposed General Plan. As shown in this table, implementation of the proposed General Plan would

generate CO and NOx emissions that would exceed the thresholds established by the SCAQMD. The rate of increase in VMT and annual growth percentages resulting from the implementation of the proposed General Plan would result in significant impacts. Implementation of the policies provided in the proposed General Plan will reduce the projected long-term increase in air pollutants. However, significant unavoidable impacts to long-term air pollutants would remain despite the implementation of the proposed policies.

Stationary pollution sources are generally divided into two subcategories: "point sources" (such as power plants and refinery boilers) and "area sources" (including small emission sources such as residential water heaters and architectural coatings). Medical facilities and residences are generally the main stationary pollution sources in Loma Linda, though most urbanized land areas and their associated activities also contribute to poor air quality in the region. The proposed General Plan contains one policy related to stationary sources. In addition, mitigation measures were added in the Draft EIR to ensure that stationary air quality impacts for residential, commercial, and institutional, and industrial would be reduced to less than significant.

An analysis was conducted of the consistency of the proposed Loma Linda General Plan with the South Coast Air Quality Management Plan (SCAQMP). The analysis concluded that the General Plan would not conflict or obstruct the SCAQMP. With the implementation of the proposed General Plan policies, the implementation of the General Plan would have a less than significant impact on the SCAQMP.

Facts in Support of Findings. The proposed General Plan includes the City and its sphere of influence. The impacts of build out of the proposed General Plan are actually a summary of the individual actions and development permits that will be undertaken throughout the Loma Linda Planning Area as opposed to an individual project with project-specific construction information occurring in a single location. PM_{10} emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors, making quantification difficult. Despite this variability in emissions, experience has shown that there are a number of feasible control measures that can be reasonably implemented to significantly reduce PM_{10} emissions from construction. Because of the lack of proposed General Plan policies relating directly to construction activity and its emissions, the proposed General Plan does not mitigate construction-related impacts on air quality. Therefore, mitigation was proposed in the EIR to reduce the effects of blowing dust during grading and construction vehicle emissions (Mitigation Measures 4.3.4.1A, 4.3.4.1B, and 4I3.4.1C). The Council hereby directs that these mitigation measures be adopted. Specifically, Mitigation Measure 4.3.4.1B requires the implementation of dust suppression measures in the SCAQMD CEQA *Air Quality Handbook* while Mitigation Measure 4.3.4.1A adds applicable SCAQMD Rule 403 measures. Compliance with the recommended Mitigation Measures would reduce the impacts; however, citywide construction emissions would remain significant and unavoidable with implementation of the General Plan and all feasible mitigation measures. It was found that there are no feasible mitigation measures or alternatives that could be adopted at this time which would reduce this impact of fugitive dust emissions to a less than significant level. To the extent that this adverse impact will not be eliminated or lessened to a less than significant level, it is found that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the project as modified, despite unavoidable residual impacts. For additional discussion regarding the project's impacts to particulate emissions, see Draft EIR, Section 4.3.
Long-term air emission impacts are associated with mobile sources involving any growth-related change. The proposed General Plan would result in mobile source increases. It is anticipated that the total new vehicular trips and associated VMT of the General Plan would result in criteria pollutant emissions to exceed the daily emissions thresholds established by the SCAQMD in its *CEQA Air Quality Handbook.* The proposed General Plan policies related to air quality (Policies 2.2.5.1.b,

2.2.5.2.d, 2.2.5.3.b, 2.2.7.3, 2.2.7.3.a, 2.2.7.3.c, 2.2.8.1.c-d, 2.2.8.2.e, 2.2.8.3.a, 2.2.8.3.c, 2.2.8.4.a, 2.2.8.4.h-i, 2.2.8.4.n, 3.1.9.1.c, 4.6.2.b, 4.6.2.j, 4.6.2.k, 9.3.6, 9.3.6.a-c, 6.10.1.b-d, 6.10.1.l-m, 6.10.2.a-g, and 6.10.3.a-d) would generally result in better planning and projects that proactively address any adverse air quality impacts that could result. Implementation of the proposed General Plan policies related to air quality would help reduce air pollutant emissions and improve the air quality by encouraging pedestrian-oriented land uses. Specifically General Plan Policy 6.10.2.g requires the site design in non-residential areas to be oriented to allow for safe and convenient pedestrian access from sidewalks, transit and bus stops, and other pedestrian facilities, in addition to access through required parking facilities. General Plan Policy 6.10.3.a requires the City to ensure that the site design of new developments provide for pedestrian access to existing and future transit routes and transit centers through specific review during the development process. Implementation of the policies provided in the proposed General Plan will reduce the projected long-term increase in air pollutants; however, significant impacts would remain. This impact is significant and unavoidable, and as the policies represent the best available mitigation measures, no further feasible mitigation measures are provided. It is found that there are no feasible mitigation measures or alternatives that could be adopted at this time which would reduce this impact of projected long-term increase in air pollutants to a less than significant level. To the extent that this adverse impact will not be eliminated or lessened to a less than significant level, it is found that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the project as modified, despite unavoidable residual impacts. For additional discussion regarding the project's impacts to projected long-term air pollutants, see Draft EIR, Section 4.3.

Because of the characteristics of the proposed project, i.e., a General Plan, it is not possible to determine the location, size, and characteristics of future stationary pollution sources. It is, therefore, not feasible to quantify the proposed General Plan-related stationary sources emissions associated with the usage of electricity and natural gas. Similarly, the quantification of mitigation measures on emissions associated with these stationary sources is not feasible at a General Plan program level review. Implementation of the proposed General Plan policy (Policy 9.3.6.d) related to stationary sources would help reduce air pollutant emissions and improve the air quality. Mitigation measures 4.3.4.3.A-F were required to ensure that stationary impacts on air quality would be reduced to less than significant. The Council hereby directs that these mitigation measures be adopted. Specifically, Mitigation Measure 4.3.4.3.D requires residential building construction to comply with energy use guidelines detailed in Title 24 of the California Administrative Code. Mitigation Measure 4.3.4.3.E requires stationary air pollution sources to comply with applicable air district rules and control measures. Therefore, with the proposed General Plan policy and additional mitigation measures, the impacts of stationary pollution will be reduced to less than significant.

Implementation of the proposed General Plan is anticipated to direct growth within the City and result in an increase in population and VMT. As shown in Section 4.12, Population and Housing, actual population in the City in year 2000 was 2,839 people below the year 2000 SCAG population projection. In addition, the projected population, housing, and employment levels upon build out of the proposed General Plan are less than the SCAG projections for the year 2025. The increase in population and VMT within the city would not exceed the projections included in the Regional Comprehensive Plan and the Air Quality Management Plan for the City of Loma Linda. Implementation of the proposed General Plan policies and Draft EIR mitigation measures identified in the prior air quality discussions would help reduce emissions of criteria pollutants associated with mobile and stationary sources. Therefore, the implementation of proposed General Plan polices pertaining to the reduction of mobile emissions would not conflict with nor obstruct the implementation of the AQMP and RCP.

5.3 Biological Resources

Potential Impacts. Implementation of the proposed General Plan would have an adverse impact on listed, proposed, or candidate species or the loss of habitat occupied by such species. Future development consistent with the proposed General Plan would cause direct loss of sensitive of critical habitat or cause habitat fragmentation resulting in isolation of sensitive habitat patches which are of limited biological value. Implementation of the proposed General Plan would also cause fragmentation of habitat that constricts, inhibits, or eliminates wildlife movement. Additionally, implementation of the proposed General Plan would result in the direct loss of oak trees. Finally, implementation of the General Plan could affect the proposed Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP).

Findings. Thus, implementation of the proposed General Plan would result in the direct mortality of listed, proposed, or candidate species or loss of habitat occupied by such species. In addition, critical habitat for the California gnatcatcher has been identified within the City. Development within areas designated as critical habitat has the potential to fragment habitat and to loose habitat all together. The proposed General Plan policies focus primarily on avoidance, preservation and minimization of impacts to biological resources and habitats. The policies do not specify a method of identifying habitats that warrant such measures or the parameters to be used if avoidance or preservation are infeasible. Therefore, mitigation measures were added in the Draft EIR to address the identification and loss of habitats. With the implementation of the proposed General Plan policies and the mitigation measures, impacts related to the loss of candidate or listed species would be less than significant.

Implementation of the proposed General Plan may result in the direct loss of 1,437.5 acres of sensitive habitat. The California Department of Fish and Game tracks the occurrence of natural communities which it considers to be the most sensitive in the state. As conditions change over time, conservation efforts may lead to habitat types being added to or removed from the set of habitats considered sensitive. Construction of proposed General Plan land uses may result in the loss or fragmentation of sensitive habitat(s). As land use proceeds under implementation of the proposed General Plan, patches of habitat on undeveloped properties will initially be fragmented by the sporadic pattern of development. However, once the proposed General Plan reaches build out, the only fragmented patches remaining would be those set aside within a project site as on-site mitigation or due to development constraints (e.g., steep slopes), or both. Thus, the initial fragmentation of undeveloped properties would be an interim condition with the long-term fragmentation occurring under total build out. Regional fragmentation will occur as existing biological reserves and other conservation lands (e.g., San Timoteo Canyon State Park) become surrounded and isolated by community and rural development. The proposed General Plan will create habitat fragmentation resulting in isolation of sensitive habitat patches creating a "checkerboard" pattern of small habitat patches of limited biological value. Even with implementation of the proposed General Plan policies and mitigation measures, the cumulative loss and fragmentation of critical coastal California gnatcatcher habitat will remain significant and unavoidable.

As land use development proceeds under the proposed General Plan, wildlife movement will be increasingly inhibited until build out of the proposed General Plan results in the exclusion of wildlife from large areas and the associated elimination of wildlife movement. Thus, the initial interruption of wildlife movement between undeveloped properties would be only an interim condition with the long-term elimination of wildlife movement occurring under total build out. The proposed General Plan will result in fragmentation of habitat that constricts, inhibits, or eliminates wildlife movement. The General Plan policies do not fully mitigate the impacts to wildlife movement. In conjunction with the proposed General Plan policies, mitigation measures were added in the Draft EIR. With implementation of the

proposed General Plan policies and the mitigation measures, the impact to wildlife corridors would be reduced to less than significant.

Oak trees are dependent upon site conditions and a variety of associated natural processes for their growth, survival, and reproduction. Natural processes and conditions upon which the trees depend include, but are not limited to, the hydrologic regime, soil structure and chemistry, and microclimate. The only oak trees in the Planning Area are confined to a small area adjacent to existing farming uses. Construction of the proposed General Plan land uses may result in the direct loss of these oak trees or may result in the alteration of natural processes upon which the trees depend. The proposed General Plan policies focus on preservation of the oak woodland area. As the oak woodland area is isolated and not considered of importance biologically, the policies would fully mitigate the impacts of development and impacts to oak trees would be less than significant.

Riverside County has adopted its Western Riverside County MSHCP. The San Bernardino County MSHCP was in the planning process at the time the EIR was written but the County Board of Supervisors has decided not to pursue an MSHCP. The County of Riverside has designated areas to be considered for preservation adjacent to the Loma Linda City limits. One of the areas under consideration for preservation in the Riverside MSHCP is adjacent to the southern hills area of Planning. However, the City of Loma Linda has shown through proposed General Plan policies its willingness to participate in such plans, should they be created. The implementation of the proposed General Plan will have a less than significant impact on Conservation Plans.

Facts in Support of Findings. According to the Draft EIR on page 4.4-14, a total of 24 species which are listed, proposed, or candidates for listing under the California and/or the Federal Endangered Species Act were identified as potentially present within the Planning Area. Moderate to low suitable habitat was present for two listed species: thread-leaved brodiaea and slender-horned spineflower. An additional 35 non-listed sensitive species are considered potentially present in the Planning Area with 17 of those species considered to have a moderate to high potential. Every potential habitat type identified will be impacted to at least some degree by implementation of the proposed General Plan. The General Plan policies (Policies 2.2.3.1.c, 2.2.3.1.g, 2.2.3.1.m, 3.1.9.2, 3.1.9.2.d, 9.2.9.2, 9.2.9.2.a, 9.4.4, 9.4.4.a-b., and 9.4.4.d-e) focus primarily on avoidance, preservation and minimization of impacts to biological resources and habitats. Specifically, General Plan Policy 2.2.3.1.m requires developers to site new development so as to maximize the permanent preservation of large blocks of unbroken open space and to minimize the loss of habitat, wildlife, and watershed resources. General Plan Policy 9.4.4.b requires appropriate setbacks adjacent to natural streams to provide adequate buffer areas ensuring the protection of biological resources. The Draft EIR included mitigation measures to identify biological resources and establish parameters for methods other than avoidance and preservation. Mitigation Measure 4.4.4.1A requires the preparation of biological reports in compliance with standards established by the City of Loma Linda for development related to uses that require discretionary approval to assess the impacts of such development and provide mitigation for impacts to biological resources. In Mitigation Measure 4.4.4.1B, the City established a baseline ratio for preserving habitat at a minimum of 1:1 replacement ratio in locations that provide long-term conservation value for impacted resources. The Council hereby directs that these mitigation measures be adopted. The implementation of proposed General Plan policies and the mitigation measures identified above will reduce this impact to a less than significant level.

Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more parts, such that the division isolates the two new areas from each other. Isolation of habitats occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another. An example is the fragmentation of habitats within and around "leapfrog" patterns of residential development. Habitat fragmentation can also occur when a portion of

one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. The result of fragmentation is that the amount of habitat available to local wildlife populations is reduced. In general, a reduction in available habitat is followed by a reduction in wildlife populations because the remaining areas are too small to support pre-fragmentation population levels. Determining if the impact is significant at the level of site-specific projects that are proposed in accordance with the proposed General Plan land uses will require analysis as part of the subsequent evaluation of such projects. The potential for such impacts to be considered significant will depend upon various factors including, but not limited to, the site conditions at the time of project evaluation, the extent of the area potentially affected, the quality of the habitat being affected, and the value of the affected habitat at local and regional scales. The proposed General Plan policies (Policies 9.2.9.2, 9.2.9.2.a-e) focus primarily on avoidance and minimization of impacts to floodplain, riparian, and wetland habitats; maintaining and conserving superior examples of native vegetation. The policies provide for avoidance and minimization of impacts to some sensitive habitats but do not specify a means for identifying habitats that warrant such measures. Specifically proposed General Plan Policy 9.2.9.2 states that the City should acquire, preserve and maintain open space and its natural resources for future generation. In addition the proposed General Plan polices do not specify parameters for compensating for the loss of habitats when avoidance or minimization of impacts is considered to be infeasible. The Draft EIR specifies the implement Mitigation Measures 4.4.4.1A and 4.4.4.1B, mentioned above, along with Mitigation Measure 4.4.4.2A, which requires construction of treatment wetlands outside of natural wetlands, allowing treatment of runoff from developed surfaces prior to entering natural stream systems. The Council hereby directs that this mitigation measure be adopted. Even with implementation of the proposed General Plan policies and mitigation measures, the cumulative loss and fragmentation of critical coastal California gnatcatcher habitat will remain significant and unavoidable. It is found that there are no feasible mitigation measures or alternatives that could be adopted at this time which would reduce this impact of the loss of critical coastal California gnatcatcher habitat to a less than significant level. To the extent that this adverse impact will not be eliminated or lessened to a less than significant level, it is found that specific economic, legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the project as modified, despite unavoidable residual impacts. For additional discussion regarding the project's impacts to biological resources and the critical habitat of the California gnatcatcher, see Draft EIR, Section 4.4.

As stated in the Draft EIR on page 4.4-19, as land use development proceeds under the proposed General Plan, wildlife movement will be increasingly inhibited until build out of the proposed General Plan results in the exclusion of wildlife from large areas and the associated elimination of wildlife movement. Thus, the initial interruption of wildlife movement between undeveloped properties would be only an interim condition with the long-term elimination of wildlife movement occurring under total build out. The proposed General Plan will result in fragmentation of habitat that constricts, inhibits, or eliminates wildlife movement. The proposed General Plan policies (Policies 3.1.9.2.b, 3.1.9.2.d-f, 3.1.9.2.l, 9.2.9.2, 9.2.9.2.a-e, 9.4.4, 9.4.4.e) focus primarily on avoidance and minimization of impacts to wildlife corridors. Specifically, General Plan Policy 9.4.4.e states the City, through development review, will retain as feasible, wildlife corridors in the Planning Area in particular, the San Timoteo Wash area. Furthermore, the policies do not specify a means for identifying specific sites (either locally or regionally) that warrant such measures. Nor do the policies specify parameters for compensating for loss of wildlife movement when avoidance or minimization of impacts is considered to be infeasible. The policies do not fully mitigate the impacts to wildlife movement. The Draft EIR proposed the following mitigation measures to ensure the preservation of wildlife corridors: Mitigation Measures 4.4.4.3A-C. One of the aforementioned measures, Mitigation Measure 4.4.4.3A, requires developers with new development in the hillside areas to prepare a biological report which includes identifying local and regional habitat patterns that provide movement routes for wildlife or where opportunities exist to establish movement routes between isolated habitat patches. The Council hereby directs that these mitigation measures be adopted. With implementation of the proposed

General Plan policies and the mitigation measures, the impact to wildlife corridors would be reduced to less than significant.

Oak trees are dependent upon site conditions and a variety of associated natural processes for their growth, survival, and reproduction. Natural processes and conditions upon which the trees depend include, but are not limited to, the hydrologic regime, soil structure and chemistry, and microclimate. The trees in the City of Loma Linda are not considered to be of biological value as they are isolated woodland. However, the trees have intrinsic value to the City as they are the only oak trees remaining within the Planning Area. The proposed General Plan contains two policies pertaining to oak trees. General Plan Policy 9.2.9.1.a requires the City to preserve outstanding natural features, such as the skyline of a prominent hill, rock outcroppings, and native and/or historically significant trees. Also, General Plan Policy 9.4.4.c requires the City to preserve, as feasible, the oak woodland areas within the City by requiring development to incorporate the trees into the development design. The proposed General Plan policies focus on preservation of the oak woodland area. As the oak woodland area is isolated and not considered of importance biologically, the policies would fully mitigate the impacts of development and therefore, implementation of the proposed General Plan would have a less than significant impact on the loss of oak trees.

Riverside County has adopted its Western Riverside County MSHCP. The San Bernardino County MSHCP has been discontinued. The County of Riverside has designated areas to be considered for preservation adjacent to the Loma Linda City limits. One of the areas under consideration for preservation in the Riverside MSHCP is adjacent to the southern hills area of Planning Area. Even though the County in which the City of Loma Linda is located has not established specific conservation areas, the City recognizes the need to establish and participate in such conservation plans as evidenced by the General Plan Policies 9.2.9.2, 9.2.9.2.a-e. Specifically, General Plan Policy 9.2.9.2.d requires the City to coordinate through development review which includes coordinating with Loma Linda's open space system in conjunction with adjacent cities, San Bernardino County, the State, and regional and private open space systems in order to connect the systems and share resources. The policies are directed toward preserving open space and thereby creating areas for habitat conservation. The implementation of the proposed General Plan will have a less than significant impact on Conservation Plans.

5.4 Cultural Resources

Potential Impacts. As determined in the Draft EIR on page 4.5-11 development within currently vacant unincorporated areas of the City will result in an increase in population and residential and non-residential structures, and associated infrastructure. Development associated with the proposed General Plan would require disturbance of vacant lands. Therefore, development as a result of implementation of the proposed General Plan could potentially directly or indirectly destroy a unique paleontological resource or site. In addition, development allowed by implementation of the proposed General Plan could have the potential to disturb buried archaeological resources and buried human remains, including those interred outside of formal cemeteries. Development allowed by implementation of the proposed General Plan could also cause the destruction of or loss of an historical resource, as defined in CEQA Guidelines, Section 15064.5.

Findings. Geological mapping of the Loma Linda area indicates the presence of four sedimentary units with two of the sedimentary units having a high potential for paleontological resources. The proposed General Plan would allow development of structures within areas that contain high sensitivity for paleontological resources. The proposed General Plan includes a policy that requires, as a standard condition of development, that if paleontological resources are encountered during site grading that grading is to be halted until a qualified paleontologist evaluates and records the find. The proposed General Plan recognizes the importance of paleontological resources. However, the

proposed General Plan lacks any provision that address a recovery program. Without this policy in place, the impact to paleontological resources would be significant. However, the Draft EIR proposed Mitigation Measure 4.5.5.1A and with adherence and the implementation of the proposed mitigation, impacts to paleontological resources would be reduced to a less than significant impact.

Due to the relatively small percentage of the Planning Area which has been surveyed for prehistoric resources (approximately 30%), pending a cultural resources survey of the balance, the majority of the Planning Area should generally be considered moderately sensitive for the presence of prehistoric resources. The exceptions include the area in the vicinity of the Guachama Rancheria, (Mission Avenue and Pepper Way), which may contain buried prehistoric resources and should be considered highly sensitive. In addition, all other built up areas located within the City should be considered moderate to low sensitivity for prehistoric resources due to the existing development of the sites. The policies within the proposed General Plan require cultural resources surveys to be conducted prior to development occurring on a site-specific basis. A cultural resources survey, which includes a records search[1], can identify the existence of above-surface human remains, archaeological and historic resources along with the likelihood for buried cultural resources including human remains. In conjunction with the proposed General Plan policies, mitigation measures were proposed in the Draft EIR that would reduce the impact to impacts to archaeological resources and disturbance to buried human remains to less than significant.

Implementation of the proposed General Plan may disturb or destroy existing historic structures and resources through the construction of new residential, commercial, institutional or industrial buildings, and/or new infrastructure such as roadways and utilities. The City of Loma Linda has had a long-term interest in historical preservation as evidenced by an architectural/historical inventory of existing structures completed fourteen years ago and the inclusion of an historic preservation chapter in the zoning code. With new development required to adhere to proposed General Plan policies and the focus on preservation of existing historical structures, future development in the City will have a less than significant impact on historical structures or resources.

Facts in Support of Findings. Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, diagnostically or stratigraphically important. This includes fossils that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. The City also considers fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy, and assemblages of fossils that might aid stratigraphic correlations, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species as significant paleontological resources. The proposed General Plan contains Policy 9.7.5.f which requires that if paleontological resources are encountered during site grading that grading is to be halted until a qualified paleontologist evaluates and record the find. The concept of reducing impacts to levels below significant involves removal of nonrenewable paleontological resources from the field of evacuation as they are exposed and, if possible, prior to damage by excavation. Although not all fossils present will be recovered by the program of excavation monitoring and salvage, it is important to recover a significant fossil assemblage that would not have been recovered if the monitoring and recovery program had not been in place. Mitigation Measure 4.5.5.1A proposed in the Draft EIR states that when existing information indicates that a site proposed for development may contain paleontological resources, a paleontologist shall monitor site grading activities with the authority to halt grading to

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1 A records search is a formal request made by a qualified archaeologist to an archaeological repository, such as the San Bernardino County Museum in Redlands, to provide a written account of all pervious recorded surveys within one square mile of a project site.

collect uncovered paleontological resources, curate any resources collected with an appropriate reposition, and file a report with the City Planning Department documenting any paleontological resources that are found during site grading. The Council hereby directs that this mitigation measure be adopted. With adherence to the proposed General Plan policy and implementation of the proposed mitigation, impacts to paleontological resources would be reduced to a less than significant impact.

As determined in the Draft EIR on page 4.5-12, although only one ethnohistoric and three historic archaeological sites have been recorded within the Planning Area (CA-SBR-2311/H, CA-SBR-647H, CA-SBR-6137H, and CA-SBR-6169H), the historic cultural landscape of Loma Linda is complex. With such a complex historical and cultural landscape located within the Planning area, all of the potential historic districts should be considered highly sensitive for subsurface cultural deposits. Given the amount of undisturbed land that remains available for development, there remains the possibility that cultural resources may be disturbed through grading activities. Impacts upon archaeological resources could result from implementation of the proposed General Plan in the form of individual private development and public works projects. Two proposed General Plan Policies, 9.7.5 and 9.7.5.f, provide guidance for archaeological resources. Policy 9.7.5 requires the City to preserve and protect the City's historic structures and neighborhoods and to identify and preserve the archaeological and paleontological resources in the City. However, the policy does not determine what should occur when buried cultural resources including human remains are found. Therefore, the Draft EIR recommended mitigation measures 4.5.5.2A, 4.5.5.2B, 4.5.5.2C to address these issues. The Council hereby directs that these mitigation measures be adopted. Mitigation Measure 4.5.5.2A details the process if human remains are encountered during a public or private construction activity and Mitigation Measure 4.5.5.2B states that avoidance is the preferred treatment for cultural resources and lists methods for protecting cultural resources. With the implementation of the proposed General Plan policies and mitigation measures impacts to buried archaeological resources and buried human remains are less than significant impacts.

The City of Loma Linda has had a long-term interest in historical preservation as evidenced by an architectural/historical inventory of existing structures completed fourteen years ago and the inclusion of an historic preservation chapter in the zoning code. Although the architectural/historical inventory has accuracy and consistency issues and needs to be updated, the City is still committed to historical preservation as evidenced by the inclusion of historical preservation in four elements of the proposed General Plan. Proposed General Plan Polices pertaining to Historic Preservation include 2.2.8.4.d, 2.2.8.7.b, 3.2.1, 3.2.1.a-f, 8.6.7.g, 9.7.5, 9.7.5.a-e. These polices require various actions to preserve historic structures including General Plan Policy 9.7.5.a which requires the Update of the Survey of Historic Properties Inventory of 1988, taking into consideration buildings, neighborhoods, and other features of historic, architectural, or cultural significance. Policy 9.7.5.c requires the City to consider pursuing the designation of new historic landmarks. Implementation of the proposed General Plan policies will require evaluation of new development in relationship to existing historical structures as well as the identification and preservation of existing historical structures. With new development projects required to adhere to these policies and the focus on preservation of existing historical structures, the implementation of the proposed General Plan will have a less than significant impact on historical structures or resources.

For additional discussion regarding the project's impact to cultural and paleontological resources, see Draft EIR, Section 4.5.

5.5 Geology and Soils

Potential Impacts. Future development permitted by the proposed General Plan may increase the potential for property loss, injury, or death resulting from development on or adjacent to the San Jacinto Fault and/or as of yet undetected earthquake fault zones as stated in the Draft EIR p. 4.6-17.

The City of Loma Linda has and will continue to be subject to ground shaking resulting from activity on local and regional faults. Future development permitted by the proposed General Plan may increase the potential for property loss, injury, or death resulting from this ground shaking hazard. Portions of Loma Linda are susceptible to liquefaction, a destructive secondary effect of strong seismic shaking. Future proposed General Plan development within Loma Linda would increase the potential for the placement of structures and facilities in or near areas susceptible to liquefaction. Soils susceptible to subsidence may be affected by a variety of natural or human activities, including earthquakes and the withdrawal of subsurface fluids. Future development within the Planning Area would increase the potential for the placement of structures and facilities in areas susceptible to subsidence. Future development within the Planning Area would increase the potential for the placement of structures and facilities in areas susceptible to slope failure. Implementation of the proposed General Plan may result in impacts related to soil erosion or the loss of topsoil. Areas exposed during development activities would be prone to soil erosion and loss of topsoil. Future development within the Planning Area would increase potential placement of residential and non-residential structures within areas susceptible to damage resulting from collapsible and expansive soils.

Findings. As stated in the Draft EIR on page 4.6-17, the San Jacinto Fault runs through the southern portion of the Planning Area and an earthquake hazard zone has been established along this trace fault, which recommends building setbacks varying from 50 to 100 feet. Future development on these lands, as envisioned in the proposed General Plan, may result in the construction and occupation of structures, critical facilities, and pipelines adjacent to known and/or as yet undetected earthquake fault zones. Such development would increase the number of persons and the amount of developed property exposed to fault rupture hazards. The proposed General Plan includes policies to reduce or minimize the effects associated with fault rupture on residents and habitable structures. While implementation of the aforementioned policies would reduce the significance of potential fault rupture impacts, they do not address potential impact related to undiscovered faults or impacts that may be identified through the use of new scientific data, equipment, or procedures. Mitigation measures were identified in the Draft EIR which will reduce potential impacts associated with this issue to a less than significant level. With the implementation of the proposed General Plan policies and mitigation measures, the impacts related to fault rupture will be reduced to less than significant.

The San Jacinto fault runs through the southern portion of the Planning Area and an earthquake hazard zone has been established along this trace fault, which recommends building setbacks varying from 50 to 100 feet. Development under the proposed General Plan may result in the total residential units in the Planning Area of about 15,052 residential units and employment for approximately 26,167 persons, thereby exposing more structures and people (residents and employees) to the effects of ground shaking. The City of Loma Linda has identified minimizing the risk of property damage and personal injury resulting from seismic and geologic hazards as one of its guiding policies in the Public Health and Safety Element of the proposed General Plan. While implementation of the aforementioned policies would reduce the significance of potential ground shaking impacts, they do not provide specific development standards for development within areas subject to potential ground shaking impacts, nor do they provide adequate mitigation for potential ground shaking impacts that may be identified through the use of new scientific data, equipment, or procedures. To provide adequate mitigation for potential ground shaking hazards, mitigation was identified in the Draft EIR to provide flexibility to the City in requiring site-specific ground shaking assessment for any development subject to potential ground shaking impacts and to require adherence to identified design standards. With the implementation of the proposed General Plan policies and mitigation measures, the impacts related to ground shaking will be reduced to less than significant.

Portions of the Planning Area are susceptible to liquefaction, a destructive secondary effect of strong seismic shaking. There are two specific areas in the Planning Area that are subject to liquefaction, located in the northwest and southwest corners of the Planning Area. The City of Loma Linda has identified minimizing the risk of property damage and personal injury resulting from liquefaction as one of its policies in the Public Health and Safety Element of the proposed General Plan. To ensure that potential impacts associated with this issue are reduced to a less than significant level, mitigation measures were identified in the Draft EIR to provide flexibility to the City in requiring site-specific liquefaction assessments. With implementation of the proposed General Plan policies and mitigation measures, the impacts related to liquefaction hazards will be reduced to a less than significant level.

Parts of the Planning Area are located within areas susceptible to ground subsidence as stated in the Draft EIR, page 4.6-22. Build out of proposed General Plan will increase the number of persons, residential units, and non-residential development that would occur on soils susceptible to subsidence or soil collapse. The General Plan includes policies to reduce the potential impacts associated with development in areas where soils susceptible to subsidence are present, to a less than significant level.

As stated in the Draft EIR, page 4.6-23, the southern portion of the City has steep natural slopes, which are susceptible to instability. The type of instability anticipated in this area includes deep-seated landslides, surficial soil slips, wet debris flows, and surficial creep. Policies are constrained in the proposed General Plan to mitigate the potentially significant impacts associated with future development within the Planning Area. The proposed General Plan Policies address the potential for damage by requiring ongoing maintenance of manufactured slopes and soil analysis in areas of high-risk of slope failure. These policies ensure that potential slope failure impacts resulting from future development within the City are reduced to a less than significant level.

Soil erosion and loss of topsoil can be associated with groundbreaking excavation activities, such as grading or cut and fill for new development. An increase in population anticipated by the City's proposed General Plan would cause an increase in residential and non-residential structures, and allow activities resulting in the alteration and loss of existing topsoil. Soil erosion policies are located in the Conservation and Open Space Element and Public Health and Safety Element. These policies reduce the potential impacts, for soil erosion and loss of topsoil involving new development, to a less than significant level.

Implementation of the proposed General Plan may result in the construction and occupation of structures within areas underlain by expansive soils. Expansive soil conditions are those soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell) if not properly mitigated by site preparation and/or foundation design. Policies are identified in the proposed General Plan which will mitigate the potentially significant impacts associated with future development within the Planning Area.

Facts in Support of Findings. Development under the proposed General Plan may result in the total residential units in the Planning Area of about 15,052 and employment for approximately 26,167 persons, thereby exposing more structures and people (residents and employees) to the effects of a fault rupture. With this increase in development under the proposed General Plan, the number of persons and the amount of developed property exposed to fault rupture would increase. The proposed General Plan includes Policies 10.1.2, and 10.1.2.a-l which directly address ways to limit the potential impacts to structures located in the Alquist-Priolo (A-F) Fault Zones. Specially, General Plan Policy 10.1.2.a requires the City to limit development to low density in areas near geologic hazards such as the San Jacinto Fault that would create adverse conditions to those inhabiting the area and to the overall community. General Plan Policy 10.1.2.d. states that the City will identify and publicize the geologic and seismic hazards within Loma Linda and advice residents and property

owners of appropriate protection measures to reduce eliminate structural damage. While implementation of the aforementioned policies would reduce the significance of potential fault rupture impacts, they do not address potential impact related to undiscovered faults or impacts that may be identified through the use of new scientific data, equipment, or procedures. To provide adequate mitigation for potential fault rupture hazards, mitigation measure 4.6.4.1A was identified in the Draft EIR to provide flexibility to the City of Loma Linda in requiring site-specific geotechnical investigations in any area falling within identified or as yet unidentified fault zones. Mitigation Measure 4.6.4.1A requires that before a project is approved or otherwise permitted within an A-P Zone or within 150 feet of any other active of potentially active fault, a site-specific geologic investigation shall be prepared to assess potential seismic hazards resulting from development of the project site. This site-specific evaluation and written report shall be prepared by a licensed geologist and shall be submitted to City of Loma Linda Community Development Department for review and approval as part of the environmental and entitlement process and prior to the issuance of building permits. The Council hereby directs that Mitigation Measure 4.6.4.1A be adopted. With the implementation of the proposed General Plan policies and mitigation measures, the impacts related to fault rupture will be reduced to less than significant.

Earthquakes are a common occurrence in Southern California. Historically, Loma Linda has experienced the geologic affects of earthquakes outside the Planning Area. The San Jacinto fault runs through the southern portion of the Planning Area and an earthquake hazard zone has been established along this trace fault, which recommends building setbacks varying from 50 to 100 feet. The policies related to seismic hazards are found in the proposed General Plan in the Public Health and Safety Element. The proposed General Plan Polices (10.1.2. and 10.1.2.a-i) provide actions to reduce potential ground shaking impacts. Specifically, General Plan Policy 10.1.2.c requires the City to provide information and establish incentives such as free inspections or possibly reduced fees for property owners to rehabilitate existing buildings using construction techniques to protect against seismic hazards particularly in buildings with high occupancy such as churches and other places of assembly. General Plan Policy 10.1.2.e requires the City to encourage continued investigation by State agencies or geologic conditions within the Inland Empire to update knowledge of seismic hazards and promote public awareness. While implementation of the aforementioned policies would reduce the significance of potential ground shaking impacts, they do not provide specific development standards for development within areas subject to potential ground shaking impacts, nor do they provide adequate mitigation for potential ground shaking impacts that may be identified through the use of new scientific data, equipment, or procedures. To provide adequate mitigation for potential ground shaking hazards, mitigation has been identified in the Draft EIR (Mitigation Measure 4.6.4.2A) to provide flexibility to the City in requiring site-specific ground shaking assessment for any development subject to potential ground shaking impacts and to require adherence to identified design standards. Mitigation Measure 4.6.4.2A requires that a site-specific assessment shall be prepared to ascertain potential ground shaking impacts resulting from development. The site-specific ground shaking assessment shall incorporate up-to-date data from government and non-government sources and may be included as part of any site-specific geotechnical investigation. The site-specific ground shaking assessment shall include specific measures to reduce the significance of potential ground shaking hazards. The Council hereby directs that Mitigation Measure 4.6.4.2A be adopted. With the implementation of the proposed General Plan policies and mitigation measure, the impacts related to ground shaking will be reduced to less than significant.

According to the Draft EIR, page 4.6-21, liquefaction is a process by which water-saturated materials (including soil, sediment, and certain types of volcanic deposits) lose strength and may fail during strong ground shaking. Liquefaction is defined as "the transformation of a granular material from a solid state into a liquefied state as a consequence of increased pore-water pressure." The potential for liquefaction also depends on soil conditions and groundwater levels, which may fluctuate. Liquefaction occurs worldwide, commonly during moderate to great earthquakes. Portions of the

Planning Area are susceptible to liquefaction, a destructive secondary effect of strong seismic shaking. The City of Loma Linda has identified minimizing the risk of property damage and personal injury resulting from liquefaction as one of its policies in the Public Health and Safety Element of the proposed General Plan. Under General Plan Policy 10.1.2.h, a specialized soils report is required in areas suspected of having problems with potential liquefaction bearing strength, expansion, settlement, or subsidence, including implementation of the recommendations of these reports into the project development. Polices related to liquefaction are also include General Plan Policies 10.1.2, 10.1.2.e, 10.3.2., 10.3.2.a, and 10.3.2.c.

While implementation of the aforementioned policies would reduce the significance of potential liquefaction impacts, they do not provide specific development standards for development within areas subject to liquefaction, nor do they provide adequate mitigation for potential liquefaction impacts that may be identified through the use of new scientific data, equipment, or procedures. To ensure that potential impacts associated with this issue are reduced to a less than significant level, mitigation measures were identified in the Draft EIR to provide flexibility to the City in requiring site-specific liquefaction assessments. Mitigation Measure 4.6.4.3A requires that as determined by the City, a site-specific assessment shall be prepared to ascertain potential liquefaction impacts resulting from development. Mitigation Measure 4.6.4.3B requires that development proposed within an identified or potential liquefaction hazard area provide adequate and appropriate measures be implemented to reduce potential liquefaction hazards. The Council hereby directs that these mitigation measures be adopted. With implementation of the proposed General Plan policies and mitigation measures, the impacts related to liquefaction hazards will be reduced to a less than significant level.

Parts of the Planning Area are located within areas susceptible to ground subsidence according to the Draft EIR, p. 4.6-22. Build out of proposed General Plan will increase the number of persons, residential units, and non-residential development that would occur on soils susceptible to subsidence or soil collapse. The proposed General Plan includes the following policies to reduce the potential impacts associated with development in areas where soils susceptible to subsidence are present. General Plan Policy 10.1.2.b requires a geologic and soils reports be prepared for proposed development sites, and incorporate the findings and recommendations of these studies into project development requirements. Additionally, General Plan Policy 10.1.2.h requires specialized soils reports in areas suspected of having problems with potential ground subsidence including implementation of the recommendations of these reports into the project development. With the implementation of the proposed General Plan policies, the impacts related to ground subsidence will be re

According to the Draft EIR, page 4.6-23, the southern portion of the City has steep natural slopes, which are susceptible to instability. The type of instability anticipated in this area includes deep-seated landslides, surficial soil slips, wet debris flows, and surficial creep. The proposed General Plan Policies address the potential for damage by requiring ongoing maintenance of manufactured slopes and soil analysis in areas of high-risk of slope failure. Specifically, General Plan Policy 10.3.2.a limits cut and fill slopes to 2:1 (50%) slope throughout the City to maintain slope stability unless an engineering geologist can establish to the City's satisfaction that a steeper slope would not pose undue risk to people and property. General Plan Policy 10.3.2.c requires a geologic and soils reports as part of the development review process and/or building permit process for development in the hillside areas to minimize slope failure. General Plan Policies 10.3.2, 10.3.2.b, and 10.3.2.d also pertain to requirements to prevent slope failure. With implementation to the proposed General Plan policies, the impacts related to slope failure will be reduced to a less than significant level.

As stated in the Draft EIR, page 4.6-24, groundbreaking excavation activities can expose unprotected soils to storm water runoff causing erosion and loss of topsoil. In addition, exposure of underlying

soils during landform modifications substantially increases the potential for soil erosion. Soil erosion policies are located in the Conservation and Open Space Element and Public Health and Safety Element and include General Plan Policies 9.2.9.1.c, 9.2.9.1.d, 10.3.2, 10.3.2.b, and 10.3.2.d. Specifically General Plan Policy 9.2.9.1 requires new development to be designed to conserve soil and avoid erosion by limiting cut and fill areas and the exporting of soil from the development site. General Plan Policy 10.3.2.d requires erosion-control measures in areas of steep slopes or areas with high erosion problems on all grading plans to reduce soil erosion from wind, grading and construction operations, and stormwater runoff. With implementation to the proposed General Plan policies in addition to the UBC and California Building Code, the impacts from soil erosion will be reduced to a less than significant level.

According to the Draft EIR, page 4.6-25, when expansive soils shrink or swell, the change in volume exerts significant pressures on loads (such as buildings) that are placed on them. An increase in surface water infiltration, such as from irrigation, or a rise in the groundwater table, combined with the weight of a building or structure, can initiate settlement and cause foundations and walls to crack. Expansive soil conditions, if not properly mitigated by site preparation and/or foundation design, can cause substantial damage to structures and other improvements over time. Implementation of the proposed General Plan may result in the construction and occupation of structures within areas underlain by expansive soils. The proposed General Plan contains polices to reduce potential impacts associated with collapsible and expansive soils. The proposed General Plan policies require soil reports within areas susceptible of collapsible and expansive soil conditions (General Plan Polices 10.1.2., 10.1.2.b, and 10.1.2h). In addition to soil report findings, project development requirements are to be enforced. Adherence to these policies will reduce potential impacts related to collapsible and expansive soils to a less than significant level.

5.6 Hazardous Materials

Potential Impacts. As was analyzed in the Draft EIR for the General Plan on page 4.7-5, implementation of the proposed General Plan may result in uncovering previously unknown hazardous materials contamination from historical use of property. As new commercial, business park, and/or industrial uses are constructed pursuant to the proposed General Plan, the potential for the storage, use, generation, and transportation of hazardous materials will increase, with associated increases in health and safety hazards. Build out of the proposed General Plan may also impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. In addition, implementation of the proposed General Plan may result in the exposure of people and structures to wildland fire areas.

Findings. Many properties in the Planning Area were developed prior to the existing hazardous materials standards. As these properties are redeveloped, there is the likelihood that hazardous materials such as asbestos-containing materials and/or lead-based paint could be encountered. There are many vacant parcels within the Planning Area which could be sites of earlier development or unknown dumping of potentially hazardous materials. The potential risks to associated with contamination of properties from historical uses have been reduced by existing federal, State and local policies and procedures that would require the delineation and remediation of sites containing hazardous substances to the satisfaction of the designated local enforcement agency and by a General Plan policy that requires a continued program of regular inspections and monitoring to ensure compliance with regulations. Compliance with existing regulations and a General Plan policy have been identified to reduce potential impacts to a less than significant level.

As stated in the Draft EIR on page 4.7-6, generally, hazardous materials are commonly used in all segments of our society, including manufacturing and service industries, commercial enterprises, agriculture, military bases, hospitals, schools, and households. The proposed land uses in the

General Plan generally will result in more than a doubling of commercial, business park, and industrial uses within the Planning Area. Recognizing the importance of protecting public safety relating to the handling and exposure of the community to hazardous materials, the proposed General Plan policies address this issue through monitoring compliance with local, State, and Federal regulations. The policies also seek a reduction in hazardous materials users and generators through the encouragement and assistance in the reduction of hazardous waste from businesses and homes in the City. With the implementation of the proposed General Plan policies, the impacts associated with the risk of hazardous materials exposure would be reduced to less than significant levels.

The new residential and non-residential structures which would be constructed with the implementation of the proposed General Plan are not currently included in adopted emergency response plans. The increase in population and resulting potential traffic congestion could cause emergency response delays. The Loma Linda Emergency Operations Plan identifies the City's emergency planning, organization, and response policies and procedures. It identifies how the City will respond to extraordinary events or disasters, from preparation through recovery. The City of Loma Linda recognizes that the planning process must address a wide range of hazards that could potentially threaten the City, including natural, technological, man-made, and national security disasters. The plan addresses the integration and coordination with other agencies and governmental levels when required. In addition, the plan provides assistance in the development of department Standard Operating Procedures (SOP). The plan also discusses after-action reporting procedures and possible disaster assistance programs depending on the type of emergency. The proposed General Plan policies ensure that emergency preparedness programs are maintained and properly coordinated throughout the Planning Area. With the implementation of these policies, the impact of new development on emergency plans would be less than significant.

As stated in the Draft EIR on page 4.7-13, recent residential development intrusion into the lower foothills to the south and southwest creates additional problems in controlling a wildland fire. These problems are due to limited firefighting facilities in the area, and the lack of direct access to the areas, which lengthens response times. The risk of fire damage to structures can be minimized with appropriate spacing of structures, brush clearance, fuel modification zones, building material, water availability and adherence to State and local fire codes. Additionally, the Public Safety Department takes part in an annual public educational program directed towards residences in hazardous fire areas. An informative pamphlet is distributed on the doors of those that live in or near the hazardous fire areas recognized by the City. Information contained in the pamphlets educates residents on vegetation management, clearance standards of brush/vegetation next to structures and access roads/ driveways, and chimney/fireplace safety tips. The proposed General Plan policies seek to minimize the risks associated with placing structures and people in wildland fire areas. With the implementation of the proposed General Plan policies, the impact associated with the exposure of persons and structures to wildland fire areas is less than significant.

Facts in Support of Findings. General Plan Policy 10.5.2.c establishes a program of regular inspections and monitoring to ensure compliance with local, State, and federal regulations which would assist in the discovery of hazardous materials should redevelopment or new developments occur. In addition, should contamination be found or disturbed, existing Federal, State, and local regulations and procedures would require the delineation and remediation of sites containing hazardous substances to the satisfaction of the designated local enforcement agency. Moreover, it is unlikely that any such contamination or disturbance would be extensive beyond the capabilities of typical remediation measures which are covered in a General Plan Update implementing policy. The implementation of proposed General Plan policies will reduce this impact to a less than significant level.

Hazardous materials are commonly used by all segments of society including manufacturing and service industries, commercial enterprises, agriculture, military bases, hospitals, schools, and households. If improperly handled, stored, or disposed of, these materials can have substantial health and environmental consequences. While the risk of exposure to hazardous materials cannot be eliminated, adherence to General Plan Policies 10.5.2.b, 10.5.2.d, 10.5.2.e, 10.5.2.g, and 10.5.2.i plus compliance with regulations, standards, and guidelines relating to storage, use, and disposal of hazardous materials established by the Environmental Protection Agency, State, County, and local agencies will reduce the potential risk of hazardous materials exposure to a less than significant level within the Planning Area.

Proposed General Plan Policies 10.6.2, and 10.6.2.a through 10.6.2.e ensure that emergency preparedness programs are maintained and properly coordinated throughout the Planning Area. The policies also address the regular review of these programs and the creation of new programs to further ensure the safety of the City and areas within the General Plan Planning Area during and after disasters. With the implementation of these policies, the impact of new development on emergency plans would be less than significant.

The proposed General Plan policies seek to minimize the risks associated with placing structures and people in wildland fire areas. While the risks are not eliminated, the proposed General Plan policies emphasize following all known safety measures. With these safety measures in place and following State and Federal guidelines, the impacts to people and property will be reduced to a less than significant level. Additional discussion of hazardous materials and fire hazards is located in the Draft EIR beginning on page 4.7-1.

5.7 Water Resources

Potential Impacts. Implementation of the proposed Loma Linda General Plan may increase the demand for water and may contribute to the depletion of groundwater supplies, thereby reducing water availability to existing well users. New development permitted pursuant to the proposed General Plan will increase the amount of impervious surfaces and result in the loss of water recharge areas. Build out of the proposed General Plan may increase the demand for water services such that it exceeds the existing and planned facilities. During future construction activities and post-construction uses associated with build out of the proposed General Plan, water quality or waste discharge requirements may be violated. The increase in demand for water due to proposed General Plan permitted uses may affect water availability for emergency fire flow.

Findings. Groundwater pumped by the City comes from Bunker Hill Basin. The production and distribution of water within the City of Loma Linda is provided by the City's Department of Public Works, Water Division. As shown in Table 4.8.H in the Draft EIR, the average water demand at build out of the proposed General Plan is projected to be 6,083 gpm, and the maximum project demand is projected to reach 12,144 gpm. As shown in Table 4.8.A of the Draft EIR, the existing well capacity is 7,900 gpm. Therefore, currently there is enough water production to meet the project average daily requirements at build out; however, there is not enough to supply water on a peak demand day. In order to meet the projected water demand at build out, new wells would need to be constructed. Although the City of Loma Linda has ascertained that there is presently enough water supply in the Bunker Hills basin to serve its future needs, the City is not the only community using that basin for water supplies. The proposed General Plan contains policies to reduce impacts associated with implementation of the proposed General Plan; however impacts associated with an increased demand for water and the depletion of groundwater supplies remain significant and unavoidable.

The groundwater pumped by the City comes from the Bunker Hill Basin, which is replenished mainly from rainfall and snowmelt from the San Bernardino Mountains. Other sources of recharge include

excess irrigation, incidental percolation from reclaimed water ponds, and recharge of off-season imported water in recharge ponds managed by water agencies. Efficient groundwater recharge depends on a variety of conditions including permeable surfaces. Increased development reduces the amount of permeable surfaces suitable for recharge, increases the rate and volume of runoff and the subsequent flow of water in streams, and increases the amount of oil and grease and other non-point source pollutants that enter streambeds and recharge areas. The proposed General Plan policy and mitigation measure requiring new development to incorporate features to facilitate the on-site infiltration of precipitation and/or runoff into groundwater basins reduces the potential impacts of the proposed General Plan below a level of significance.

New development within the City pursuant to implementation of the proposed General Plan will require the installation of additional water transmission and distribution lines, as well as pipelines (purple pipe) for reclaimed water for the purpose of irrigation systems. The City's Water Master Plan (pages 5-8) states that the City's water distribution system is generally hydraulically adequate with respect to pipelines through build out of the proposed General Plan, with the exception of two areas. Additional pipelines are recommended, especially in the North Central Neighborhood. New pipelines required for new development will be installed and/or financed by the developer. With the proposed General Plan policies in place, the impacts associated with the distribution of water would be reduced to less than a significant level.

Future construction, grading, and excavation would cause temporary disturbance of surface soils which would likely produce silt and debris during runoff, resulting in a short-term increase in the sediment load of the storm drain system serving the City. Federal law requires the City of Loma Linda to implement the provisions of the National Pollutant Discharge Elimination System (NPDES) for municipal and private projects to protect groundwater recharge areas from construction runoff and other potential sources of pollutant runoff. Therefore, adherence to the proposed General Plan policies and implementation of Federal law will reduce impacts related to water quality to less than significant.

The volume of water allocated for emergency uses is typically determined based on the historical record of emergencies experienced and on the amount of time expected to lapse before an anticipated emergency can be corrected. The City of Loma Linda recognizes the importance of maintaining adequate fire flow in a General Plan policy. With the proposed General Plan policies in place, the impacts on fire flow from the implementation of the proposed General Plan would be reduced to a less than significant level.

Facts in Support of Findings. As stated in the Draft EIR on pages 4.8-14 and 4.8-15, the City of Loma Linda will not have enough water to supply the proposed General Plan build out on a peak demand day. With increased development in the planning area, anticipated with the implementation of the proposed General Plan, water resources will continue to diminish not only for the City of Loma Linda but also for the rest of the communities in Southern California. As the rest of the region grows and as the native water supply decreases, the region's dependence on imported water grows and water conservation, including the use of reclaimed water and control of water runoff pollution becomes critical to not only Loma Linda but the entire region. The City has identified the provision and protection of water resources as one of prime importance in the implementation of the proposed General Plan. General Plan policies 8.7.2, 8.7.2.a, 8.7.2.c, 8.7.2.f, 9.6.2, and 9.6.2.a through 9.6.2.f recognize the water supply issues and encourage the use of water conservation measures. However, the City does not assure the provision of water supplies adequate to support development that may occur as a result of implementation of the proposed General Plan. It is found that there are no additional feasible mitigation measures or alternatives that could be adopted at this time which would reduce this impact to a less than significant level. To the extent that this adverse impact will not be eliminated or lessened to an acceptable (less than significant) level, it is found that specific economic,

legal, social, technological, and other considerations identified in the Statement of Overriding Considerations support approval of the project as modified, despite unavoidable residual impacts.

The groundwater pumped by the City comes from the Bunker Hill Basin, which is replenished mainly from rainfall and snowmelt from the San Bernardino Mountains. Typical groundwater recharge programs artificially replenish groundwater in wet years with surplus imported water. Water is withdrawn from groundwater reserves during periods of drought or during emergency situations. Although proposed General Plan Policy 2.2.3.1.m provides for the protection of watersheds, there are no policies which reduce or minimize potential impacts that implementation of the proposed General Plan may have on groundwater recharge. Implementation of the proposed mitigation measure which requires requiring new development to incorporate features to facilitate the on-site infiltration of precipitation and/or runoff into groundwater basins will reduce the potential impacts of the proposed General Plan below a level of significance.

New pipelines required for new development will be installed and/or financed by the developer. Policies 8.7.2, 8.7.2.a, 8.7.2.b, 8.7.2.c, and 8.7.2.g in the proposed General Plan address the issue of Loma Linda's water distribution in the City. With these policies in place, and the recognized policy of developers providing required new distribution lines, the impacts associated with the distribution of water would be reduced to less than a significant level.

Future construction, grading, and excavation would cause temporary disturbance of surface soils which would likely produce silt and debris during runoff, resulting in a short-term increase in the sediment load of the storm drain system serving the City. Substances such as oils, fuels, paints and solvents may be transported to nearby drainage systems, watersheds and groundwater recharge areas. Source-control Best Management Practices are required by the Regional Water Quality Control Board in its water discharge permits. All new development would be required to comply with these legal/regulatory requirements. Adherence to General Plan Policy 9.6.2.g and implementation of Federal law will reduce impacts related to water quality to less than significant.

Because the occurrence and magnitude of an emergency situation is not subject to accurate evaluation, the volume of emergency storage is generally based upon engineering judgment and/or utility policy. Although General Plan Policies 8.7.2 and 8.7.2.d call for the provision of a water system that will have sufficient water in storage reservoirs for emergency and fire protection, mitigation is necessary to address the need for water storage capacity in Zone 4. Implementation of proposed General Plan policies and the mitigation measure which requires development in Zone 4 to provide appropriate water storage capacity and hydraulic pumps as necessary to meet required water and fire flow during emergencies would reduce the impacts on fire flow from the implementation of the proposed General Plan to a less than significant level.

Further discussion of the impacts to Water Resources can be found in the Draft EIR beginning on page 4.8-1.

5.8 Land Use and Agricultural Resources

Potential Impacts. Implementation of the proposed General Plan would change the predominant agricultural land use pattern in the eastern section of the Planning Area, thus changing the predominant character of the area. According to the Draft EIR for the General Plan on page 4.9-12, implementation of the proposed General Plan would result in changes to existing land use designations in certain areas which could negatively affect the existing pattern of development as well as the surrounding uses. With a small portion of the City of Loma Linda located within the San Bernardino International Airport influence area in the "draft" land use plan, proposed land use

designations may be incompatible with the "draft" Airport Land Use Commission's plan for the influence area.

Findings. Currently, the Planning Area contains about 889 acres of land in agricultural use with approximately 386 acres in the City and approximately 503 acres existing in the sphere of influence. The City has always considered that agricultural uses will transition to urban uses since the time of incorporation as evidenced by the fact that the original General Plan Land Use Plan does not include an agricultural land use designation even though this area contains State prime and unique farmland. The agricultural land fronting on Redlands Boulevard and fronting on Barton Avenue have been planned for housing and special development since 1989. The proposed General Plan policies provide clear direction that the intent of the City is to encourage the conversion of existing agricultural uses to urban uses. With implementation of proposed General Plan policies, impacts associated with the change from a predominately agricultural land use pattern to urban uses are less than significant.

One of the primary purposes of land use planning in the proposed General Plan is the generation of a land use plan which represents the City's vision of its future. Most of the proposed land use changes involve the consolidation of residential use designations. The General Plan Land Use Map currently utilized incorporates eleven different land use categories. The proposed General Plan reduces the number of land use designations to seven by combining redundant land use categories such as High density Residential 11-20 and Very High Density 13.1-20 into one category. The proposed General Plan policies support the vision of the City to continue to be a small, friendly, beautiful community with natural assets, unique economy and healthy lifestyle. In addition, the proposed General Plan policies further the vision of the City as the location of diverse housing opportunities where the natural environment is protected and enhanced. With the implementation of the proposed General Plan policies, the impacts to land use changes will be reduced to less than significant.

The San Bernardino International Airport, a commercial airport with an instrument landing system and a 10,000-foot runway, is located 1.5 miles from the northern boundary of the City. As shown in Draft EIR Figure 4.9.3, portions of the City fall within the 2-mile radius considered within the airport influence area. The City is obligated to have its general plan be consistent with the approved Airport Land Use Compatibility Plan. When a project, under jurisdiction of the City of Loma Linda, is proposed within the San Bernardino International Airport influence area, it will be reviewed for compatibility with the provisions of the airport land use plan. At the time of the preparation of the City's General Plan, the San Bernardino International Airport land use plan was not adopted. Implementation of the proposed General Plan would not result in any safety hazards related to airports.

Facts in Support of Findings. General Plan policies 9.5.2, 9.5.2.a, and 9.5.2.b provide clear direction that the intent of the City is to encourage the conversion of existing agricultural uses to urban uses. With this stated purpose, the change in character of the agricultural areas is sought by the City and would be considered a positive effect of the proposed General Plan. Therefore, with implementation of the proposed General Plan policies, the change in land use character of the eastern portion of the Planning Area is considered a positive outcome and would be considered less than significant.

The proposed General Plan recognizes the City's unique economy as evidenced by its recognition of the importance of Loma Linda University and the various extensive medical facilities in the community, promoting mixed-use development throughout the community and in recognizing the sensitivity of development impacts that may occur in the hillside by addressing development in this area based on slope gradient and the proposed land use designation are compatible with those in the surrounding areas and their associated development patterns. The proposed policies in the General Plan cover possible land use conflicts while addressing standards for new development. With

implementation of proposed General Plan policies contained in the Land Use Element, impacts associated with the change in land use designations and patterns of development in the City as well as the surrounding area is considered less than significant.

Portions of the City fall within the 2-mile radius considered within the San Bernardino International Airport influence area. General Plan policies 10.7.2.1, 10.7.2a, and 10.7.2b support the vision of the San Bernardino Airport Land Use Commission. Implementation of the policies will ensure land use designations are compatible with those uses in the surrounding area and their associated development patterns. With implementation of the proposed General Plan policies, the impacts to land use changes will be reduced to less than significant.

Further discussion of the impacts to Land Uses and Agricultural Resources is located in the Draft EIR beginning on page 4.9-1.

5.9 Flood Hazards

Potential Impacts. As stated in the Draft EIR on page 4.10-12, implementation of the proposed General Plan may result in exposure of people or structures to the impacts of flooding through the placement of structures in the 100-500 year floodplain. Future development under the proposed General Plan would likely result in a net increase in impervious surfaces (i.e., roads, parking lots, buildings). An increase in impervious surfaces reduces the amount of rainfall that can infiltrate into the subsurface. Increases in runoff can amplify drainage volumes and velocities causing storm drainage facilities that are at or near capacity to fail during peak events. This excess runoff may result in localized ponding and/or flooding. Therefore, the implementation of development in accordance with the proposed General Plan may result in significant impacts related to existing drainage facilities.

Findings. Flooding represents a potential hazard within the Planning Area. The majority of the area potentially subject to flood hazards is located in the northern portion of the Planning Area, as shown in Figure 4.10.1 in the Draft EIR. Implementation of the proposed General Plan would increase the City's population and total acreage of development. While most of the potential flooding hazards are in the northern section of the City, new development in the Southern Hills area could be affected by flood hazards if located near naturally occurring streambeds or aboveground storage tanks. The implementation of the proposed General Plan policies would require new projects to not only evaluate stormwater runoff from their project sites but also require construction of needed drainage and flood control facilities. Implementation of the proposed General Plan policies and the mitigation measure prohibiting development within the 100-year floodplain will reduce potential flooding impacts that may result from the build out of the Planning Area (as envisioned in the proposed General Plan) to less than significant levels.

Build out of the proposed General Plan will increase the number of impervious surfaces throughout the Planning Area. New development that would increase the area of impervious surfaces would increase the volume and rate of stormwater entering the current drainage system, which may exceed the capacity of the system. Development will increase and concentrate runoff, which, if not controlled, may accelerate the rates of erosion of unprotected surfaces. The implementation of the proposed General Plan policies would require new projects to not only evaluate stormwater runoff from their project sites, but also to provide perpetual maintenance of detention basins if necessary and require new development to incorporate features that would reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff. With the implementation of the proposed General Plan policies, the impacts related to flood hazards would be reduced to a less than significant level.

Facts in Support of Findings. While the majority of the area potentially subject to flood hazards is located in the northern portion of the Planning Area, local topography and the presence of a number of large aboveground water storage tanks increase the potential for flood events in other portions of the Planning Area. The San Bernardino County Flood Control District maintains three regionally significant storm drain facilities within the City. General Plan Policies 10.2.3.a through 10.2.3.g address the maintenance of these storm drains, and requires new projects to evaluate stormwater runoff from their project site, and minimize the surface waste runoff created by the project. Additionally, new development projects will be required to provide for the maintenance of stormwater facilities which serve their needs. With the implementation of the proposed General Plan policies and the mitigation measure prohibiting development within the 100 year floodplain, the impacts related to flood hazards would be reduced to a less than significant level.

The natural materials in the Planning Area are relatively susceptible to erosion. Development within the Planning Area, especially in the southern portion, will increase the potential for soil erosion. Increased rates of erosion will likely accelerate sedimentation of drainage channels and flood control features, which may impact the effectiveness of these features. Development which encompasses 1.0 acre or more is required to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES), which regulates the pollutant discharges from developed sites. The City will continue to require existing and new development to adhere to the applicable provisions required by existing permits. With implementation of proposed General Plan Policies 10.2.3.a, 10.2.3.c, and 10.2.3.d, potential stormwater drainage impacts resulting from build out of the Planning Area will be reduced to a less than significant level.

Further discussion of the impacts to Flooding Hazards is located in the Draft EIR beginning on page 4.10-1.

5.10 Noise

Potential Impacts. As stated on page 4.11-18 in the Draft EIR, noise levels from grading and other construction activities would potentially result in noise levels reaching 91 dBA L_{max} at off-site locations 50 feet from the site boundary, potentially impacting off-site sensitive receptors adjacent to individual construction sites. Implementation of the proposed General Plan would result in potential long-term vehicular noise that would affect sensitive land uses along the roads. New development, particularly residential uses along and adjacent to major transit corridors, could be exposed to excessive traffic-related noise levels. New development associated with the proposed General Plan could expose existing and/or new sensitive uses to stationary noise sources, such as those generated by industrial and/or commercial uses. Although the proposed General Plan would not result in potential project-related increases in railroad noise, there could be new proposed sensitive land uses along and adjacent to the railroads that would be affected by high noise levels from railroad operations.

Findings. As stated on page 4.11-19 in the Draft EIR, implementation of projects allowed by the proposed General Plan would result in construction at various sites throughout the City. The transport of workers and construction equipment and materials to these project sites would incrementally increase noise levels on access roads leading to these sites. Noise generated during excavation, grading, and building construction on development sites would result in potential noise impacts to off-site uses while construction occurs. While the proposed General Plan policies provide guidance and standards for reducing noise impacts due to construction, additional measures are necessary to further ensure that the impacts are reduced to less than significant levels. The impacts of noise during construction would be short-term in duration and the policies in the proposed General Plan and the mitigation measures would reduce the impacts from construction noise to less than significant level.

As stated on page 4.11-22 of the Draft EIR for the General Plan, new developments within the City of Loma Linda and regional growth will result in an increase in traffic within the City. Existing sensitive receptors in the city would be potentially affected by noise associated with these new traffic trips. The projected future build out traffic noise in the City ranges from moderate to high, with the 70 dBA CNEL confined within the roadway right-of-way for 33 of the 58 of the surface street segments analyzed. Implementation of the proposed General Plan policies and the stated mitigation will reduce potential traffic-related noise impacts to a less than significant level.

The development of new industrial and commercial uses pursuant to the proposed General Plan and related actions may increase noise levels in their vicinity due to the establishment of new stationary noise sources. Although vehicular noise is exempt from local regulation when operating on public streets, cities can regulate vehicular noise while operating on private property. New projects developed under the proposed General Plan would be subject to the City's noise ordinance and the provisions of the proposed General Plan. Implementation of the proposed General Plan policies will reduce potential stationary impacts to a less than significant level.

As stated on page 4.11-29 of the Draft EIR, new development, particularly residential uses along and adjacent to railroad corridors, could be exposed to excessive train-related noise levels. An increase in rail usage is expected in the future, due to the establishment and expansion of commuter rail services. The policies in the proposed General Plan would reduce the effect of railroad noise on sensitive land uses, thus ensuring noise impacts that are less than significant.

Facts in Support of Findings. Short-term noise impacts would be associated with excavation, grading, and erecting buildings during construction of individual projects allowed through the implementation of the proposed General Plan. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area today, but would cease once construction of the project is completed. While the proposed General Plan policies provide guidance and standards for reducing noise impacts due to construction, additional measures are necessary to further ensure that the impacts are reduced to less than significant levels. Construction impacts associated with the implementation of the proposed General Plan would still occur with the implementation of the proposed General Plan policies and mitigation measures. However, the impacts would be short-term in duration and General Plan Policies 7.8.1.1.h through 7.8.1.1.l and Mitigation Measures 4.11.5.1A through E would reduce the impacts from construction noise to less than significant level. The proposed mitigation measures provide performance standards related to noise which must be followed at all construction sites. These performance standards regulate the hours of construction, the timing of pile-driving, the location of stationary noise sources, the use of best available noise control techniques for equipment and trucks, and a method of tracking and responding to noise complaints. The Council hereby directs that these mitigation measures be adopted.

Long-term noise impacts would be associated with mobile and vehicular noise sources, as well as stationary industrial and commercial noise sources. Future increased traffic in the Planning Area would add up to 7.0 dBA to area roadway links. More than half of the roadway links analyzed have the 65 dBA CNEL contour extending outside the roadway right-of-way. The 65 dBA CNEL extends up to 307 feet from the centerline of the road. Although proposed General Plan Policies 7.8.1.2.a through 7.8.1.2.f provide guidance and standards for reducing traffic-related noise impacts, Mitigation Measures 4.11.5.2A through C are necessary to further reduce noise impacts. These mitigation measures require buildings associated with noise-sensitive uses and exposed to significant traffic noises be equipped with air conditioning and incorporate upgraded building facades. Additionally, outdoor active use areas would need to be protected by sound walls. The Council hereby directs that these mitigation measures be adopted. Implementation of the proposed General Plan policies and the

stated mitigation measures will reduce potential traffic-related noise impacts to a less than significant level.

The use of heavy trucks on private properties (e.g., making deliveries to commercial and industrial uses) will result in noise levels of 73 dBA at 50 feet from the source of the noise (e.g., truck's engine). The use of multiple trucks on a site, such as might occur at a warehouse, could generate noise levels of about 80 dBA L_{eq} as measured at a distance of 50 feet. Industrial processing equipment and conducting outdoor industrial activities could also generate increased noise levels. New projects developed under the proposed General Plan would be subject to the City's noise ordinance and Policies 7.8.1.1a through 7.8.1.1.h of the proposed General Plan. Implementation of the proposed General Plan policies will reduce potential stationary noise impacts to a less than significant level.

New proposed sensitive land uses locates along and adjacent to existing railroads would be exposed to increased noise levels as future increases in rail usage occur. The proposed General Plan's land use noise compatibility and mobile source noise policies would apply to railroad noise within the City, thus ensuring noise impacts that are less than significant.

Further discussion of Noise impacts is located in the Draft EIR beginning on page 4.11-1.

5.11 Population and Housing

Potential Impacts. Build out of the Loma Linda General Plan will increase the study area's population, both directly as the result of residential development, and indirectly through commercial/industrial development. This growth will not exceed the housing and population projections for the Planning Area, as shown in Table 4.12F on page 4.12-6 of the Draft EIR.

As stated on page 4.12-6 of the Draft EIR, implementation of the proposed General Plan would not result in the displacement of a substantial number of residential units and persons. Upon build out of the proposed General Plan, approximately 15,052 residential units are projected to exist within the Planning Area. Development will occur on vacant or agricultural land and would not displace residential units or persons; therefore, no impact would occur.

As stated on page 4.12-7 of the Draft EIR, implementation of the proposed General Plan will result in an increase in employment growth within the City exacerbating the jobs-to-housing balance. Even though the City of Loma Linda is expected to have many more jobs than households by 2025, other cities within San Bernardino County are expected to have a much lower jobs-to-household ratio. Because Loma Linda's numerous jobs will help to balance the numerous households in surrounding cities, a balance between the number of jobs and households will exist within the region by 2025, and the jobs within Loma Linda will have a beneficial effect on the region. Therefore, the implementation of the proposed General Plan will help to balance land uses regionally and no adverse impact associated with this issue would occur.

Findings. Projections for population, employment, and residential dwellings were identified to reflect the "theoretical" build out of the Loma Linda General Plan Planning Area, utilizing land use designations and assumptions detailed in the proposed General Plan. A General Plan is, by definition, growth inducing in that it provides a plan for accommodating future increases in population, housing, and employment. The proposed General Plan includes areas outside the Loma Linda City limits and the land uses proposed permit extensive development within portions of Loma Linda's sphere of influence. The proposed General Plan will result in a potential cumulative impact on employment, housing, and population. This potential impact is considered substantial, but not adverse, in light of the project's contribution to improved jobs/housing balance and transportation demand management promoted by SCAG's regional policies. Therefore, there are no significant

unavoidable adverse impacts related to population and housing for the reasons set forth in the Draft EIR.

Facts in Support of Findings. The proposed General Plan and the EIR use the build out year of 2025 as an assumption for analysis purposes. Build out of the proposed General Plan by 2025 would be a worst-case scenario. Regional economics and the marketplace will dictate the build out of the proposed General Plan and dictate how accurate projections are. Because the proposed General Plan assumes build out in 2025 that does not exceeds the currently adopted SCAG regional projections for 2025 build out, exceeding the regional population and housing projections would not be considered a significant unavoidable impact.

5.12 Public Services and Utilities

Potential Impacts. The future development envisioned by the Loma Linda Planning Area will increase the demand for public services and facilities. Demands on fire and police protection will increase as the result of residential, commercial, business park, and industrial development with the implementation of the proposed General Plan. In locations where new development occurs, additional fire protection services would be needed. In addition, there could be an increase in student enrollment within the Redlands Unified School District (RUSD), Colton Joint Unified School District (CJUSD), and the San Bernardino Superintendent of Schools with the built out of the City. Implementation of the proposed General Plan would result in increased demand for sewer services within the Planning Area. The increase in development would result in increased demand for solid waste services and an increase in the demand for landfill capacity.

Findings. According to the Draft EIR on page 4.13-6, development associated with the implementation of proposed General Plan would require additional on-duty firefighters and a new fire station facility in the South Hills portion of the city. The City of Loma Linda's Fire and Rescue Division's ability to provide fire protection services to support the needs of future growth is dependent upon its ability to construct, staff, and equip this new fire station as the need for fire protection services increases with development. Implementation of the proposed General Plan policies and City requirements would reduce potential impacts related to the effects of future development on fire protection services by reducing the threat of fire, improving firefighting infrastructure, and ensuring that future growth does not exceed acceptable levels of service.

The Planning Area is served by the San Bernardino County Sheriff's Department. With the increase in businesses and industries, the daytime population would also increase and require new police services. The use of community arterial roadways, including Barton Road, Redlands Boulevard, Anderson Street and Mountain Avenue would also increase, which would impact enforcement of traffic laws. The proposed General Plan includes goals that address the level of police services to be maintained to accommodate long-term growth and a requirement to continuously evaluate the provision of police services provided. With implementation of these propose General Plan Policies, potential impacts to police protection services would be reduced to a less than significant impact. For additional discussion of the impacts to police protection, see DEIR Section 4.13.2.

Implementation of the proposed General Plan would increase the number of dwelling units in the Planning Area thereby increasing the number of students attending local schools. The greatest residential growth in the Planning Area is projected to occur in the South Hills portion of the city. The Redlands Unified School District (RUSD) and Colton Joint Unified School District (CJUSD) would need to build new schools with build out of the proposed General Plan. The proposed General Plan includes policies to address the need for school facilities and provide the maximum mitigation allowable under State law. The maximum mitigation is a development fee based on the particular school district's need and this fee will be imposed on all new development. Because the Government

Code states that compliance with Senate Bill 50 will provide full and complete mitigation, no significant impacts will occur.

The City of Loma Linda is considered a "job rich" community as the number of jobs available in the city totaled 14,733 in 2000 (as determined by the 2001 RTP Growth Forecast) while the number of employed persons over the age of 16 living within the City totaled 8,679 (according to the 2000 Census). However, unlike many communities with substantial local employment, a large percentage of Loma Linda's workforce is already locally employed. Loma Linda University and associated medical institutions including the Veterans Hospital are the largest employers in the City providing employment for the residents of City of Loma Linda.

Future wastewater flows are based on ultimate build out of the City based on land uses identified in the General Plan. The City of Loma Linda's capacity is based upon a Joint Powers Agreement with the City of San Bernardino. The implementation of the proposed General Plan will initiate an increase for wastewater services as demand increases. The proposed General Plan policies ensure that new development provides adequate infrastructure for average and peak wastewater conditions. In addition, the proposed General Plan policies state that the City will ensure that adequate infrastructure is in place and operational prior to occupancy of new development; such that new development will not negatively impact the performance of sewer facilities serving existing developed areas. Implementation of these proposed General Plan policies and the continual updating of the Master Plan for sewer facilities would ensure that adequate wastewater facilities are in place to accommodate existing and future development, thereby reducing effects associated with future development to a less than significant level. The Master Plan for sewer facilities would ensure that infrastructure is sufficiently in place to accommodate existing for safe disposal of sewage.

Implementation of the proposed General Plan will increase the number of commercial, industrial, and residential land uses within the City and, therefore, the demand for solid waste services will increase. The ability to dispose of solid waste in Loma Linda is tied to available landfill capacity and compliance with the California Integrated Waste Management Board (CIWMB) diversion rate of 50 percent. The proposed General Plan policies recognize both the need to reduce solid waste and the need to limit the locations of solid waste transfer stations. Implementation of the proposed General Plan policies, in addition to continued compliance with the State-mandated 50 percent reduction in solid waste, would reduce solid waste impacts to less than significant.

Facts in Support of Findings. The City of Loma Linda has indicated that the southern portion of the City, south of the Hillside Initiative Boundary, may need a second fire station for several reasons. The City's ability to provide fire protection services to support the needs of future growth is dependent upon its ability to construct, staff, and equip a new fire station as the need for fire protection services increases with development. The funding for the construction of the necessary facilities, as specified in the policies of the proposed General Plan, will be provided by development served by the facilities. Implementation of proposed General Plan Policies outline in Section 8.1.2 (Guiding Policy) and existing City requirements would reduce potential impacts related to the effects of future development on fire protection services by reducing the threat of fire, improving firefighting infrastructure, and ensuring that future growth does not exceed acceptable levels of service. The aforementioned General Plan policies also provide for timely assessment of emergency services to ensure the levels of service are being met and provide for funding of the necessary services by requiring new development to pay its fair share. Therefore, potential impacts related to fire protection services due to the implementation of the proposed General Plan will be reduced to a less than significant level.

The City of Loma Linda's current police officer to population ratio is 1 sworn officer per 2,479 residents. The population within the City limits at build out is anticipated to be 32,890. Based on this population, the City would need a total of 15 sworn officers to service the City at build out. Currently,

the City employs 12 sworn officers. The City of Loma Linda has identified protection from crime as one of its goals. The proposed General Plan includes policies that address the level of police services to be maintained to accommodate long-term growth and a requirement to continuously evaluate the provision of police services provided. These policies also require new development to fund the facilities and services necessary to maintain the proposed General Plan goals pertaining to level of service. With implementation of these proposed General Plan policies, potential impacts to police protection services would be reduced to a less than significant level.

Implementation of the proposed General Plan would increase the number of dwelling units in the Planning Area and, therefore, the number of students attending local schools would also increase. The greatest residential growth in the Planning Area is projected to occur in the South Hills portion of the city. This area is projected to contain approximately 1,185 new dwellings at General Plan build out. State law limits the power of the City to impose mitigation for development impacts on schools. The proposed General Plan includes policies that address the need for school facilities and provide the maximum mitigation allowable under State law. The proposed General Plan policies require mitigation of impacts on school facilities and services be provided as development occurs. Because Government Code 65996(a) and (b) state that compliance with payment of maximum school fees provides full and complete mitigation, no significant impacts will occur. For additional discussion regarding the project's impacts to schools, see DEIR Section 4.13.3.

The projected wastewater flow at build out of the proposed General Plan is 3.63 mgd. With a current treatment capacity of allotment of 7 mgd from the San Bernardino Municipal Water Department, the proposed General Plan projected build out wastewater demand would be less than the capacity allotment by 0.73 mgd. The City of Loma Linda's capacity is based upon an agreement with the San Bernardino Municipal Water Department. Proposed General Plan policies ensure that new development provides adequate infrastructure for average and peak wastewater conditions. Implementation of these policies and the continual updating of the Master Plan for sewer facilities would ensure that adequate wastewater facilities are in place to accommodate existing and future development, thereby reducing effects associated with future development to a less than significant level.

The ability to dispose of solid waste in Loma Linda is tied to available landfill capacity and compliance with the CIWMB diversion rate of 50 percent. The City of Loma Linda is currently in an agreement with Waste Management of the Inland Empire and transports solid waste not recycled to the San Timoteo Solid Waste Disposal Site. It is estimated that San Timoteo will reach final capacity by 2016, California Street Sanitary Landfill by the end of 2007, Colton by 2006, Barstow by 2012, Fontana by 2033, Victorville by 2005, and Landers by 2007. With the majority of the landfills in the County scheduled to close before 2010, the proposed General Plan recognizes both the need to reduce solid waste and the need to assist the County in expanding landfill capacity. The County Integrated Waste Management Plan has projected that the San Timoteo landfill will be viable for the next 15 years. While the City can rely on landfill capacity during the next 15 years, assurances are not available after that time period. However, it is expected that compliance with the State-mandated 50 percent reduction in solid waste and implementation of the proposed General Plan policies would reduce solid waste impacts to less than significant.

5.13 Transportation/Traffic

Potential Impacts. Implementation of the proposed General Plan will facilitate the development of residential, commercial, industrial, institutional, and other types of projects that will result in increased traffic volumes. This increase in traffic volumes could, in turn, result in congestion along area roadways and highways. The proposed General Plan and related actions are not expected to result in an inadequate parking supply because the proposed General Plan and related actions do not modify

current parking standards. Future developments will continue to supply parking according to City code requirements.

The proposed General Plan and related actions are not expected to result in inadequate emergency vehicle access. In addition, the existing City requirements for the provision of emergency access to development projects will continue to be implemented. It is not expected that future congestion will significantly affect emergency vehicle access due to the availability of alternate routes and improvements to key roadways to maintain standards. Also, the City will implement traffic signal system upgrades that help to facilitate more efficient emergency vehicle access and give priority to emergency vehicles.

The proposed General Plan and related actions are not expected to result in unsafe conditions for pedestrians and bicyclists. Implementation of existing City requirements and the provisions of Section 6.10.2 (Non-Motorized Transportation) of the proposed General Plan would avoid significant impacts to pedestrian and bicycle travel by providing for a bicycle and trails network and supporting the safe and convenient movement of pedestrians. The City will continue to require development projects to provide bicycle and pedestrian facilities and amenities according to City codes, and as a result of the development review process. The proposed General Plan and related actions are also not expected to result in conflicts with regional transportation policies on alternative transportation, since Section 6.10.2 of the proposed General Plan objectives and policies support alternative transportation and increased use of transit services.

Findings. Future growth associated with the implementation of the proposed General Plan and related actions will result in a substantial increase in the traffic that is generated throughout the Loma Linda Planning Area. This traffic will affect not only Loma Linda, but also surrounding lands within unincorporated areas. Development consistent with the implementation of the proposed General Plan will facilitate new growth within the Planning Area that will generate additional roadway traffic. Analysis shows that several roadway linkages are projected to operate at LOS E or F at build out. This analysis assumed a series of roadway widenings, intersection improvements, and other measures that are part of the Transportation and Circulation Element and are considered reasonably foreseeable. The analysis of cumulative future traffic that will be generated at build out of the proposed General Plan and following implementation of related actions indicates that level of service standards will be met. Thus, the proposed General Plan will reduce traffic impacts to a less than significant level.

Facts in Support of Findings. The analysis conducted by LSA Associates in a Traffic Impact Analysis (TIA) January 2004 evaluated the impacts of the proposed Loma Linda General Plan. The TIA was prepared to analyze the impacts on the transportation and circulation system from build-out of the proposed General Plan land uses. Land use input to the traffic model for the Loma Linda Planning Area was consistent with the proposed General Plan Land Use Program. The roadway network within the City of Loma Linda Planning Area that was ultimately used for the traffic analysis encompasses build out of the City's planned roadway network as shown in the proposed General Plan Master Roadways Map. The results of the technical traffic modeling showed that roadways and highways in Loma Linda will operate at acceptable levels of service with the implementation of the proposed General Plan. The roadway network included a variety of roadway infrastructure improvements in the in the City to enable the network to accommodate travel demand produced by the City's land use plans. The analysis of cumulative future traffic impacts that will be generated at build out of the proposed General Plan demonstrated that, following implementation of General Plan Policies 6.10.1.a through 6.10.1.r, the proposed General Plan will reduce traffic impacts to a less than significant level. The policies in the Transportation and Circulation Program set City roadway performance standards to implement the Circulation Plan shown in Figure 6.5. This planned roadway network was used in the TIA conducted by LSA Associates, Inc. The roadway network included a

variety of roadway infrastructure improvements in the City to enable the network to accommodate travel demand produced by the City's proposed General Plan land use plan build out.

The results of the technical traffic modeling preformed for the Transportation and Circulation Plan showed that the roadways and highways will operate at an acceptable level of service at the proposed General Plan build out. However, the City of Loma Linda cannot ensure that the improvements needed to maintain level of service standards in surrounding communities or at freeway interchanges will actually be completed, even if developments in Loma Linda provide fair contributions. In addition, there are no mechanisms in place, nor are any contemplated to be available in the foreseeable future, that would provide for developer contributions to improvements along freeway mainlines. While implementation of the proposed General Plan policies and Draft EIR mitigation measures will reduce impacts along roadways, at intersection and at freeway interchanges to below a level of significance, the implementation of these measures cannot ensure such mitigation for traffic along freeway mainlines, and a significant unavoidable impact will remain. For additional discussion of the project's impacts to transportation and circulation, see Draft EIR Section 4.14.

In October 2005, LSA Associates, Inc. (LSA) prepared a revised Trip Generation Analysis for the Loma Linda General Plan as a result of changes to the General Plan land uses since the TIA was approved by the San Bernardino Associated Governments (SANBAG) on May 11, 2004.

The following changes had been made to the land use densities since the General Plan TIA was approved by SANBAG:

- TAZ 290630 – In the submitted TIA, it was assumed that this TAZ would have 1,746 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 585 dwelling units. This leads to a reduction of 1,161 dwelling units.
- TAZ 290771 – In the submitted TIA, it was assumed that this TAZ would have 204 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 184 dwelling units. This leads to a reduction of 20 dwelling units.
- TAZ 290772 – In the submitted TIA, it was assumed that this TAZ would have 2,173 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 1,167 dwelling units. This leads to a reduction of 1,006 dwelling units.
- TAZ 290773 – In the submitted TIA, it was assumed that this TAZ would have 523 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 350 dwelling units. This leads to a reduction of 173 dwelling units.
- TAZ 290781 – In the submitted TIA, it was assumed that this TAZ would have 1,392 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 1,366 dwelling units. This leads to a reduction of 26 dwelling units.
- TAZ 290782 – In the submitted TIA, it was assumed that this TAZ would have 954 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 934 dwelling units. This leads to a reduction of 20 dwelling units.
- TAZ 290790 – In the submitted TIA, it was assumed that this TAZ would have 953 dwelling units. Under the proposed plan, this TAZ will have, under ultimate build out conditions, 461 dwelling units. This leads to a reduction of 492 dwelling units.

The changes in land uses will lead to a forecast reduction of 1,872 trips in the a.m. peak hour, 2,438 trips in the p.m. peak hour, and 24,145 daily trips.

Since the TIA analyzed a higher trip generation (which was used in the EIR), the traffic operations projected in the study represent a worst case condition. Under the proposed land uses, traffic operations would likely be better than or the same as those disclosed in the TIA. Since all study intersections were projected to operate at satisfactory levels of service under the analysis scenarios after the recommended improvements per the TIA, it is expected that the study intersections would continue to operate at satisfactory conditions with the currently proposed land uses.

In January 2006, LSA prepared a supplemental analysis and re-evaluation of seven intersections in the City of Loma Linda that had been analyzed as part of the General Plan update process. These intersections included:

- Barton Road/University Avenue;
- Anderson Street/Redlands Boulevard;
- Anderson Street/Barton Road;
- Benton Street/Prospect Avenue;
- Mountain View Avenue/Redlands Boulevard;
- Mountain View Avenue/Barton Road; and
- California Street/Redlands Boulevard.

These intersections were analyzed using 2003 existing peak hour turn movement traffic volumes in the "Existing Setting" section of the General Plan Circulation Analysis and were found to operate at levels of service (LOS) C and D. These levels of service are considered satisfactory operation in Loma Linda and throughout the west valley area of San Bernardino County; however, discussions with City staff and other stakeholders thought that these intersections (or individual approaches/movements of these intersections) do not exhibit satisfactory operations. This analysis presented a focused re-evaluation of the data, analysis, and model inputs used to arrive at the stated LOS and observations of conditions at the intersections during the critical p.m. peak hour.

In the case of the subject intersections, the 2003 existing setting document concluded that the seven locations were operating at LOS C and LOS D during the a.m. and p.m. peak hours. One simple translation is that LOS C represents overall intersection capacity saturation of 70 to 80 percent of the available capacity. LOS D represents overall intersection capacity saturation of 80 to 90 percent of the total intersection capacity. Therefore, while LOS C and D are considered satisfactory from a policy-making position, they do reflect a condition where the majority of the intersection capacity is being used.

The evaluations begin with a review of the mathematical calculations, followed by a presentation of field survey findings. The analysis concluded that there are factors that may affect the operation of individual lane groups and/or approaches during individual signal cycles at the seven subject intersections. The analysis identifies many of these operational issues, such as the formation of queues, which have been included in the overall General Plan Circulation Analysis and in previous analyses.

Because of the specificity of each occurrence (e.g., queue formation for one lane group and peak hour factors associated with specific land uses), the overall average intersection LOS should not be dramatically affected. The LOS reported for the given 2003 traffic volumes surveyed and intersection geometrics observed are fair representation of the prevailing conditions.

Subsequent to the January 2006 report analyzing the traffic patterns at seven intersections, comments from the City staff and other stakeholders raised questions regarding whether the LOS analysis reflected the actual traffic conditions at these intersections. As a result, LSA collected new

traffic count data in January 2006 and performed a revised LOS analysis for the existing traffic conditions at the following four major intersections:

- Anderson Street and Redlands Boulevard;
- Anderson Street and Barton Road;
- Mountain View Avenue and Redlands Boulevard; and
- Mountain View Avenue and Barton Road.

The counts were collected for the a.m. and p.m. peak hours and LOS analysis was performed using Traffix 7.7 and HCM methodologies. This analysis followed a similar procedure to the previous analysis (January 2006), the only difference being the inclusion of minimum green times and peak hour factors at all intersections. These adjustments constrain the calculations and express worse levels of service. The significant change from the 2001 analysis is updated with new traffic counts reflecting five additional years of growth in traffic.

Based on the new LOS analysis, all the intersections have satisfactory LOS conditions. For the a.m. peak hours, Anderson Street/Redlands Boulevard, Anderson Street/Barton Road, and Mountain View Avenue/Redlands Boulevard currently operate at LOS C while Mountain View Avenue/Barton Road operates at LOS D. For p.m. peak hours, Anderson Street/Redlands Boulevard and Anderson Street/Barton Road currently operate at LOS D while Mountain View Avenue/Redlands Boulevard and Mountain View Avenue/Barton Road operate at LOS C.

5.14 Parks and Recreation

Potential Impacts. Implementation of the proposed General Plan will facilitate the development of residential, commercial, industrial, institutional, and other types of projects that will result in the increased use of existing neighborhood parks, regional parks and other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Build out of the proposed Loma Linda General Plan will result in a substantial increase in population, requiring additional parkland and recreational facilities. The increased demand for recreational facilities may result in the need for increased park maintenance and recreational programs and services.

Findings. The City of Loma Linda currently provides only park maintenance services and no recreational programs are offered. As the City population grows with the implementation of the proposed General Plan, the demand for recreational services would increase. Also, as more parks are constructed, the demand for park maintenance will also increase. The proposed General Plan policies anticipate and address the need for increased park maintenance and recreational services in the future. The proposed General Plan policies set forth in the Public Services and Facilities Element identified the need for the City to recognize that high quality maintenance and upkeep of park facilities is necessary for the economic health of the community. In addition, several policies are in place to require the City to develop athletic fields and specialized recreation areas in order to accommodate the growing community needs for such facilities. With the policies covering recreational services and the maintenance of parklands and facilities, the impact to these recreational resources will be reduced to less than significant.

As stated previously, the demand for park maintenance will increase as more parks are constructed. Proposed General Plan policies anticipate and address the need for increased park maintenance and recreational services in the future. Ways to fund these necessary programs are also covered. The performance standards for maintenance of the parkland and facilities are established within the proposed policies. For additional discussion regarding impacts to parks and recreational resources, see DEIR Section 4.15.1.

Facts in Support of Findings. With approximately 75 acres of parkland, the City of Loma Linda has an existing park ratio of 3.8 acres per 1,000 residents (based on 2002 population of 19,636). This is more than the standard of 3.0 acres for every 1,000 residents set forth in the Government Code but less than the standard of 5.0 acres of parkland per 1,000 residents set forth in current City ordinance and contained in the proposed General Plan.

Implementation of the proposed General Plan is forecast to generate a population of 32,890 at proposed General Plan build out. Based on the City's parkland ratio of 5.0 acres per 1,000 people, the population increase would create a total demand of approximately 165 acres of parkland within the Planning Area. As specified in the proposed General Plan policies, new development shall be required to meet the City standard of 5.0 acres of parkland per 1,000 residents. Implementation of the performance standards contained within the proposed General Plan policies related to parks and recreational facilities would minimize the impact of growth and development on parkland and recreational facilities.

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EXHIBIT C: STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE LOMA LINDA GENERAL PLAN AND RELATED ACTIONS

1.0 INTRODUCTION

The General Plan is the product of a thorough planning and public comment process that involved issues identification, interagency coordination, plan formulation, and multiple public hearings providing for public input and comment. As set forth in the preceding sections, the City Council's approval of the proposed General Plan will result in significant adverse environmental impacts that cannot be avoided even with the adoption of all feasible mitigation measures. All feasible mitigation has been proposed to reduce or avoid potentially significant impacts identified in the EIR, and no additional feasible mitigation is available to further reduce significant impacts without creating new significant adverse impacts. Despite the occurrence of these effects, however, the City Council chooses to approve the proposed General Plan (Project) because, in its view, the economic, social, and other benefits that the Project will produce will render the significant effects acceptable.

The following statement identifies why, in the Council's judgment, the benefits of the Project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the entire Project. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section.

2.0 SOCIAL, ECONOMIC AND OTHER CONSIDERATIONS

The Council finds that the General Plan would have the following economic, social, and environmental benefits:

2.1 Improving the Jobs-Housing Balance in the Region

The jobs-to-housing ratio measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. This ratio identifies the number of jobs available in a given region compared to the number of housing units in the same region, and determines potential imbalances between housing and employment opportunities. In theory, if households have job opportunities closer to where they live, this can potentially reduce overall commuting. Longer commutes result in increased vehicle trip length, which creates environmental effects associated with transportation, air quality, and noise.

The City of Loma Linda is considered a "jobs rich" community as the number of jobs available in the City totaled 14,733 in 2000 (as determined by the 2001 RTP Growth Forecast) while the number of employed persons over the age of 16 living within the City totaled 8,679 (according to the 2000 Census). However, unlike many communities with substantial local employment, a large percentage of Loma Linda's workforce is already employed locally. Loma Linda University and associated medical institutions along with the Veterans Hospital are the largest employers in the City providing employment in the fields of education, health, and social services. As shown in the 2000 Census, 54 percent of the residents of City of Loma Linda are employed in these fields.

The SCAG employment projections for 2025 exceed the projections of the proposed General Plan by 46.5 percent. The proposed General Plan does not project proposed land uses to produce as many jobs as anticipated by SCAG. While the number of jobs in the City is forecast to increase, the number will not be as great as expected regionally. On the other hand, the number of dwelling units expected in 2025 by the General Plan is much closer to the SCAG forecast number. While 17,261 housing units will be developed in the City by the General Plan build out, job opportunities in the City are expected to total about 27,564, which are more than 1.6 jobs for every household.

Even though the City of Loma Linda is expected to have many more jobs than households by 2025, the other cities within Loma Linda's Regional Statistical Area are expected to have a large percentage more households than jobs. Within the region, SCAG projects the number of households and jobs to balance by 2025. The SCAG 2001 RTP projects that, as a whole, the Regional Statistical Area that Loma Linda is in will have more than 300,000 jobs and more than 300,000 households by 2025. Because Loma Linda's numerous jobs will help to balance the numerous households in surrounding cities, a balance between the number of jobs and households will exist within the region by 2025, and the jobs within Loma Linda will have a beneficial effect on the region. Therefore, the implementation of the proposed General Plan will help to balance land uses regionally and no impact associated with this issue would occur.

The land use designations and policies of the proposed General Plan have been tailored to improve the balance between local employment and housing opportunities, thereby reducing commute times and distances between residential developments and employment centers, and associated environmental effects such as noise, air quality, and traffic.

The City of Loma Linda's hillside backdrop is highly prized by its residents. The residents passed the Hillside Preservation Initiative in 1993 to preserve the significant natural hillside amenities within the boundaries of the City. Additionally, the City's slogan is based upon the City's unique setting – "*A City with a View*". Conserving and protecting the hillsides along with the quality and quantity of clean air, native plant and wildlife species, water resources, and historic resources is a significant ingredient in the well being of the City and its residents. Also as the City becomes more built-out, the pressure to develop the hillsides will increase. Conservation of the hillsides should remain a part of the long-range plan for the hillside areas.

2.2 Diversification and Expansion of the City's Housing Stock

The proposed General Plan contains a number of policies which, when implemented, would serve to diversify and expand the City's housing stock. For example, within the Housing Program, there are policies that encourage both housing affordable to lower income households, seniors, and other special needs groups who often have difficulty obtaining and keeping housing, and housing for moderate and above moderate-income households.

It is important that a variety of housing types and styles of residential development be provided, including rental and starter housing, as well as housing for young growing families, empty nesters, and the elderly. In 2000, almost one-quarter of Loma Linda's population was under the age of 20, compared to 35.6 percent countywide, while 15.4 percent of the population was 65 years old or over. This indicates that Loma Linda is still within its "growth" stage, attracting young families. Population growth projections for the City indicate that this trend toward attracting young families will continue for the next 20 years.

Loma Linda's population has a higher percentage of households earning more than 95 percent of the median income than that of San Bernardino County as a whole. However, the City has a much lower percentage of households with a moderate income (80-120% of median income) than the County as

a whole. The differences in households that are very low and low-income are small, which indicates that the City provides housing for approximately the same percentage of very low and low-income households as do other communities in the County.

Provisions of the Housing Program provide specific action programs to facilitate the provision of housing for all economic segments of the community, aimed at meeting Loma Linda's fair share of regional housing needs. The General Plan also provides for large-scale planned communities in the Land Use Program which will provide high level amenities and move-up housing in close proximity to jobs in the City and the region. The planned communities will thus assist in reducing travel time which will lower vehicle emissions that cause air pollution.

2.3 Improvement to Roadways

While the region as a whole is expected to grow significantly over the life of the planning period, improving the jobs-housing balance within the City, will improve projected traffic within the City and along the region's roadway system, even as the number of vehicles on the road increases with population growth. Without the policies of the proposed General Plan promoting these benefits, the condition of roadways within the Planning Area could be expected to become much worse as the inevitable population growth occurs. Circulation Program policies, for example, aim to reduce reliance on automobiles, thereby reducing the burden on area roadways, while Land Use policies seek to improve the area's jobs/housing balance. It should be noted that the traffic analysis prepared for the proposed General Plan does not include construction of the proposed Bi-County Corridor. There were two traffic analyses prepared for the General Plan. The two studies included the Traffic Impact Analysis (TIA) January 2004 that was approved by the San Bernardino Associated Governments (SANBAG) on May 11, 2004 and a revised Trip Generation Analysis prepared in October 2005 for the Loma Linda General Plan as a result of changes to the General Plan land uses since the TIA was approved. The two studies further support the Draft General Plan policies.

The City facilitates pedestrian travel through the design of pedestrian-oriented neighborhoods with well-connected streets and sidewalks. The City also provides convenient and safe sidewalk routes to shopping, schools and recreation areas. One such route connects Hulda Crooks Park to Beaumont Avenue thus encouraging pedestrian travel. In addition, the City provides an off-road trail system designed for walking and hiking activities. The Conservation and Open Space Element includes the Trails Plan which covers the City and sphere of influence. One of these proposed pedestrian trails is the Edison Easement Trail, which is partially complete, and parallels Mountain Avenue between Redlands Boulevard and Beaumont Avenue. Other examples include the encouragement of rider-ship on public transit through use of City information sources (e.g., City web site, and mail-outs) to provide information on transit services and the possible creation of a multi-modal transportation center to serve the downtown area and nearby medical and educational facilities.

2.4 Protection of Significant Environmental Features

The City of Loma Linda's hillside backdrop is highly prized by its residents. The residents passed the Hillside Preservation Initiative in 1993 to preserve the significant natural hillside amenities within the boundaries of the City. Additionally, the City's slogan is based upon the City's unique setting – "*A City with a View*". Conserving and protecting the hillsides along with the quality and quantity of clean air, native plant and wildlife species, water resources, and historic resources is a significant ingredient in the well being of the City and its residents. Also as the City becomes more built-out, the pressure to develop the hillsides will increase. Conservation of the hillsides should remain a part of the long-range plan for the hillside areas.

The proposed General Plan contains several policies that focus on preserving open space as a significant environmental feature. The General Plan identifies the permanent nature of the land use designation and further emphasizes that open space is not a temporary "holding zone." Ensuring these benefits now, before population pressures become even greater, and the political will to avoid developing these areas perhaps weakens, is especially important. The General Plan sets forth policies that will function as environmental performance standards to ensure the protection of significant environmental features, such as open space and biological resources. These policies also address certain specific environmental features such as the need to maintain a permanent open space in the South Hills. The General Plan also requires the development projects be directed away from lands with sensitive biological resources to the extent feasible.

2.5 Provision for Public Services and Facilities

The General Plan ensures that the expansion of public facilities will occur in an equitable manner, and that new development provides the on- and off-site facilities needed to support the development in a manner that avoids increased costs for and reductions in the level of public services provided to existing residents and businesses.

2.6 Fiscal and Economic Considerations

The General Plan supports the retention and development of Loma Linda University Medical Center and J.L. Pettis Veterans Memorial Medical Center to assist in maintaining the long-term economic viability of the City. Additionally, the General Plan seeks to expand upon these economic assets while also diversifying the local economy. The General Plan recognizes that Long-term economic stability strengthens the stability and predictability of municipal costs and revenues. The General Plan also provides for economic growth through encouraging retail opportunities to create a downtown area or city center, which could provide a focal point for the community. A vibrant downtown area would confer a sense of place that would strengthen the community's image and encourage residents as well as visitors and workers to shop, dine, and pursue leisure activities locally. As the roots of the community are associated with Loma Linda University, the downtown could be located near the University at Anderson Street and Prospect Street. Creating a downtown would entail, among other actions, expanding the services and businesses presently in the area, providing public parking and improving access to the area for both students and the general community of Loma Linda.

The General Plan supports attracting and assisting the relocation and expansion of firms in high-tech, biotech, research and development, and retail trade and services. Capitalizing on Loma Linda's identity in the healing arts by working with the Loma Linda University Medical Center and the Veterans Hospital Administration to identify health services-related firms and trade organizations that could benefit from locating in Loma Linda. Such businesses might include those involved in medical research and clinical trials, and research, development and testing of medical equipment, as well as vendors to these and other medical facilities.

The General Plan also supports actively seeking larger retail businesses the City lacks; such has Home Furnishing and Appliance Stores, Hardware and Building Materials, expanded Auto Dealerships, and Supermarkets to locate on Redlands Boulevard. The General Plan also supports working with private sector entities to identify and implement advanced infrastructure technologies that will facilitate the relocation of technology-related businesses to Loma Linda, as well as the expansion of existing businesses. And working with the private sector to maintain an adequate supply of skilled workers and the capital needed to attract and maintain business in Loma Linda. The General Plan also provide sufficient land to accommodate planned development, with office, business

park, and commercial areas complementing residential and public development in location, access, mix of uses, attractiveness, and design quality.

As a means of financing infrastructure for future development, the General Plan requires new development to pay for its fair share of new infrastructure, public and community facilities, and the incremental operating costs it imposes on the City.

3.0 ADDITIONAL OVERRIDING CONSIDERATIONS

Following is a summary of the significant unavoidable impacts of the Project and a description of the overriding considerations for each of the unavoidable, significant impacts.

3.1 Aesthetic and Visual Resources

Significant Unavoidable Adverse Impact. Conversion of open space to urban uses.

Overriding Considerations. The Planning Area currently contains 2,450.3 acres of open space and undeveloped parcels in the hillsides. Build out of the proposed General Plan would result in an increase in urban uses throughout the proposed General Plan area. The development of structures and facilities would occur on vacant properties and would be consistent with the policies outlined in the proposed General Plan. The conversion of open space to urban uses would result in a significant impact by causing the obstruction of existing open views as well as potentially obstructing distant panoramic views to the south from existing development; therefore, implementation of the proposed General Plan will contribute to the loss of visual character of the City as well as loss of open space. While it is not possible to mitigate this impact to a level of insignificance, approval of the proposed General Plan would assist in protecting and preserving a large portion of the open space land through maintaining a permanent open space, including a broad area of the South Hills. Other benefits of the proposed General Plan related to protecting open space include the following:

- Development shall be clustered in the less sensitive and more developable portions of the site as a means of preserving the natural appearance of area hillsides, open space, and habitats. Under this concept, dwelling units and other forms of development are to be grouped in the more level and less environmentally sensitive portions of the site, while steeper and more environmentally sensitive areas are preserved in a natural state. The effect of permitted clustering is to preserve natural open space, enhance the protection of sensitive environmental resources within a development project, and facilitate the permanent protection of key natural features, such as steep slopes, biological habitats, ridgelines, and scenic areas. Clustering is not to be used to increase the overall density of an area beyond that which is otherwise permitted by the General Plan and applicable zoning regulations, but may result in urban density development within portions of a site that would otherwise have rural densities.
    - The location of clustered units is to be restricted to portions of a site less with than a 35 percent slope where sites have sufficient relatively flat areas to accommodate the development. Within sites comprising primarily or exclusively areas with slopes greater than 35 percent, the location of clustered units shall be designed to preserve open space, reduce necessary grading, and protect visual and biological resources.
    - Within clustered development sites, development may be sited on mass graded pads, provided that the overall project results in the permanent preservation of large blocks of natural open space. Where individual clusters of development will exceed 100 to 200

dwelling units in size, such clusters should be separated from each other by natural open space, resulting in an interwoven mosaic natural and developed land.

- Adequate legal provisions shall be made to ensure the preservation of open space areas in perpetuity.
- When viewed from the valley floor to the north, clustered subdivisions should have no greater visual impacts than would a non-clustered development.

- When clustered development is used, site the development in order to maintain a visual open space throughout the development, and preserve the undeveloped portion of the land as open space in perpetuity;
- Site new development so as to maximize the permanent preservation of large blocks of unbroken open space and to minimize the loss of habitat, wildlife, and watershed resources;
- The interface between new development and natural open space shall be designed to provide a gradual transition from manufactured areas into natural areas. By extending fingers of planting into existing enjoyed from existing dwellings;
- Design new development so as to maximize the permanent preservation of open space and to minimize the loss of habitat, wildlife, and watershed resources;
- Acquire, preserve and maintain open space and its natural resources for future generations;
- Base open space preservation and acquisition on the evaluation of significant view sheds and ridgelines, wildlife habitats and fragile ecosystems, significant scientifically, historically, or ecologically unique natural areas, passive recreational areas, and stream or creek environs;
- Encourage, through open space easements, development rights transfers or acquisition, or other incentives, the long-term maintenance of existing and future open space lands. Encourage acquisition and/or a land exchange program to place some of the Hillside Conservation Area in public ownership to be kept as open space;
- To the extent legally possible, require other local, regional, State, or Federal agencies to maintain an adequate inventory of open space lands within Loma Linda;
- Coordinate through development review, Loma Linda's open space system with adjacent cities, San Bernardino County, the State, and regional and private open space systems in order to connect the systems and share resources;
- Utilize the resource of national, regional and local conservation organizations, corporations, non-profit associations and benevolent entities to acquire environmentally sensitive land or preservation areas;
- The San Jacinto Fault Zone area should be preserved as open space through easement dedication during the review process of applicable new developments;
- Limit culverts or the channeling of creeks to only those situations in which public health and safety are at risk so as to preserve creeks and their natural habitat for open space;
- Encourage access to open space areas in the design of development adjacent to open space, such as a trail; and
- Continue to require through development standards, the integration of open space and recreational uses and facilities in all multiple-family residential projects.

Conclusion. Based upon the previously described social, economic, and other benefits or considerations of the Project and the additional overriding considerations described above, the benefits of the proposed General Plan outweigh the impact related to the loss of open space and any adverse environmental effects associated with this impact are considered to be acceptable.

3.2 Air Quality

Significant Unavoidable Adverse Impact. Implementation of the General Plan will exceed local and regional air quality standards for fugitive dust and mobile source emissions during construction and long-term mobile source emissions resulting in a worsening of air quality.

Overriding Considerations. The South Coast Air Basin is the largest basin in the State and has been designated by the Environmental Protection Agency as non-attainment for 8-hour ozone and $PM_{2.5}$. Thus, a significant air quality problem exists now in the non-desert area of San Bernardino County which will persist for a number of years whether or not there is significant growth in the Loma Linda Planning Area. Also, urban growth will likely occur in communities surrounding the City of Loma Linda irrespective of the adoption of the proposed General Plan. Air quality is a regional problem that does not respect jurisdictional or planning area boundaries. Continuing urban growth, whether it occurs in the Loma Linda Planning Area or in other areas, will contribute to the regional air quality problem in roughly the same manner.

The adoption of the proposed General Plan, which includes policies that provide positive actions toward a comprehensive strategy dealing with air quality and are provided below, will be beneficial to the regional air quality program. These policies incorporate the majority of the goals, policies, and programs identified by the South Coast Air Quality Management District. The beneficial General Plan policies include the following:

- Encouraging developers of large residential and non-residential projects to participate in programs and to take measures to improve traffic flow and/or reduce vehicle trips resulting in decreased vehicular emissions;
- Supporting and facilitating employer-based trip reductions programs by recognizing such programs as mitigation for traffic and air quality impacts where their ongoing implementation can be ensured;
- Expand intersections to include additional turning and through lanes at intersections where needed to relieve congestion and improve intersection operation, so long as the intersection can continue to accommodate pedestrians and bicyclists. Avoid traffic system improvements that facilitate vehicular turning and bus movements, but that also discourage pedestrian or bicycle movements;
- Design new residential neighborhoods to provide safe pedestrian and bicycle access to schools, parks and neighborhood commercial facilities through explicit development requirements for such amenities;
- Maintain roadway designs that maintain mobility and accessibility for bicyclists and pedestrians through incorporation of sidewalks and bicycle lanes, where appropriate;
- Where shopping facilities are located adjacent to residential areas, provide direct access between residential and commercial uses without requiring pedestrians and bicyclists to travel completely around the commercial development through stipulations in the design review process;

- Ensure that the site design of new developments provides for pedestrian access to existing and future transit routes and transit centers through specific review during the development review process;
- Encourage rider-ship on public transit through use of City information sources (e.g., City web site, and mail-outs) to provide information on transit services;
- Encourage associated health care facilities and services to locate within close proximity of each other and require pedestrian connections (and bicycle paths, where appropriate) between such uses in order to limit necessary vehicle trips for patients, visitors, health care workers, and health care students;
- Provide increased access by designing pedestrian linkages from the adjacent residential cul-de-sacs to the trail system;
- Site all residential uses to facilitate pedestrian access to the park from the residential areas;
- Provide the residential uses with easy access to the planned recreation trail running north and south through the city (located approximately one half mile east of Mountain View Avenue), such as by placing trail connections at the end of cul-de-sacs;
- Provide individual neighborhoods with pathways and open spaces that connect residences to school and recreational facilities, thereby facilitating pedestrian and bicycle access;
- Promote the establishment of workplace alternatives, including home occupations and telecommuting to reduce peak hour congestion. Continue to allow home occupations in all residential districts;
- Explore the creation of a multi-modal transportation center to serve the downtown area and nearby medical and educational facilities; and
- Look for participation opportunities with potential transit center development, destination use development in the South Hills, San Timoteo Creek joint development uses, and similar opportunities.

Conclusion. Based upon the previously described social, economic, and other benefits or considerations of the Project and the additional overriding considerations described above, the benefits of the of the proposed General Plan outweigh the impact related to air quality and any adverse environmental effects associated with this impact are considered to be acceptable.

3.3 Biological Resources

Significant Unavoidable Adverse Impact. Implementation of the proposed General Plan would cause direct loss of sensitive critical habitat or cause habitat fragmentation resulting in isolation of sensitive habitat patches which are of limited biological value.

Overriding Considerations. Implementation of the proposed General Plan may result in the direct loss of 1,437.5 acres of sensitive habitat. The CDFG, through its NDDB, tracks the occurrence of natural communities which it considers to be the most sensitive in the state. As conditions change over time, conservation efforts may lead to habitat types being added to or removed from the set of habitats considered sensitive. Construction of proposed General Plan land uses may result in the loss or fragmentation of sensitive habitat(s).

Determining if the impact is significant at the level of site-specific projects that are proposed in accordance with the proposed General Plan land uses will require analysis as part of the subsequent evaluation of such projects. The potential for such impacts to be considered significant will depend upon various factors including, but not limited to, the site conditions at the time of project evaluation, the extent of the area potentially affected, the quality of the habitat being affected, and the value of the affected habitat at local and regional scales. As land use proceeds under implementation of the proposed General Plan, patches of habitat on undeveloped properties will initially be fragmented by the sporadic pattern of development. However, once the proposed General Plan reaches build out, the only fragmented patches remaining would be those set aside within a project site as on-site mitigation or due to development constraints (e.g., steep slopes), or both. Thus, the initial fragmentation of undeveloped properties would be an interim condition with the long-term fragmentation occurring under total build out. Regional fragmentation will occur as existing biological reserves and other conservation lands (e.g., San Timoteo Canyon State Park) become surrounded and isolated by community and rural development. The proposed General Plan will create habitat fragmentation resulting in isolation of sensitive habitat patches creating a "checkerboard" pattern of small habitat patches of limited biological value.

The proposed General Plan policies focus primarily on avoidance and minimization of impacts to floodplain, riparian, and wetland habitats; maintaining and conserving superior examples of native vegetation. The policies provide for avoidance and minimization of impacts to some sensitive habitats. The adoption of the proposed General Plan, which includes policies that provide positive actions toward a comprehensive strategy dealing with biological resources and are provided below, will be beneficial to the critical habitat and cause habitat fragmentation. The beneficial General Plan policies include the following:

- Development shall be clustered in the less sensitive and more developable portions of the site as a means of preserving the natural appearance of area hillsides, open space, and habitats. Under this concept, dwelling units and other forms of development are to be grouped in the more level and less environmentally sensitive portions of the site, while steeper and more environmentally sensitive areas are preserved in a natural state. The effect of permitted clustering is to preserve natural open space, enhance the protection of sensitive environmental resources within a development project, and facilitate the permanent protection of key natural features, such as steep slopes, biological habitats, ridgelines, and scenic areas. Clustering is not to be used to increase the overall density of an area beyond that which is otherwise permitted by the General Plan and applicable zoning regulations, but may result in urban density development within portions of a site that would otherwise have rural densities;
- Site new development so as to maximize the permanent preservation of large blocks of unbroken open space and to minimize the loss of habitat, wildlife, and watershed resources;
- Acquire, preserve and maintain open space and its natural resources for future generations;
- Base open space preservation and acquisition on the evaluation of significant view sheds and ridgelines, wildlife habitat and fragile ecosystems, significant scientifically, historically, or ecologically unique natural areas, passive recreational areas, and stream or creek environs;
- Preserve habitats supporting rare and endangered species of plants and animals including wildlife corridors;
- Comply with the Federal policy of no net loss of wetlands through avoidance and clustered development. Where preservation in place is found to be infeasible (such as an unavoidable a road crossing through habitats), require 1) on-site replacement of wetland areas, 2) off-site replacement, or 3) restoration of degraded wetland areas at a minimum ratio of one acre of

replacement/restoration for each acre of impacted on-site habitat, such that the value of impacted habitat is replaced;

- Require appropriate setbacks adjacent to natural streams to provide adequate buffer areas ensuring the projection of biological resources;
- Through the project approval and design review processes, require new development projects to protect sensitive habitat areas, including, but not limited to, coastal sage scrub, and native grasslands. Ensure the preservation in place of habitat areas found to be occupied by state and federally protected species. Where preserved habitat areas occupy areas that would otherwise be graded as part of a development project, facilitate the transfer of allowable density to other, non-sensitive portions of the site;
- Through development review, retain, as feasible, wildlife corridors in the Planning Area in particular, the San Timoteo Wash area;
- Base open space preservation and acquisition on the evaluation of significant view sheds and ridgelines, wildlife habitats and fragile ecosystems, significant scientifically, historically, or ecologically unique natural areas, passive recreational areas, and stream or creek environs;
- Encourage, through open space easements, development rights transfers or acquisition, or other incentives, the long-term maintenance of existing and future open space lands. Encourage acquisition and/or a land exchange program to place some of the Hillside Conservation Area in public ownership to be kept as open space;
- To the extent legally possible, require other local, regional, State, or Federal agencies to maintain an adequate inventory of open space lands within Loma Linda;
- Coordinate through development review, Loma Linda's open space system with adjacent cities, San Bernardino County, the State, and regional and private open space systems in order to connect the systems and share resources; and
- Utilize the resource of national, regional and local conservation organizations, corporations, non-profit associations and benevolent entities to acquire environmentally sensitive land or preservation areas.

The following mitigation measures are also proposed to address impacts to critical habitat and habitat fragmentation.

- Require the preparation of biological reports in compliance with standards established by the City of Loma Linda for development related uses that require discretionary approval to assess the impacts of such development and provide mitigation for impacts to biological resources. The report must be prepared by a qualified biologist; the City Community Development Department must be notified in advance that a report will be prepared for a specific project; the report must include a signed certification attesting to the report contents, specific information as to the type of survey (e.g., General Biological Resources Assessment, Habitat Assessment, etc.), site location, property owner. In addition, the report must include the following:

  a. Specified attachments (summary sheet, level of significance checklist, biological resources/project footprint map, and site photos);

  b. Information on literature sources (e.g., California Natural Diversity Data Base, California Department of Fish and Game, U.S. Fish and Wildlife Service, and environmental documents for nearby projects);

  c. A description of surveys, including timing, personnel, and weather conditions;

d. A description of site conditions including plant and wildlife habitat, disturbances, and sensitive elements;

e. An assessment of anticipated project impacts and a discussion of mitigation;

f. A list of all species observed or detected and a recommendation for any additional focused surveys that may be necessary.

- The City establishes baseline ratios for mitigating the impacts of development related uses to rare, threatened and endangered species and their associated habitats as the following:
  - Preserve habitat at minimum of 1:1 replacement ratio in locations that provide long-term conservation value for impacted resources. This could involve acquisition of habitat occupied by the affected species, acquiring a key parcel that fills in a missing link or gap in a reserve that provides conservation for the species, or acquisition of credits in a mitigation bank (endorsed by the USFWS and/or CDFG) that has been established to provide conservation value for the species. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.

Conclusion. Based upon the previously described social, economic, and other benefits or considerations of the Project and the additional overriding considerations described above, the benefits of the of the proposed General Plan outweigh the impact related to the loss of critical habitat and habitat fragmentation in the Planning Area outside of the City limits and the sphere of influence and any adverse environmental effects associated with this impact are considered to be acceptable.

3.4 Water Resources

Significant Unavoidable Adverse Impact. Implementation of the proposed General Plan would increase the existing demand for water thereby reducing water availability to, or interfering with, existing users of well water.

Overriding Considerations. With increased development in the Planning Area, anticipated with the implementation of the General Plan Update, water resources will continue to diminish not only for the City of Loma Linda but also for the rest of the communities in Southern California. Although the City of Loma Linda has ascertained that there is presently enough water supply in the Bunker Hills basin to serve its future needs, the City is not the only community using that basin for water supplies. As the rest of the region grows and as the native water supply decreases, the region's dependence on imported water grows and water conservation, including the use of reclaimed water and control of water runoff pollution becomes critical to not only Loma Linda but the entire region. The City has identified the provision and protection of water resources as one of prime importance in the implementation of the General Plan Update. While the proposed General Plan policies recognize the water supply issues and encourage the use of water conservation measures, they do not assure the provision of water supplies adequate to support development that may occur as a result of implementation of the proposed General Plan Update.

The adoption of the proposed General Plan, which includes policies that provide positive actions toward a comprehensive strategy dealing with water supply and conservation efforts and are provided below, will be beneficial to the City's need for potable water. The beneficial General Plan policies include the following:

- Provide a water system that supplies high quality water to serve existing and future needs of the City during peak use conditions, with sufficient water in storage reservoirs for emergency and fire protection;
- Ensure that adequate water supply capacity and infrastructure is in place prior to occupancy of new development;
- Update the City's Water Master Plan as needed, with a review occurring at least every five years;
- Encourage water conservation as a means of preserving water resources. Require new development to be equipped with water conservation devices;
- Ensure that an adequate supply of water is available to serve existing and future needs of the City;
- Develop and encourage the implementation of water conservation programs by residents, employers, students, and service providers;
- Participate with State and regional agencies to monitor groundwater supplies and take steps to prevent overuse, depletion, and toxicity;
- Encourage sustainable landscapes or landscapes that require little irrigation through the use of drought-tolerant and native vegetation in new development;
- Through the development review process require that water supply capacity is available or will be available prior to approval of a development project;
- Pursue the use of reclaimed water for the irrigation of all appropriate open space facilities and City projects, and encourage existing and new developments to tie to the reclaim water system when available and recommended by the San Bernardino Municipal Water Department; and
- Through the development review process, encourage water conservation in all new and rehabilitated development through the use of water conserving fixtures in residential and commercial development.

Conclusion. Based upon the previously described social, economic, and other benefits or considerations of the Project and the additional overriding considerations described above, the benefits of the of the proposed General Plan outweigh the impact related to water resources and any adverse environmental effects associated with this impact are considered to be acceptable.

3.5 Traffic

Significant Unavoidable Adverse Impact. Implementation of the proposed General Plan would result in an increase in traffic volumes which could result in congestion along area roadways and the I-10 freeway.

Overriding Considerations. The traffic impact analysis (TIA) undertaken for the General Plan sets forth a number of measures that, when implemented, will maintain service level standards along all roadways and highways that will be affected by the Loma Linda General Plan. However, the City of Loma Linda cannot ensure that the improvements needed to maintain level of service standards in surrounding communities or at freeway interchanges will actually be completed, even if developments in Loma Linda provide fair share contributions. In addition, there are no mechanisms in place, nor are any contemplated to be available in the foreseeable future, that would provide for developer contributions to improvements along freeway mainlines. The General Plan and TIA does include policies that will reduce the traffic impacts on area roadways and are as follows:

- Facilitate roadway capacity by implementing the Loma Linda Circulation Plan.
  - Pursue the Evans Street interchange and roadway extension.
  - Although included in regional funding for additional lanes, maintain a four-lane divided highway on Redlands Boulevard except at intersection of Anderson Street where additional through lanes will be necessary.
  - Provide access to new development in the southern hills via Oakwood Drive, with emergency access connection to Reche Canyon;
- Promote the design of roadways to optimize safe traffic flow within established roadway configurations by minimizing driveways and intersections, uncontrolled access to adjacent parcels, on-street parking, and frequent stops to the extent consistent with the character of adjacent land uses;
- As development occurs, provide adequate capacity at intersections to accommodate future traffic volumes by installing intersection traffic improvements and traffic control devices, as needed.
  - At the intersection of California Street and Redlands Boulevard, add additional lanes as necessary.
  - At the intersection of Benton Street and Barton Road, provide additional lanes when necessary.
  - Provide additional lanes at Anderson Street and Redlands Boulevard to accommodate traffic as needed.
  - Provide two-way center left turn lane at the intersection of the proposed Evans Street as needed.
  - Realign Mission Road intersection to coincide with Orange Avenue intersection.
- Facilitate the synchronization of traffic signals along Redlands Boulevard, Barton Road, Anderson Street, and Mountain View Avenue;
- Require the provision of reciprocal access and parking agreements between adjacent land uses where appropriate to facilitate off-street vehicular movement between adjacent commercial and other non-residential uses, and to reduce the number of driveways along major roadways;
- Encourage regional goods movement to remain on area freeways and other appropriate routes;
- Require the design of new developments to focus through traffic onto arterial streets, and away from local neighborhoods;
- Require that existing driveways that are unnecessary or substandard be removed or upgraded, wherever feasible, in conjunction with any on-site development or any adjacent street construction;
- Where single-family residences have no feasible alternative but to front on collector or arterial roadways, require, wherever possible, that circular driveways or on-site turnarounds be provided to eliminate the need for residents to back onto the street;
- Locate driveways on corner parcels as far away from the intersection as is possible;
- Avoid locating driveways within passenger waiting areas of bus stops or within bus bays. Locate driveways so that drivers will be able to see around bus stop improvements;
- Where a series of traffic signals is provided along a route, facilitate the coordination of traffic signals to optimize traffic progression on a given route. Traffic signalization should emphasize

facilitating access from neighborhood areas onto the City's primary roadway network, and should work to discourage through traffic from using local streets;

- Expand intersections to include additional turning and through lanes at intersections where needed to relieve congestion and improve intersection operation, so long as the intersection can continue to accommodate pedestrians and bicyclists. Avoid traffic system improvements that facilitate vehicular turning and bus movements, but that also discourage pedestrian or bicycle movements;
- Maintain the first priority for public streets of providing safe and efficient travel for the public with on-street parking as a second priority;
- Pursue construction of parking structures within the downtown area to serve projected parking demand and facilitate mixed-use development without the need to meet off-street parking standards on each individual parcel;
- Work with the Loma Linda University/Medical Center to provide a direct connection of Van Leuven Street to Anderson Street, preferably at the existing intersection of Academy Street;
- Work with the Loma Linda Academy to modify its entry to provide stacking room for parents' vehicles waiting to drop off or pick up students; and
- As part of the development of the mixed-use area west of California Street, realign Mission Road to connect to Orange Street. West of California Street, design the realigned Mission Road to maximize access to lands north of Barton Road.

The following mitigation measure is also proposed to address identified traffic impacts.

- Individual development projects undertaken pursuant to the General Plan shall be required to provide roadway/intersection improvements or provide a fair share contribution toward such improvements as are needed to maintain applicable Level of Service standards on roadway links, intersections, and at freeway interchanges. For impacts on roadways and intersections outside of the City of Loma Linda, as well as for freeway interchanges, implementation of the requirement to provide improvements or fair share contributions shall be predicated on the commitment of the agency controlling the roadway, intersection, or interchange to commit to completing the improvement.

Conclusion. Based upon the previously described social, economic, and other benefits or considerations of the Project and the additional overriding considerations described above, the benefits of the of the proposed General Plan outweigh the impact related to increase traffic and any adverse environmental effects associated with this impact are considered to be acceptable.

ATTACHMENT 2

Council Bill R-2005-57
Adopting all Elements of the General Plan (June 2006)

Exhibits:

A. Draft Final General Plan (June 2006)

B. Existing Setting Report (June 5, 2002) – CD

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOMA LINDA APPROVING THE GENERAL PLAN UPDATE PROJECT AND ADOPTING THE GENERAL PLAN (JUNE 2006)

WHEREAS, the City Council adopted the existing General Plan for the City of Loma Linda by Resolution No. 105 on September 11, 1973, following the City's incorporation in 1970; and

WHEREAS, the City Council and staff noted that while several elements have been added to the General Plan over the years, the document has not received a comprehensive update since its adoption in 1973; and

WHEREAS, in August 2000, the City determined that a new General Plan was needed to reflect the shared vision of the community relating to the City's future growth and development, and directed staff to prepare Request for Qualifications and Request for Proposals documents and begin the consultant selection process for the General Plan Update Project; and

WHEREAS, on May 10, 2001, the City Council approved an Agreement for Professional Services between the City and LSA Associates, Inc. for the preparation of a new General Plan, Program Environmental Impact Report (EIR), and Traffic Impact Analysis (in compliance with the Regional Congestion Management Plan) for the General Plan Update Project; and

WHEREAS, the City and Consultant conducted 18 public workshops from July 2001 through April 2004 to obtain public input on the development of the Land Use Plan and Land Use Element, Circulation Master Plan and Transportation and Circulation Element, California Housing requirements and the Housing Element, and other mandatory and optional general plan elements; and

WHEREAS, the City's Administrative Review Committee (the "ARC"), which is comprised of staff representatives from the City Administration, Community Development Department, Public Works Department, Fire Department, Information Systems Department, Redevelopment Agency, reviewed the General Plan Update Project and provided input to the Consultant at many meetings from June 2001 through January 2004; and

WHEREAS, in May 2003, the City made the first Draft General Plan (and all subsequent drafts) available to the public, local jurisdictions and counties, government agencies and other interested persons for their concerns and comments; and

WHEREAS, the Planning Commission conducted six study sessions of the Draft General Plan Land Use (2.0) and Community Design (3.0) Elements (May 2003) in open public meetings on July 7, 2003, August 6, 2003, August 20, 2003, September 10, 2003, October 1, 2003, and October 7, 2003 in an effort to comprehensively review the document and provide constructive comments to staff and the Consultant; and

WHEREAS, on January 27, 2004 the ARC forwarded the General Plan Update Project to the Planning Commission with recommendations for approval and adoption; and

WHEREAS, the Planning Commission conducted noticed public hearings on February 11, 2004, March 3, 2004, March 17, 2004, March 31, 2004, April 7, 2004, April 28, 2004, May 5, 2004, May 19, 2004, June 23, 2004, July 21, 2004, August 4, 2004, August 25, 2004, September 15, 2004, September 29, 2004, October 20, 2004, and November 10, 2004 in order to review the Draft General Plan (various editions) and solicit public testimony and comments on the General Plan Update Project and related environmental documents; and

WHEREAS, the Planning Commission forwarded the bulk of the General Plan Update Project to the City Council on September 15, 2005, and forwarded the Draft Hillside Designation and Special Planning Areas Designations to the City Council on November 10, 2004, with recommendations for approval and adoption of the Draft General Plan (October 2005); and

WHEREAS, the City Council conducted noticed public hearings on October 12, 2004; November 16, 2004; December 7, 2004; December 14, 2004; January 11, 2005; February 1, 2005; February 8, 2005; February 22, 2005; March 8, 2005; April 12, 2005; April 26, 2005; May 17, 2005; June 7, 2005, June 28, 2005; July 26, 2005; August 16, 2005; October 11, 2005, October 25, 2005, November 8, 2005,

November 15, 2005, December 6, 2005, January 10, 2006, January 24, 2006, February 28, 2006, April 18, 2006, May 23, 2006, and June 13, 2006 in order to fully review and consider the General Plan Update Project, which included the Draft General Plan (June 2006, and all previous drafts), Draft Program EIR, Response to Comments, Mitigation Monitoring Plan, Congestion Management Plan Traffic Impact Analysis (CMP TIA), Findings for Statements of Overriding Consideration, Planning Commission Staff Reports, Planning Commission and staff recommendations, and public testimony; and

WHEREAS, the City Council directed staff to hold a Joint Workshop of the City's Commissions, Committees, and Boards on March 12, 2006 to consider and evaluate three alternatives for inclusion in the Draft General Plan to address land use, open space, and development in the South Hills; and

WHEREAS, the results of the March 12, 2006 Workshop were presented to the City Council on April 18, 2006 in the form of a Matrix that showed the consensus of four groups consisting of the Commission, Committee, and Board members who participated in the Workshop; and the City Council directed staff and the consultant to revise the final Draft General Plan to reflect the findings that resulted from the Workshop; and

WHEREAS, the City Council found that many of the proposed residential and mixed-use designations described in the Draft General Plan, Land Use Plan text and shown on the Land Use Plan Map would allow higher densities than usual for Loma Linda and directed that staff revise the plan to reduce densities throughout the 6,092.81 acre planning area that includes the City of Loma Linda legal limits and Sphere of Influence; and

WHEREAS, the City Council has reviewed the Draft General Plan (June 2006), Draft Final Program Environmental Impact Report prepared for the General Plan Update Project and adopted Findings for a Statement of Overriding Consideration for the significant unavoidable adverse impacts related to Air Quality, Loss of Open Space, Biological Resources, Water Supply, and Traffic and

Circulation that cannot be mitigated to below a level of significance, and certified the Final Program Environmental Impact Report based on said findings.

NOW, THEREFORE, BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF LOMA LINDA MAKES THE FOLLOWING FINDINGS:

A. The proposed Draft General Plan (June 2006) is internally consistent and will provide a shared vision of the community and its future growth and development through the Goals and Policies contained in all of the mandatory and optional elements, which include: Introduction to the General Plan Elements; Land Use Element; Community Design Element; Economic Development Element; Housing Element; Transportation and Circulation Element; Noise Element; Public Services and Facilities Element; Conservation and Open Space Element; Public Health and Safety Element; Growth Management Element; and, General Plan Implementation Programs Element.

B. The proposed Draft General Plan (June 2006) would not be detrimental to the public interest, health, safety, convenience, or welfare of the City in that it will provide goals and policies for the City's future growth and development. The Draft General Plan (June 2006) has been reviewed by the public, local jurisdictions and counties, government agencies and other interested persons to ensure future growth and development are compatible with the existing development in the City and adjacent and surrounding jurisdictions and county areas. Implementation of the Draft General Plan will further the public interest and promote the general welfare to the City by encouraging that future growth and development occur in a logical pattern, adjacent to previously developed areas and in ways that allow for clear linkages to the existing circulation and infrastructure systems.

C. The proposed Draft General Plan (June 2006) would maintain the appropriate balance of land uses in proportion to the city's current and projected growth rates and housing needs. As previously stated, the Land Use Plan Map shows the distribution of land uses throughout the City that have been carefully considered by the City Council, Planning Commission, other City Commissions, Committees,

and Boards, outside Agencies, and the public, and evaluated in the Final Program Environmental Impact Report that was prepared for the General Plan Update Project and certified by the City Council.

D. The land use distribution shown on the proposed Draft General Plan (June 2006) Land Use Plan Map and described in the Draft General Plan (June 2006) text has been carefully evaluated to ensure that the locations and types of proposed land use designations are physically suitable (including, but not limited to, access, provision of utilities, compatibility with adjoining land uses, and absence of physical constraints) for existing and future land use development.

NOW, THEREFORE, BE IT FURTHER RESOLVED by the City Council of the City of Loma Linda that the General Plan (June 2006), including text and maps, and all mandatory elements and optional elements is adopted as shown in Exhibit "A", attached hereto and made a part hereof.

PASSED, APPROVED AND ADOPTED this 13th day of June 2006 by the following vote:

Ayes:
Noes:
Abstain:
Absent:

_____
Floyd Petersen, Mayor

ATTEST:

_____
Pamela Byrnes-O'Camb, City Clerk

Draft Final General Plan
(June 2006)

Hard Copy

Existing Settings Reports
(June 5, 2002)

CD

ATTACHMENT 3

LSA Associates Focused Traffic Studies

Exhibits:

A. Supplemental Operational Analysis of the General Plan Intersections (January 18, 2006)

B. Revised Existing Level of Service Analysis (February 7, 2006)

LSA

LSA ASSOCIATES, INC.
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BERKELEY
CARLSBAD
COLMA
FORT COLLINS
IRVINE
PALM SPRINGS
POINT RICHMOND
ROCKLIN
SAN LUIS OBISPO

JAN 2 3 2006

January 18, 2006

Deborah Woldruff, AICP, Director
City of Loma Linda Community Development Department
25541 Barton Road
Loma Linda, California 92354

Subject: Supplemental Operational Analysis of General Plan Intersections (LSA Project No. LLD130)

Dear Ms. Woldruff:

LSA Associates, Inc. (LSA) has prepared this supplemental analysis and re-evaluation of seven intersections in the City of Loma Linda that have been analyzed as part of the General Plan update process. These intersections include:

- Barton Road/University Avenue;
- Anderson Street/Redlands Boulevard;
- Anderson Street/Barton Road;
- Benton Street/Prospect Avenue;
- Mountain View Avenue/Redlands Boulevard;
- Mountain View Avenue/Barton Road; and
- California Street/Redlands Boulevard.

These intersections were analyzed using 2003 existing peak hour turn movement traffic volumes in the "Existing Setting" section of the General Plan Circulation Analysis and were found to operate at levels of service (LOS) C and D. These levels of service are considered satisfactory operation in Loma Linda and throughout the west valley area of San Bernardino County; however, discussions with City staff and other stakeholders posit that these intersections (or individual approaches/movements of these intersections) do not exhibit satisfactory operations. This analysis presents a focused re-evaluation of the data, analysis, and model inputs used to arrive at the stated LOS and observations of conditions at the intersections during the critical p.m. peak hour.

LEVEL OF SERVICE FUNDAMENTALS

Prior to the focused analysis of individual intersections, it is useful to review the definition of level of service and its limitations. Intersection level of service is a mathematical expression of a driver's perception of travel speed, convenience, and safety. Six levels of service are defined in the *Highway*

Capacity Manual, with letter grades A to F: LOS A represents the best operations at free flow conditions and LOS F the worst at capacity operations. Level of service attempts to distill into a single letter grade all drivers' perceptions of travel time, freedom to maneuver, comfort, and convenience; this is an inherent limitation of the concept. Thus, while one motorist may believe a particular route is convenient, another may consider it congested and intolerable.

In the case of the subject intersections, the 2003 existing setting concluded that the seven locations were operating at LOS C and LOS D during the a.m. and p.m. peak hours. One simple translation is that LOS C represents overall intersection capacity saturation of 70 to 80 percent of the available capacity. LOS D represents overall intersection capacity saturation of 80 to 90 percent of the total intersection capacity. Therefore, while LOS C and D are considered satisfactory from a policy-making position, they do reflect a condition where the majority of the intersection capacity is being used.

Furthermore, intersection LOS is a metric defining the average operations of the entire intersection over a one-hour period. It is not uncommon for an intersection LOS to calculate between LOS B and D, and yet one approach or multiple turn movements may exhibit congestion during one or more traffic signal cycles. This does not mean the overall LOS calculation is incorrect, as the balance of approaches or movements may be congestion-free. For purposes of General Plan level analysis and development review, intersection levels of service and the attendant static gradient of LOS A through F are valuable tools for comparative analysis (e.g., with and without project or alternatives analysis). Capital improvement planning and operational deficiencies may warrant more detailed analysis.

OPERATIONAL INTERSECTION ANALYSIS

The following sub-sections present detailed analysis of the subject intersections. The evaluations begin with a review of the mathematical calculations, followed by a presentation of field survey findings, and finally, a conclusion regarding the operations and levels of service. The LOS worksheets are included as an attachment to this analysis.

University Avenue/Barton Road

This intersection was determined to operate at LOS C in both the a.m. and p.m. peak hours in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 6 seconds. Based on the traffic signal configuration, this parameter could be set to 9 to 12 seconds.
2. No minimum green times were input into the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The southbound approach to this intersection is on a tight curve. This curve could affect the departing vehicles on this approach. Additionally, the southbound right-turn queues are calculated at between 375 feet (a.m. peak hour) to 850 feet (p.m. peak hour). These queues, along with the horizontal alignment, affect the operation of the southbound leg.
4. The eastbound left turn movements measured 492 in the a.m. peak hour. The queue for this movement is calculated at 375 feet, possibly contributing to congestion in the eastbound approach.

5. On-site observation did not show any backup and/or unsatisfactory operations at this location.

Anderson Street/Redlands Boulevard

This intersection was determined to operate at LOS C in the a.m. and p.m. peak hours in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 8 seconds. Based on the traffic signal configuration, this parameter could be set to 12 to 16 seconds.
2. No minimum green times were input into the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The southbound left turn demand in the a.m. and p.m. peak hours is greater than the available storage length. In the a.m. peak hour, the 2003 existing demand is for 125 feet of storage. Approximately 275 feet of storage is needed in the p.m. peak hour. The southbound left turn pocket is approximately 110 feet in length. Therefore, for peak signal cycles within the peak hours, the southbound left turn may queue into the southbound through lane.
4. The southbound through and right turn traffic volumes are great enough to queue back 300 feet and influence the operation of the ramp intersections. This is not a function of the Anderson Street/Redlands Boulevard overall intersection LOS, but an operational deficiency that affects the Anderson Street corridor.
5. The proximity of Interstate 10 (I-10) interchange may have an effect on the discharge of vehicles toward Redlands Boulevard during the peak hours.
6. The eastbound left turn demand in the p.m. peak hour is greater than the available storage length. The 2003 existing demand is for 150 feet of storage. The eastbound left turn pocket is approximately 100 feet long; therefore, for peak signal cycles within the peak hours, the eastbound left turn may queue into the eastbound through lane.
7. The southbound left-turn queues were observed to be long and did not clear in one cycle. This also caused partial blockage of the southbound through lane, increasing the delay for that movement as well.
8. Vehicles entering and exiting the driveway to the fast-food restaurant further caused vehicles to slow, even when the southbound through movement had the green light. Although, this impedes the smooth flow of traffic and increases delay, it cannot be incorporated in the LOS analysis.
9. Similarly, the northbound vehicles also backed up and did not clear in one cycle. This could be because of the Academy and University staff leaving during the peak hour. The analysis assumes a peak hour factor of 0.95. It could be lower due to the proximity to the Academy and the University, leading to a worse observed LOS.
10. The eastbound and westbound vehicles were observed to clear with no backup.

Anderson Street/Barton Road

This intersection was determined to operate at LOS C in the a.m. and p.m. peak hours in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 8 seconds. Based on the traffic signal configuration, this parameter could be set to 12 to 16 seconds.
2. No minimum green times were input into the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The peak hour factor (PHF), a factor that addresses peak 15-minute flows within the overall peak hour, has been set to the County standard 0.95. Due to the influence of the University, it may be that individual 15-minute peaks within the peak hour are greater than the 0.95 PHF factor would reflect. Therefore, the traffic on average over the entire hour would operate at LOS C, but may have worse conditions for limited signal cycles within the overall hour.
4. The eastbound left-turn queues were observed to exceed capacity and do not clear in the available green time. The LOS predicts a 6-vehicle queue for that movement. The queues were observed to be higher. This might be attributed to overall increase in traffic volumes between 2003 and 2005.
5. Substantial pedestrian activity was observed at this location resulting in an actual minimum green time (observed) of at least 20 seconds. This can worsen the LOS at the intersection; however, pedestrian activity moderates throughout the peak hour. The observed pedestrian activity was through one or two cycles. The average volume of pedestrians over the entire hour and their effect on the overall LOS is unclear.

Benton Street/Prospect Avenue

This All-Way Stop Controlled (AWSC) intersection was calculated to operate at LOS B in the a.m. peak hour and LOS A in the p.m. peak hour. From the perspective of the LOS calculation, all inputs and approaches appear satisfactory. In the a.m. peak hour, the northbound approach volumes are relatively high, but not so much as to have an adverse effect the overall intersection LOS. The peak hour traffic volumes observed in 2003 are indicative of the calculated levels of service.

1. No major issues were observed during the visit to this intersection.
2. The driveway to the Veterans Medical Center on Benton Street (east leg of the intersection) has stop signs inside the medical center property, which is very close to the intersection. Due to the insufficient throat length, vehicles might overflow on to Benton Street and affect operations at the intersection.

Mountain View Avenue/Redlands Boulevard

This intersection was determined to operate at LOS C in the a.m. and p.m. peak hours in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 8 seconds. Based on the traffic signal configuration, this parameter could be set to 12 to 16 seconds.

2. No minimum green times were input to the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The queues formed in the southbound approach in the a.m. peak hour may reach Sun Avenue. The southbound queue can reach as long as 300 feet during the a.m. peak hour. While this would affect the circulation to and from Sun Avenue, it would not affect the LOS at this intersection.
4. The queues formed in the northbound approach in the p.m. peak hour may reach Miramonte Street. The northbound queue can reach as long as 350 feet during the p.m. peak hour. While this would affect the circulation to and from Miramonte Street, it would not affect the LOS at this intersection.
5. The southbound queues were observed to be significant, confirming the calculations in the LOS worksheets.
6. The westbound left-turn queues do not clear in the available green time.
7. Due to the high northbound through volume, the northbound right-turning vehicles are delayed. This confirms the calculations in the LOS worksheets.

Mountain View Avenue/Barton Road

This intersection was determined to operate at LOS C in the a.m. and p.m. peak hours in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 6 seconds. Based on the traffic signal configuration, this parameter could be set to 12 to 16 seconds.
2. No minimum green times were input to the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The east and westbound right-turn lanes coded into the LOS worksheet are de facto lanes (i.e., the outside lanes in the eastbound and westbound directions are 20 feet or more in width, thus allowing a right-turning vehicle to move around a through vehicle and negotiate the right turn). Although de facto right lanes do work, their operation may be constrained by the through traffic "crowding" the lane. This may create queues not reflected in the LOS calculations. These conditions would also occur during specific signal cycles and would not be reflected in the overall intersection LOS.
4. The queues formed in the southbound right-turn movement may reach 275 feet, affecting ingress/egress at adjacent driveways.
5. Similar to the intersection at Anderson Street/Barton Road, the influence of the hospital may create surges that are not reflected in the 0.95 standard PHF. The traffic on average, over the entire hour, would operate at LOS C, but may have periodic worse conditions for limited signal cycles.
6. The southbound queues were observed to be significant and backed up to the next intersection, confirming the calculations in the LOS worksheets.
7. Driveways to the Rite-Aid complex on the east side of Mountain View Avenue and to the gas station complex on the west side are closely spaced to the intersection. Vehicles turning left into and out of the driveways lead to delays and may block through vehicles.

8. The westbound left-turn queues do not clear in the available green time and block the westbound through lane, leading to a worse observed LOS as described in issue 3, above.

California Street/Redlands Boulevard

This intersection was determined to operate at LOS D in the a.m. peak hour and LOS C in the p.m. peak hour in the existing 2003 setting. Issues affecting the LOS calculation versus perceived operations may include:

1. Loss time (excluding yellow and all red) was set at the County-recommended 8 seconds. Based on the traffic signal configuration, this parameter could be set to 12 to 16 seconds.
2. No minimum green times were input to the LOS calculation. LSA did not receive signal timing plans to determine whether minimum green times have been established for this intersection; however, minimum green time could affect overall intersection delay.
3. The overall geometrics at this intersection might affect its operation. The skew and angle of the northbound single-lane approach may affect the signal timing and discharge of vehicles through the intersection that would not be addressed in the LOS worksheets.
4. Similar to the intersection at Anderson Street/Barton Road, the influence of the school may create surges that are not reflected in the 0.95 standard PHF. The traffic on average over the entire hour would operate at LOS C, but may have periodic worse conditions for limited signal cycles.
5. Queues in all approaches have been identified between 200 to 325 feet. These queues are factored into the overall LOS calculations, yet may affect the operations of each approach during the peak hours.
6. The south leg of the intersection is skewed and vehicles have to follow a curved path to travel through the intersection. This leads to a reduction in speed, which adversely affects the ability of vehicles to clear the intersection within the signal phase.

CONCLUSIONS

Factors have been identified that may affect the operation of individual lane groups and/or approaches during individual signal cycles at the seven subject intersections. The LOS worksheets identify many of these operational issues, such as the formation of queues, which have been included in the overall General Plan Circulation Analysis and in previous analyses.

Because of the specificity of each occurrence (e.g., queue formation for one lane group and peak hour factors associated with specific land uses), the overall average intersection LOS should not be dramatically affected. The LOS reported for the given 2003 traffic volumes surveyed and intersection geometrics observed are fair representation prevailing conditions.

One factor that has not been addressed is the possible change in traffic flows and overall traffic volumes between the 2003 existing condition and current 2005/2006 conditions. A traffic volume count-collection task and re-evaluation of LOS based on 2005/2006 traffic volumes and intersection geometrics may indicate significant LOS impacts that have been alluded to by City staff and other stakeholders.

Thank you for the opportunity to conduct this re-evaluation and analysis of the seven subject intersections of the General Plan circulation analysis.

Sincerely,

LSA ASSOCIATES, INC.

Sandipan Bhattacharjee, AICP
Transportation Planner

Attachments: LOS Worksheets for Existing (Year 2003) conditions

Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #7 University Avenue/Barton Road

****

Cycle (sec): 90 Critical Vol./Cap. (X): 0.770
Loss Time (sec): 6 (Y+R = 4 sec) Average Delay (sec/veh): 22.4
Optimal Cycle: 51 Level Of Service: C

****

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	0 1	0	0 1	0 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	34	3	15	4	5	336	488	1192	18	10	751	2
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	34	3	15	4	5	336	488	1192	18	10	751	2
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	36	3	16	4	5	354	514	1255	19	11	791	2
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	36	3	16	4	5	354	514	1255	19	11	791	2
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	36	3	16	4	5	354	514	1255	19	11	791	2
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	0.94	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.17	0.83	0.44	0.56	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	300	1500	756	944	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.02	0.01	0.01	0.01	0.01	0.20	0.30	0.35	0.01	0.01	0.22	0.00
Crit Moves:						****	****				****	
Green Time:	23.0	23.0	23.0	23.0	23.0	23.0	35.3	60.0	60.0	1.1	25.7	25.7
Volume/Cap:	0.08	0.04	0.04	0.02	0.02	0.77	0.77	0.52	0.02	0.52	0.77	0.00
Delay/Veh:	25.6	25.3	25.3	25.1	25.1	38.8	29.2	7.9	5.1	67.0	33.1	23.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	25.6	25.3	25.3	25.1	25.1	38.8	29.2	7.9	5.1	67.0	33.1	23.0
HCM2kAvg:	1	0	0	0	0	11	14	9	0	1	12	0

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Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #19 Anderson Street/Redlands Boulevard

****

Cycle (sec):	90	Critical Vol./Cap. (X):	0.623
Loss Time (sec):	8 (Y+R = 4 sec)	Average Delay (sec/veh):	26.7
Optimal Cycle:	40	Level Of Service:	C

****

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	1 1	0	1 0	1 1	0	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	64	631	64	167	876	122	89	207	220	173	306	191
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	64	631	64	167	876	122	89	207	220	173	306	191
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	67	664	67	176	922	128	94	218	232	182	322	201
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	67	664	67	176	922	128	94	218	232	182	322	201
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	67	664	67	176	922	128	94	218	232	182	322	201
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.82	0.18	1.00	1.76	0.24	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	3268	332	1700	3160	440	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.04	0.20	0.20	0.10	0.29	0.29	0.06	0.06	0.13	0.11	0.09	0.11
Crit Moves:	****				****				****	****		
Green Time:	5.7	31.8	31.8	16.2	42.2	42.2	11.3	18.6	18.6	15.5	22.8	22.8
Volume/Cap:	0.62	0.58	0.58	0.58	0.62	0.62	0.44	0.29	0.62	0.62	0.35	0.44
Delay/Veh:	51.8	24.3	24.3	36.5	18.7	18.7	37.9	30.4	35.8	38.7	27.8	28.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	51.8	24.3	24.3	36.5	18.7	18.7	37.9	30.4	35.8	38.7	27.8	28.9
HCM2kAvg:	3	9	9	5	11	11	3	3	7	6	4	5

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Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #24 Anderson Street/Barton Road

Cycle (sec): 90 Critical Vol./Cap. (X): 0.604
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 27.6
Optimal Cycle: 38 Level Of Service: C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	85	179	36	126	189	92	226	765	140	171	706	243
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	85	179	36	126	189	92	226	765	140	171	706	243
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	89	188	38	133	199	97	238	805	147	180	743	256
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	89	188	38	133	199	97	238	805	147	180	743	256
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	89	188	38	133	199	97	238	805	147	180	743	256
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.83	0.17	1.00	1.00	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	1499	301	1700	1800	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.05	0.13	0.13	0.08	0.11	0.05	0.14	0.22	0.08	0.11	0.21	0.14
Crit Moves:		****		****			****				****	
Green Time:	9.8	18.7	18.7	11.6	20.6	20.6	20.9	35.0	35.0	16.6	30.8	30.8
Volume/Cap:	0.48	0.60	0.60	0.60	0.48	0.24	0.60	0.57	0.21	0.57	0.60	0.42
Delay/Veh:	39.7	35.0	35.0	41.7	31.0	28.6	33.5	22.2	18.4	36.1	25.4	23.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	39.7	35.0	35.0	41.7	31.0	28.6	33.5	22.2	18.4	36.1	25.4	23.2
HCM2kAvg:	3	7	7	4	5	2	7	9	3	5	9	6

Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM 4-Way Stop Method (Base Volume Alternative)

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Intersection #30 Benton Street/Prospect Avenue

****

Cycle (sec): 100 Critical Vol./Cap. (X): 0.707
Loss Time (sec): 0 (Y+R = 4 sec) Average Delay (sec/veh): 14.1
Optimal Cycle: 0 Level Of Service: B

****

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0	0 1	0 1	0
Volume Module:												
Base Vol:	57	238	256	32	99	6	3	39	79	28	11	7
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	57	238	256	32	99	6	3	39	79	28	11	7
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	60	251	269	34	104	6	3	41	83	29	12	7
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	60	251	269	34	104	6	3	41	83	29	12	7
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	60	251	269	34	104	6	3	41	83	29	12	7
Saturation Flow Module:												
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.10	0.43	0.47	0.23	0.73	0.04	0.02	0.32	0.66	1.00	0.70	0.30
Final Sat.:	85	354	381	158	490	30	15	197	400	480	369	161
Capacity Analysis Module:												
Vol/Sat:	0.71	0.71	0.71	0.21	0.21	0.21	0.21	0.21	0.21	0.06	0.03	0.05
Crit Moves:		****		****				****		****		
Delay/Veh:	16.7	16.7	16.7	9.3	9.3	9.3	9.5	9.5	9.5	9.8	9.0	9.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	16.7	16.7	16.7	9.3	9.3	9.3	9.5	9.5	9.5	9.8	9.0	9.0
LOS by Move:	C	C	C	A	A	A	A	A	A	A	A	A
ApproachDel:		16.7			9.3			9.5			9.5	
Delay Adj:		1.00			1.00			1.00			1.00	
ApprAdjDel:		16.7			9.3			9.5			9.5	
LOS by Appr:		C			A			A			A	

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Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #37 Mountain View Avenue/Redlands Boulevard

Cycle (sec):	90	Critical Vol./Cap. (X):	0.623
Loss Time (sec):	8 (Y+R = 4 sec)	Average Delay (sec/veh):	21.1
Optimal Cycle:	40	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	1 1	0	2 0	1 1	0	1 0	1 1	1	1 0	1 1	0
Volume Module:												
Base Vol:	131	804	72	40	1029	114	58	198	101	101	321	78
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	131	804	72	40	1029	114	58	198	101	101	321	78
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	138	846	76	42	1083	120	61	208	106	106	338	82
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	138	846	76	42	1083	120	61	208	106	106	338	82
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	138	846	76	42	1083	120	61	208	106	106	338	82
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.84	0.16	2.00	1.80	0.20	1.00	1.99	1.01	1.00	1.61	0.39
Final Sat.:	1700	3304	296	3200	3241	359	1700	3576	1824	1700	2896	704
Capacity Analysis Module:												
Vol/Sat:	0.08	0.26	0.26	0.01	0.33	0.33	0.04	0.06	0.06	0.06	0.12	0.12
Crit Moves:	****				****		****				****	
Green Time:	11.7	57.0	57.0	2.9	48.3	48.3	5.2	10.6	10.6	11.4	16.8	16.8
Volume/Cap:	0.62	0.40	0.40	0.40	0.62	0.62	0.62	0.49	0.49	0.49	0.62	0.62
Delay/Veh:	42.5	8.2	8.2	45.2	15.2	15.2	53.3	37.8	37.8	38.4	35.5	35.5
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	42.5	8.2	8.2	45.2	15.2	15.2	53.3	37.8	37.8	38.4	35.5	35.5
HCM2kAvg:	5	6	6	1	12	12	3	3	3	3	6	6

Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #41 Mountain View Avenue/Barton Road

Cycle (sec):	90	Critical Vol./Cap. (X):	0.653
Loss Time (sec):	6 (Y+R = 4 sec)	Average Delay (sec/veh):	22.1
Optimal Cycle:	37	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 1	0 1	0	1 0	1 1	0	2 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	107	408	48	128	298	408	199	306	49	64	1046	195
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	107	408	48	128	298	408	199	306	49	64	1046	195
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	113	429	51	135	314	429	209	322	52	67	1101	205
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	113	429	51	135	314	429	209	322	52	67	1101	205
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	113	429	51	135	314	429	209	322	52	67	1101	205
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	0.97	1.00	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00
Lanes:	0.39	1.44	0.17	1.00	1.00	1.00	2.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	663	2528	297	1700	1800	1800	3200	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.17	0.17	0.17	0.08	0.17	0.24	0.07	0.09	0.03	0.04	0.31	0.11
Crit Moves:						****	****				****	
Green Time:	32.9	32.9	32.9	32.9	32.9	32.9	9.0	35.4	35.4	15.7	42.1	42.1
Volume/Cap:	0.47	0.47	0.47	0.22	0.48	0.65	0.65	0.23	0.07	0.23	0.65	0.24
Delay/Veh:	22.1	22.1	22.1	19.9	22.2	25.2	43.8	18.2	17.1	32.3	19.3	14.5
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	22.1	22.1	22.1	19.9	22.2	25.2	43.8	18.2	17.1	32.3	19.3	14.5
HCM2kAvg:	6	7	7	3	7	11	4	3	1	2	12	3

Loma Linda General Plan
Existing (2003) Conditions
A.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #51 California Street/Redlands Boulevard

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Cycle (sec): 90 Critical Vol./Cap. (X): 0.791
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 36.9
Optimal Cycle: 62 Level Of Service: D

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Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1! 0	0	1 0	0 1	0	1 0	1 1	0	1 0	1 1	0
Volume Module:												
Base Vol:	85	283	21	208	267	159	122	198	56	52	364	213
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	85	283	21	208	267	159	122	198	56	52	364	213
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	89	298	22	219	281	167	128	208	59	55	383	224
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	89	298	22	219	281	167	128	208	59	55	383	224
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	89	298	22	219	281	167	128	208	59	55	383	224
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	1.00	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	0.22	0.73	0.05	1.00	0.63	0.37	1.00	1.56	0.44	1.00	1.26	0.74
Final Sat.:	393	1310	97	1700	1128	672	1700	2806	794	1700	2271	1329
Capacity Analysis Module:												
Vol/Sat:	0.23	0.23	0.23	0.13	0.25	0.25	0.08	0.07	0.07	0.03	0.17	0.17
Crit Moves:			****		****		****				****	
Green Time:	25.9	25.9	25.9	28.3	28.3	28.3	8.6	19.4	19.4	8.4	19.2	19.2
Volume/Cap:	0.79	0.79	0.79	0.41	0.79	0.79	0.79	0.34	0.34	0.34	0.79	0.79
Delay/Veh:	37.7	37.7	37.7	24.8	35.6	35.6	62.4	30.2	30.2	39.5	39.1	39.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	37.7	37.7	37.7	24.8	35.6	35.6	62.4	30.2	30.2	39.5	39.1	39.1
HCM2kAvg:	13	13	13	5	13	13	6	3	3	2	10	10

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Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #7 University Avenue/Barton Road

Cycle (sec): 90 Critical Vol./Cap. (X): 0.761
Loss Time (sec): 6 (Y+R = 4 sec) Average Delay (sec/veh): 21.0
Optimal Cycle: 50 Level Of Service: C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	0 1	0	0 1	0 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	25	9	20	12	5	398	166	1024	34	31	1281	11
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	25	9	20	12	5	398	166	1024	34	31	1281	11
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	26	9	21	13	5	419	175	1078	36	33	1348	12
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	26	9	21	13	5	419	175	1078	36	33	1348	12
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	26	9	21	13	5	419	175	1078	36	33	1348	12
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.31	0.69	0.72	0.28	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	559	1241	1220	508	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.02	0.02	0.02	0.01	0.01	0.23	0.10	0.30	0.02	0.02	0.37	0.01
Crit Moves:						****	****				****	
Green Time:	27.5	27.5	27.5	27.5	27.5	27.5	12.2	53.1	53.1	3.4	44.3	44.3
Volume/Cap:	0.05	0.06	0.06	0.03	0.03	0.76	0.76	0.51	0.03	0.51	0.76	0.01
Delay/Veh:	22.1	22.1	22.1	21.9	21.9	34.4	51.3	11.0	7.7	49.0	20.5	11.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	22.1	22.1	22.1	21.9	21.9	34.4	51.3	11.0	7.7	49.0	20.5	11.7
HCM2kAvg:	1	1	1	0	0	12	7	9	0	2	17	0

Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #19 Anderson Street/Redlands Boulevard

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Cycle (sec): 90 Critical Vol./Cap. (X): 0.701
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 31.1
Optimal Cycle: 48 Level Of Service: C

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Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0 1	1 0		1 0 1	1 0		1 0 2	0 1		1 0 2	0 1	
Volume Module:												
Base Vol:	89	487	48	364	539	126	149	613	136	117	345	282
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	89	487	48	364	539	126	149	613	136	117	345	282
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	94	513	51	383	567	133	157	645	143	123	363	297
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	94	513	51	383	567	133	157	645	143	123	363	297
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	94	513	51	383	567	133	157	645	143	123	363	297
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.82	0.18	1.00	1.62	0.38	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	3277	323	1700	2918	682	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.06	0.16	0.16	0.23	0.19	0.19	0.09	0.18	0.08	0.07	0.10	0.16
Crit Moves:		****		****			****					****
Green Time:	10.8	20.1	20.1	28.9	38.2	38.2	11.8	23.5	23.5	9.5	21.2	21.2
Volume/Cap:	0.46	0.70	0.70	0.70	0.46	0.46	0.70	0.69	0.30	0.69	0.43	0.70
Delay/Veh:	38.5	35.0	35.0	30.8	18.7	18.7	47.0	32.1	27.1	49.4	29.6	36.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	38.5	35.0	35.0	30.8	18.7	18.7	47.0	32.1	27.1	49.4	29.6	36.7
HCM2kAvg:	3	9	9	11	7	7	6	9	3	5	5	9

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Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #24 Anderson Street/Barton Road

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Cycle (sec):	90	Critical Vol./Cap. (X):	0.686
Loss Time (sec):	8 (Y+R = 4 sec)	Average Delay (sec/veh):	29.3
Optimal Cycle:	46	Level Of Service:	C

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Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	209	209	75	223	186	263	164	880	67	36	749	95
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	209	209	75	223	186	263	164	880	67	36	749	95
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	220	220	79	235	196	277	173	926	71	38	788	100
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	220	220	79	235	196	277	173	926	71	38	788	100
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	220	220	79	235	196	277	173	926	71	38	788	100
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.74	0.26	1.00	1.00	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	1325	475	1700	1800	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.13	0.17	0.17	0.14	0.11	0.15	0.10	0.26	0.04	0.02	0.22	0.06
Crit Moves:		****		****			****				****	
Green Time:	18.2	21.8	21.8	18.1	21.7	21.7	13.3	38.7	38.7	3.4	28.7	28.7
Volume/Cap:	0.64	0.69	0.69	0.69	0.45	0.64	0.69	0.60	0.09	0.60	0.69	0.17
Delay/Veh:	36.8	35.5	35.5	39.0	29.8	33.8	44.0	20.3	15.3	57.4	28.4	22.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	36.8	35.5	35.5	39.0	29.8	33.8	44.0	20.3	15.3	57.4	28.4	22.2
HCM2kAvg:	7	9	9	7	5	8	6	10	1	2	11	2

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Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM 4-Way Stop Method (Base Volume Alternative)

Intersection #30 Benton Street/Prospect Avenue

Cycle (sec):	100	Critical Vol./Cap. (X):	0.320
Loss Time (sec):	0 (Y+R = 4 sec)	Average Delay (sec/veh):	9.8
Optimal Cycle:	0	Level Of Service:	A

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Stop Sign			Stop Sign			Stop Sign			Stop Sign		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1! 0	0	0 0	1! 0	0	0 0	1! 0	0	0 1	0 1	0
Volume Module:												
Base Vol:	56	119	33	7	174	7	5	13	100	113	54	19
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	56	119	33	7	174	7	5	13	100	113	54	19
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	59	125	35	7	183	7	5	14	105	119	57	20
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	59	125	35	7	183	7	5	14	105	119	57	20
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	59	125	35	7	183	7	5	14	105	119	57	20
Saturation Flow Module:												
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.27	0.57	0.16	0.04	0.92	0.04	0.04	0.11	0.85	1.00	0.80	0.20
Final Sat.:	184	392	109	25	625	25	29	75	579	557	492	126
Capacity Analysis Module:												
Vol/Sat:	0.32	0.32	0.32	0.29	0.29	0.29	0.18	0.18	0.18	0.21	0.12	0.16
Crit Moves:		****		****					****	****		
Delay/Veh:	10.2	10.2	10.2	10.0	10.0	10.0	8.8	8.8	8.8	10.4	9.2	9.2
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	10.2	10.2	10.2	10.0	10.0	10.0	8.8	8.8	8.8	10.4	9.2	9.2
LOS by Move:	B	B	B	A	A	A	A	A	A	B	A	A
ApproachDel:		10.2			10.0			8.8			9.9	
Delay Adj:		1.00			1.00			1.00			1.00	
ApprAdjDel:		10.2			10.0			8.8			9.9	
LOS by Appr:		B			A			A			A	

Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #37 Mountain View Avenue/Redlands Boulevard

Cycle (sec):	90	Critical Vol./Cap. (X):	0.707
Loss Time (sec):	8 (Y+R = 4 sec)	Average Delay (sec/veh):	28.6
Optimal Cycle:	48	Level Of Service:	C

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	1 0	1 1	0	2 0	1 1	0	1 0	1 1	1	1 0	1 1	0
Volume Module:												
Base Vol:	142	920	202	107	629	112	150	622	173	160	409	73
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	142	920	202	107	629	112	150	622	173	160	409	73
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	149	968	213	113	662	118	158	655	182	168	431	77
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	149	968	213	113	662	118	158	655	182	168	431	77
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	149	968	213	113	662	118	158	655	182	168	431	77
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.64	0.36	2.00	1.70	0.30	1.00	2.00	1.00	1.00	1.70	0.30
Final Sat.:	1700	2952	648	3200	3056	544	1700	3600	1800	1700	3055	545
Capacity Analysis Module:												
Vol/Sat:	0.09	0.33	0.33	0.04	0.22	0.22	0.09	0.18	0.10	0.10	0.14	0.14
Crit Moves:		****		****				****		****		
Green Time:	13.3	41.8	41.8	4.5	32.9	32.9	14.2	23.1	23.1	12.6	21.6	21.6
Volume/Cap:	0.59	0.71	0.71	0.71	0.59	0.59	0.59	0.71	0.39	0.71	0.59	0.59
Delay/Veh:	39.5	20.7	20.7	55.7	23.9	23.9	38.6	32.3	27.7	46.3	31.4	31.4
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	39.5	20.7	20.7	55.7	23.9	23.9	38.6	32.3	27.7	46.3	31.4	31.4
HCM2kAvg:	5	14	14	3	9	9	5	10	4	6	7	7

Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

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Intersection #41 Mountain View Avenue/Barton Road

****

Cycle (sec): 90 Critical Vol./Cap. (X): 0.568
Loss Time (sec): 6 (Y+R = 4 sec) Average Delay (sec/veh): 22.3
Optimal Cycle: 31 Level Of Service: C

****

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Permitted			Permitted			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 1	0 1	0	1 0	1 1	0	2 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	118	241	80	198	305	197	397	1077	66	110	507	123
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	118	241	80	198	305	197	397	1077	66	110	507	123
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	124	254	84	208	321	207	418	1134	69	116	534	129
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	124	254	84	208	321	207	418	1134	69	116	534	129
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	124	254	84	208	321	207	418	1134	69	116	534	129
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00
Lanes:	0.56	1.08	0.36	1.00	1.22	0.78	2.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	953	1946	646	1700	2187	1413	3200	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.13	0.13	0.13	0.12	0.15	0.15	0.13	0.31	0.04	0.07	0.15	0.07
Crit Moves:					****			****		****		
Green Time:	23.3	23.3	23.3	23.3	23.3	23.3	28.4	49.9	49.9	10.8	32.3	32.3
Volume/Cap:	0.50	0.50	0.50	0.47	0.57	0.57	0.41	0.57	0.07	0.57	0.41	0.20
Delay/Veh:	28.9	28.9	28.9	29.0	29.8	29.8	24.5	13.4	9.3	41.1	21.9	20.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	28.9	28.9	28.9	29.0	29.8	29.8	24.5	13.4	9.3	41.1	21.9	20.1
HCM2kAvg:	6	6	6	5	7	7	5	10	1	4	6	2

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Loma Linda General Plan
Existing (2003) Conditions
P.M. Peak Hour

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

****

Intersection #51 California Street/Redlands Boulevard

****

Cycle (sec): 90 Critical Vol./Cap. (X): 0.750
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 34.0
Optimal Cycle: 54 Level Of Service: C

****

Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L -	T -	R	L -	T -	R	L -	T -	R	L -	T -	R
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Lanes:	0 0	1! 0	0	1 0	0 1	0	1 0	1 1	0	1 0	1 1	0
Volume Module:												
Base Vol:	50	259	29	262	197	91	170	726	93	60	422	297
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	50	259	29	262	197	91	170	726	93	60	422	297
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
PHF Volume:	53	273	31	276	207	96	179	764	98	63	444	313
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	53	273	31	276	207	96	179	764	98	63	444	313
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	53	273	31	276	207	96	179	764	98	63	444	313
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	0.16	0.76	0.08	1.00	0.68	0.32	1.00	1.77	0.23	1.00	1.17	0.83
Final Sat.:	264	1367	153	1700	1231	569	1700	3191	409	1700	2113	1487
Capacity Analysis Module:												
Vol/Sat:	0.20	0.20	0.20	0.16	0.17	0.17	0.11	0.24	0.24	0.04	0.21	0.21
Crit Moves:		****			****		****				****	
Green Time:	23.9	23.9	23.9	20.2	20.2	20.2	12.6	32.8	32.8	5.1	25.2	25.2
Volume/Cap:	0.75	0.75	0.75	0.72	0.75	0.75	0.75	0.66	0.66	0.66	0.75	0.75
Delay/Veh:	36.9	36.9	36.9	39.0	40.2	40.2	49.6	25.2	25.2	57.0	32.7	32.7
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	36.9	36.9	36.9	39.0	40.2	40.2	49.6	25.2	25.2	57.0	32.7	32.7
HCM2kAvg:	10	11	11	9	10	10	7	11	11	3	11	11

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LSA

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FEB 8 2006

February 7, 2006

Ms. Deborah Woldruff, AICP
Community Development Director
City of Loma Linda
25541 Barton Road
Loma Linda, California 92354

Subject: Loma Linda General Plan Update: Revised Existing Level of Service Analysis (LSA Project No. LLD130)

Dear Ms. Woldruff:

As part of the 2001 Loma Linda General Plan Update, LSA Associates, Inc. (LSA) conducted a traffic analysis for the Circulation Element. The existing levels of service (LOS) for the following four major intersections were determined using Traffix 7.7 based on Highway Capacity Manual (HCM) methodologies:

1. Anderson Street and Redlands Boulevard;
2. Anderson Street and Barton Road;
3. Mountain View Avenue and Redlands Boulevard; and
4. Mountain View Avenue and Barton Road.

The results indicated satisfactory LOS conditions for all the four major intersections. Comments from the City staff and other stakeholders raised questions regarding whether the LOS analysis reflected the actual traffic conditions at these intersections. As a result, LSA collected new traffic count data in January 2006 and performed a revised LOS analysis for the existing traffic conditions at these intersections. The counts were collected for the a.m. and p.m. peak hours and LOS analysis was performed using Traffix 7.7 and HCM methodologies. This analysis followed a similar procedure to the previous analysis, the only difference being the inclusion of minimum green times and peak hour factors at all intersections. These adjustments constrain the calculations and express worse levels of service. The significant change from the 2001 analysis is updated with new traffic counts reflecting five additional years of growth in traffic.

Based on the new LOS analysis, all the intersections have satisfactory LOS conditions. For the a.m. peak hours, Anderson Street/Redlands Boulevard, Anderson Street/Barton Road, and Mountain View Avenue/Redlands Boulevard currently operate at LOS C while Mountain View Avenue/Barton Road operates at LOS D. For p.m. peak hours, Anderson Street/Redlands Boulevard and Anderson Street/Barton Road currently operate at LOS D while Mountain View Avenue/Redlands Boulevard and Mountain View Avenue/Barton Road operate at LOS C.

Attached are the results of the analysis in tabular form for all the four major intersections for the a.m. and p.m. peak hours.

If you have any questions or comments regarding the above, please feel free to call me at (949) 553-0666.

Sincerely,

LSA ASSOCIATES, INC.

Anthony L. Petros
Principal

Attachments: Traffix 7.7 LOS Analysis Worksheets

Scenario Report

Scenario:	Existing AM
Command:	Default Command
Volume:	ex am
Geometry:	Default Geometry
Impact Fee:	Default Impact Fee
Trip Generation:	Default Trip Generation
Trip Distribution:	Default Trip Distribution
Paths:	Default Paths
Routes:	Default Routes
Configuration:	ex am

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #1 Anderson Street/Redlands Boulevard

Cycle (sec): 100 Critical Vol./Cap. (X): 0.791
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 33.5
Optimal Cycle: 63 Level Of Service: C

Street Name:	Anderson Street						Redlands Boulevard					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	1 1	0	1 0	1 1	0	1 0	1 1	0	1 0	1 1	0
Volume Module:												
Base Vol:	75	693	63	169	1025	178	89	190	215	157	241	171
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	75	693	63	169	1025	178	89	190	215	157	241	171
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.69	0.87	0.82	0.90	0.90	0.83	0.85	0.81	0.68	0.84	0.73	0.72
PHF Volume:	109	793	77	187	1143	216	105	236	317	188	330	236
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	109	793	77	187	1143	216	105	236	317	188	330	236
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	109	793	77	187	1143	216	105	236	317	188	330	236
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.82	0.18	1.00	1.68	0.32	1.00	1.00	1.00	1.00	1.17	0.83
Final Sat.:	1700	3281	319	1700	3028	572	1700	1800	1800	1700	2097	1503
Capacity Analysis Module:												
Vol/Sat:	0.06	0.24	0.24	0.11	0.38	0.38	0.06	0.13	0.18	0.11	0.16	0.16
Crit Moves:	****				****				****	****		
Green Time:	10.0	38.9	38.9	17.7	46.6	46.6	13.8	21.7	21.7	13.6	21.6	21.6
Volume/Cap:	0.64	0.62	0.62	0.62	0.81	0.81	0.45	0.60	0.81	0.81	0.73	0.73
Uniform Del:	43.3	24.6	24.6	38.0	22.9	22.9	39.6	35.2	37.2	41.9	36.4	36.4
IncremntDel:	8.2	0.9	0.9	4.0	3.1	3.1	1.4	1.1	7.2	18.8	3.5	3.5
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	51.5	25.5	25.5	42.0	25.9	25.9	41.0	36.4	44.3	60.7	39.9	39.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	51.5	25.5	25.5	42.0	25.9	25.9	41.0	36.4	44.3	60.7	39.9	39.9
HCM2kAvg:	4	11	11	6	20	20	3	7	12	8	10	10

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #2 Anderson Street/Barton Road

Cycle (sec): 100 Critical Vol./Cap. (X): 0.688
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 33.0
Optimal Cycle: 48 Level Of Service: C

Street Name:	Anderson Street						Barton Road					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	80	185	29	121	198	134	203	745	134	183	754	226
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	80	185	29	121	198	134	203	745	134	183	754	226
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.81	0.67	0.70	0.92	0.83	0.96	0.88	0.90	0.62	0.78	0.86	0.78
PHF Volume:	98	275	41	131	238	139	230	825	217	234	882	292
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	98	275	41	131	238	139	230	825	217	234	882	292
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	98	275	41	131	238	139	230	825	217	234	882	292
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.87	0.13	1.00	1.00	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	1565	235	1700	1800	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.06	0.18	0.18	0.08	0.13	0.08	0.14	0.23	0.12	0.14	0.24	0.16
Crit Moves:		****		****			****				****	
Green Time:	15.8	25.6	25.6	11.2	20.9	20.9	19.6	34.5	34.5	20.7	35.6	35.6
Volume/Cap:	0.37	0.69	0.69	0.69	0.63	0.37	0.69	0.66	0.35	0.66	0.69	0.46
Uniform Del:	37.6	33.6	33.6	42.7	36.0	33.9	37.3	27.8	24.4	36.4	27.5	24.8
IncremntDel:	0.8	4.4	4.4	10.1	3.4	0.6	6.0	1.4	0.3	4.7	1.6	0.5
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	38.4	38.0	38.0	52.8	39.5	34.5	43.3	29.2	24.7	41.2	29.1	25.3
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	38.4	38.0	38.0	52.8	39.5	34.5	43.3	29.2	24.7	41.2	29.1	25.3
HCM2kAvg:	3	10	10	5	8	4	8	12	5	8	12	7

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #3 Mountain View Avenue/Redlands Boulevard

Cycle (sec): 100 Critical Vol./Cap. (X): 0.623
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 25.5
Optimal Cycle: 48 Level Of Service: C

Street Name:	Mountain View Avenue						Redlands Boulevard					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0 1	1 0		2 0 1	1 0		1 0 2	0 1		1 0 2	0 1	
Volume Module:												
Base Vol:	103	778	67	52	898	93	75	177	47	84	314	47
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	103	778	67	52	898	93	75	177	47	84	314	47
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.84	0.81	0.83	0.64	0.80	0.81	0.74	0.85	0.50	0.89	0.89	0.82
PHF Volume:	122	958	81	82	1121	114	101	208	94	94	355	57
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	122	958	81	82	1121	114	101	208	94	94	355	57
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	122	958	81	82	1121	114	101	208	94	94	355	57
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.84	0.16	2.00	1.81	0.19	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	3319	281	3200	3267	333	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.07	0.29	0.29	0.03	0.34	0.34	0.06	0.06	0.05	0.06	0.10	0.03
Crit Moves:	****				****		****				****	
Green Time:	11.5	49.2	49.2	17.0	54.8	54.8	10.0	12.9	12.9	12.9	15.7	15.7
Volume/Cap:	0.63	0.59	0.59	0.15	0.63	0.63	0.60	0.45	0.41	0.43	0.63	0.20
Uniform Del:	42.2	18.1	18.1	35.3	15.6	15.6	43.1	40.3	40.1	40.2	39.4	36.7
IncremntDel:	6.3	0.5	0.5	0.1	0.6	0.6	5.7	0.7	1.2	1.4	2.2	0.4
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	48.5	18.6	18.6	35.4	16.2	16.2	48.7	41.0	41.2	41.6	41.6	37.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	48.5	18.6	18.6	35.4	16.2	16.2	48.7	41.0	41.2	41.6	41.6	37.0
HCM2kAvg:	5	12	12	1	13	13	4	3	3	3	6	2

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #4 Mountain View Avenue/Barton Road

Cycle (sec): 100 Critical Vol./Cap. (X): 0.861
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 37.2
Optimal Cycle: 83 Level Of Service: D

Street Name:	Mountain View Avenue						Barton Road					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	1 1	0	1 0	2 0	1	2 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	112	446	60	128	352	365	169	327	51	56	1154	218
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	112	446	60	128	352	365	169	327	51	56	1154	218
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.68	0.76	0.98	0.85	0.80	0.72	0.89	0.87	0.83	0.72	0.91	0.80
PHF Volume:	165	584	61	150	442	507	190	377	61	77	1272	272
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	165	584	61	150	442	507	190	377	61	77	1272	272
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	165	584	61	150	442	507	190	377	61	77	1272	272
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.81	0.19	1.00	2.00	1.00	2.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	3259	341	1700	3600	1800	3200	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.10	0.18	0.18	0.09	0.12	0.28	0.06	0.10	0.03	0.05	0.35	0.15
Crit Moves:	****					****	****				****	
Green Time:	10.9	27.2	27.2	15.2	31.5	31.5	10.0	25.3	25.3	24.2	39.6	39.6
Volume/Cap:	0.89	0.66	0.66	0.58	0.39	0.89	0.59	0.41	0.13	0.19	0.89	0.38
Uniform Del:	44.0	32.3	32.3	39.4	26.7	32.6	43.1	31.1	28.8	30.1	28.2	21.5
IncremntDel:	37.7	1.7	1.7	3.3	0.2	16.4	3.0	0.3	0.1	0.2	7.6	0.3
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	81.7	33.9	33.9	42.8	26.9	49.0	46.1	31.4	29.0	30.3	35.8	21.8
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	81.7	33.9	33.9	42.8	26.9	49.0	46.1	31.4	29.0	30.3	35.8	21.8
HCM2kAvg:	8	10	10	5	5	18	4	5	1	2	22	6

Scenario Report

Scenario:	Existing PM
Command:	Default Command
Volume:	ex pm
Geometry:	Default Geometry
Impact Fee:	Default Impact Fee
Trip Generation:	Default Trip Generation
Trip Distribution:	Default Trip Distribution
Paths:	Default Paths
Routes:	Default Routes
Configuration:	ex pm

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #1 Anderson Street/Redlands Boulevard

Cycle (sec): 100 Critical Vol./Cap. (X): 0.859
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 40.9
Optimal Cycle: 82 Level Of Service: D

Street Name:	Anderson Street						Redlands Boulevard					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	1 1	0	1 0	1 1	0	1 0	1 1	0	1 0	1 1	0
Volume Module:												
Base Vol:	98	597	45	346	563	197	176	767	146	135	419	260
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	98	597	45	346	563	197	176	767	146	135	419	260
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.80	0.92	0.73	0.94	0.94	0.90	0.94	0.95	0.80	0.77	0.84	0.84
PHF Volume:	123	647	61	367	601	219	187	809	183	175	501	309
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	123	647	61	367	601	219	187	809	183	175	501	309
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	123	647	61	367	601	219	187	809	183	175	501	309
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.83	0.17	1.00	1.47	0.53	1.00	1.63	0.37	1.00	1.24	0.76
Final Sat.:	1700	3288	312	1700	2638	962	1700	2937	663	1700	2227	1373
Capacity Analysis Module:												
Vol/Sat:	0.07	0.20	0.20	0.22	0.23	0.23	0.11	0.28	0.28	0.10	0.22	0.22
Crit Moves:		****		****				****		****		
Green Time:	14.6	22.9	22.9	25.1	33.4	33.4	14.5	32.1	32.1	12.0	29.5	29.5
Volume/Cap:	0.49	0.86	0.86	0.86	0.68	0.68	0.76	0.86	0.86	0.86	0.76	0.76
Uniform Del:	39.3	37.0	37.0	35.8	28.8	28.8	41.1	31.9	31.9	43.2	32.0	32.0
IncremntDel:	1.5	9.0	9.0	15.9	1.6	1.6	13.0	6.7	6.7	28.8	3.3	3.3
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	40.8	46.0	46.0	51.7	30.4	30.4	54.1	38.5	38.5	72.0	35.3	35.3
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	40.8	46.0	46.0	51.7	30.4	30.4	54.1	38.5	38.5	72.0	35.3	35.3
HCM2kAvg:	4	13	13	14	12	12	7	17	17	8	13	13

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #2 Anderson Street/Barton Road

Cycle (sec): 100 Critical Vol./Cap. (X): 0.791
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 37.2
Optimal Cycle: 63 Level Of Service: D

Street Name:	Anderson Street						Barton Road					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	0 1	0	1 0	1 0	1	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	198	155	66	246	209	312	179	1117	58	45	712	144
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	198	155	66	246	209	312	179	1117	58	45	712	144
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.77	0.88	0.84	0.88	0.94	0.87	0.88	0.90	0.79	0.79	0.94	0.80
PHF Volume:	258	177	78	279	221	357	205	1236	73	57	755	181
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	258	177	78	279	221	357	205	1236	73	57	755	181
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	258	177	78	279	221	357	205	1236	73	57	755	181
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	0.69	0.31	1.00	1.00	1.00	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	1247	553	1700	1800	1800	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.15	0.14	0.14	0.16	0.12	0.20	0.12	0.34	0.04	0.03	0.21	0.10
Crit Moves:	****					****		****		****		
Green Time:	18.0	19.2	19.2	22.2	23.4	23.4	18.4	40.6	40.6	10.0	32.1	32.1
Volume/Cap:	0.85	0.74	0.74	0.74	0.52	0.85	0.65	0.85	0.10	0.34	0.65	0.31
Uniform Del:	39.7	38.0	38.0	36.2	33.4	36.6	37.8	26.9	18.4	41.9	29.1	25.6
IncremntDel:	19.1	8.1	8.1	7.5	1.2	14.6	4.9	4.8	0.1	1.2	1.3	0.3
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	58.8	46.2	46.2	43.7	34.6	51.1	42.7	31.6	18.5	43.1	30.5	25.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	58.8	46.2	46.2	43.7	34.6	51.1	42.7	31.6	18.5	43.1	30.5	25.9
HCM2kAvg:	10	9	9	10	6	13	7	20	1	2	11	4

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #3 Mountain View Avenue/Redlands Boulevard

Cycle (sec): 100 Critical Vol./Cap. (X): 0.742
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 34.4
Optimal Cycle: 54 Level Of Service: C

Street Name:	Mountain View Avenue						Redlands Boulevard					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	1 1	0	2 0	1 1	0	1 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	165	882	195	99	618	89	162	585	100	163	462	41
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	165	882	195	99	618	89	162	585	100	163	462	41
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.79	0.86	0.88	0.71	0.98	0.81	0.83	0.86	0.88	0.93	0.86	0.59
PHF Volume:	208	1032	221	139	633	110	196	677	114	175	538	70
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	208	1032	221	139	633	110	196	677	114	175	538	70
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	208	1032	221	139	633	110	196	677	114	175	538	70
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.65	0.35	2.00	1.70	0.30	1.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	2966	634	3200	3065	535	1700	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.12	0.35	0.35	0.04	0.21	0.21	0.12	0.19	0.06	0.10	0.15	0.04
Crit Moves:		****		****				****		****		
Green Time:	20.3	44.6	44.6	10.0	34.3	34.3	16.2	24.1	24.1	13.2	21.1	21.1
Volume/Cap:	0.60	0.78	0.78	0.43	0.60	0.60	0.71	0.78	0.26	0.78	0.71	0.18
Uniform Del:	36.2	23.5	23.5	42.3	27.2	27.2	39.6	35.4	30.7	42.0	36.6	32.4
IncremntDel:	3.0	2.5	2.5	0.9	0.8	0.8	8.2	4.6	0.3	15.9	3.1	0.2
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	39.1	26.0	26.0	43.3	28.0	28.0	47.8	40.0	31.1	57.8	39.7	32.6
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	39.1	26.0	26.0	43.3	28.0	28.0	47.8	40.0	31.1	57.8	39.7	32.6
HCM2kAvg:	7	18	18	3	10	10	7	12	3	7	9	2

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #4 Mountain View Avenue/Barton Road

Cycle (sec): 100 Critical Vol./Cap. (X): 0.728
Loss Time (sec): 8 (Y+R = 4 sec) Average Delay (sec/veh): 33.3
Optimal Cycle: 52 Level Of Service: C

Street Name:	Mountain View Avenue						Barton Road					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Protected			Protected			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	10	10	10	10	10	10	10	10	10	10	10	10
Lanes:	1 0	1 1	0	1 0	2 0	1	2 0	2 0	1	1 0	2 0	1
Volume Module:												
Base Vol:	99	211	120	199	302	212	396	1232	11	125	503	47
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	99	211	120	199	302	212	396	1232	11	125	503	47
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	0.68	0.91	0.72	0.98	0.89	0.92	0.91	0.94	0.69	0.79	0.83	0.89
PHF Volume:	145	231	167	203	340	231	438	1305	16	159	605	53
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	145	231	167	203	340	231	438	1305	16	159	605	53
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Final Vol.:	145	231	167	203	340	231	438	1305	16	159	605	53
Saturation Flow Module:												
Sat/Lane:	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800	1800
Adjustment:	0.94	1.00	1.00	0.94	1.00	1.00	0.89	1.00	1.00	0.94	1.00	1.00
Lanes:	1.00	1.16	0.84	1.00	2.00	1.00	2.00	2.00	1.00	1.00	2.00	1.00
Final Sat.:	1700	2093	1507	1700	3600	1800	3200	3600	1800	1700	3600	1800
Capacity Analysis Module:												
Vol/Sat:	0.09	0.11	0.11	0.12	0.09	0.13	0.14	0.36	0.01	0.09	0.17	0.03
Crit Moves:	****					****		****		****		
Green Time:	11.7	14.1	14.1	15.3	17.6	17.6	28.1	49.8	49.8	12.8	34.5	34.5
Volume/Cap:	0.73	0.78	0.78	0.78	0.54	0.73	0.49	0.73	0.02	0.73	0.49	0.09
Uniform Del:	42.6	41.5	41.5	40.8	37.5	38.9	29.9	19.8	12.7	41.9	25.8	22.1
IncremntDel:	12.7	7.7	7.7	14.3	0.9	8.2	0.4	1.5	0.0	11.7	0.3	0.1
InitQueuDel:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Delay Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Delay/Veh:	55.3	49.2	49.2	55.1	38.4	47.1	30.4	21.3	12.7	53.6	26.1	22.2
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	55.3	49.2	49.2	55.1	38.4	47.1	30.4	21.3	12.7	53.6	26.1	22.2
HCM2kAvg:	6	8	8	8	5	8	6	17	0	6	8	1

ATTACHMENT 4

Responses to Comments on the Loma Linda General Plan Update Final Program EIR Received After the Public Comment Period on the Draft EIR

Exhibits:

A. Letter A – Dr. Timothy P. Krantz, San Bernardino Valley Audubon Society (June 27, 2005)

B. Letter B – Lisa Belenky, Center for Biological Diversity (June 6, 2005)

C. Letter C – Kathy Glendrange, DVM, JD, Save Loma Linda (November 8, 2005)

D. Letter D – Raymond W. Johnson, Johnson & Sedlack on behalf of Save Loma Linda (April 18, 2006)

RESPONSES TO COMMENTS ON THE LOMA LINDA GENERAL PLAN UPDATE FINAL PROGRAM EIR RECEIVED AFTER THE PUBLIC COMMENT PERIOD ON THE DRAFT EIR.

The comments on the Loma Linda General Plan Draft Program EIR (State Clearinghouse No. 2003101159) and the individual responses to each comment were included in Section 3 of the Final EIR. The primary objective and purpose of the Draft EIR public review process is to obtain comments on the adequacy of the analysis of environmental impacts, the mitigation measures presented, and other analyses contained in the report. The California Environmental Quality Act (CEQA) requires that the City of Loma Linda respond to all significant environmental issues raised (*CEQA Guidelines*, Section 15088). However, subsequent to the finalization of the EIR but prior to public hearings on the Final EIR, the City received four comment letters on the Final EIR and is responding to the commenters in writing.

Aside from the courtesy statements, introductions, and closings, individual comments within each letter have been assigned an alphanumeric identifier. The number following the first digit will indicate the individual comment letter within the category, while the digit(s) following the hyphen will identify the specific comment within each letter. For example, the comment identified as A-1 will correspond to the first comment in the first comment letter.

Copies of each comment letter are included with the responses. Brackets delineating the individual comments and the alphanumeric identifier have been added to the right margin of each letter. Following each comment letter is (are) the page(s) of responses to each individual comment.

Letter A

San Bernardino Valley Audubon Society
P.O. Box 10973
San Bernardino, CA 92423-0973

June 27, 2005

Subject: City of Loma Linda General Plan Update
Final Program Environmental Impact Report
SCH No. 2003101159

City Council Members
c/o Deborah Woldruff
Community Development and Planning Division
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

Dear Council Members,

These comments are submitted on behalf of the San Bernardino Valley Audubon Society ("Audubon") on the Final Program Environmental Impact Report ("FEIR") for the City of Loma Linda General Plan SCH No. 2003101159 ("the Project"). Audubon is a non-profit environmental organization dedicated to the protection of native species and their habitats in the Inland Empire and Southern California. These comments are focused on potential adverse impacts to biological resources in the Loma Linda hills.

The FEIR for the Project is inadequate in that it defers any substantive environmental analysis of potential environmental impacts on biological resources indefinitely, pending future development applications. With respect to biological resources, the Draft and FEIR rely entirely on a cursory search and checklist of the California Natural Diversity Database–an online search that any lay person could accomplish in about ten minutes. 1

The FEIR completely fails to take into consideration the known location of Nevin's barberry (*Berberis nevinii*) within the Project area–a California Endangered species and without question one of the most critically endangered species on the planet–limited to just six known plants in this, one of only two extant populations. In fact, the Hillside element of the General Plan contemplates residential development with slope density transfers ***into*** the Nevin's barberry location–representing a direct conflict between the typical slope-density transfer policies promoted in the FEIR and the reality of the endangered species occurrence. 2

Historically, there were several other sites of known Nevin's barberry locations in the Project area; and the entire hillside portion of the General Plan area should be surveyed during February when the bright yellow blooms make this handsome shrub easily 3

discernible. The FEIR must include measures to avoid known occurrences of Nevin's barberry and reduce adverse environmental impacts to this unique species. 3

The only "substantive" biological information included in the Draft and FEIR other than a checklist of potential special status species is a crude U.S. Fish and Wildlife Service critical habitat map for the California coastal gnatcatcher (*Polioptila californica c.*). The map identifies 1,910 acres of designated critical habitat in the Project area, although the actual habitat–comprised of coastal sagebrush scrub vegetation–encompasses nearly 3,000 acres of potential habitat in the Loma Linda hills. Again, the FEIR completely defers any protocol surveys pending applications for development. Rather, the FEIR makes a lame comment about a non-protocol (out of season?) survey that found no birds in 1998. 4

Both of these two examples underscore the basic failure of the Biological Resources section of the General Plan: the General Plan is supposed to provide direction for growth and development in the City of Loma Linda for the next decade or two; taking into consideration the best available knowledge that we have today to plan for reasonable growth with the least possible environmental impacts tomorrow. 5 The Project plan fails to provide even the most rudimentary existing information on endangered species in the Project area, and fails to analyze reasonable alternatives to avoid and minimize impacts to these resources; and thus fails to anticipate and re-direct development away from these areas and, as in the case of Nevin's barberry, may actually focus development into the sensitive areas instead. 6

The San Bernardino Valley Audubon Society strongly opposes the adoption and certification of the FEIR and General Plan as it stands today. The City should consider adopting the General Plan, but reserving adoption of the biological resources section of the FEIR pending protocol surveys during the appropriate season (February for Nevin's barberry and March-May for California gnatcatcher). At the very least, analysis of known locations of endangered species should be undertaken; with a look toward re-directing development away from sensitive locations and establishment of policies to protect them (such as conservation easements, density transfers, etc.). 7

Do not adopt the General Plan in its entirety tonight; and reserve the Biological Resources section for further analysis and consideration at a later date. I would be glad to respond to any questions regarding these issues; and would like to be kept informed of any further hearings and decisions in this regard. 8

Sincerely,

Dr. Timothy P. Krantz,
Associate Professor of Environmental Studies,
University of Redlands,
on behalf of the Board of Directors of the
San Bernardino Valley Audubon Society

RESPONSE TO LETTER A

San Bernardino Valley Audubon Society

Response to Comment A-1. According to CEQA §15168, *Program EIR*, the Final EIR is a program level document which can be used with later activities. Subsequent activities would be evaluated with a new initial study which could lead to an EIR or negative declaration. The Policies in the proposed Loma Linda General Plan focus on avoidance, preservation, and minimization of impacts and are bound by the biological requirements under the Federal Endangered Species Act (ESA), California ESA, California Department of Fish and Game Code, and the Migratory Bird Treaty Act. Please also refer to Response to Comment A-5.

Response to Comment A-2. Twenty-four State and federally listed as threatened or endangered species were identified as potentially present in the Planning Area. Nevins barberry (*Berberis nevinii*) is one such species. According to the existing environment section, it was not found in the Planning Area; however, the Policy of the General Plan is to protect sensitive biological resources with respect to future project activities in accordance with applicable environmental laws and regulations. The Policies in the proposed Loma Linda General Plan focus on avoidance, preservation, and minimization of impacts and are bound by the biological requirements under the Federal Endangered Species Act (ESA) and the California ESA for this species. For example, surveys for this species would be conducted during the flowering stage and applicable mitigation implemented prior to development (i.e., project activities that have the potential to adversely affect the species or its known habitat) if this species were to be found in the Planning Area.

Response to Comment A-3. Please refer to Response to Comment A-2.

Response to Comment A-4. The Critical Habitat map that is provided in the EIR (Figure 4.4.2) is directly from the USFWS GIS database and the City assures the Commenter that the map is not crude and truly does cover 1,910 acres of the City of Loma Linda. If the Commenter has information that is contrary to the information in the EIR, the Commenter should provide the information to the City. There is no direct evidence that the entire 3,000 acres of the South Hills is coastal sage scrub.

Response to Comment A-5. The analysis in the Draft EIR was based on the collection of data presented in the Loma Linda General Plan Existing Setting Report, which was provided as an appendix to the Draft EIR. General biological reconnaissance of the Planning Area was conducted prior to the preparation of the Draft EIR. The biological resources analysis determined the potentially significant impacts that will occur to biological resources with the implementation of the General Plan, but is not based on the detailed site-specific surveys that would be expected of subsequent development projects.

The Draft EIR identifies policies from the General Plan Update that directly and indirect address potential impacts to listed species, and their habitats. These guidelines will guide the location, type, and density of future development in the City; ensure the preservation of open space areas in perpetuity; provide for the acquisition, preservation, and maintenance of open space; and the preservation of habitats supporting rare and endangered species of plants and animals including wildlife corridors The broad identification of potential City-wide impacts to biological resources sufficient provides City decision makers with the General Plan level information required to make a decision on the proposed project. To address potential site-specific biological resource impacts, the Draft EIR includes measures that mandate: the preparation of biological reports that assess the

biological impacts associated with such development and provide appropriate mitigation for any impacts identified.

The identification of alternatives to a proposed action is limited to those that would, "...feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." (§15126.6(a))

The Draft EIR includes a thorough analysis of each of these project alternatives. Overall, the Reduced Residential Hillside Density Alternative would result in similar or reduced impacts compared with the proposed General Plan (with the exception of land use impacts, population, fire protection, and solid waste) and was identified as the Environmentally Superior Alternative, while still meeting the stated objectives of the proposed General Plan.

Response to Comment A-6. Please refer to Response to Comment A-5.

Response to Comment A-7. CEQA §15152(c) states, "...Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof...the development of detailed, site specific information may not be feasible but can be deferred until such time as the lead agency prepares a future environmental document in connections with a project of a more limited geographical scale..." Such a "first-tier" document must not prevent adequate information of the significant effects of the planning approval at hand.

The Final EIR for the Loma Linda General Plan Update has been identified as a "Program EIR" which evaluates the broad-scale impacts of the proposed General Plan, evaluating the large-scale impacts on the environment that can be expected to result from the adoption of the General Plan, but not necessarily addressing the site-specific impacts that may result from the construction and operation of smaller, and as yet unidentified projects. CEQA requires each of those subsequent development projects be evaluated for their particular site-specific impacts. These site-specific analyses are typically encompassed in second-tier documents, such as Project EIRs, Focused EIRs, or Negative Declarations on individual development projects subject to the General Plan, which typically evaluate the impacts of a single activity undertaken to implement the overall plan.

Section 4.04 of the Draft EIR, identified the following potential impacts anticipated to result from implementation of the General Plan Update:

- Implementation of the proposed General Plan would have an adverse impact on listed, proposed, or candidate species or the loss of habitat occupied by such species;
- Implementation of the proposed General Plan would cause direct loss of sensitive of critical habitat or cause habitat fragmentation resulting in isolation of sensitive habitat patches which are of limited biological value;
- Implementation of the proposed General Plan would cause fragmentation of habitat that constricts, inhibits, or eliminates wildlife movement;
- Implementation of the proposed General Plan would result in the direct loss of oak trees;
- Implementation of the General Plan could affect the proposed Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP) and/or the San Bernardino County MSHCP, which is in the initial planning stage.

The Draft EIR identifies policies from the General Plan Update that directly and indirect address potential impacts to listed species, and their habitats. These guidelines will guide the location, type, and density of future development in the City; ensure the preservation of open space areas in perpetuity; provide for the acquisition, preservation, and maintenance of open space; and the preservation of habitats supporting rare and endangered species of plants and animals including wildlife corridors. To address potential site-specific biological resource impacts, the Draft EIR includes measures that mandate: the preparation of biological reports that assess the biological impacts associated with such development and provide appropriate mitigation for any impacts identified.

General biological reconnaissance of the Planning Area was conducted prior to the preparation of the Draft EIR. The biological resources analysis determined the potentially significant impacts that will occur to biological resources with the implementation of the General Plan, but is not based on the detailed site-specific surveys that would be expected of subsequent development projects. The EIR assumes full realization of the proposed General Plan policies through a build out year estimated to be 2030. Protocol surveys have a limited "shelf-life," that is, the findings contained in said surveys remain valid and are only accepted by various Trustee and Responsible Agencies for an established period, often expiring after as little as a year. The proposed use of protocol surveys for a long-term program, such as the General Plan Update, would not provide an accurate assessment of the physical, natural, or regulatory conditions that may exist in the Planning Area at the time future development is proposed. Therefore, as established in the Draft EIR, the discussion of the potential project-specific biological resource impacts associated with future development is more appropriately reserved for the period prior to the any future discretionary action the City may take.

Response to Comment A-8. The City recognizes the commenter's desire that the Final EIR not be adopted prior to the completion of further analysis of potential biological resource impacts. The comments from the San Bernardino Valley Audubon Society will be considered by the City prior to taking final action on the document.

Letter B

JUN - 7 2005

CALIFORNIA AND PACIFIC OFFICE

protecting and restoring natural ecosystems and imperiled species through science, education, policy, and environmental law

June 6, 2005

VIA ELECTRONIC MAIL (without exhibits) and FEDERAL EXPRESS OVERNIGHT (with exhibits)

City Council Members
c/o Deborah Woldruff
Community Development and Planning Division
City Hall
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354
dwoldruff@lomalinda-ca.gov

RE: City of Loma Linda General Plan Update Final Program Environmental Impact Report SCH No. 2003101159.

Dear Council Members,

I. INTRODUCTION.

These comments are submitted on behalf of the Center for Biological Diversity ("Center") on the Final Program Environmental Impact Report ("FEIR") for the City of Loma Linda General Plan SCH No. 2003101159 ("the project"). The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 13,000 members throughout California and the western United States, including in San Bernardino County where the project is located. The Center objects to approval of the project based on the inadequacy of the current environmental documents. The FEIR has failed to identify and adequately analyze several potential environmental impacts of the project and has failed to provide alternatives that would avoid those impacts or enforceable mitigation measures to minimize those impacts. The City Council should not certify the FEIR and should not consider adopting the general plan update until adequate environmental review is completed. 1

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These comments are timely because they have been submitted prior to the FEIR's certification. Pub. Res. Code § 21177(a),(b); *Galante Vineyards v. Monterey Peninsula Water Management District*, 60 Cal. App.4th 1109, 1117-1121 (1997). Therefore, the Center hopes and expects that the City will give full consideration to all comments submitted regarding this project. 2

II. THE FEIR FAILS TO MEET THE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

A. The FEIR Improperly Defers CEQA Mandated Environmental Review and Mitigation.

Many of the inadequacies of the FEIR identified in these comments can be attributed to the fact that the FEIR improperly defers identification and analysis of many of the project's impacts, as well as formulation of mitigation measures, to a later time when development of specific projects is considered. This deferral frustrates informed decision-making and violates CEQA. "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." CEQA Guidelines § 15151. *See Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Association*, 42 Cal. 3d 929 (1986) ("the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions."); *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners*, 91 Cal.App.4th 1344 (2001); *Stanislaus Natural Heritage Project v. County of Stanislaus*, 48 Cal. App. 4th 182 (1996). 3

While the level of detail required in a program level EIR is not the same as that required in an EIR for a specific development project, a lead agency is required to "use its best efforts to find our and disclose all it reasonably can." CEQA Guidelines §15144. In addition, "[a]n EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment." CEQA Guidelines §15146. The FEIR fails on both counts. 4

Here, the FEIR has not demonstrated that the formulation of mitigation measures now for the project as a whole is infeasible. Nor has the City adopted specific design criteria or performance standards as mitigation measures for this project and ensured no environmental harm will occur until such design criteria are met. *See, e.g., Sacramento Old City Association et al. v. City Council of Sacramento*, 229 Cal. App. 3d 1011, 1028-9 (1991); *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal. 3d 375, 418 (1988). As a result, this lack of analysis and deferral is contrary to CEQA. 5

Unfortunately, the FEIR abounds with examples of impacts that are identified in only the most cursory fashion, and left both unanalyzed and unmitigated. For example, while part of the Planning Area represents critical habitat for the California Coastal Gnatcatcher, analysis of the status of the Gnatcatcher is left to future EIRs and thorough discussion of mitigation for lost habitat is likewise limited. Further, the FEIR will allow extensive development in the Hillside 6

zone and fragmentation of open space that provides habitat to many species as well as providing wildlife corridors but completely fails to adopt any specific feasible mitigation measures or design criteria that will ensure continuous wildlife corridors are preserved or that direct, indirect, and cumulative impacts to rare, threatened and endangered species and their habitat will be adequately mitigated. The June 1, 2005, Draft Hillside Conservation Designation attached to the City Council Staff Report for the June 7, 2005, meeting ("June 7, 2005, Staff Report") provides some additional "guiding policy for Hillside Conservation" and clarifies some provisions for clustered development, but fails to provide the necessary detailed, enforceable mitigation measures that will lessen the impacts of the proposed Hillside build-out. Rather, it provides vague policies that may not, in fact, provide any protection to biological resources. 6

Feasible mitigation measures that should be included in the FEIR, include but are not limited to the following requirements: (1) buffer zones between housing, streets, driveways and open space to reduce noise and light impacts; (2) limits on outdoor night lighting and street lighting to reduce impacts, including specific criteria for positioning, directing, and shielding lighting to avoid light spill into open space and sensitive habitat; (3) restrictions on off-leash dogs in the Hillside zone; (4) walls or fences that will inhibit domestic animals from harassing and harming native species including "cat-proof" fencing to prevent house cats from accessing sensitive habitat; (5) identification and purchase of mitigation habitat of equal or greater quality *before* any grading or construction may begin on any project within the Hillside zone including but not limited to construction of any infrastructure, streets, or housing; (6) securing adequate dedicated wildlife corridors throughout the Hillside zone *before* any site specific approvals can be considered including, but not limited to, construction of any infrastructure, streets, or housing; (7) mitigation of at least 3:1 for all habitat loss in the Hillside zone to reflect the cumulative impacts of the loss of a large contiguous area of open space and habitat; (8) erecting educational signs that indicate the importance of the open space and sensitive habitat areas, prohibiting pet access, motorized vehicle use, and all activities that may harm or significantly disturb wildlife; (9) providing educational materials to all local schools regarding the importance of the open space and sensitive habitat areas and the connection between species survival and habitat conservation; (10) requiring gates to restrict access to lands set aside for habitat preservation by animals and motorized vehicles; and (11) requiring the use of native vegetation for all development in the Hillside zone. 7

The FEIR claims that the detailed work is better left to Project specific EIRs. However, such deferral fails to understand the significance of a Program EIR. In this instance, once the General Plan update is approved, the southern hills will be opened to development. The City's duty to provide a detailed analysis of environmental impacts of the proposed project and to impose enforceable mitigation measures cannot be shifted to the future, therefore the FEIR's repeated reliance on general background law, general plan standards, and other local planning standards is misplaced. 8

Furthermore, the City's duty cannot be shifted onto other agencies, therefore its reliance on federal, state, or regional planning standards is misplaced. For example, the FEIR fails to adequately identify and analyze the direct, indirect and cumulative impacts to water and air quality that may occur due to build out of housing within the Hillside zone. Rather, the FEIR 9

attempts to rely on standard conditions, such as conforming with SCAQMD rules during construction to fully mitigate any impacts from project construction, and "encourages" use of efficient materials, heating, and cooling in housing. *See* FEIR at 5-6. As the City is well aware, mitigation measures should be *required* in order for the City to rely on them to reduce a projects impacts to the environment. 9

The City's duty to provide as much detail as possible in its environmental review, including identification and analysis of the direct, indirect, and cumulative impacts of the proposed project as a whole, identification and analysis of alternatives that will avoid those impacts, and adoption of enforceable mitigation measures must be met before the general plan can be amended or updated. 10 Because the FEIR is inadequate the City should not certify it and must revise and recirculate it before considering approval of the general plan update. 11

B. The FEIR's Description of the Environmental Setting and Environmental Baseline are Inadequate.

As described in Section 4.4 of the DEIR, an extensive amount of land covered by the Loma Linda General Plan is currently undeveloped and contains high quality habitat--coastal sage scrub and nonnative grasslands--for the California Coastal Gnatcatcher. FEIR Appx. C at C-8. This undeveloped area, referred to as the southern hill, consists of approximately 3000 acres, 1,910 of which are currently designated as critical habitat for the Gnatcatcher. 12

Unfortunately, the FEIR is not based on current protocol surveys for the Gnatcatcher in this area. The only information provided in regards to this extensive Gnatcatcher habitat is that the closest known occurrence of the Gnatcatcher was in the hills of the City of Colton, approximately one mile southwest of the southwest corner of the Planning Area and contiguous with the southern hills, and that surveys conducted on 900 acres of the southern hills in 1998 found no Gnatcatchers. Such limited information, however, fails to provide even a basic foundation on which to adequately ascertain how development will impact the Gnatcatcher. One survey conducted on 900 acres in 1998 tells us very little about the 1,910 acres of designated critical habitat or about the entire 2,939 acres of actual habitat. One outdated survey cannot be used to make broad conclusions--seven years have passed since that survey and the survey failed to examine the entire habitat. Moreover, the fact that Gnatcatchers are known to occur within one mile of the southern hills contradicts the idea that the southern hills are currently unoccupied. Unless and until the EIR provides adequate data regarding the current status of the Gnatcatcher in the southern hills, based on adequate protocol surveys, it is premature to discuss how development will impact the species. 13

The FEIR is equally inadequate in its identification of the presence of other species in the area. For example, the Stephen's Kangaroo Rat ("SKR") also uses coastal sage scrub as habitat. Although Appendix C of the FEIR claims that the threat to the Stephen's Kangaroo Rat from the General Plan is low to moderate, no background or status information or analysis is provided. Without such basic information, however, accurate future planning is impossible. Since the southern hills represent important habitat for the SKR, protocol surveys and meaningful analysis 14

must be provided that address the actual current status of the SKR and mitigation that can be adopted to protect it. 14

Even if it were proper to assume that no Gnatcatchers or SKRs currently occupy the southern hills, which it is not, that would not relieve the City from the duty to identify and analyze impacts to these species due to the fact that the Planning Area contains valuable high quality habitat that Gnatcatchers and SKR will need in the future in order to adequately recover, which of course, is the goal of the ESA. In other words, just because habitat is not currently occupied does not mean the habitat is unnecessary or inessential to conservation of the species which includes both survival and recovery of the species. To the contrary, every acre of coastal sage scrub that is left is critically important to the future recovery of the Gnatcatcher and other endemic species. Therefore, without adequate current surveys to the contrary, the FEIR must assume that Gnatcatchers, SKR, and other species associated with the coastal sage scrub are present in the southern hills and that, even if these species are not present, the loss of high quality unoccupied habitat to development may directly, indirectly, and cumulatively impact the conservation of these species. 15

Likewise, the FEIR fails to include recent botanical surveys and fails to provide necessary information about rare, threatened, and endangered plant species that are known to be present in the southern hills including, but not limited to, the Nevin's barberry (*Berberis nevinii*). 16

C. The FEIR Fails To Properly Identify The Full Range Of Direct, Indirect, And Cumulative Impacts To Biological Resources And to Avoid or Mitigate Those Impacts.

The southern hills of Loma Linda do not exist in a vacuum. As the FEIR itself points out in section 4.4-11, the southern hills are part of an extension of larger undeveloped areas. Since species like the Gnatcatcher require large blocks of un-fragmented habitat in order to survive in the long term, it is vital that habitat such as the southern hills be preserved intact and provide continuity with other surrounding open space areas. In other words, if the southern hills become fragmented and/or destroyed due to development, the surrounding open space loses its value because of the overall reduction in size of contiguous habitat. 17

The FEIR, however, does not fully discuss how the proposed zoning changes will contribute to habitat fragmentation and destruction. The FEIR fails to discuss the impacts to surrounding open space or to the southern hills itself. There is mention of clustering the development but the discussion does not provide any meaningful analysis of how the clustering will prevent significant destruction of habitat or how destruction of habitat will actually be mitigated. *See* FEIR 4.4-15; *see also* June 7, 2005, Staff Report There is also talk of "maximizing the permanent preservation of large blocks of unbroken open space," the desire to "acquire, preserve, and maintain open space," and the need to "preserve…wildlife corridors," but no real analysis as to how that can actually be accomplished in the face of extensive development. *See* FEIR 4.4-15. As the FEIR itself admits, the proposed General Plan may result in the direct loss of 1,437.5 acres of sensitive habitat and will create a "checkerboard pattern of small habitat patches of limited biological value." *See* FEIR 4.4-17-18. Instead of doing what 18 19

CEQA requires—thoroughly discussing how such a significant loss of habitat will impact species, alternatives that will avoid these impacts, or specific mitigation measures to lessen such impacts—the overall theme of the FEIR is just the opposite, stating that "loss and fragmentation of critical coastal California gnatcatcher habitat will remain significant and unavoidable." Such a conclusion is unwarranted and premature given the inadequacy of the FEIR's identification and analysis of impacts required by CEQA, and the lack of meaningful alternatives analysis or mitigation measures. 19

The FEIR calls for a minimum of 1:1 replacement of developed habitat (FEIR 4.4-17) but there is no concrete analysis of how that will actually happen given the fact that coastal sage scrub communities are already extremely rare and that replacement habitat will likely be fragmented. Thus, even if 1:1 replacement is accomplished, it may not adequately protect the Gnatcatcher because the replacement habitat will not be contiguous or as extensively connected or as high quality as the current southern hills habitat. Thus, 1:1 replacement of fragmented areas will not properly mitigate the loss of contiguous open space and wildlife corridors, therefore, the FEIR should require a minimum of 1:3 mitigation of equal quality habitat if the areas are not contiguous. Moreover, the FEIR fails to require that all mitigation lands be secured *before* and grading or destruction of habitat in the Southern Hills. Mitigation that is delayed by months or years is *not* of equal quality and value to the species that depend on it, this is particularly true for nesting habitat and other breeding areas. 20 Where terrestrial species such as the SKR may be found, the FEIR provides no measures for preservation of individuals or any requirements that grading and other land disturbing activities avoid breeding seasons. 21

The FEIR also fails to adequately analyze the applicability of the Endangered Species Act ("ESA") to the proposed project. Section Nine of the Endangered Species Act forbids the "take" of threatened and endangered species. 16 U.S.C. §1538, ESA §9; 50 C.F.R. § 17.31. Take is defined by the ESA as "harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in such conduct," 16 U.S.C. § 1532(19), and harm "means an act which actually kills or injures wildlife. Such act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering." 50 CFR §17.3. The proposed General Plan update will result in harm to the Gnatcatcher, at minimum, through modification and degradation of its habitat, and may result in harm to several other listed species. Unfortunately, the FEIR fails to adequately identify or analyze these issues. 22

The Center has compiled a database entitled *Summary of Authorized Impacts to the Coastal California Gnatcatcher*, attached as Exhibit A. This database tracks gnatcatcher take authorized by the USFWS over a 10-year period from 1993 to 2003. The Center has recorded authorized take of 832 gnatcatcher pairs via individual biological opinions, at least 236 additional pairs through the "Proposed Special Rule to Authorize Take of the California Gnatcatcher" pursuant to Section 4(d) of the ESA, and at least 212 pairs through the California Natural Communities Conservation Planning ("NCCP") process. Some NCCPs authorize take of large amounts of habitat and "all associated gnatcatcher pairs" without quantifying the number of pairs authorized for take, and therefore 212 pairs is an underestimate of take authorized to date. Thus, the Center has documented take of at least 1,280 pairs of gnatcatchers since listing. 23

Authorized take, is itself an underestimate of harm to the species, because coastal sage scrub habitat is often lost, and Gnatcatchers are harmed, harassed, or killed, without the perpetrator obtaining any permits. In biological opinions in 2000 and 2001, the U.S. Fish and Wildlife Service estimated that only 2,898 pairs of gnatcatchers remained in the U.S. While this number purportedly accounted for take authorized up to that time, it is questionable whether this is true since multiple biological opinions issued for the take of many pairs of gnatcatchers all used the same number, and the most recent biological opinions we have obtained do not give a population estimate. Regardless, many pairs have been lost since the 2000 and 2001 population estimates. 23

In addition, other events such as the October 2003 fires in Southern California, had a substantial adverse impact on the gnatcatcher and other species. While periodic fires are normal and desirable in healthy southern California ecosystems, the combined impact of habitat destruction, fragmentation, non-native species, and larger and higher intensity fires than normal (caused by factors including past fire suppression, drought, and global warming) can have a catastrophic impact on species that already have severely reduced populations and face grave threats to their continued existence. Overall, more than 743,000 acres burned in southern California in October 2003. This was a historical landscape-altering event, and it is not possible to accurately describe the environmental setting or address impacts to sensitive species without including information on the status of species following the fires. 24

The Center has recently released a report analyzing the potential impacts of the 2003 southern California wildfires on the Quino checkerspot butterfly, mountain yellow-legged frog, coastal California gnatcatcher, and least Bell's vireo. Bradley and Bond, "Impacts of the 2003 Southern California Wildfires on Four Federally Listed Species," attached as Exhibit B. Each of these four species has a highly restricted range, occurring only in limited microhabitats within rapidly dwindling vegetation communities of southwestern California, and both the Gnatcatcher and the least Bell's vireo may be found in the Loma Linda hills. FEIR Appx. C. The Center's fire report uses USFWS and USFS GIS data to analyze the potential effects of the 2003 wildfires on known occurrences, modeled habitat, and designated critical habitat for each species throughout its entire range. While the report recognizes that fire is a natural and important ecological disturbance in southern California, the response of organisms to fire can be complicated by invasion of non-native species and fragmentation and isolation of habitat patches due to urban sprawl. 25

The GIS analysis documents that the wildfires burned 19% of critical habitat and 27% of known occurrences of the Quino checkerspot butterfly; 40% of modeled habitat for mountain yellow-legged frog; 4% of known occurrences, 16% of critical habitat, and 28% of modeled habitat for the California gnatcatcher; and 3% of critical habitat and 2% of modeled habitat for least Bell's vireo. The Center hopes that the information provided in the report will prove useful in re-evaluating baseline conditions for these species in the wake of the 2003 fires, and will assist in determining the cumulative effects of current and future development projects, planning, and large-scale habitat conservation plans. These species have been rapidly losing habitat to rampant and widespread urban development in the region, and the FEIR should have considered the *effects of temporary habitat modification due to the fires.* 26

Unfortunately the FEIR improperly defers identification and analysis of these impacts. The Program FEIR is precisely the stage at which the City is required to consider landscape-wide impacts from the potential loss of critical habitat and fragmentation of large areas of contiguous habitat. 27

D. The FEIR Fails To Identify And Analyze The Full Range Of Direct, Indirect, And Cumulative Impacts To Water Resources and Water Quality And To Avoid or Mitigate Those Impacts.

The FEIR acknowledges that the project will cause significant impacts to water supply but fails to adequately identify or analyze the actual impacts that may occur. FEIR at 5-11 to 5-12. Indeed, the City admits that there are no assurances that "the provision of water supplies adequate to support development that may occur as a result of implementation of the proposed General Plan, therefore significant unavoidable impacts will remain." FEIR at 5-12. CEQA requires more. CEQA requires that the City identify the source of water for the development allowed by the project and examine the environmental impacts that may result if that water supply is tapped for the build-out of the project. *See Santiago County Water Dist. v. County of Orange*, 118 Cal. App. 3d 818 (1981); *Stanislaus Natural Heritage Project v. County of Stanislaus*, 48 Cal. App. 4th 182 (1996). Moreover, where, as here, the water supply is uncertain and a shortfall in those supplies theoretically available is likely, the EIR must evaluate that issue, identify other potential sources, and identify and analyze the environmental consequences of tapping those resources. *Santa Clarita Org. for Planning the Environment v. County of Los Angeles*, 106 Cal. App. 4th 715 (2003); *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors*, 91 Cal. App. 4th 342, 371 (2001). Where there is remaining uncertainty that the water supply will be available, the EIR must provide mitigation measures that will prevent development until water supply is secured. *See Napa Citizens*, 91 Cal. App. 4th at 374. The FEIR fails on all counts. 28

The FEIR notes that the water available to the City wells in the Bunker Hill Basin is artificially recharged from many sources including, but not limited to, the Santa Ana River, Lytle Creek, Mill Creek and other local creeks and streams. Moreover, recharge water also comes from the State Water Project which imports water to the region. Nonetheless, the FEIR attempts to defer the required analysis of impacts to local and regional water resources by stating that the project "will not directly result in new development. Rather, it will dictate where and in what manner development will occur." FEIR at 4.8-13. This statement is fundamentally misleading—the project will facilitate development and, indeed, the General Plan Update will facilitate far greater development than could otherwise be expected to occur in the City. In particular, the project will greatly increase the amount of development allowed in the southern hills, than could have occurred under the existing General Plan. Build-out of the project will significantly impact water resources and the FEIR must be revised to properly address these issues. 29

The most glaring omission in the FEIR is the failure to identify or analyze the direct, indirect, and cumulative impacts to water resources and the biological resources dependent on them. For example, the FEIR fails to identify the current baseline impacts that result from water 30

diversions from local streams and rivers to recharge the groundwater basin, including but not limited to impacts to in-stream biological resources and fails to identify any new impacts from potential increases in water diversions for recharge. Moreover, although the FEIR notes that water may be sought from the San Bernardino Valley Municipal Water District ("Muni") under the City's existing "option to purchase," the FEIR completely fails to identify or analyze the environmental impacts that are caused by Muni's current water diversions from local streams and rivers or the impacts that will be caused by its pending proposals to divert additional water from the Santa Ana River. Because the FEIR fails to properly identify, analyze, avoid or mitigate impacts to water resources, the EIR must be revised. 30

The FEIR's discussion of water quality is also inadequate. The FEIR completely ignores increased impacts to water quality caused by increased development—particularly due to increases in runoff and surface contamination. The FEIR completely ignores the impacts that increased runoff potentially contaminated by a host contaminants may have to local creeks and rivers including the San Timeteo Wash and the Santa Ana River. The only issue that the FEIR does address is the quality of the well water in the City. Thus, the water quality section of the FEIR is wholly inadequate. 31

E. The FEIR Fails to Adequately Identify And Analyze Impacts to Air Quality, and To Avoid or Mitigate Those Impacts.

The FEIR's air quality section falls far short of CEQA's requirements. The project is located in the South Coast Air Basin ("SoCAB"), which has one of the most severe air quality problems in California and the nation. The FEIR explains the state and federal Clean Air Act regulatory framework at some length, but then fails to conduct a complete analysis of the project's air quality impacts. The fact that other agencies have regulatory control over some aspects of air pollution pursuant to other statutes in no way lessens the City's responsibility to fully disclose, analyze, avoid, minimize, and mitigate all air quality impacts of the proposed project. The past failure of many agencies to do so has been a major contributing factor to the SoCAB's current air quality crisis. 32

The FEIR looks at several criteria pollutants under the Clean Air Act including carbon monoxide (CO), oxides of nitrogen (NOx), oxides of sulfur (SOx), and particulate matter (PM). Under the California Clean Air Act, the California Air Resources Board (CARB) regulates these same criteria pollutants, in addition to others including sulfate, hydrogen sulfide, vinyl chloride, and visibility (a measure of air quality rather than a pollutant). However a range of other Hazardous Air Pollutants (HAPs), also called Toxic Air Pollutants (TACs) under California law should also be evaluated. The federal Clean Air Act requires the U.S. EPA to develop new regulations for 189 such toxic substances, in an effort to protect human health and decrease cancer risk. The U.S. EPA considers that an "acceptable" cancer risk caused by HAPs is a one-in-one million chance of contracting cancer over the course of an average person's lifetime. The ARB currently monitors and assesses the health risks of 10 HAPs in California, including Acetaldehyde, Benzene, 1,3 Butadiene, Carbon Tetrachloride, Chromium (Hexavalent), para-Dichlorobenzen, Formaldehyde, Methylene chloride, Perchloroethylene, and diesel particulates. The FEIR contains no real description of these HAPs and no analysis of the project's impacts. 33

The project's generation of HAPs during both the construction and operation phases of the project must be fully disclosed, analyzed, avoided, minimized, and mitigated in an EIR. 33

A wealth of information on the environmental and health ramifications of the SoCAB's poor air quality is readily available. These reports contain critical information on the health and environmental impacts of air quality. One study found that in San Bernardino County alone, 486 deaths per year are due to current PM 2.5 levels, and 231 deaths and 34,127 asthma attacks per year are due to current PM10 levels. Exhibit C, *Particle Civics, How Cleaner Air in California Will Save Lives and Save Money*, at 19. The FEIR's failure to include even the most basic information on the link between air quality, health impacts, and impacts to biological resources renders it inadequate. 34

The Air Quality Section of Appendix G of the CEQA Guidelines (Environmental Checklist Form) specifically calls out a project's potential to conflict with or obstruct implementation of any applicable air quality plan as an impact to be discussed. The FEIR contains no discussion of the proposed project's contribution to this problem. Failure to meet regulatory deadlines have serious economic, environmental, and health ramifications for the SoCAB, all of which should be discussed. 35

The FEIR also fails to address the proposed project's contribution to excess nitrogen deposition. This phenomenon is impacting vegetation in southern California and in particular causing losses of coastal sage scrub, a rare and threatened plant community that supports many threatened, endangered, and sensitive species. Exhibit D, Allen, et al., *Nitrogen Deposition Effects on Coastal Sage Vegetation of Southern California*, 1998; Exhibit E, Cione, et al., *Restoration of Native Shrubland Impacted by Exotic Grasses, Frequent Fire, and Nitrogen Deposition in Southern California*, June 2002. This impact must be disclosed and analyzed in a revised EIR. 36

The FEIR does not adequately explore mitigation measures to reduce air quality impacts. The FEIR finds that the project will have long term impacts on air quality but fails to avoid or mitigate those impacts below the level of significance. Most of the measures relate only to construction impacts to air quality and none of the long term operational mitigation measures identified in the FEIR are enforceable conditions of the project approval other than those measures which require adherence to existing laws and regulations—which is already required by law. FEIR at 5-3 to 5-6. Most of the operational mitigation measures are entirely voluntary, rely on implementation strategies of other agencies, and encourage changes in energy use and alternative materials. None of the measures adequately address vehicular traffic or alternative transportation. 37

The FEIR has also omitted entirely any discussion of the project's long term cumulative air quality impacts. Air quality is an area where the always important cumulative impacts analysis is particularly crucial, because major air quality problems are created by a vast number of small sources which may appear individually insignificant. A revised EIR must be circulated that contains an adequate cumulative impacts analysis for each criteria pollutant and HAP and 38

addresses topics including human health, and impacts to biological resources, including nitrogen deposition. 38

F. The FEIR Fails To Analyze A Meaningful Range of Feasible Alternatives.

An FEIR is required to describe a range of reasonable alternatives to the project, which would feasibly attain most of its basic objectives but would avoid or substantially lessen its significant effects. Cal. Code Regs § 15126.6(a). The City has a substantive duty to adopt feasible, environmentally superior alternatives. Pub. Res. Code § 21002, Cal. Code Regs §§ 15002(a)(3), 15021(a)(2). A lead agency cannot abdicate this duty unless substantial evidence supports a finding that the alternative is infeasible. *See, e.g., Citizens of Goleta Valley v. Board of Supervisors*, 197 Cal. App. 3d 1167, 1181 (1988). The FEIR identifies the No Project/ General Plan and the No Project/No build alternatives as the environmentally superior alternatives. Because the FEIR clearly shows that denial of the project is the environmentally superior alternative, the City should not adopt the General Plan update. 39

The FEIR identifies significant unavoidable effects including loss of open space, degradation of air quality, fragmentation and loss of extensive areas of natural habitats and associated biological resources (including harm to the Gnatcatcher), impacts to water resource availability, and increased traffic and congestion. FEIR at 5-11 to 5-12. Nonetheless, the FEIR fails to describe a reasonable range of alternatives to the proposed project. For example, the Reduced Residential Hillside Density Alternative does not fairly provide a reasonable alternative, but rather sets up a straw-man for the City to discount. A meaningful alternative would continue the current land use provisions in the southern hills while increasing density in other areas of the City. For example, an alternative should be examined that calls for town houses and clustered development around shopping and transportation hubs. Such transit based, high density development could mitigate the impacts of the project to both air quality and biological resources. 40

III. THE EIR SHOULD BE REVISED AND RECIRCULATED FOR PUBLIC REVIEW AND COMMENT.

A lead agency must recirculate an EIR for further public comment under any of four circumstances:

(1) When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigation measure;

(2) When the new information shows a substantial increase in the severity of an environmental impact, except that recirculation would not be required if mitigation that reduces the impact to insignificance is adopted; 41

(3) When the new information shows a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure; or

(4) When the draft EIR was "so fundamentally and basically inadequate and conclusory in nature" that public comment on the draft EIR was essentially meaningless.

Guidelines §15088.5.

Based on the comments above, it is clear that the EIR must be re-drafted and recirculated. Conditions (1), (2) and (3) above will be met by meaningful and adequate discussion of the project description, impacts, mitigation measures, and cumulative impacts. The combined effect of these omissions makes it clear that the fourth condition has also been met. 41

IV. THE CITY COUNCIL SHOULD NOT CERTIFY THE FINAL PROGRAM EIR AND SHOULD NOT ADOPT THE GENERAL PLAN UPDATE BASED ON THE FEIR.

The City Council should not certify the Final Program EIR, because the Final Program EIR fails to adequately disclose, analyze, avoid, minimize, and mitigate the environmental impacts of the proposed general plan update. As detailed above, the FEIR fails to comply with CEQA and fails to provide necessary information about the impacts of the project in many areas including biological resources, open space, and air and water quality. 42

Neither decision makers nor the public can make informed decisions about the costs to the environment of proposed general plan update based on this fundamentally flawed and cursory environmental review. Therefore, the City Council should reject the proposed general plan update and postpone further consideration of the project until adequate environmental review is completed. 43

Sincerely,

Lisa T. Belenky

Lisa Belenky
Center for Biological Diversity

List of Exhibits

Exhibit A: *Summary of Authorized Impacts to the Coastal California Gnatcatcher*, Center for Biological Diversity, 2003.

Exhibit B: Bradley and Bond, *Impacts of the 2003 Southern California Wildfires on Four Federally Listed Species*, Center for Biological Diversity.

Exhibit C: Sharp and Walker, Particle Civics, How Cleaner Air in California Will Save Lives and Save Money, Environmental Working Group.

Exhibit D: Allen, E.B, A. Bytnerowocz, R. Minnich, P.E. Padgett, *Nitrogen Deposition Effects on Coastal Sage Vegetation of Southern California*, USDA Forest Service Gen. Tech. Rep. PSW-GTR-166, 1998.

Exhibit E: Cione, et al., *Restoration of Native Shrubland Impacted by Exotic Grasses, Frequent Fire, and Nitrogen Deposition in Southern California*, Restoration Ecology, Vol. 10 No. 2, pp. 376-384, June 2002

CC: (via U.S. mail, without exhibits)

Field Supervisor
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Carlsbad Field Office
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Attn: Karin Cleary-Rose

RESPONSE TO LETTER B

Center for Biological Diversity

Response to Comment B-1. As stated in the Response to Comment A-7, The Final EIR for the Loma Linda General Plan Update has been identified as a "Program EIR" which evaluates the broad-scale impacts of the proposed General Plan, that can be expected to result from the adoption of the General Plan, but not necessarily addressing the site-specific impacts that may result from the construction and operation of smaller, and as yet unidentified projects. According to CEQA §15168, *Program EIR*, the Final EIR is a program level document which can be used with later activities. Subsequent activities would be evaluated with a new initial study which could lead to an EIR or negative declaration. The Policies in the proposed Loma Linda General Plan focus on avoidance, preservation, and minimization of impacts and are bound by the biological requirements under the Federal Endangered Species Act (ESA), California ESA, California Department of Fish and Game Code, Migratory Bird Treaty Act, etc.

The analysis included in an EIR for a local general plan or similar document need not be as detailed as an EIR on the specific construction projects that may follow from implementation of said plan (§15146.b.) As stated in CEQA (§15146(a)), "An EIR prepared for a specific development proposal will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy." The analysis must be specific enough to permit informed decision making and public participation.

The identification of alternatives to a proposed action is limited to those that would, "...feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." (§15126.6(a)) The Draft EIR included the following alternatives to the proposed General Plan Update:

- No Project/No Build
- No Project/Existing General Plan;
- Reduced Residential Hillside Density Alternative
- Increased Residential Alternative

The Draft EIR includes a thorough analysis of each of these project alternatives. Overall, the Reduced Residential Hillside Density Alternative would result in similar or reduced impacts compared with the proposed General Plan (with the exception of land use impacts, population, fire protection, and solid waste) and was identified as the Environmentally Superior Alternative, while still meeting the stated objectives of the proposed General Plan.

Response to Comment B-2. The City is formally responding in writing to the Center for Biological Diversity's (Center) letter dated June 6, 2005. Although it is not required by CEQA §15207 ".... Although the lead agency need not respond to late comments, the lead agency may choose to respond to them", the City considers the Center's comments important and noteworthy enough to respond to. The City will take into full consideration the Center's comments when making its decision whether or not to certify the EIR and adopt the General Plan.

Response to Comment B-3. The commenter fails to recognize the programmatic nature of the General Plan EIR. While the commenter cites CEQA §15151 to challenge the sufficiency of the Final

EIR, this section further states, "...An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of the EIR is to be reviewed in the light of what is reasonably feasible." It is reasonable to assume the most appropriate point to address the site-specific impacts associated with a particular development that may occur up to 25 years in the future. It is similarly infeasible to attempt to forecast the natural, physical, and regulatory environment that may exist subsequent to adoption of the General Plan. The Draft EIR appropriately provides for project-specific analysis at the time subsequent development is presented to the City. In regards to the implementation of the proposed General Plan update, as permitted under CEQA, the Draft EIR includes a preliminary analysis of the broad potentially environmental effects associated with implementation of the proposed project and the identifies relevant proposed General Plan policies and mitigation to reduce the severity of these impacts.

Response to Comment B-4. The analysis in the Draft EIR was based on the collection of data presented in the Loma Linda General Plan Existing Setting Report, which was provided as an appendix to the Draft EIR. Again, the commenter selectively cites CEQA (§15146). This section further states, "...The analysis included in an EIR for a local general plan or similar document need not be as detailed as an EIR on the specific construction projects that may follow from implementation of said plan..." (§15146(b)). As the environmental document for the City's proposed General Plan Update, the City may correctly rely on a more preliminary identification of the potential environmental effects associated with implementation of the proposed project.

Response to Comment B-5. Please refer to the Response to Comment A-7.

Response to Comment B-6. Please refer to Response to Comment A-1. In addition, since Coastal California Gnatcatchers were not observed in the Planning Area, mitigation may not be required. Surveys would be conducted for future planned activities at the appropriate time when they would be expected to occur in the Planning Area. Section 4.4.4.3, Conservation and Open Space Element, Part 9.4.4 states "Preserve habitats supporting rare and endangered species of plant and animals including wildlife corridors and Mitigation Measures 4.4.4.3A and 4.4.4.3B are required measures to support preserving wildlife corridors. In other words, wildlife corridors would be identified, and would require avoidance of impacts that restrict, eliminate, or substantially inhibit wildlife movement especially in the hillsides prior to development occurring in the hillsides.

Response to Comment B-7. General Plan policies and City design standards already include many of the standards, such as restrictions on outdoor lighting and street lighting, and setbacks between housing, streets, and open space that the commenter has suggested for feasible mitigation measures. Because development within the General Plan area would be required to adhere to General Plan policies and City design standards, many of the suggested feasible mitigation measures are not warranted. Additionally, some of the mitigation measures suggested, such as "(4) walls or fences that will inhibit domestic animals from harassing and harming native species including "cat-proof" fencing to prevent house cats from accessing sensitive habitat" and "(9) providing educational materials to all local schools regarding the importance of the open space and sensitive habitat areas and the connection between species survival and habitat conservation" do nothing to reduce impacts associated with development in the Hillside Conservation Area. Additionally, some of the mitigation measures recommended by the commenter, such as "(3) restrictions on off-leash dogs in the Hillside zone" is not feasibly enforceable, and therefore, likely to fail at reducing potential impacts. The comment does not provide any useful mitigation measures that are not already included in General Plan policies or City design standards.

Response to Comment B-8. Please refer to the Response to Comment A-7.

Response to Comment B-9. The commenter suggests that the City is shifting responsibility for mitigation of impacts onto other agencies and that the City is not providing adequate mitigation for such impacts. Although the specifics of this comment are not clear, it appears to contend that the Final EIR relies on federal, state, or regional requirements instead of providing mitigation measures related to water and air quality impacts. The comment is categorically in error because it confuses the difference between a mitigation measure and existing requirements. In general, existing federal, state, or regional requirements are regulations applicable to any and all development projects within Loma Linda. Therefore, Loma Linda will comply with, with or without additional CEQA review. These requirements are not mitigations measures and the Final EIR in no way suggests otherwise. Furthermore, the mitigation measures on page 5-6 of the Final EIR as cited by the commenter are mitigation measures that will be monitored by the City.

Response to Comment B-10. The City is of the opinion that the analysis in the EIR is adequate under CEQA and does identify the indirect, direct, and cumulative impacts of the implementation of the proposed General Plan and provides enforceable mitigation measures (refer to Draft EIR Sections 4-5) to reduce the identified significant adverse effects. The EIR also identifies and analyzes alternatives to the proposed General Plan that do reduce the significant effects of implementing the proposed General Plan (refer to Section 6.0 in the Draft EIR).

Response to Comment B-11. It is the opinion of the Commenter, not the City, that the Final EIR is inadequate and should be revised and recirulated prior to approval of the General Plan. There is no evidence in the public record that would lead the City to the same conclusion as the Commenter.

Response to Comment B-12. The comment summarizes the existing quantity of gnatcatcher habitat in the City of Loma Linda. No response is necessary.

Response to Comment B-13. The data provided in the Final EIR was the most update data at the time of publication. Future activities in the Planning Area with respect to threatened or endangered, and rare species and their habitats are governed by the mitigation measures and Policies of the Loma Linda General Plan as indicated in the Final EIR. Future presence/absence surveys would be conducted at the time of site specific development to determine if a rare, threatened or endangered species are present.

Response to Comment B-14. Yes, suitable habitat is present for the Stephen's Kangaroo Rat in the coastal sage scrub plant community. Please refer to Response to Comment B-13.

Response to Comment B-15. Please refer to Response to Comment B-13.

Response to Comment B-16. CEQA §15152(c) states "Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand." Surveying every inch of the South Hills area of the City was not practical or feasible at the stage of the General Plan. The City does not own all the property in the South Hills and does not have access to private property to conduct site specific biological surveys.

The EIR incorporates by reference the Environmental Setting Report that was prepared by the City for the General Plan Update dated June 5, 2002. Section 5 of this document provides information as to how data was collected (refer to page 5-6) as follows:

"Reconnaissance surveys were conducted on August 21, 23, and 28, 2001 by LSA biologist, Wendy Walters. Prior to the survey, aerial photographs (San Bernardino Flood Control District, 2001; Eagle Aerial March 2000) of the Planning Area were consulted to determine locations of undeveloped areas and their associated habitat conditions. The California Native Plant Society's (CNPS) Inventory of Rare and Endangered Vascular Plants of California (Smith and Berg, 2001) and the California Natural Diversity Database (CNDDB, 2001) were consulted to determine what, if any, threatened, endangered or sensitive plant and animal species might occur within the Planning Area. These records were searched by USGS 7.5' minute topographic quadrangles within and adjacent to the Planning Area (Redlands, San Bernardino South, Sunnymead, Riverside East, Devore, Fontana, Harrison Mountain, San Bernardino North, and Yucaipa). Agency biologists, Doug McPherson from the U.S. Fish and Wildlife Service (USFWS) and Gabbi Gatchel from the California Department of Fish and Game (CDFG) were consulted by telephone on August 21, 2001 regarding special concerns or additional sensitive species to be addressed in this section. The Soil Conservation Service soil survey for San Bernardino County (1980) was referenced, in order to determine if any soils were present that sensitive species may require in their habitat.

The reconnaissance-level surveys were conducted by vehicle and on foot by surveying accessible open space areas shown on the aerial photographs shown on the vacant land inventory map provided by the City of Loma Linda. The dominant plant communities observed were delineated on an aerial photograph and a topographic map. The dominant plant species for each community were also compiled.

The survey consisted of a visual inspection of the Planning Area, emphasizing areas with the greatest likelihood of supporting sensitive wildlife species, such as natural drainages, native vegetation in the hills of southern Loma Linda, and areas designated as critical or proposed critical habitat for sensitive species. The scope of the study did not include determining the presence or absence of specific sensitive species. Rather, this study evaluated the potential of specific areas to support sensitive species."

The information above is also provided in Section 4.4, page 4.4-1 of the Draft EIR. Section 4.4., page 4.4-2 of the Draft EIR also provides information on rare, threatened and endangered species, which the Commenter stated is lacking, as follows:

"Twenty-four State and federally listed as threatened or endangered species were identified as potentially present within the Planning Area. Suitable habitat was present for nine of these species:

- *California gnatcatcher: Coastal sage scrub in low-lying foothills and valleys (i.e., southern hills).*
- *Southwestern willow flycatcher (Empidonax traillii extimus): Riparian scrub (i.e., San Timoteo wash).*

- *Least Bell's vireo (Vireo bellii pusillus): Riparian scrub (i.e., San Timoteo wash).*
- *San Bernardino kangaroo rat: Gravelly and sandy soils of alluvial fans, braided river channels, active channels and sandy terraces (e.g., San Timoteo Wash and larger drainages in the southern hills).*
- *Stephen's kangaroo rat (Dipodomys stephensi): Grassland, open coastal sage scrub (i.e., southern hills).*
- *Arroyo toad (Bufo californicus): Washes and arroyos with open water, sand or gravel beds, and sparse overstory vegetation (i.e., San Timoteo Wash).*
- *Nevin's barberry (Berberis nevinii): Sandy and gravelly soils at margins of dry washes (i.e., San Timoteo Wash and larger drainages in the southern hills).*
- *Slender-horned spineflower (Dodecahema leptoceras): Sandy soils in flood-deposited terraces and washes (i.e., San Timoteo Wash and larger drainages in the southern hills).*
- *Santa Ana River woollystar (Eriastrum densifolium ssp. sanctorum): Sandy soils on river floodplains and terraced fluvial deposits (i.e., San Timoteo Wash and larger drainages in the southern hills).*

Moderate to low suitable habitat was present for the following two listed species: thread-leaved brodiaea and slender-horned spineflower. Please see the table in Appendix C for occurrence probability within the Planning Area.

Suitable habitat was not present within the Planning Area for 13 threatened or endangered species known from nearby areas. These species include marsh sandwort (Arenaria paludicola), salt marsh bird's beak (Cordylanthus maritimus), Gambel's watercress (Rorippa gambelli), California red-legged frog (Rana aurora draytonii), southern rubber boa (Charina bottae umbratica), Santa Ana sucker (Catastomus santaanae), unarmored three-spine stickleback (Gasterosteus aculeatus williamsoni), Quino checkerspot butterfly (Euphydryas editha quino), Delhi sands flower-loving fly (Rhaphiomidas terminatus abdominalis), mountain plover (Charadrius montanus), California yellow-billed cuckoo (Coccyzus americanus occidentalis), bald eagle (Haliaeetus leucocphalus), and brown pelican (*Pelecanus occidentalis californicus*)."

Twenty-four State and federally listed as threatened or endangered species were identified as potentially present in the Planning Area. Nevins barberry (*Berberis nevinii*) is one such species. According to the existing environment section, it was not found in the Planning Area; however, the Policy of the General Plan is to protect sensitive biological resources with respect to future project activities in accordance with applicable environmental laws and regulations. The Policies in the proposed Loma Linda General Plan focus on avoidance, preservation, and minimization of impacts and are bound by the biological requirements under the Federal Endangered Species Act (ESA) and the California ESA for this species. For example, surveys for this species would be conducted during the flowering stage and applicable mitigation implemented prior to development (i.e., project activities

that have the potential to adversely affect the species or its known habitat) if this species were to be found in the Planning Area.

Response to Comment B-17. Section 4.4.4.3, Conservation and Open Space Element, Part 9.4.4 states "Preserve habitats supporting rare and endangered species of plant and animals including wildlife corridors," and Mitigation Measures 4.4.4.3A and 4.4.4.3B are required measures to support preserving wildlife corridors. In other words, wildlife corridors would be identified, and would require avoidance of impacts that restrict, eliminate, or substantially inhibit wildlife movement especially in the hillsides.

Response to Comment B-18. The commenter suggests that the Final EIR proposes zoning changes that contribute to habitat fragmentation and destruction. There are no zoning changes proposed within the Final EIR. The direct loss of 1,437.5 acres of sensitive habitat is discussed within the Draft EIR it also mentions that as conditions change over time, conservation efforts may lead to habitat types being added to or removed from the set of habitats considered sensitive. The loss of habitat has been analyzed and identified as significant and unavoidable. Mitigation measures and general plan policies have been introduced and lessen the impact but cannot be reduced to a less than significant level. In addition, the Final EIR for the Loma Linda General Plan Update has been identified as a "Program EIR" which evaluates the large-scale impacts on the environment that can be expected to result from the adoption of the General Plan, but not necessarily addressing the site-specific impacts that may result from the construction and operation of smaller, and as yet unidentified projects. CEQA requires each of those subsequent development projects be evaluated for their particular site-specific impacts. Please also refer to Response to Comment A-7.

Response to Comment B-19. Please refer to Responses to Comments B-18, B-20, B-28 and A-5.

Response to Comment B-20. The Final EIR Section 4.4 provides Mitigation Measure 4.4.4.1B which states:

> *The City establishes baseline ratios for mitigating the impacts of development related uses to rare, threatened and endangered species and their associated habitats as the following:*
>
> *Preserve habitat at minimum of 1:1 replacement ratio in locations that provide long-term conservation value for impacted resources. This could involve acquisition of habitat occupied by the affected species, acquiring a key parcel that fills in a missing link or gap in a reserve that provides conservation for the species, or acquisition of credits in a mitigation bank (endorsed by the USFWS and/or CDFG) that has been established to provide conservation value for the species. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.*

The mitigation measure does provide "how the replacement will happen" by acquiring habitat occupied by the species in perpetuity. It has not been determined that the California gnatcatcher occupies the South Hills. It has however, been determined that the South Hills is within Critical Habitat designated by the USFWS for the California gnatcatcher and prior to approval of any project within the South Hills the developer is required to (according to Mitigation Measure 4.4.4.1A page 4.4-16 of the Draft EIR) to "prepare a biological report in compliance with standards established by the City of Loma Linda for development related uses that require discretionary approval to assess the impacts of such development and provide mitigation for impacts to biological resources. The report must be prepared by a qualified biologist; the City Community Development Department must be

notified in advance that a report will be prepared for a specific project; the report must include a signed certification attesting to the report contents, specific information as to the type of survey (e.g., General Biological Resources Assessment, Habitat Assessment, etc.), site location, property owner. In addition, the report must include the following:

a. Specified attachments (summary sheet, level of significance checklist, biological resources/project footprint map, and site photos);

b. Information on literature sources (e.g., California Natural Diversity Data Base, California Department of Fish and Game, U.S. Fish and Wildlife Service, and environmental documents for nearby projects);

c. A description of surveys, including timing, personnel, and weather conditions;

d. A description of site conditions including plant and wildlife habitat, disturbances, and sensitive elements;

e. An assessment of anticipated project impacts and a discussion of mitigation;

f. A list of all species observed or detected and a recommendation for any additional focused surveys that may be necessary."

If focused surveys are required for the California gnatcatcher, as determined by a qualified biologist, they will be conducted and the appropriate mitigation for impacts to individual species and Critical Habitat will be determined in consultation with the USFWS. The City is recommending a 1:1 replacement of habitat as a minimum, not a maximum. If in consultation with the USFWS, at the time a project is processed with the City, it is determined that a greater or lesser habitat replacement is appropriate, that will be the replacement ratio at that time. There is nothing in the mitigation measure that precludes the City or the USFWS from requiring that replacement habitat be contiguous to existing open space or at a higher ratio. It could be that there is contiguous habitat in the South Hills that could be preserved while allowing development on private property to occur. Mitigation will also occur on a project by project basis, at which time the City will require that the replacement of habitat occur prior to grading of the project site whether the property site is in the South Hills or other sensitive areas of the City.

Response to Comment B-21. There is no requirement by the CDFG or USFWS that terrestrial species be avoided dusting the nesting season. This is not true for rare, endangered or threatened species which are protected under the federal and state ESA. For all species, including the SKR, that are protected by the federal and state ESA, there are restrictions that would not allow the "take" of species without first obtaining a section 7 or 10 permit with USFWS and/or section 1601 through the CDFG.

Response to Comment B-22. Since the Coastal California Gnatcatcher has not been observed in the Planning Area, modification of suitable or critical habitat is not expected to occur. In addition, see response to Response to Comment B-1 with respect to the portion dealing with threatened and endangered species and applicable laws and regulations for future activities.

Response to Comment B-23. The comment is informational in nature and raises no substantive issues regarding the adequacy of the Final EIR. No further response is necessary.

Response to Comment B-24. The Existing Setting Report for the Loma Linda General Plan was prepared in June 2002. While the Existing Setting Report does include a discussion of fire hazards, and lists wildfires that have affected the South Hills area since 1998, the Existing Setting does not include a discussion of the October 2003 fires, as the report was prepared prior to this date. The 2003

fires did not affect the South Hills area of Loma Linda. The NOP for the General Plan Draft EIR was published on October 30, 2003. The October 2003 fires included the Old Fire and the Grand Prix Fire. These fires both burned into the second week of November. Per CEQA Guidelines 15125 "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective." The October 2003 fires were still burning into the first two weeks of November; therefore, this issue was not included as part of the environmental conditions in the vicinity of the project, because the fires were still burning at the time and the extent of their damage was not known for some time after the issuance of the NOP. According to the report "Impacts of the 2003 Southern California Wildfires on Four Federally Listed Species," during the Old Fire and the Grand Prix Fire, "less than 24% of the mapped habitat burned at high severity (and none of the contained known occurrences) (page 13). The report also notes that "fire can cause temporary reductions in gnatcatcher use of coastal sage scrub." (page 11) Habitat that burned during these fires and other fires will begin to grow back and become once again, suitable habitat. Almost 2 years has passed since the Old Fire and Grand Prix Fires burned through San Bernardino County. Additionally, development of the South Hills area under the General Plan may not occur for many years. The General Plan has a buildout year of 2030. It is reasonable to assume that by the time such development occurs under the General Plan, areas that have been burned will be suitable habitat once again. As the report states, this loss of habitat caused by the fires is temporary. Additionally, as stated by the commenter, "fire is a natural and important ecological disturbance in Southern California..." While the commenter's concern regarding the impacts these fires have had on gnatcatcher habitat and other species is noted, the fires were not included as part of the existing setting due to their occurrence during and after the publication of the NOP, and the potential for re-growth of damaged habitat to occur prior to development within the South Hills area. Information provided by the commenter will be provided to and considered by the City decision-makers prior to their decision.

Response to Comment B-25. The commenter discusses a recently released report analyzing the potential impacts of the 2003 southern California wildfires on four species. No specific comment relative to the content of the Final EIR has been raised, and as such, no response has been provided.

Response to Comment B-26. The commenter includes a discussion of the Center for Biological Diversity's recently released report analyzing the potential impacts of the 2003 southern California wildfires on four species ("Impacts of the 2003 Southern California Wildfires on Four Federally Listed Species"). The commenter hopes that the report will provide information useful for evaluating baseline conditions for several species following the fires. However, according to CEQA Guidelines and as previously stated above, the EIR is required to include a description of the physical environmental conditions in the project vicinity as they exist at the time of publication of the NOP. As the referenced report does not include a publication date, it is difficult to determine when the report was prepared; however, since the 2003 fires did not finish burning until after the publication of NOP, a discussion was not included in the existing setting. Additionally, as the referenced report states, the loss of habitat from fires is temporary, and with the General Plan's build out year of 2030, it is reasonable to assume that much of the habitat lost during the fires will be able to support gnatcatchers in a much shorter time frame. The referenced report will be provided to and considered by the City decision-makers prior to their decision on the General Plan.

Response to Comment B-27. Please refer to the Response to Comment A-7.

Response to Comment B-28. The opinion stated is duly noted, however the Lead Agency has fully evaluated the effects and impacts of the proposed project and alternatives commensurate with the requirements of CEQA and in a comprehensive and inter-disciplinary manner that is completely consistent with standards of procedure for analysis and documentation for EIRs. The comment is

considered to be reflective of likely project effects. Potential impacts of such activities were not, "provide[d with] mitigation measures that...[would] prevent development until water supply is secured" because such impacts are unknown. The Final EIR has been planned and designed to effectively utilize and build upon current information and to address current and near term issues. The Final EIR cannot be, effectively, expected to call out impacts on water supply thirty years from now when models from water agencies only project out to twenty years. For its part, the Lead Agency has conducted an objective and comprehensive analysis of the effects and impacts of the proposed project and alternatives and have provided reasonable and practical conclusions.

Response to Comment B-29. The approval of the Final EIR itself will not result in new development because it is not a new housing tract or a new warehouse facility. The Final EIR serves to supplement the General Plan, which ironically will reduce the building density of the surrounding hills from what the current General Plan has in place.

The commenter also infers that there is a reasonable distinction that can be made between a realistic project area appropriately subject to special conditions and the larger study area of potential project effects as analyzed in the Final EIR. Such an assumption is smart but faulty. The comment even acknowledges that, "the water supply [in this area] is uncertain and a shortfall in those [available] supplies" is theoretically likely. As the water supply is of an uncertain nature, it is difficult to examine or quantify the impacts of the water supply thirty years from now due to the limitations of the current water supply models which only predict for the next twenty. The analysis in the Final EIR is based on the best use of reasonably obtainable information in order to essentially determine whether impacts will occur and under what proposed conditions.

Response to Comment B-30. The direct, indirect, and cumulative impacts upon biological resources dependent upon local water resources cannot be fully analyzed due to the time frame of the proposed plan. However, within the City's General Plan land use polices, identification of water recharge areas have been analyzed therefore, promoting the protection and significance of those resources. Policies have been implemented into the Final EIR that attend to the importance of water resources and the impacts associated with the future development of which analyze on a single project basis, such as policy 2.2.3.1.m, "Site new development so as to maximize the loss of habitat, wildlife, and watershed resources".

Response to Comment B-31. Water quality impacts created by the potential for increased development is addressed in policies provided within the City's General Plan and discussed within the flooding hazard section of the Final EIR. It is agreed upon that with buildout of project area there will be an increased in impacts to water quality. Therefore, the City's General Plan and Final EIR have established policies that would minimize those impacts with future development, for example; policy 10.2.3.d, states, "Require new development to incorporate features into drainage plans that would reduce impermeable surface area, increase water infiltration, and minimize surface water runoff during storms" and additional policies that address the concern for the impacts created by a single project basis. Such as policy 10.2.3.b, which states "In areas where local and subregional drainage facilities are not currently provided, require new development to prepare hydrologic studies to assess storm runoff on the local and subregional storm drainage systems and/or creek corridors and incorporate appropriate mitigation in project development". These policies adequately address the concern for water quality impacted by additional runoff and surface contamination.

The City of Loma Linda receives its water source from Bunker Hill Water Basin, as stated in the Water Source section of the Final EIR, "This aquifer supplies the water to the City of Loma Linda". In the case that the City needs additional water resources, as it has in the past, the City would replenish the Bunker Hill Basin by importing water from the State Project Water. Therefore, water quality testing

can be performed within the basin/well region. In addition, water quality standards are set under the Safe Drinking Water Act (SDWA), the Environmental Protection Agency (EPA) is responsible for setting national limits for hundreds of substances in drinking water and specifies various treatments that water systems must use to remove these substances from drinking water. Water utility providers are required to monitor continually for these substances. If any such substance is detected, water utility providers are required to report to the California Department of Health Services (CDHS) and the EPA. Under the SDWA, water utility providers are required to provide annual water quality information to water customers, as stated within the water resource section of the Final EIR.

Response to Comment B-32. The Final EIR includes a section of air quality study suitable for this program level of impact analysis. Project level detailed analysis will be conducted when individual project with specific information is proposed. Please refer to Response to Comment A-7.

Response to Comment B-33. As is described on page 4.3-16, in the paragraph titled "Odors and Toxic Air Contaminants", "Implementation of the proposed General Plan will not in and of itself generate odor or toxic air contaminants. Individual development within the City that has the potential to generate odors or toxic air contaminants will be evaluated when project-specific information is available. The SCAQMD Rule 1401 will need to be followed for permit application for any facility that has the potential to emit toxic air contaminants. No additional control measures are required." Potential health risks associated with HAPs or TACs varies with the specific use and proximity of its adjacent sensitive uses. This level of information is not available for the General Plan impact analysis. There is no construction nor any operations directly associated with the implementation of the General Plan. Please refer to Response to Comment A-7 for a discussion on the appropriate level of analysis in a Program EIR.

Response to Comment B-34. The link between air quality and health impacts is discussed on page 4.3-3, in the paragraph under the "Federal Regulations/Standards" heading. The second to last sentence says: "... and the health effects from exposure to the criteria pollutants are described in Table 4.3.D." Table 4.3.D describes in detail for each criteria pollutant what the associated health effects are.

Despite great progress in air quality improvement, approximately 146 million people nationwide lived in counties with pollution levels above the NAAQS in 2002. Out of the 230 nonattainment areas identified during the 1990 Clean Air Act Amendment designation process, 124 areas remain as nonattainment today. In these nonattainment areas, however, the severity of air pollution episodes has decreased. For instance, air quality in the South Coast Air Basin in the past 20 years has improved steadily and dramatically, even with the tremendous increase in population, vehicles, and other sources.

As shown in Table 4.3.D, long-term exposure to elevated levels of criteria pollutants could result in potential health effects. However, emission thresholds established by the air district are used to manage total regional emissions within an air basin, based on the air basin attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations that may affect or delay the projected attainment target year for certain criteria pollutants.

Response to Comment B-35. On page 4.3-25 there is a discussion of "Impact 4.3.4.4". It contains a detailed discussion of how the "Implementation of the proposed General Plan Update would not conflict or obstruct implementation of the South Coast Air Quality Management Plan (AQMP) or the Regional Comprehensive Plan (RCP) of the Southern California Association of Governments (SCAG)".

Response to Comment B-36. Nitrogen deposition is receiving a great deal of research attention. However, neither EPA nor ARB have any regulations that apply to nitrogen deposition, nor any established methods for analyzing or modeling the effect. There is no reason to incorporate a nitrogen deposition discussion into the EIR. Separately, the effects of NO_x (ozone precursors) and specifically NO_2, have been included in the impact analysis due to established standards and known health effects.

Response to Comment B-37. Starting on page 4.3-13 is a discussion of proposed General Plan Policies that relate to air quality. These policies must be followed by any project built after this General Plan goes into effect. These policies are not voluntary and directly address vehicular traffic and alternative transportation which is the dominant pollution source in the South Coast Air Basin.

Response to Comment B-38. The entire EIR is considering environmental impacts related to the General Plan build out time frame, approximately in 2030. For example, the CO Concentrations analysis starting on page 4.3-9 analyzes in detail the effects of traffic that is predicted to occur at the time of the General Plan build out in 2030. Analysis of the cumulative air quality impacts on HAP and nitrogen deposition is not feasible at this time without available information and established standards and procedures.

Response to Comment B-39. The commenter correctly states that an EIR is required to analyze a reasonable range of alternatives to the proposed project. The alternatives should attain most of the project objectives while avoiding or reducing significant effects. The lead agency is required to adopt the feasible, environmentally superior alternative; or provide justification why not in the form of findings and a statement of overriding considerations. The comment incorrectly states that the No Project/General Plan and No Project/No Build Alternatives are environmentally superior to the proposed project. As stated on page 6-28 of the Draft EIR, the No Project/No Build Alternative was determined to be not feasible as it fails to accommodate current and projected growth within the City. Consequently, it was rejected as environmentally inferior to the proposed General Plan. The No Project/Existing General Plan Alternative would result in greater impacts associated with seven topic areas, the same impact associated with ten topic areas, and reduced impacts associated with four topic areas. Although it is not specifically stated in the Draft EIR, this alternative is also environmentally inferior to the proposed General Plan because it would produce more impacts than the proposed project.

Response to Comment B-40. The Commenter is correct in that the City analyzed the impacts of implementation of the proposed General Plan and it would have significant and unavoidable impacts (as stated in Section 5.5 of the Final EIR) on the loss of open, air quality, fragmentation and loss of California gnatcatcher critical habitat, loss of extensive areas of natural habitat, water supplies, and traffic on the I-10 mainline. Section 6.0 of the Final EIR does evaluate a range of alternatives to the proposed project that were designed to be capable of avoiding or substantially lessening the significant effects of the proposed project. The primary goal of the proposed General Plan is to provide residents of the City with a "blueprint" for future public and private development and for management of the community's natural environment. The proposed General Plan will act as the foundation upon which City leaders will make growth and land use-related decisions. The proposed General Plan expresses the community's goals with respect to human-made and natural environments and sets forth the policies and implementation measures to achieve them. The objective of the proposed General Plan is to achieve the vision of the City residents in conformance with State planning law.

The analysis provided in Chapter 4.0 of the EIR determined that air quality, loss of open space, biological resources, water supply and traffic/circulation impacts would remain significant after implementation of the proposed General Plan polices and mitigation. The alternatives analysis

discusses how each alternative would avoid, reduce, or exacerbate the environmental effects of the proposed General Plan. It also discusses other, less than significant, impacts. The analysis of alternatives included the assumption that all applicable goals, policies or mitigation measures associated with the proposed General Plan would be implemented with the proposed alternatives analyzed in the EIR.

The following alternatives were analyzed in the EIR:

- No Project/No Build
- No Project/Existing General Plan;
- Reduced Residential Hillside Density Alternative
- Increased Residential Alternative

The No Project/Existing General Plan assumed build out under policies and implementing strategies of the current General Plan including the South Hills. Under the current General Plan, a maximum of 2,429 dwelling units could be built in the South Hills. Under the proposed General Plan a maximum of 1,206 dwelling units may be constructed only after meeting the goals and policies in the Hillside Conservation Area, which includes clustering. Clearly, there would be a greater impact on biological resources by implementing the current General Plan in the South Hills since there are no provisions in the current General Plan that would allow clustering of dwelling units and an appropriate level of development that can be designed to minimize impacts on the natural environment, protect public health and safety, avoid increases in citywide utility and public service costs, and ensure safe access for emergency vehicles. The proposed Hillside designation is intended to provide for appropriate management of the City's hillside areas, including preservation of existing public lands in permanent open space, acquisition of additional lands for open space, establishment of a public trails system, and appropriate residential development consistent with community open space objectives.

Response to Comment B-41. The opinion stated is duly noted, however the Lead Agency has fully evaluated the effects and impacts of the proposed project and alternatives commensurate with the requirements of CEQA and in a comprehensive and inter-disciplinary manner that is completely consistent with standards of procedure for analysis and documentation for EIRs. The Lead Agency believes that the studies and analyses that were carried out for the Final EIR were appropriate in scope and methodology, followed applicable regulations and guidelines, and were consistent with current practice in the field of environmental impact analysis to assure compliance with CEQA for this project. The Final EIR document and this document, in combination, represent what the Lead Agencies believe to be a comprehensive, good-faith, and successful effort in complying with the comment letters and fundamental principles of CEQA. It has been determined that with the information in the Final EIR and the additional amplifying information provided in this document, there have been no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts have been brought forward. As such, the demand for the recirculation of the Final EIR is not only unnecessary but not required.

Response to Comment B-42. The commenter suggests that the City Council should not certify the Final Program EIR because it fails to disclose, analyze, avoid, minimize, and mitigate environmental impacts of the proposed project. As lead agency, the City of Loma Linda has prepared the subject EIR in accordance with CEQA. The EIR provides a comprehensive and programmatic assessment of project impacts, proposes feasible mitigation measures, and reports the significance of impacts after mitigation.

Response to Comment B-43. Please refer to Response to Comment B-42. Based on the evidence provided in the subject EIR and the responses to these comments, it is clear that the EIR provides an adequate assessment of impact assessment and proposes feasible mitigation measures.

Letter C

NOV - 8 2005

Save Loma Linda
Kathy Glendrange, DVM, JD
P.O. Box 259
Loma Linda, CA 92354

November 8, 2005

Mayor Petersen and City Council Members
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

RE: COMMENTS ON LOMA LINDA PROPOSED GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

Dear Mayor Petersen and City Council Members,

Save Loma Linda and Kathy Glendrange submit the following comments in regard to the proposed General Plan Environmental Impact Report (the "EIR"). Additionally, we hereby incorporate all of the comments made by other parties in regard to the EIR, including without limitation comments made by the Center for Biological Diversity and the Loma Linda Conservation Society.

The EIR is flawed in regard to the analysis and conclusions relating to the following environmental impacts:

1. **Affected Views to Scenic Vistas and Scenic Resources**

The EIR's conclusion that the impact to views is "less than significant" is wrong. This is actually a terrible impact. Loma Linda has a small town atmosphere and the majority of the land is located in the largely undeveloped hills. The impact on views and aesthetics and the loss of open space and beauty of the natural hillside areas which are so important to the community will have a horrible impact. 1

2. **Light and Glare**

The EIR's conclusion that the impacts of light and glare are "less than significant" is wrong. Given the proposed general plan's substantial increase in allowable densities and allowing mixed-uses of commercial and residential uses in close proximity, the resultant light and glare will actually have a terrible impact. 2

3. **Loss of Open Space**

The EIR's conclusions that no feasible mitigation is available and that the loss of open space is "significant and unavoidable," are incorrect. Further, the EIR's analysis is inadequate. There are mitigation measures available. The Council could adopt other alternatives which result in more open space. Yet, the proposed General Plan allows development which will destroy substantial amounts of open space which are so valuable to the community. 3

4. **Air Quality**

The EIR's conclusion that the impacts to air quality are "significant and unavoidable" is wrong. The analysis is inadequate. There should be general plan policies to address these impacts. Some of the impacts are avoidable. For example, not substantially increasing allowable densities would reduce these impacts. 4

5. **Vehicular Emissions**

The EIR's analysis is flawed. Stating that no mitigation measures are required is wrong. The EIR's conclusion that the impacts are "significant and unavoidable" is also wrong. The Council could adopt another alternative which would result in fewer vehicular emissions. 5

6. **Impacts to Sensitive Species and Sensitive Natural Communities**

The EIR's conclusion that the impacts to species and communities are "less than significant" is wrong. The analysis is flawed. A substantial number of species and communities will be destroyed by the allowable development under the plan. Further, the EIR suggests inadequate mitigation measures. 6

7. **Loss of Critical Habitat**

The EIR's conclusion that the loss of critical habitat is "significant and unavoidable" is wrong. Further, the analysis is flawed and inconsistent with the analysis regarding the impacts to sensitive species and communities. How can the impact to species and communities be "less than significant" yet the loss of critical habitat is "significant and unavoidable?" The Council could choose another alternative which decreases the loss of habitat. Further, the EIR suggests inadequate mitigation measures. 7

8. **Impacts to Migratory Wildlife Corridors**

The EIR's conclusion that the impacts to wildlife corridors is "less than significant" is wrong. Loma Linda's wildlife provides important contributions to the community. Further, allowing the corridors to be cut off, which impacts not just wildlife in Loma Linda but wildlife in neighboring cities and counties, is actually a terrible impact. Loma Linda could single-handedly cut off multiple corridors and affect wildlife in entire neighboring regions. The mitigation measures are inadequate to reduce the impacts to "less than significant" levels. 8

9. **Conflict with Adopted Conservation Plans**

The EIR's conclusion that the conflict with other conservation plans is "less than significant" is wrong. Loma Linda's developments have far-reaching impacts on the conservation plans of neighboring cities and counties. Wildlife migrates, therefore, Loma Linda's wildlife and lack of conservation efforts do not exist in a vacuum. The analysis of the impacts is inadequate and mitigation is required. 9

10. **Adverse Change in the Significance of an Historical Resource**

The EIR's conclusion that the impacts to historical resources are "less than significant" is wrong. Stating that no mitigation is required is wrong. The Plan's affect on the Historic Mission Overlay District, in which development was supposed to preserve a rural atmosphere, illustrates how the impacts have been more than significant. Further, the analysis is flawed and the policies have not been effective thus far. The Historic Mission Overlay District will be ruined if the development proceeds under the Plan. 10

11. **Fault Rupture / Ground Shaking / Liquefaction / Ground Subsidence / Slope Failure / Soil Erosion/Loss of Topsoil / Collapsible and Expansive Soils**

The EIR's conclusions that the above impacts are "less than significant" are among the most egregious of the EIR's conclusions. Increasing the development intensity in the hills and thereby increasing the risks of geologic hazards to the public are actually terrible impacts of the Plan. Further, the analyses of the policies and the conclusions that no mitigation measures are required for several of these impacts are wrong. Additionally, the mitigation measures suggested for some of the impacts are inadequate. 11

12. **Impair an Emergency Response Plan**

The EIR's conclusion that the impacts to emergency response plans are "less than significant" is wrong. Further, the analysis and the statement that no mitigation is required is inadequate. The Plan increases allowable densities in the vast majority of land in the City as well as allows for intensive development in the hillside areas. The burden on City services, increase in costs of services, and difficulty of providing services in remote hillside areas, are actually very significant. 12

13. **Wildland Fire Hazards**

The EIR's conclusion that the impacts regarding wildland fire hazards are "less than significant" is wrong. Further, the analysis and the statement that no mitigation is required is inadequate. The Plan allows for intensive development in the hillside areas. The burden on City services, increase in costs of services, difficulty of providing services in remote hillside areas, and public safety hazards, are actually very significant. 13

14. **Impacts to Groundwater Supplies / Groundwater Recharge / Demand for Water Services**

The conclusion that the impacts to groundwater supplies are "significant and unavoidable" is wrong. The Council could adopt alternatives which would not place as great a burden on the water supplies. Given the fundamental importance of water to the community, the EIR's cursory analysis of this issue is wholly inadequate. The policies do not lessen the burden on the water supplies in any meaningful way. Further, the statement that "there are no mitigation measures which can assure the availability of water resources in the future" is an inadequate attempt at mitigation. 14

Further, given the EIR's conclusion that the availability of water resources cannot be assured, the conclusions that the other impacts (ex. demand for water services) are "less than significant" and that no mitigation is required are inconsistent.

15. **Impacts to Water Quality**

The EIR's conclusion that the impacts to water quality are "less than significant" is wrong. The EIR acknowledges that implementation of the Plan may violate water quality standards, then cites an inadequate policy to remedy this, and then concludes that no mitigation is required. 15

16. **Changes in the Pattern of Land Use / Affect Existing Development Patterns**

The EIR's conclusions that these impacts are "less than significant" are wrong. These impacts will be terrible. Loma Linda has a small town atmosphere and the majority of the town has developed with a certain character. Substantially changing the allowable development intensities and patterns will permanently alter the character of the town which is of primary importance to many of the residents. It will also result in uses which are incompatible with currently existing uses. The analyses and policies cited are inadequate to meaningfully address these issues. Further, the conclusion that no mitigation is required is wrong. 16

17. **Long-Term Vehicular Noise Impacts**

The EIR's conclusion that the noise impacts from long-term vehicular use are "less than significant" is wrong. Enjoying peace and quite in their homes is of utmost importance to the residents. Further, the analysis of the policies is inadequate and flawed. The mitigation measures are also inadequate to reduce the impacts to "less than significant." This can be illustrated by the University Village and Orchard Park developments, which were allowed by the Plan, and yet one of the "significant and unavoidable" impacts of the projects related to excessive noise. 17

18. **Population and Housing Projections are Exceeded**

The EIR's conclusion that the population and housing projections of the Plan will not be exceeded is wrong. Further, the conclusion that these impacts will be "less than significant" is wrong. The projections substantially underestimate the actual population and housing numbers allowed by the land use element of the Plan. The higher population and housing numbers will substantially affect the public health, safety and welfare by increasing the burden on city services, and causing crowding, traffic congestion, and air pollution. The analysis and statement that no mitigation is required is inadequate and flawed. 18

19. **Fire Protection / Police Protection / Public Educational Facilities / Wastewater / Solid Waste**

The EIR's conclusion that these impacts will be "less than significant" is wrong. The Plan's increasing of the population and housing numbers will substantially affect the public health, safety and welfare by increasing the burden on city services, and causing crowding, traffic congestion, and air pollution. The analysis and statement that no mitigation is required is inadequate and flawed. It is common wisdom that residential development results in a net loss to the City in the long-run. Increasing the housing and the burden on city services without sufficient policies or mitigation measures in place, and then concluding that the impacts will be "less than significant" is completely flawed. 19

20. **Increased Traffic Volumes**

The EIR's conclusion that increased traffic volumes are "significant and unavoidable" is wrong. The City could adopt an alternative which has less traffic impacts. Avoiding worsening traffic congestion is of utmost importance to the residents. Yet, the analysis and policies set forth are inadequate to meaningfully address the traffic impacts. The mitigation measures are also inadequate. 20

21. **Availability of Adequate Park/Recreational Facilities**

The EIR's conclusion that the impacts on availability of parks and recreational facilities are "less than significant" is wrong. This is actually a terrible impact for the residents. Currently, ~60% of the City is open space, agricultural, or undeveloped land. As development proceeds under the Plan, access to adequate parks and facilities for rest and relaxation will become of even greater importance to the residents. The EIR acknowledges that implementation of the Plan may result in significant impacts to the availability of parks and facilities. Yet, the EIR then sets forth a cursory inadequate analysis and states that no mitigation is required. Meaningful policies and mitigation measures are required to assure these vital resources are available for the public welfare. 21

Sincerely,

Kathy Glendrange

Save Loma Linda, by member
Kathy Glendrange, DVM, JD

Kathy Glendrange

Kathy Glendrange, DVM, JD

RESPONSE TO LETTER C

Save Loma Linda

Kathy Glendrange

General Response. As stated in CEQA Guidelines §15204, "...Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects." Respondents to an EIR should be cognizant that the adequacy of any EIR is determined in terms of what is reasonably feasible, in light of scope and complexity of the project. When offering comment, respondents should, "...explain the basis for their comments, and submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comment." Pursuant to CEQA (§15064), "...an effect shall not be considered significant in the absence of substantial evidence."

The commenter consistently claims that the analysis contained in the EIR is "...wrong," "...flawed", "...inadequate," yet provides no reasonable evidence to support any such claim. Merely stating that the analyses is "...wrong" does not make it so. Furthermore, the commenter does not provide, nor in any manner suggests, any mitigation, alternative, or alternative analysis, which would remedy what she perceives as "wrong" in the EIR.

Response to Comment C-1. The Final EIR for the Loma Linda General Plan Update has been identified as a "Program EIR" which evaluates the broad-scale impacts of the proposed General Plan, evaluating the large-scale impacts on the environment that can be expected to result from the adoption of the General Plan, but not necessarily addressing the site-specific impacts that may result from the construction and operation of smaller, and as yet unidentified projects.

CEQA provides that the programmatic environmental analysis for such large-scale planning efforts differs from the sort of environmental analysis performed for a specific development project. According to the CEQA Guidelines, §15168, "...[a] program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways." A Program EIR allows the Lead Agency to examine the overall effects of the proposed course of action and to take steps to avoid unnecessary adverse environmental effects. Subsequent activities within the program (e.g., future development) are required to examine the individual activities to determine the project specific impacts. CEQA requires each of those subsequent development projects be evaluated for their particular site-specific impacts. These site-specific analyses are typically encompassed in second-tier documents, such as Project EIRs, Focused EIRs, or Negative Declarations. These second-tier documents typically evaluate the impacts of a single activity (e.g., development proposal) undertaken pursuant to the overall plan.

As stated in the EIR, "...The City of Loma Linda has no officially designated scenic vistas or views; however, views and landforms in general are an important element of the City as evidenced by the 1993 Hillside Preservation Initiative which was passed, among other reasons, to preserve significant natural hillside amenities." Policies identified in the General Plan recognize the importance of these views to the image of the City and provide specific guidance to the location of new development in the hillsides. These policies will provide for protection of the City's natural landforms and scenic vistas.

The commenter's statement does not provide substantial evidence that adherence to policies identified in the General Plan would not mitigate for impacts to the "scenic vistas and scenic resources" in the City. An evaluation of potential impacts of development on views within the City will be conducted on a project-by-project basis. Compliance with the General Plan policies would reduce the project specific and cumulative impacts on views and unique landforms to a less than significant level.

Response to Comment C-2. The proposed General Plan policies recognize the impact of light and glare on sensitive receptors and set standards for the screening and the location of new lighting sources to protect these sensitive receptors. Future development projects will be required to take part in site development review on a site-specific basis to ensure compliance with light and glare standards.

An evaluation of potential lighting-related impacts of subsequent development will be conducted on a project-by-project basis. Compliance with the General Plan policies would reduce the project specific and cumulative impacts on views and unique landforms to a less than significant level.

Response to Comment C-3. The standard of adequacy for EIRs is established in CEQA Guidelines §15151 which states, "... evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible."

The analysis included in an EIR for a local general plan or similar document need not be as detailed as an EIR on the specific construction projects that may follow from implementation of said plan (§15146.b.) As stated in CEQA Guidelines §15146[a], "...An EIR prepared for a specific development proposal will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy." The analysis must be specific enough to permit informed decision making and public participation.

The identification of alternatives to a proposed action is limited to those that would, "...feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." (§15126.6[a]). The Draft EIR included the following alternatives to the proposed General Plan Update:

- No Project/No Build
- No Project/Existing General Plan;
- Reduced Residential Hillside Density Alternative
- Increased Residential Alternative

The Draft EIR includes a thorough analysis of each of these project alternatives. Overall, the Reduced Residential Hillside Density Alternative would result in similar or reduced impacts compared with the proposed General Plan (with the exception of land use impacts, population, fire protection, and solid waste) and was identified as the Environmentally Superior Alternative.

As growth in the City and region continues, the City must maintain flexibility in the number and type of residential options available to City residents. While Environmentally Superior, the Reduced Hillside Alternative would reduce the number of residential units to below the number forecast to be

developed under the existing General Plan (13,225 units). A primary objective of the General Plan, the continued provision of a diverse inventory of housing options in the City, would not be achieved under the this alternative. In addition, the Environmentally Superior Alternative would not meet Sate law requirements for affordable housing and the City could not adopt an alternative that would violate California housing law. Based on the record, the City, in its capacity as CEQA Lead Agency, is not considering the approval of an alternative that would not satisfy one of the key objectives of the proposed General Plan.

Response to Comment C-4. Please refer to the General Response as to the general adequacy and/or relevancy of this comment.

The proposed General Plan policies related to air quality would generally result in better planning and projects that proactively address any adverse air quality impacts that could result. Implementation of the proposed General Plan policies related to air quality would help reduce air pollutant emissions and improve the air quality by encouraging pedestrian-oriented land uses and reduction of blowing dust through landscaping. Policies are also provided to reduce vehicular trips. Those policies are contained within the Land Use Element, Community Design Element, Conservation and Open Space Element, and Transportation and Circulation Element, and have been appropriately referenced in the EIR.

Long-term air emission impacts are those associated with stationary sources and mobile sources related to the proposed project. Increasing the density of development would still result in the same amount of development, only this development would be more densely located. As traffic generation factors are generally based on the amount and type of use rather than the density of development, increasing density would not substantially alter the number of vehicle trips generated. No substantial reduction in the volume of air pollutants would result increasing development densities.

Response to Comment C-5. Please refer to the General Response as to the general adequacy and/or relevancy of this comment.

The EIR identified a wide variety of policies, the adherence to which would reduce (though not to a less than significant level) the pollutant emissions resulting from current and planned development in the City. As stated in the EIR, "...No mitigation measures beyond the policies identified in the proposed General Plan and SCAQMD regulations are available to reduce this impact to a less than significant level."

The commenter incorrectly interpreted the language in the EIR. The EIR states that, "...This impact is significant and unavoidable, and as the policies represent the best available mitigation measures, no further feasible mitigation measures are *provided* [emphasis added]" rather (as claimed by the commenter) that, "...no mitigation is required."

The Draft EIR includes a thorough analysis of each of these project alternatives. The air emissions associated with each of the "developed" alternatives either exceed or were similar to that which would occur under the proposed General Plan. As stated previously, the identification of alternatives to a proposed action is limited to those that would, "...feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." It is the opinion of the City that the selection of the alternatives considered in the EIR is sufficient.

Response to Comment C-6. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The EIR is a program level document which can be used with later activities. Subsequent activities would be evaluated with a new Initial Study which could lead to preparation of either a focused EIR or Negative Declaration. The policies in the proposed Loma Linda General Plan focus on avoidance, preservation, and minimization of impacts and are bound by the biological requirements under the Federal Endangered Species Act (ESA), California ESA, California Department of Fish and Game Code, and the Migratory Bird Treaty Act. Additionally, mitigation measures incorporated into the EIR require the preparation of project-specific biological resource studies prior to subsequent development; as well as the preservation and/or avoidance of sensitive habitats.

Response to Comment C-7. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The General Plan policies focus primarily on avoidance, preservation and minimization of impacts to biological resources and habitats. However, the policies do not specify a method of identifying habitats that warrant such measures or the parameters to be used if avoidance or preservation are infeasible. As subsequent development is proposed, the City will require the identification of the project-specific and cumulative impacts of such development. In addition to the General Plan policies, the EIR identifies the manner in which project-specific biological resource studies will be conducted. Project-specific biological resource studies would be required to identify the impacts to sensitive species, as well as mitigation measures that will reduce such impacts. Additionally, the EIR identifies a minimum baseline mitigation ratio that will be utilized to further the long-term conservation of impacted species.

The Final EIR Section 4.4 provides Mitigation Measure 4.4.4.1B which states:

> *The City establishes baseline ratios for mitigating the impacts of development related uses to rare, threatened and endangered species and their associated habitats as the following:*
>
> *Preserve habitat at minimum of 1:1 replacement ratio in locations that provide long-term conservation value for impacted resources. This could involve acquisition of habitat occupied by the affected species, acquiring a key parcel that fills in a missing link or gap in a reserve that provides conservation for the species, or acquisition of credits in a mitigation bank (endorsed by the USFWS and/or CDFG) that has been established to provide conservation value for the species. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.*

The mitigation measure does provide "how the replacement will happen" by acquiring habitat occupied by the species in perpetuity. It has not been determined that the California gnatcatcher occupies the South Hills. It has however, been determined that the South Hills is within Critical Habitat designated by the USFWS for the California gnatcatcher and prior to approval of any project within the South Hills the developer is required to (according to Mitigation Measure 4.4.4.1A page 4.4-16 of the Draft EIR) to "prepare a biological report in compliance with standards established by the City of Loma Linda for development related uses that require discretionary approval to assess the impacts of such development and provide mitigation for impacts to biological resources. The report must be prepared by a qualified biologist; the City Community Development Department must be notified in advance that a report will be prepared for a specific project; the report must include a signed certification attesting to the report contents, specific information as to the type of survey (e.g., General Biological Resources Assessment, Habitat Assessment, etc.), site location, property owner. In addition, the report must include the following:

g. Specified attachments (summary sheet, level of significance checklist, biological resources/project footprint map, and site photos);

h. Information on literature sources (e.g., California Natural Diversity Data Base, California Department of Fish and Game, U.S. Fish and Wildlife Service, and environmental documents for nearby projects);

i. A description of surveys, including timing, personnel, and weather conditions;

j. A description of site conditions including plant and wildlife habitat, disturbances, and sensitive elements;

k. An assessment of anticipated project impacts and a discussion of mitigation;

l. A list of all species observed or detected and a recommendation for any additional focused surveys that may be necessary."

If focused surveys are required for the California gnatcatcher, as determined by a qualified biologist, they will be conducted and the appropriate mitigation for impacts to individual species and Critical Habitat will be determined in consultation with the USFWS. The City is recommending a 1:1 replacement of habitat as a minimum, not a maximum. If in consultation with the USFWS, at the time a project is processed with the City, it is determined that a greater or lesser habitat replacement is appropriate, that will be the replacement ratio at that time. There is nothing in the mitigation measure that precludes the City or the USFWS from requiring that replacement habitat be contiguous to existing open space or at a higher ratio. It could be that there is contiguous habitat in the South Hills that could be preserved while allowing development on private property to occur. Mitigation will also occur on a project by project basis, at which time the City will require that the replacement of habitat occur prior to grading of the project site whether the property site is in the South Hills or other sensitive areas of the City.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment C-8. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

In addition to General Plan policies that focus on lessening impacts to sensitive biological resources and their habitat, the EIR identifies mitigation that specifically addresses the potential effect the proposed General Plan will have on wildlife movement. For subsequent development projects, these measures would: require all new development in the hillside areas to prepare a biological report which includes identifying local and regional habitat patterns that provide movement routes for wildlife or where opportunities exist to establish movement routes between isolated habitat patches; require avoidance of impacts that would eliminate, substantially constrict, or substantially inhibit wildlife movement, or acquire land that would establish movement routes between isolated habitat patches and create or restore habitat to reestablish the connection; and where on-site habitat preservation would not provide meaningful mitigation either for affected species or for habitat connectivity, off-site mitigation shall be implemented through the acquisition of lands that provide for regional habitat connectivity. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment C-9. The comment brings out two issues that need to be responded to: conflicts with adopted conservation plans and potential impacts on wildlife movement, migration, etc.

Regarding conflicts with adopted conservation plans, the California Department of Fish and Game indicates that there are no existing approved or proposed habitat conservation plans in the local jurisdictions adjacent to the City of Loma Linda and within San Bernardino County.[1] Riverside County has adopted the Western Riverside County Multiple-Species Habitat Conservation Plan (MSHCP), which designates areas to be considered for conservation adjacent to the southern limits of Loma Linda. The City has set forth policies in the proposed General Plan which will preserve environmentally sensitive land in recognition of the important role conservation of designated areas have on habitats. These policies and their effectiveness are discussed in detail in the Draft EIR, Section 4.04, Biological Resources, pages 4.4-23 through 4.4-24. Implementation of the General Plan polices will reduce impacts to regional conservation planning efforts to less than significant.

Regarding potential impacts on wildlife movement and migration, the southern hills provide suitable habitat for the California gnatcatcher as well as other species that depend on the coastal sage scrub community. The Draft EIR concludes that although implementation of the General Plan will allow development in the southern hills that would constrict larger habitat areas located to the southwest in the Blue and Box Springs Mountains and the southeast to the Badlands and San Jacinto Mountains, this constriction would not fragment habitat within these surrounding areas. These areas are identified in Riverside County's MSHCP as core open space areas. San Timoteo Wash provides a wildlife corridor for riverine associated species. San Timoteo Wash mainly serves as a corridor leading out of the City toward the Badlands, as a result of the degraded nature (cement-lined) of the wash downstream of Loma Linda. Issues associated with wildlife movements are discussed in detail in the Draft EIR, Section 4.04, Biological Resources, pages 4.4-8 through 4.4-11.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment C-10. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The proposed General Plan in itself does not guarantee that future development would occur, rather it would act as a "blueprint for development," guiding where, how, what, or under what conditions development may occur. Implementation of the proposed General Plan policies would require evaluation of new development in relationship to existing historical structures as well as the identification and preservation of existing historical structures. With new development required to adhere to these policies and the focus on preservation of existing historical structures.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies sufficiently address this issue.

Response to Comment C-11. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The proposed General Plan policies recognize the geologic conditions in the City and the full range of seismic, slope, and geologic hazards that existing and future development would be susceptible to. Project-specific geotechnical investigations would be required for any project deemed by the City to

[1] California Department of Fish and Game, Status of NCCP Planning Efforts, http://www.dfg.ca.gov/status.htm, June 7, 2006, website

be susceptible by any such hazard. The project-specific geotechnical investigations would be prepared by a licensed geologist, and reviewed/approved by the City prior to the issuance of building permits. Where potential hazards are identified, the project-specific geotechnical investigations would be required to identify site restrictions or design requirements that would reduce the significance of any geotechnical, seismic, or slope-related hazards.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently address this issue.

Response to Comment C-12. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The Loma Linda Emergency Operations Plan identifies the City's emergency planning, organization, and response policies and procedures. More specifically, it identifies how the City will respond to extraordinary events or disasters, from preparation through recovery. The plan addresses the integration and coordination with other agencies and governmental levels when required. In addition, the plan provides assistance in the development of department Standard Operating Procedures (SOP). Each department's SOP defines their responsibilities pertaining to specific emergency situations. Implementation of the General Plan would not alter the Emergency Operations Plan.

Proposed policies in the General Plan require the maintenance/update of the Emergency Operations Plan, as well as the continued coordination of emergency response with adjacent jurisdictions, and the appropriate training of City. Like the current practice, future development within the City will be reviewed by applicable law enforcement, fire protection, and public works personnel to ensure appropriate compliance with emergency response plans.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies sufficiently address this issue.

Response to Comment C-13. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

The proposed General Plan policies require: implementation of fire protection measures; fire protection agency review of all development in high fire risk areas; utilization of fire-resistant building materials where appropriate, on-site fire suppression systems in new development in areas of high wildfire hazard; detailed fire prevention and control measures, including community firebreaks, for development projects in high fire hazard zones; and prohibitions on single-access neighborhoods in high fire hazard areas.

As stated previously, the proposed General Plan EIR is a programmatic document intended to provide a preliminary assessment of the potential impacts associated with the implementation of the General Plan. More detailed, project-specific analysis of these issues is appropriately reserved for later environmental documents. Development in hillside areas would only occur after a thorough review of each subsequent development.

Compared to the proposed General Plan, the reduced Residential Hillside Density Alternative would reduce some of the environmental effects associated with the project. As growth in the City and region continues, the City must maintain flexibility in the number and type of residential options available to City residents. While Environmentally Superior, the Reduced Hillside Alternative would reduce the number of residential units to below the number forecast to be developed under the existing General Plan (13,225 units). A primary objective of the General Plan, the continued provision of a diverse inventory of housing options in the City, would not be achieved under the this alternative.

Based on the record, the City, in its capacity as CEQA Lead Agency, is not considering the approval of an alternative that would not satisfy one of the key objectives of the proposed General Plan.

Response to Comment C-14. Please refer to the General Response as to the general adequacy and/or specificity of this comment.

In *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 741-746, the Court of Appeal stated that, in preparing a "first tier EIR" for a plan-level decision, an agency may permissibly defer until later project-specific EIRs analysis that might otherwise be required in a stand-alone project EIR. In its ruling, this court stated that EIRs must remain sufficient flexibility to encompass vastly different projects with varying levels of specificity. The degree of specificity required in an EIR "will correspond to the degree specificity involved in the underlying activity which is described in the EIR." (*CEQA Guidelines* §15146.) Thus, "an EIR on the adoption of a general plan . . . must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow." CEQA recognizes that environmental studies in connection with amendments to a general plan will be "general in nature." The Courts have stated "...Deferral of more detailed analysis to a project EIR is legitimate. It has been held that "where practical considerations prohibit devising such measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval."

Because of long-term nature of the proposed General Plan program, and the uncertainty of future water supplies, the City has determined that water supply impact would be significant and unavoidable. Each of the "development" alternatives identified in the EIR would have similar water supply impacts. As stated in the State *CEQA Guidelines* § 15092 and 15096(h), to approve the General Plan, the City must find that the benefits of the General Plan outweigh the unavoidable adverse environmental effects. However, when approving a project (in this case, the General Plan), the Lead Agency (City) is required by CEQA to prepare a Statement of Overriding Considerations. The Statement of Overriding Considerations is a written statement explaining why the agency is willing to accept each significant effect (Public Resources Code Section 21081; Guidelines Section 15093); in other words, CEQA requires that the decision-makers balance the benefits of the proposed General Plan against the unavoidable environmental risks in determining whether to approve the General Plan.

Response to Comment C-15. The claim of "inadequacy" of the policy identified by the commenter is unsupported. The proposed General Plan policy requires the implementation of Best Management Practices (BMPs) to reduce the discharge of pollutants. Implementation of the proposed General Plan would result in development on sites in excess of one acre. When this occurs, any future project would be required to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit. The project would be required to adhere to the water quality measures which are contained within the NPDES permit, including the preparation of a Storm Water Pollution Prevention Plan (SWPPP) for construction-related discharges, and a Water Quality Management Plan (WQMP) that will address potential water quality impacts associated with the long-term operation of future development.

Project-specific water quality impacts would be identified and mitigated in project-specific environmental documents. As future development would be required to adhere to applicable NPDES, SWPPP, and WQMP requirements, the EIR has appropriately identified water quality impacts associated with implementation of the General Plan as less than significant.

Response to Comment C-16. The proposed General Plan reflects the City's vision for the future. The land use plan has been developed during an extended period of public participation and review.

The proposed policies support the City's vision of the City to continue to be, "...a small, friendly, beautiful community with natural assets, unique economy, and healthy lifestyle."

The proposed General Plan in itself does not guarantee that future development would occur, rather it would act as a "blueprint for development," guiding where, how, what, or under what conditions development may occur. The EIR incorporates an exhaustive list of proposed policies that require development of a scale, type, and intensity that is compatible with existing uses. As new development will be evaluated based on project-specific compliance with the proposed General Plan, and because the proposed General Plan policies establish the City's future vision for development; the City's determination of a less than significant impact for land use compatibility issues is appropriate.

Response to Comment C-17. The EIR identifies the City's proposed noise standard, the policies intended to limit noise impacts, and additional mitigation to ensure that City identified noise standards are not exceeded. The General Plan has yet to be adopted by the City; therefore, any project currently under review (or previously reviewed) by the City (the University Village and Orchard Park developments) would not have been subject to either the proposed General Plan policies or additional mitigation identified in the EIR. Subsequent to approval of the General Plan, future development will be reviewed under and subject to the policies and mitigation identified in the General Plan and General Plan EIR.

Based on the information contained in a noise assessment prepared for the General Plan Update, the City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently address this issue; therefore, a determination that traffic related noise impacts would be less than significant is appropriate.

Response to Comment C-18. A General Plan, by definition, is growth inducing in that it provides a plan for accommodating future increases in population, housing, employment, and the services and utilities that will support such growth. It is not possible to isolate the City from the regional growth that is occurring within San Bernardino County or the Southern California region. As growth occurs, the City is required by law to provide housing of the broad range of residents that live in the City.

The population and housing projections identified in the EIR, represent the City's best estimate of the number of persons and housing units that would be located within the City at buildout of the General Plan. As stated in the EIR, the number of persons anticipated to reside in the City at buildout is less than that projected by the Southern California Association of Governments (SCAG), which is the regional Metropolitan Planning Organization for the Southern California (minus San Diego County) region.

In its capacity as the CEQA Lead Agency, the City has determined the proposed General Plan policies sufficiently address this issue; therefore, a determination that the impacts associated with population growth resulting from implementation of the General Plan are less than significant is appropriate.

Response to Comment C-19. Again, the commenter cites "common wisdom" when making her statement regarding the inadequacy of the analysis contained in the EIR, without providing supporting data to support her claim.

As stated previously, the project-specific public service impacts associated with future development is appropriately reserved until such time as this development occurs. Proposed General Plan policies require an evaluation of how development affects the provision of public services. Policies requiring the maintenance of established emergency response time, payment of applicable school

development fees, and compliance with the provisions of existing service requirements, will ensure that impacts associated with implementation of the General Plan remain less than significant.

In its capacity as the CEQA Lead Agency, the City has determined the proposed General Plan policies sufficiently address this issue; therefore, a determination that the impacts associated with the provision of public services and utilities that may result from implementation of the General Plan are less than significant is appropriate.

Response to Comment C-20. It is not possible to isolate the City from the regional growth that is occurring within San Bernardino County or the Southern California region. As population occurs, the number of vehicle trips to, through, and within the City will increase. The traffic data detailed in the EIR forecasts the traffic volumes that will result from implementation of the General Plan. Taken as a whole, the City has determined that these impacts are significant and unavoidable.

As development occurs, the City will require project-specific traffic analyses. Such analyses will be reviewed by the City to ensure appropriate mitigation for project-related and cumulative traffic impacts are appropriately addressed.

Despite this subsequent review, the traffic volumes cited in the EIR are reflective of the growth anticipated to occur in the City. In its capacity as the CEQA Lead Agency, the City has determined that adequate measures have been identified to reduce the significance of traffic impacts within the City, but not those impacts that occur outside the City or on freeway mainline segments. In the absence of such measures, the City's determination that traffic impacts that may result from implementation of the General Plan are significant and is appropriate.

Response to Comment C-21. The "60 percent" figure the commenter cites includes the City's current inventory of open space, agricultural land, and undeveloped land, most of which is privately owned and not available and/or accessible to the general public for recreational uses. To compare the effects of the General Plan implementation against this inflated figure artificially elevates the perceived severity of impacts.

The EIR incorporates proposed General Plan policies that identify the amount, size, and/or type of park facilities in the City. During subsequent environmental review, the City will evaluate how future development will satisfy appropriate General Plan policies. As future development occurs, adherence to proposed General Plan policies will ensure that sufficient amounts and varieties of recreational uses are maintained within the City. In its capacity as the CEQA Lead Agency, the City has determined the proposed General Plan policies sufficiently address this issue; therefore, a determination that the impacts associated with the provision of recreational facilities that may result from implementation of the General Plan are less than significant is appropriate.

Letter D

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April 18, 2006

APR 18 2006

Loma Linda City Council
25541 Barton Rd.
Loma Linda, CA 92354

RE: General Plan Update and EIR

This firm represents Save Loma Linda and submits these comments on their behalf.

EIR COMMENTS

General:

The EIR depends totally upon the policies of the General Plan to mitigate project impacts. These policies are not however adopted as mitigation measures and are thus uncertain and unenforceable. **We hereby specifically request that all General Plan Goals Guiding Policies, Policies and Implementing Policies be adopted as mitigation measures for the project.** Other mitigation measures are uncertain and unenforceable as they are couched in terms of "encouraging" some action. This is not certain or enforceable. 1

The EIR did not evaluate a reasonable range of alternatives in that none of the alternatives was truly a reduced scope alternative designed to reduce project impacts. Because the Reduced Hillside Density alternative is environmentally superior and meets project objectives, the City cannot approve the proposed project. Any rejection of the environmentally superior is without evidentiary support. However, the level of analysis for the Reduced Hillside Density is inadequate to establish adequate mitigation. The document should be redone to fully analyze the impacts of this alternative and adopt adequate mitigation measures. 2 3

The findings in the EIR are not supported by substantial evidence in the record. 4

Biological Resources:

There has been no current survey of the project area to determine the presence or absence of rare, threatened or endangered species. Biological Surveys are only valid for one year and any survey relied upon is out of date and no longer valid. 5

The mitigation for rare, threatened and endangered species specifically allows a take of these species and yet concludes that the impacts will be mitigated below a level of significance. Any project that allows a take of rare, threatened and endangered species cannot be determined to be a less than significant impact. The replacement of occupied habitat with potential habitat is unacceptable and does not effectively mitigate impacts. 6

The analysis of the impacts on the Riverside County MSHCP is inadequate and no mitigation is proposed. The document itself provides a fair argument of a significant impact to the MSHCP. 7

Mitigation measures are uncertain and unenforceable and thus ineffective at mitigating the potential impacts. All categories of biological impacts should be significant impacts. 8

Noise:

Limitation of noise producing activities to daytime hours does not mitigate impacts below a level of significance. It merely limits the time of exceedance of standards. We hereby propose the addition of the following mitigation measures:

> During construction, temporary sound walls shall be installed as necessary to ensure that noise levels at or beyond adjacent property lines does not exceed city noise standards.
>
> The development that causes an increase in sound levels, for any property, above City standards shall be responsible for the cost of constructing sound walls to eliminate any exceedance of City Standards. 9
>
> Where the impact of a project adds cumulatively to an exceedance of City noise standards, the project applicant shall pay their fair share contribution to fully mitigate their portion of any sound exceedance. If there is not a an accepted city program in place for the construction of sound walls as a result of cumulative impacts, the applicant shall construct the sound wall and enter into a reimbursement agreement with the City to be reimbursed as future funds are received by the city for that improvement.

Air Quality:

We hereby propose the following mitigation measures to reduce PM10 air quality impacts:

> The grading period for proposed projects shall be extended so that calculated PM10 air quality impacts will not exceed the AQMD thresholds. 10

We hereby propose the following mitigation measures to reduce vehicular air quality impacts:

> Each development shall be required to contribute its fair share contribution to the synchronization of traffic signals along Redlands Blvd., Barton Road, Anderson St. and Mountain View Ave. If the City has not yet adopted an implementation 11

mechanism for these improvements, the project applicant shall install the required synchronization and enter into a reimbursement agreement with the City to be reimbursed as future funds are received by the city for that improvement.

Each development shall be required to construct all facilities required as a direct result of its project at the intersections of California St. and Redlands Blvd.; Benton St. and Barton Rd.; Anderson St. and Redlands Blvd.; and realignment of Mission Road with Orange Ave. contribute its fair share contribution to the synchronization of traffic signals along Redlands Blvd., Barton Road, Anderson St. and Mountain View Ave. as well as contribute its fair share cost of the cumulative impacts of the project for these improvements. If the City has not yet adopted an implementation mechanism for these improvements, the project applicant shall install the required improvements and enter into a reimbursement agreement with the City to be reimbursed as future funds are received by the city for that improvement. 11

Require that all new projects that will employ ten or more employees shall develop and adopt Transportation Demand Management programs to reduce trips. 12

Agricultural Resources:

The analysis of the loss of agricultural resources is inadequate. The analysis fails to recognize that the loss of agricultural resources is felt on a regional and statewide basis and is not confined to the city. Not only is the individual loss of farm lands significant, it is also cumulatively significant.

Mitigation suggested by the Resources Department should be adopted.

We hereby suggest the following mitigation measure:

The conversion of agricultural lands shall be compensated for by the acquisition of permanent agricultural easements in a like amount within the county of Riverside and/or county of San Bernardino. 13

Transportation:

The impacts to transportation impacts will be cumulatively significant. We hereby suggest the adoption of the following mitigation measures:

All development shall fully mitigate all direct project traffic impacts.

All development shall contribute its fair share of cumulative traffic impacts. These impacts shall include impacts within adjacent jurisdictions and to roadways under CALTRANS jurisdiction. If the City has not yet adopted an implementation mechanism for these improvements, the project applicant shall install the required improvements and enter into a reimbursement agreement with the City to be reimbursed as future funds are received by the city for that improvement. 14

The mitigation for traffic impacts is uncertain and unenforceable. The result will be many intersections not meeting level of service requirements. 15

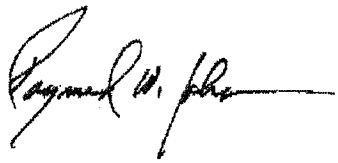
GENERAL PLAN COMMENTS

The General Plan is internally inconsistent, particularly policies relative to preservation of resources and land use and traffic. The policies are working at cross purposes. 16

Additionally, the policies of the General Plan are inconsistent with the previously approved voter initiative and amounts to an improper amendment without the approval of the people. The hillside standards are particularly inconsistent with the initiatives as are portions of the circulation element, land use element, natural resources, visual and safety elements. 17

Thank you for your consideration of these comments.

Johnson & Sedlack



By:
Raymond W. Johnson, Esq. AICP

RESPONSE TO LETTER D

Johnson & Sedlack

General Response. The Final EIR for the Loma Linda General Plan Update has been identified as a "Program EIR" which evaluates the broad-scale impacts of the proposed General Plan, evaluating the large-scale impacts on the environment that can be expected to result from the adoption of the General Plan, but not necessarily addressing the site-specific impacts that may result from the construction and operation of smaller, and as yet unidentified projects.

CEQA provides that the programmatic environmental analysis for such large-scale planning efforts differs from the sort of environmental analysis performed about a specific development project. According to the CEQA Guidelines §15168, "...[a] program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) A logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways." A Program EIR allows the Lead Agency to examine the overall effects of the proposed course of action and to take steps to avoid unnecessary adverse environmental effects. Subsequent activities within the program (e.g., future development) are required to examine the individual activities to determine the project specific impacts. CEQA requires each of those subsequent development projects be evaluated for their particular site-specific impacts. These site-specific analyses are typically encompassed in second-tier documents, such as Project EIRs, Focused EIRs, or Negative Declarations. These second-tier documents typically evaluate the impacts of a single activity (e.g., development proposal) undertaken pursuant to the overall plan.

Response to Comment D-1. In addition to proposed General Plan policies, as appropriate, the EIR identifies additional measures that provide mitigation for the significant impacts that may result from implementation of the proposed General Plan. The EIR does not rely completely on the policies within the proposed General Plan as mitigation. Mitigation is proposed where appropriate. The General Plan is the overall guidance document for future development within the City and is self mitigating. All future development is by law required to be consistent with the policies contained in a general plan.

An EIR for a program (e.g. a General Plan) must remain sufficiently flexible to encompass vastly subsequent projects with varying levels of specificity. The degree of specificity required in an EIR "...will correspond to the degree specificity involved in the underlying activity which is described in the EIR," (CEQA Guidelines §15146.) Thus, an EIR on the adoption of a general plan . . . must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow. As stated above, project-specific impacts associated with future development will be addressed in second-tier documents. Similarly, mitigation to reduce the significant effects of said developments will be more appropriately focused during any required environmental review.

Response to Comment D-2. The identification of alternatives to a proposed action is limited to those that would, "...feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project..." (§15126.6[a]) The Draft EIR included the following alternatives to the proposed General Plan Update:

- No Project/No Build

- No Project/Existing General Plan;
- Reduced Residential Hillside Density Alternative
- Increased Residential Alternative

The Draft EIR includes in as far as CEQA requires a thorough analysis of each of these project alternatives. Overall, the Reduced Residential Hillside Density Alternative would result in similar or reduced impacts compared with the proposed General Plan (with the exception of land use impacts, population, fire protection, and solid waste) and was identified as the Environmentally Superior Alternative.

As growth in the City and region continues, the City must maintain flexibility in the number and type of residential options available to City residents. While Environmentally Superior, the Reduced Hillside Alternative would reduce the number of residential units to below the number forecast to be developed under the existing General Plan (13,225 units). A primary objective of the General Plan, the continued provision of a diverse inventory of housing options in the City, would not be achieved under the this alternative. In addition, The Environmentally Superior Alternative would not meet Sate law requirements for affordable housing and the City could not adopt an alternative that would violate California housing law. Based on the record, the City, in its capacity as CEQA Lead Agency, is not considering the approval of an alternative that would not satisfy one of the key objectives of the proposed General Plan.

Response to Comment D-3. The objectives of the General Plan identified by the City include: provide for balanced development of the community where people can live, work, shop, and have recreational activities without needing to leave the City; manage residential growth to provide a range of housing opportunities, including executive homes, traditional single-family neighborhoods, and affordable housing for very low and low-income households and senior housing; and expand the local commercial base to provide a variety of retail establishments including restaurants. Compared to the proposed General Plan, the reduced Residential Hillside Density Alternative would reduce some of the environmental effects associated with the project. Yet, this alternative would reduce the number of dwelling units in the City by 37 percent (to 19,199 units) from that anticipated under the existing General Plan. As growth in the City and region continues, the City must maintain flexibility in the number and type of residential options available to City residents. While Environmentally Superior, the Reduced Hillside Alternative would reduce the number of residential units to below the number forecast to be developed under the existing General Plan (13,225 units). While some General Plan objectives would be satisfied, the primary objective, the provision of a diverse inventory of housing options, would not. Based on the record, the City, in its capacity as CEQA Lead Agency, has elected not to further consider an alternative that would not satisfy one of the key objectives of the proposed General Plan.

Response to Comment D-4. State CEQA Guidlelines, §15146), states, "...The analysis included in an EIR for a local general plan or similar document need not be as detailed as an EIR on the specific construction projects that may follow from implementation of said plan..." (§15146(b)). As the environmental document for the City's proposed General Plan Update, the City may correctly rely on a more preliminary identification of the potential environmental effects associated with implementation of the proposed project. The City's General Plan process has been consistently supported by an exhaustive public participation/review. Additionally, the EIR incorporates relevant data from a variety of technical studies and staff reports compiled specifically for this effort, as well as other general resource data from governmental and non-governmental sources. These references are identified in Section 8.0 of the Draft EIR.

The City has fully evaluated the effects and impacts of the proposed General Plan and alternatives commensurate with the requirements of CEQA and in a comprehensive and inter-disciplinary manner that is completely consistent with standards of procedure for analysis and documentation for EIRs. The Lead Agency believes that the studies and analyses that were carried out for the EIR were appropriate in scope and methodology, followed applicable regulations and guidelines, and were consistent with current practice in the field of environmental impact analysis to assure compliance with CEQA for this project. The EIR document and this document, in combination, represent what the City believes to be a comprehensive, good-faith, and successful effort in complying with the comment letters and fundamental principles of CEQA.

When considering whether to approve the General Plan, the City, according to State CEQA Guidelines Sections 15092, 15093, and 15096 (h), must find that the benefits of the General Plan outweigh the unavoidable adverse environmental effects. However, when approving a project (in this case, the General Plan), the City is required by CEQA to prepare a Statement of Overriding Considerations. The Statement of Overriding Considerations is a written statement explaining why the agency is willing to accept each significant effect (Public Resources Code Section 21081; Guidelines Section 15093); in other words, CEQA requires that the decision-makers balance the benefits of the proposed General Plan against the unavoidable environmental risks in determining whether to approve the General Plan.

Response to Comment D-5. State CEQA Guidelines §15152(c) states "...Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand." Surveying every inch of the South Hills area of the City was not practical or feasible for the General Plan. The City does not own all the property in the South Hills and does not have access to private property to conduct site specific biological surveys.

One of the objectives of the General Plan is to protect sensitive biological resources with respect to future project activities in accordance with applicable environmental laws and regulations. The proposed General Plan focuses on avoidance, preservation, and minimization of impacts and is bound by the biological requirements under the Federal Endangered Species Act (ESA) and the California ESA. In addition to General Plan policies that focus on lessening impacts to sensitive biological resources and their habitat, the EIR identifies mitigation that specifically addresses the potential effect the proposed General Plan will have on wildlife movement. For subsequent development projects, these measures would: require all new development in the hillside areas to prepare a biological report which includes identifying local and regional habitat patterns that provide movement routes for wildlife or where opportunities exist to establish movement routes between isolated habitat patches; require avoidance of impacts that would eliminate, substantially constrict, or substantially inhibit wildlife movement, or acquire land that would establish movement routes between isolated habitat patches and create or restore habitat to reestablish the connection; and where on-site habitat preservation would not provide meaningful mitigation either for affected species or for habitat connectivity, off-site mitigation shall be implemented through the acquisition of lands that provide for regional habitat connectivity. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment D-6. Neither the proposed General Plan policies nor the mitigation identified to augment these polices allow "take" of endangered and/or threatened species. Mitigation proposed in the EIR requires the preparation of project-specific biological reports in compliance with standards established by the City of Loma Linda for development projects requiring discretionary approval. These project-specific reports must include assessment of anticipated project impacts and a discussion of mitigation. The City has established baseline ratios for mitigating the impacts of development related uses to rare, threatened and endangered species and their associated habitats. Satisfying this mitigation requirement could involve acquisition of habitat occupied by the affected species; acquiring a key parcel that fills in a missing link or gap in a reserve that provides conservation for the species; or acquisition of credits in a mitigation bank (endorsed by the USFWS and/or CDFG) that has been established to provide conservation value for the species. Implementation of the mitigation measure shall include provisions for the preservation of such areas in perpetuity.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment D-7. While it is true that portions of the City abut areas included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the proposed General Plan policies adequately address impacts that may occur to regional conservation planning efforts.

The City, in its capacity as the CEQA Lead Agency, has determined the proposed General Plan policies and additional mitigation sufficiently addresses this issue.

Response to Comment D-8. Please refer to the response to Comments C-6 through C-9 and D-6.

Response to Comment D-9. The EIR identifies the City's proposed noise standard, the policies intended to limit noise impacts, and additional mitigation to ensure that City identified noise standards are not exceeded. Subsequent to approval of the General Plan, future development will be reviewed under and subject to the policies and mitigation identified in the General Plan and General Plan EIR. A discussion of project-specific noise impacts will be included as part of the environmental review of any such development. Because the nature of noise impacts varies widely with the type of development proposed, the identification of project-specific mitigation is more appropriate reserved until a specific development proposal is to be considered by the City.

As appropriate, the City will consider the mitigation identified by the commenter during the review of future development proposals.

Response to Comment D-10. As appropriate, the City will consider the mitigation identified by the commenter during the review of future development proposals.

Response to Comment D-11. As appropriate, the City will consider the mitigation identified by the commenter during the review of future development proposals.

Response to Comment D-12. As appropriate, the City will consider the mitigation identified by the commenter during the review of future development proposals.

Response to Comment D-13. Under CEQA, each agency is encouraged to develop thresholds of significance to determine the environmental effects of projects within their jurisdiction. Per the State CEQA Guidelines §15064(b), "...An iron clad definition of significant impact is not always possible

because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban setting may be significant in a rural area."

The conversion of agricultural lands in the City represents a continuation of a pattern that is occurring throughout the San Bernardino Valley. The steadily decreasing amount of agricultural land in the City is a result of various economic and demographic factors. Increased costs for water and a continuing demand for housing in the region have provided the primary impetus for this agricultural land conversion.

State CEQA Guidelines §15021(d) states, "...CEQA recognizes that in determining whether and how a project is approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian." As stated in the EIR, since its incorporation in 1970, the City has always considered that agricultural uses will transition to urban uses. This vision is supported by the fact that the City's existing General Plan (1971) does not provide an agricultural designation despite the presence of Prime, Unique, and Statewide Important farmland within the General Plan area. One of the primary uses of land use planning is the adoption of a land use plan that represents the City's vision of the future. What exists today may not be what is desired in the future. The guiding principle of the City's General Plan is the desire to increase employment and broaden housing opportunities for local residents.

This comment fails to recognize the urban environment in which the City is located, the pattern of agricultural conversion that is occurring in the City and throughout the San Bernardino Valley, and the economic and demographic pressures faced by local farmers. As stated previously, the City of Loma Linda has maintained a long-standing goal of allowing the conversion of farmland to urban uses that support the goals and desires of the City; therefore, the identification of impacts to agricultural resources as less than significant is appropriate.

Mitigation measures must be feasible and fully enforceable through permit conditions, agreements, or other legally binding considerations. To be feasible, mitigation must be capable of being accomplished in a successful manner within a reasonable period of time, taking into account the economic, environmental, legal, social, and technological factors. No mechanism for the mitigation of impacts to farmland has been enacted by the City. By establishing a future agricultural easement, the mitigation identified by the commenter would prevent the future conversion of as-of-yet unidentified farmland; but would not avoid, minimize, or otherwise directly mitigate the farmland impacts resulting from the implementation of the proposed General Plan. No "new" farmland would be created.

The conservation mechanisms cited by the State Department of Conservation are not feasible, as they are either contrary to the City's vision (as stated in its General Plan) for the eventual transition of agricultural lands to urban uses or do not reduce the direct agricultural impacts that will result from the development of the proposed project. Because of the location of the project site, pattern of development, limited extent of farmland in the City, the stated intent of the City, and the absence of any local or regional mitigation programs, mitigation of agricultural impacts are not feasible.

Response to Comment D-14. As appropriate, the City will consider the mitigation identified by the commenter during the review of future development proposals.

Response to Comment D-15. It is not possible to isolate the City from the regional growth that is occurring within San Bernardino County or the Southern California region. As population occurs, the number of vehicle trips to, through, and within the City will increase. The traffic data detailed in the EIR forecasts the traffic volumes that will result from implementation of the General Plan. Taken as a whole, the City has determined that these impacts are significant and unavoidable.

As development occurs, the City will require project-specific traffic analyses. Such analyses will be reviewed by the City to ensure appropriate mitigation for project-related and cumulative traffic impacts are appropriately addressed.

Despite this subsequent review, the traffic volumes cited in the EIR are reflective of the growth anticipated to occur in the City. In its capacity as the CEQA Lead Agency, the City has determined that adequate measures have been identified to reduce the significance of traffic impacts within the City, but not those impacts that occur outside the City or on freeway mainline segments. In the absence of such measures, the City's determination that traffic impacts that may result from implementation of the General Plan are significant and is appropriate.

Response to Comment D-16. It is the opinion of the City that the policies identified in the proposed General Plan and as referenced in the EIR are internally consistent and are sufficiently to address, on a programmatic level, the significant environmental issues resulting from implementation of the proposed General Plan. The commenter does not provide adequate specificity as to the perceived internal inconsistencies of the EIR.

Response to Comment D-17. The comment is broad, and does not site any specific instances of alleged inconsistencies. Overall, the commenter is incorrect in his assertion that the proposed General Plan is inconsistent with the provisions of the previously approved voter initiative. The proposed General Plan, in fact, specifically acknowledges and incorporates the provisions of that initiative into the General Plan, and does not attempt to amend any of its provisions.

The allowable density for development within areas subject to the initiative is specifically taken from the initiative. Densities in this area are limited to 1.0 dwelling unit per 10 acres in non-clustered development, and may be clustered to a maximum density of 1.0 dwelling unit per 5 acres. The General Plan also notes that "development on lands that are subject to the City's Hillside Initiative shall be consistent with the provisions of the initiative in addition to the provisions of the General Plan, the South Hills designation, and applicable zoning, whichever are more restrictive. It is specifically acknowledged that a project that meets applicable development policies might not achieve the maximum allowable development intensity for the site." Other hillside provisions seek to protect the same resources that the initiative was designed to protect, including views of the north facing slopes and ridgelines within the South Hills when viewed from the valley floor to the north.

The primary provision of the initiative affecting the Circulation element is the initiative's prohibition of the creation of through roadways within lands subject to the initiative. The Circulation Element identifies *potential* points of access into the South Hills, but does not designate any through roadways within lands subject to the initiative. Within initiative areas, the General Plan requirement that development be consistent with the provisions of the initiative would apply to the design of road systems for access to allowable development.

The commenter's reference to a "natural resources" element is assumed to refer to the Conservation and Open Space Element. The provisions of the General Plan Conservation and Open Space Element specifically acknowledge the 1993 initiative, which established a Hillside Conservation Area and set forth the parameters for development of a portion of the South Hills area. The initiative required that a specific statement be included in the Conservation Element. Consistent with the provisions of the initiative, the following statement is included in the Conservation and Open Space Element:

> *"**Hillside Conservation Area.** That area designated "Hillside Conservation" ("Hillside Initiative") on the Land Use Element Map is an important conservation area for the City.*

This area is characterized by natural, scenic hillsides, rough terrain, and limited services constituting the highest ridgelines visible from the City proper. Only that development which is consistent with the overall conservation goals for this area is permitted, including residential development at a density not greater than one unit per 10 acres, unless the criteria specified by the Hillside Conservation Land Use Designation are met in which even development at a maximum of up to one unit per 5 acres is permitted. Other consistent uses, should be limited to riding, hiking, and other trails, educational, and research activities consistent with conservation of the area. In addition, uses normally accessory to such uses, such as corrals, riding stables, groves, and the like may be allowed where the City determines, based upon environmental review, that such uses are consistent with the overall conservation goals for this area. The provisions of the Hillside Initiative will be met through implementation of the General Plan Land Use Element."

The provisions of the Conservation and Open Space Element aim toward the protection of natural habitats and visual resources, and are consistent with the provisions of the initiative. The provisions of the Safety Element are designed to protect public health and safety in terms of geologic, seismic, and fire hazards, among others, and do not conflict with the provisions of the initiative.

Specific provisions to protect visual resources are contained in the Conservation and Open Space Element, including requirements to:

a. Preserve outstanding natural features, such as the skyline of a prominent hill, rock outcroppings, the San Timoteo Creek Aviary Sanctuary, and native and/or historically significant trees.

b. Provide incentives such as a density bonus for clustering of allowable densities to avoid unnecessary grading for site development. The extent of permitted clustering within areas subject to the hillside initiative is limited by the provisions of the initiative to a maximum density of 1 dwelling unit per 5 acres.

c. Require new development to be designed to conserve soil and avoid erosion by limiting cut and fill areas and the exporting of soil from the development site.

d. Preserve the beauty of the South Hills as viewed from the valley floor to the north by preserving the most northerly north-facing slopes and signature ridgelines in natural open space.

ATTACHMENT 5

Correspondence on the Draft General Plan (October 2005 and June 2006) Received from November 2005 through June 2006

Exhibits:

A. Kathy Glendrange, DVM, JD, Save Loma Linda (November 8, 2005)

B. Joseph S.C. Bonadiman, P.E., Joseph E. Bonadiman & Associates (March 31, 2006)

Save Loma Linda
Kathy Glendrange, DVM, JD
P.O. Box 259
Loma Linda, CA 92354

November 8, 2005

Mayor Petersen and City Council Members
City of Loma Linda
25541 Barton Road
Loma Linda, CA 92354

RE: COMMENTS ON LOMA LINDA PROPOSED GENERAL PLAN

Dear Mayor Petersen and City Council Members,

Save Loma Linda and Kathy Glendrange submit the following comments in regard to the proposed General Plan. Additionally, we hereby incorporate all of the comments made by other parties in regard to the proposed General Plan, including without limitation comments made by the Center for Biological Diversity and the Loma Linda Conservation Society.

1. **The City Council has already approved at least four general plan amendments of mandatory elements, ex. the land use element, this year.** Thus, adopting the proposed General Plan would violate the California Government Code, which provides that "no mandatory element of a general plan shall be amended more frequently than four times during any calendar year."

2. **The proposed General Plan contains substantial modifications proposed by the City Council not previously considered by the Planning Commission during its hearings.** Thus, adopting the proposed General Plan would violate the California Government Code, which provides that any such substantial modification "shall first be referred to the Planning Commission for its recommendation."

3. **The proposed General Plan is not internally consistent.** Thus, adopting the proposed General Plan would violate the California Government Code, which provides that "the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency."

Because the proposed General Plan has only been available for ~2 1/2 weeks, I have not had time to completely review and analyze the Plan. However, the following are examples of some of the internal inconsistencies which exist:

a) The proposed General Plan's projections for the population and housing units at build-out are substantial underestimates of the actual numbers allowed by the land use element;

b) The land use element is inconsistent with the housing element. For example, the housing element states that the City is following SCAG's recommendations for this planning period. However, the number of housing units allowed by the land use element greatly exceeds the number of housing units which would comply with SCAG's recommendations. The land use element also allows for projects which result in growth-inducing impacts which conflict with SCAG's policies (ex. University Village and Orchard Park);

c) The circulation element is inconsistent with the land use element. For example, both the Staff's South Hills designation and the Developers' Alternative 2 allow for more roads through the hills than the circulation element.

Furthermore, the circulation element does not adequately address or plan for the infrastructure which will be needed as a result of build-out of the proposed Plan; and

d) The language with regard to allowable development within some of the land areas is internally inconsistent, ex. Special Planning area H; and the South Hills Designation.

4. The proposed General Plan is flawed for many other reasons.

a) First, the proposed General Plan does not include all of the revisions which the City Council made/voted for. For example, a majority of the Council voted that the density not exceed Very Low Density (2 dus / acre) in Special Planning Area H. However, the text of Special Planning Area H states that Low Density is allowed in that area, and then later states that Low Density and Medium Density are allowed in that area.

Again, because the proposed General Plan has only been available for ~2 1/2 weeks, I have not had time to completely review and analyze the Plan. Furthermore, I have been informed that the general plan consultant lost several months worth of revisions due to a computer malfunction. Accordingly, there may be many other changes which were made by the Council which have not been included in the final draft of the proposed Plan. Given the importance of the General Plan to the future of the City, I would hope that the Council takes adequate time to ensure that the document incorporates all of the revisions the Council has requested;

b) Second, the EIR acknowledges that "there are no mitigation measures which can assure the availability of water resources in the future." Whether or not the citizens will have water in the future is obviously of paramount importance. Yet, the proposed Plan has a cursory and inadequate analysis regarding this issue. It appears that the analyses required by law have not been done. Further, the proposed Plan appears to be illegally taking away our water rights. The proposed Plan increases allowable

densities for the majority of the vacant land in the City and yet almost ignores that there may not be water for the citizens upon implementation of the Plan; and

c) The proposed General Plan fails to adequately address the increased risk of public safety hazards, such as earthquakes, fires, floods, soil erosion, landslides, etc., which will result from increasing development intensity in the hills. It also fails to satisfactorily address all of the implications to the public health, safety and welfare from build-out of the hills under the proposed Plan.

5. The proposed General Plan violates the current Hillside Initiative, Ordinance 541. The following are examples of violations:

a) First, the proposed General Plan does not include all of the amendments made to the General Plan Text by the current Hillside Initiative;

b) Second, the proposed General Plan changes the definitions of the residential land use designations without a majority vote of the voters (ex. new low density would include up to 5 dus/acre not 4 dus/acre, etc);

c) Third, the proposed General Plan's roads provisions violate the spirit and the intent of the current Hillside Initiative's roads provisions and change them without a majority vote of the voters. For example, violated provisions include but are not limited to, the limitations on roads through the Hillside Conservation Area (with the exception of Oakwood Drive); that only Oakwood Drive may connect to Reche Canyon Road; the provisions minimizing the need for access roads; and the requirements that roads should minimize cut and fill, avoid disruption of habitat, sensitive and view areas, and be designed to fit the hilly terrain;

d) Fourth, the proposed General Plan changes and allows for uses within the Hillside Conservation Area which are inconsistent with the overall preservation and conservation goals for that area, without a majority vote of the voters;

e) Fifth, the proposed General Plan changes the density bonus criteria and allows for density transfers from the Hillside Conservation Area without a majority vote of the voters;

f) Sixth, the proposed General Plan changes the provisions for allowable development in the Hillside Conservation Area without a majority vote of the voters by requiring that such development conform to more restrictive provisions in the proposed General Plan, the South Hills Designation, and applicable zoning; and

g) Seventh, the proposed City Official General Plan Land Use Element Map incorrectly depicts and changes without a majority vote of the voters the Hillside Conservation Area and the Urban Slope Line.

6. The South Hills Designation of the proposed General Plan is flawed for many reasons.

a) The South Hills designation violates the current Hillside Initiative as set forth above;

b) "Ensuring economic use of private property" is listed as the third highest priority (of eight listed) of Loma Linda's hillside priorities. It is not legally within the Council's discretion or purview to "ensure economic use of private property," particularly as a "high priority." When did the City become "guarantors" of the hillside property investors? Further, on what rational basis would the Council ensure economic use of private property in the South Hills but not of private property located elsewhere in the City?;

c) The South Hills designation fails to state a maximum **allowable** density for the South Hills, and thus is vague as to whether the maximum densities stated are the maximum "allowable" or the maximum "anticipated";

d) The South Hills designation states that "a maximum of 1,185 dwelling units may be developed within lands designated "South Hills"... inclusive of any incentive programs that may be developed for the South Hills."

First – I doubt whether setting a maximum total number of houses in the hills is legal and enforceable.

Second, the Plan is vague and ambiguous because it fails to specify where and how many acres are in the "Hillside Areas not Subject to the Hillside Initiative" and the "Bench Areas not Subject to the Hillside Initiative."

It also appears that the Plan actually allows for a higher number of houses than 1,185 based on the maximum densities set forth in the Table. This is inconsistent - does this mean that the first landowners to build up to 1,185 houses can develop their land, but that other landowners are then prohibited from developing? Of-course any such provision would not be legal or enforceable.

Further, the Plan states that the "targeted open space" and "incentive program" for transferring out of the targeted open space will be decided in the implementation phase. This is also inconsistent – how do you provide incentives to landowners to transfer out of the targeted open space without increasing the densities for doing so? If the incentive program allows for a higher density, then the number of houses in the hills will certainly exceed 1,185;

e) Determining the "targeted open space" and "incentive program" in the future makes the South Hills designation an incomplete plan because it is basically something to be decided in the future; and

f) Allowing the transfer of densities from one property to another contiguous or non-contiguous property owned by a different landowner is not standard land use planning and it is inconsistent with the Plan setting different densities based on different geographic areas in the hills.

7. If Alternative 2 is a specific plan proposed by the developers for the South Hills designation, then it would violate the California Government Code for the Council to adopt it.

If Alternative 2 is considered a specific plan, then the Council would violate the California Government Code by adopting it because:

a) The City Council must first adopt a general plan, then a specific plan may be prepared for implementation of the general plan;

b) Alternative 2 does not include all of the details required by the Code;

c) Alternative 2 has not been referred to all of the entities required by the Code;

d) The analyses required by the Code relating to schools, water supplies, etc., have not been done;

e) The Planning Commission has not held at least one noticed public hearing regarding Alternative 2;

f) The Planning Commission has not made a written recommendation regarding Alternative 2; and

g) Alternative 2 is not consistent with the proposed General Plan because, among other things, it allows for more houses in the hills than are projected in the proposed Plan.

8. Alternative 2, proposed by the developers for the South Hills designation, is flawed for many reasons.

a) Alternative 2 violates the current Hillside Initiative in many of the ways set forth above in paragraph 5 (ex. in regard to the roads provisions; uses inconsistent with the preservation and conservation goals for the Hillside Conservation Area; changing the density bonus criteria and allowing for density transfers from the Area; and changing the provisions for allowable development in the Area; all without a majority vote of the people);

b) Alternative 2 also fails to state a maximum **allowable** density and thus is vague as set forth above;

c) We raise the same objections regarding Alternative 2 setting a "cap" of 1,185 houses as those set forth above in paragraph 6;

d) Alternative 2 is vague and ambiguous as to where the "Hillside Areas not Subject to the Hillside Initiative," the "Bench Areas not subject to the Hillside Initiative," and the "Existing and Approved Hillside Areas" are. Although, the existing Pilgrim Road and Scotch Lane developments are shown on the map, those properties do not add up to the 413 acres which are included in the "Existing and Approved Hillside Areas." Where are the other "Existing and Approved Hillside Areas?" Only the developers and possibly the City Officials know.;

e) Alternative 2 also allows for a higher number of houses than 1,185 based on their Table. Thus, it is internally inconsistent;

f) The Tables are vague, ambiguous and internally inconsistent;

g) Alternative 2 also allows for the transfer of densities from one property to another contiguous or non-contiguous property owned by a different landowner, which is objectionable for the reasons set forth above;

h) Alternative 2 allows all "currently existing commercial uses" in the hills – whether those uses are legal or not. This could lead to unintended consequences, be void as against public policy, and impact neighboring properties in an adverse and discriminatory manner;

i) Providing that a decrease in the targeted open space, or an increase in the base densities or density bonus factors shall only be allowed by a vote of the people, unfairly and irrationally discriminates against the small landowners because it basically requires the small landowners to sponsor and get an initiative passed to participate equitably in the density increases;

j) Alternative 2 is a self-serving plan in which the large landowners and developers basically split up the vast majority of the 1,185 housing units among themselves (disproportionately to the amount of land which they own) and treat most of the small landowners' properties as "already developed";

k) The map showing the "targeted open space" and "developable" areas is not based on the topographic characteristics of the hills for the most part; it is based on maximizing the densities and density bonuses for the large landowners and developers. For example, some of the north facing slopes are designated "targeted open space" and some are designated "developable or cluster areas." There is no rational basis for discriminating between the properties in this manner. The basis for discriminating between these properties is to allow the larger landowners and developers to maximize development of their land.

Another example is the Pilgrim Road Area, where they treat the small landowners' properties as "already developed" (with 10 acre minimum lots). However, on the property immediately adjacent, attached housing units with no minimum lot size are allowed. Again, there is no rational basis for discriminating between properties in this manner; and

l) Taking private properties with similar characteristics and designating some of them as "targeted open space," some as "developable," and some as "existing and approved," without a rational basis, illegally discriminates between properties whether it constitutes a taking, spot-zoning, and/or other violation of law.

9. City Officials have committed Ralph Brown Act, other Government Code and Public Records Act violations in regard to the proposed General Plan.

The Ralph Brown Act set forth in the California Government Code states that:

"[T]he Legislature finds and declares that the public commissions, boards and **councils** and the other public agencies in this State **exist to aid in the conduct of the people's business**. It is the intent of the law that their actions be taken openly and that their deliberations be conducted openly.

The people of this State do not yield their sovereignty to the agencies which serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may retain control over the instruments they have created."

a) The Staff Report for the October 25, 2005 City Council hearing states that "Over the past 12 months, the Council made many revisions to all Elements of the document that are too numerous to catalog in this report." For the vast majority of these revisions (probably all of them except for some of the hillside revisions), the final draft of the proposed Plan incorporating the revisions was not released until ~2 ½ weeks ago. Yet, the Council has closed the public hearing, except in regard to the South Hills designation. Therefore, if the Council were to adopt the proposed General Plan, it would violate the Ralph Brown Act because the Council must provide an opportunity for the public to address the Council on any item that has been substantially changed since the Council heard the item;

b) The Ralph Brown Act states that "[A]ny use of direct communication, personal intermediaries… that is employed by a majority of the members of the legislative body to develop a collective concurrence as to action to be taken on an item by the members of the legislative body is prohibited." A local newspaper recently reported that the developers' alternative for the hillside designation has "met with favor from City officials." The developers' plan has never been presented at a noticed public hearing. If it is true that the developers' plan has met with favor from City Officials, how and when

was a collective concurrence reached as to the action to be taken by the Council regarding the hillside designation?;

c) In regard to many matters that are within the jurisdiction of the Council, it seems that decisions regarding the action that at least the majority of the Council will take have already been made at meetings which are neither noticed nor which the public is even aware of;

d) Because the proposed General Plan has only been available for ~2 ½ weeks, the public has not had time to completely review and analyze the Plan. Thus, even if the Council were to allow public comment on the proposed Plan, there has not been adequate time to allow the citizens' involvement in a meaningful, careful consideration of the final draft of the proposed Plan. I also wonder if – and how -the Council has had adequate time to thoughtfully and carefully review the final draft of the proposed Plan. This is particularly concerning when, in this case, the Council is scheduled to approve an update of the entire General Plan which will govern land use decisions for the next 20 years!; and

e) In violation of the California Public Records Act: the City has limited, delayed, or denied the public the right to inspect and/or obtain a copy of disclosable records; and the City regularly fails to maintain complete copies of Agenda packets at the requisite public places, ex. the library, for the public to inspect and/or copy.

10. Finally, we would like to respond to several misleading or erroneous statements contained in the November 8 Staff Report in regard to the Residential and Hillside Development Control Measure (the "Initiative"). In particular, we respond to the Report's following conclusions:

a) We dispute the Report's conclusion that "Alternative 1 (Initiative) is very complex and the maximum allowable density or number of dwelling units is not clearly spelled out." This statement is misleading and erroneous.

Page 4 of the Initiative clearly states the maximum allowable densities for the designated hillside areas covered by the Initiative. The fact that either doubling or tripling of density bonuses is allowed if either of the two lists of specified criteria is met does not change that. Additionally, we respectfully disagree that the Initiative is "very complex." The Initiative states the maximum allowable densities, density bonuses, and density bonus criteria in plain language. Further, the Initiative's maximum allowable densities, density bonuses, and density bonus criteria are substantially similar to the current Hillside Initiative. At least two projects have been filed under those provisions and the citizens, developers and City Officials have not found the provisions overly befuddling or complex.

Further, Staff's Hillside Alternative does not even set maximum **allowable** densities – it sets maximum densities. Thus, it is not clear whether those densities are the maximum **allowable** or the maximum **anticipated** (as a former draft referred to them).

Second, Staff's Alternative also allows density bonuses for clustering. However, Staff's Alternative is not only "not clearly spelled out," the "targeted open space" and "incentive program" are actually completely missing from the plan and left to be decided in the future. I doubt that stating a "cap" of 1,185 on the number of houses remedies this because it is probably not even legal or enforceable to do so. The actual number of houses will be determined by the maximum densities, the density bonuses, the targeted open space, the incentive programs, and the actions eventually taken by the individual property owners regarding whether or not they choose to participate in the bonuses/incentive programs.

Further, the developers' Alternative also does not set maximum **allowable** densities – it sets maximum densities. Thus, again, it is not clear whether those densities are the maximum **allowable** or the maximum **anticipated.** Second, the developers' Alternative also allows density bonuses – but they allow three different density bonuses for three different sets of criteria. For the reasons stated above, I doubt that stating a "cap" of 1,185 on the number of houses remedies this because it is probably not even legal or enforceable to do so.

Additionally, the developers' Alternative is not only very complex, but also a disguised extremely self-serving plan, which is designed so that the large landowners and developers can split up the vast majority of the density increases and bonuses among themselves and leave the small landowners with little to no densities and bonuses. A person must have knowledge of who owns which pieces of properties and the topographic characteristics of the hills, as well as to be able to recognize the "untruths" in the Tables, to realize that the densities and maps are primarily drawn to allow the major landowners to split up the vast majority of the 1,185 houses among themselves.

For instance, in the developers' Alternative, the "Existing and Approved Hillside Areas," consist of land owned by smaller landowners. They are entitled to zero density increases and bonuses and have no land designated as "developable," **for no rational basis whatsoever**, except to allow the larger landowners and developers to distribute the smaller landowners' proportionate share of density increases among themselves.

Further, the map does not follow the topographic characteristics of the hills (ex. north of the toe of slope or the northerly facing slopes) when designating "targeted open space." The real property owners who the map benefits becomes clearer when covered with an overlay of the development plans contained in the developers' flyers distributed this year. Conveniently, the development projects fit quite nicely within the "developable" and "cluster" areas designated on the map.

Finally, the developers' Alternative is more complex because the targeted open space does not follow property lines in many areas, but includes portions of parcels. Thus, the final number of houses allowed will also depend on estimates of how much targeted open space the landowners ultimately propose to preserve;

b) We also dispute the Report's conclusion that the property owner and developer of the property in the western portion of the hills, southwest of the Fault Line, "have stated their interest in constructing around 400 dwelling units," and that "these additional dwelling units would not be included in the dwelling unit cap for Alternative 1." First, it is an erroneous assumption, we hope, that because a developer states an interest in developing a certain number of houses, that that is tantamount to a guarantee that the City Council will approve that number of houses. Second, until the City Council adopts a South Hills designation, it is impossible to calculate the total number of houses allowed in the hills because the Initiative leaves the current hillside initiative intact and leaves it to the Council to set densities in certain other hillside areas.

Further, Staff's Alternative also does not include those 400 dwelling units in their cap of 1,185 houses. The property which Staff is referring to includes ~220 acres. Thus, under Staff's Alternative, that property owner would be entitled to develop ~110 houses in a clustered development (~220 acres x 1 du / 2 acres = ~110 houses). If the ultimate targeted open space and incentive program will increase this number to 400 houses, then we find it even more concerning that those items are left to be decided in the future and also more doubtful that the ultimate cap on the number of houses will remain at 1,185;

c) We also dispute the Report's conclusion that the developers' Alternative is "largely based on the South Hills designation in the final draft general plan." This statement is misleading and erroneous in that it is actually the opposite – the South Hills designation in the final draft general plan is largely based on the developers' Alternative, which was pitched to the Staff and general plan consultant in non-public meetings with the developers;

d) We also dispute the Report's conclusion that the developers' Alternative "would allow a maximum of 1,185 dwelling units in the hillside area." This statement is false. A review of the developers' Tables reveals that under their Alternative, the total number of houses in the hillside areas would be higher than 1,185;

e) It is interesting that the Report noted in regard to the developers' Alternative that "Similar to the South Hills designation, the densities per acre would vary from one geographic area of the hills to another." This statement is pointing out a potential benefit of the developers' Alternative. The same potential benefit is true of the Initiative and yet the Report failed to mention it;

f) Finally, we note that the October 25 Staff Report failed to include every other page of the Initiative, including the map. This rendered the Initiative impossible for the citizens and the Council to understand. Subsequently, the manner in which the November 8 Report attempted to create possible ambiguities in the plain language of the Initiative on the above issues, particularly when contrasted with the Report's failure to discuss any of the Initiative's potential benefits, seriously calls into question the fairness and objectivity of the Report. If this one-sidedness is not corrected by the Staff and Council, the Report runs the risk of becoming, in essence, a de facto ballot argument. Accordingly, because the California Supreme Court has expressly held that any

expenditure of public funds on a ballot measure must be limited to a "fair presentation" of "all relevant facts," we urge the Staff and Council to correct these misleading and erroneous conclusions and to provide the required fair presentation of the Initiative.

The Report's exclusive focus on casting the Initiative in a negative light, may well violate the constitutional requirement that cities remain neutral in ballot measure election contests. As the California Supreme Court has explained, "[a] fundamental precept of this nation's democratic electoral process is that the government may not 'take sides' in election contests or bestow an unfair advantage on one of several competing factions." Accordingly, any public funds the City expends regarding the Initiative must be limited to giving a "fair presentation" of "all relevant facts."

Sincerely,

Kathy Glendrange

Save Loma Linda, by member
Kathy Glendrange, DVM, JD

Kathy Glendrange

Kathy Glendrange, DVM, JD

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March 31, 2006

City of Loma Linda
Attn: Deborah Woldruff, Planner
25541 Barton Road
Loma Linda, CA 92354-3160

APR - 4

Dear Ms. Woldruff,

This letter is being written on behalf of our client, the J.J. Ramirez Family, pertaining to properties that they own in the County of San Bernardino within the City of Loma Linda's Zone of Influence. We have noticed for a period of time the jockeying of several parties to input their desires into the new proposed general plan. In that our client has approximately 300 acres within the area known as the South Hills, we feel that their input should be considered at least equally with those other interested persons, some of whom do not own property in this area.

Our general feeling is that the city has gone through great expense to hire LSA, a professional planning group, to assist them with the new general plan and therefore that planner's suggestion should be given greater weight than individual residents of the city. We also feel that affected landowners should be given consideration that's commensurate with their investment in the city. A portion of the property that's owned by the Ramirez Family contiguous to and south of Beaumont Avenue described in the general plan as the Bench Areas is not subject to the hillside initiative. The density for this property of two dwelling units per acre seems to be well thought out when one recognizes the other development that is also contiguous to Beaumont Avenue. The apparent logic that the LSA Group used in suggesting the density on the Bench properties seems to be well founded as opposed to others that are suggesting higher densities but without what appears to us any sound logic.

The Ramirez family has always supported the City of Loma Linda in the past and wants to assure you that they wish to be good neighbors in the future.

Very Truly Yours,

Joseph S.C. Bonadiman, P.E.

JCB/ja

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