

**Appendix A:  
NOP Public Comment Letters**

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**From:** Mario Suarez <msuarez@coltonca.gov>  
**Sent:** Wednesday, February 12, 2025 1:55 PM  
**To:** Alison Rondone <arondone@fcs-intl.com>; Alex So <aso@urbanxroads.com>  
**Subject:** FW: Housing Element Program 10 & 11 General Plan Amendment and Rezone - SCH 2025010520

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See below and attached.

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**From:** Flores, Victor F@DOT <[Victor.F.Flores@dot.ca.gov](mailto:Victor.F.Flores@dot.ca.gov)>  
**Sent:** Wednesday, February 12, 2025 12:12 PM  
**To:** Mario Suarez <[msuarez@coltonca.gov](mailto:msuarez@coltonca.gov)>  
**Subject:** Housing Element Program 10 & 11 General Plan Amendment and Rezone - SCH 2025010520

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Hi Mario,

I hope all is well with you! It's been a while since we last saw each other in Pomona. I noticed that you've returned to your old stomping grounds at the City of Colton — that's great to see!

We received the NOP for the Housing Element Program 10 & 11 General Plan Amendment and Rezone. Once the Traffic Impact Analysis becomes available, we would like to review it.

For your reference, I have attached the Transportation Impact Study Guide. Please feel free to send any future inquiries to our inbox [LDR-D8@dot.ca.gov](mailto:LDR-D8@dot.ca.gov). Let me know if you have any questions or need further information.

Thank you,



**Victor Flores**

*Transportation Planner*

Local Development Branch

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May 20, 2020

# Vehicle Miles Traveled-Focused Transportation Impact Study Guide



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## Use of this Guidance

The Transportation Impact Study Guide (TISG) was prepared by the State of California, Department of Transportation (Caltrans) to provide guidance to Caltrans Districts, lead agencies, tribal governments, developers and consultants regarding Caltrans review of a land use project or plan's transportation analysis using a vehicle miles traveled (VMT) metric. This guidance is not binding on public agencies and it is intended to be a reference and informational document. The guidance may be updated based upon need, or in response to updates of the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

The TISG replaces the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002) and is for use with local land use projects, not for transportation projects on the State Highway System.

# 1. Introduction

The Transportation Impact Study Guide (TISG) is used by the California Department of Transportation's (Caltrans) Local Development-Intergovernmental Review (LD-IGR) program during environmental review of land use projects and plans. As owner/operator of the State Highway System Caltrans may review projects and plans as a commenting agency or responsible agency under the California Environmental Quality Act (CEQA).

Caltrans LD-IGR program works with local jurisdictions early and throughout their land use planning and decision making processes, consistent with the requirements of CEQA and state planning law. Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, and transit, and reduce greenhouse gas (GHG) emissions. Those goals along with standard CEQA practice create the foundation of Caltrans review of proposed new land use projects.

## 1.1 Changes to CEQA

For 50 years CEQA has required that public agencies examine, disclose, and minimize the anticipated environmental impacts of public and private investments in the state. These investments include both land development projects and infrastructure investments such as freeway projects. Senate Bill 743, approved in 2013 and incorporated into the State's CEQA Guidelines in 2018, better aligned CEQA with the State's climate goals. It is changing CEQA analysis of transportation impacts associated with both land development and infrastructure projects.

For Caltrans, SB 743 means major changes in two activities:

1. Review of land use project or plan's potential impact to the State Highway System, which are generally addressed through the Caltrans LD-IGR program, and
2. CEQA analysis of capacity increasing transportation projects on the State Highway System

These changes follow both the CEQA Guidelines and the Governor's Office of Planning and Research's (OPR) [Technical Advisory on Evaluating Transportation Impacts in CEQA](#). Caltrans supports implementation of the guidance published by its State Agency partners.

A key change for the LD-IGR program is that CEQA documents will now consider different types of transportation impacts than previously examined. When analyzing the impact of VMT on the State Highway System resulting from local land use projects, the focus will no longer be on traffic at intersections and roadways immediately around project sites. Instead, the focus will

be on how projects are likely to influence the overall amount of automobile use. SB 743 specifies that “...automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment” (California Public Resources Code Section 21099).

Caltrans supports these changes, which aim to reduce automobile use while increasing use of more sustainable modes that are essential to supporting a growing population and economy while meeting climate goals.

## 1.2 Caltrans Updates Its Review of Land Use Decisions and Projects

For land use projects and plans, automobile delay is no longer considered a significant impact on the environment under CEQA (SB 743, 2013). Caltrans review of land use projects and plans is focused on a VMT metric, consistent with changes to the CEQA Guidelines (California Code of Regulations Section 15064.3(b)(1)). This VMT-focused TISG provides a foundation for review of how lead agencies apply the VMT metric to CEQA project analysis.

Beyond or in addition to the use of the VMT metric, determining how the State Highway System may otherwise be affected by a land use project may still be necessary at times, particularly as it relates to the safety of the traveling public. **Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and focuses on multi-modal conflict analysis as well as access management issues. With this guidance the Department will transition away from requesting LOS or other vehicle operations analyses of land use projects.**

This VMT-Focused Transportation Impact Study Guide is intended for use by the Caltrans LD-IGR program, lead agencies, tribal governments, developers, and consultants when reviewing or analyzing land use projects or plans that may impact or affect the State Highway System. It supports CEQA streamlining for qualifying projects as identified by CEQA Guidelines (California Code of Regulations Section 15064.3(b)(1)).

The objectives of this Guide are to provide:

- a. Guidance in determining when a lead agency for a land use project or plan should analyze possible impacts to the State Highway System, including its users.
- b. An update to the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002) that is consistent with SB 743 and the CEQA Guidelines adopted on December 28, 2018.
- c. Guidance for Caltrans land use review that supports state land use goals, state planning priorities, and GHG emission reduction goals.

- d. Statewide consistency in identifying land use projects' possible transportation impacts, to the State Highway System, and to identify potential non-capacity increasing mitigation measures.
- e. Recommendations for early coordination during the planning phase of a land use project to reduce the time, cost, and/or frequency of preparing a Transportation Impact Study or other indicated analysis.

The TISG replaces the *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002). Caltrans continues to emphasize the importance of coordination early in the land use project approval/CEQA review process. Early coordination helps to ensure transportation impact analysis and/or site design elements that address the needs of all users are identified. Early coordination can also minimize costs and time associated with analysis of transportation impacts. The information herein may be used as part of a land use project's CEQA transportation analysis as well as for other elements of a project's review, analysis, or approval processes to determine impacts or potential and appropriate changes or mitigation necessitated by such projects.

## 2. Reducing Greenhouse Gas Emissions and Vehicle Miles Traveled

California law, including Assembly Bill 32 (Nunez, 2006) and SB 32 (Pavley, 2016), known as the California Global Warming Solutions Act of 2006, requires GHG reductions. California Air Resources Board (CARB) developed a Scoping Plan that describes the approach California will take to reduce greenhouse gas emissions. CARB finds per capita vehicle travel needs to be below what today's policies and plans would achieve. CARB's assessment is based on data in the 2017 Scoping Plan Update and 2016 Mobile Source Strategy. In those documents, CARB examined the relationship between VMT and the state's GHG emissions reduction targets. Most recently, CARB's 2018 Progress Report stated:

“With emissions from the transportation sector continuing to rise despite increases in fuel efficiency and decreases in the carbon content of fuel, California will not achieve the necessary greenhouse gas emissions reductions to meet mandates for 2030 and beyond without significant changes to how communities and transportation systems are planned, funded, and built.” ([https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report\\_SB150\\_112618\\_02\\_Report.pdf](https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf) Page 5)

SB 743, through a new CEQA metric for transportation impacts, sought to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses (Public Resources Code Section 21099 (7)(b)(1)). That is, it sought to modernize CEQA transportation analysis in a way that supports these goals. A new metric, VMT, was selected for land use development based on the expectation that a vehicle miles traveled metric will better support greenhouse gas emission reductions and improve multimodal transportation options for land use development.

### 3. Caltrans Review of Local Development Projects

Caltrans LD-IGR program's focus is aligned with Caltrans Strategic Management Plan's goals and targets to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, and transit, and reduce GHG emissions.

CEQA Guidelines and OPR's Technical Advisory distinguish types of development projects that are presumed to have a less than significant impact on VMT and therefore, a less than significant adverse impact on transportation. Caltrans review of land use projects is attentive to the distinction and encourages development in low VMT areas while at the same time maintaining safety for the State Highway System and all its users.

#### 3.1 VMT Analysis is Caltrans' Focus

Many lead agencies are adopting VMT metrics in advance of it becoming the standard CEQA transportation metric on July 1, 2020. VMT analysis replaces level of service, the prior widely applied metric used for CEQA transportation analysis. Caltrans' primary review focus for a land use project's impacts is now VMT.

Caltrans references OPR's December 2018 SB 743 Technical Advisory as a basis for this guidance document. Caltrans recommend use of OPR's recommended thresholds for land use projects. As each lead agency develops and adopts its own VMT thresholds for land use projects, Caltrans will review them for consistency with OPR's recommendations, which are consistent with the state's GHG emissions reduction targets and CARB's Scoping Plan.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance" based on substantial evidence. Caltrans will review VMT thresholds as a lead agency sets them by policy, resolution, ordinance, etc. After this one time review, there may be no need for Caltrans to comment on the thresholds as it reviews individual land use projects, unless the Agency updates its threshold.

If a lead agency sets a VMT threshold on a case by case basis, Caltrans will review it along with the individual land use project.

Caltrans supports CEQA streamlining for land use projects in defined transit priority areas and other areas identified with existing low VMT, as described in OPR's Technical Advisory. Caltrans recommends following the guidance on methods of VMT assessment found in OPR's Technical Advisory. **Caltrans comments on a CEQA document may note methodological deviations from those methods and may recommend that significance determinations and mitigation be**

**aligned with state GHG reduction goals as articulated in OPR's guidance, CARB's Scoping Plan, and related documentation.** OPR's Technical Advisory is available [online](#).

If work is required within the State Highway System Right of Way a local land use project will need a Caltrans Encroachment Permit. In such cases, follow procedures within Caltrans Encroachment Permit Manual.

### 3.2 VMT Calculation

A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT (Public Resources Code 15064.3 (b)(4)). Caltrans will review an agency's VMT calculator or VMT calculation for consistency with technical considerations in OPR's Technical Advisory.

Because direct and indirect impacts due to VMT are regional in nature, Caltrans may review and comment on a proposed land use project's potential transportation impacts even if the project is not immediately adjacent to the State Highway System.

## 4. Projects Presumed to Have a Less than Significant Transportation Impact

Certain types of projects as identified in statute, the CEQA Guidelines, or in OPR's Technical Advisory are presumed to have a less than significant impact on VMT and therefore a less than significant impact on transportation. Generally, the identified projects contribute to efficient land use patterns enabling higher levels of walking, cycling, and transit as well as lower average trip length. This section addresses how Caltrans will determine which projects will be presumed to have a less than significant transportation impact. These projects include, for example, projects in transit priority areas, projects consisting of residential infill or those located in low VMT areas.

Caltrans references OPR's December 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which identifies projects and areas presumed to have a less than significant transportation impact. Those include:

1. Residential, office, or retail projects within a Transit Priority Area, where a project is within a ½ mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor.
  - a. A major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (Pub. Resources Code, § 21064.3).
  - b. A high-quality transit corridor is defined as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours (Pub. Resources Code, § 21155).
2. An area pre-screened by an agency as having low residential or office VMT:
  - a. An area where existing residential projects exhibit VMT per capita 15 percent or more below city or regional average.
  - b. An area where existing office projects exhibit VMT per capita 15 percent or more below regional average.
3. Residential projects composed of 100 percent or near-100 percent affordable housing located in any infill location. Additionally, per OPR's Technical Advisory, "Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed use projects) containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes

any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units.”

4. A locally-serving retail project (such a project typically reduces vehicle travel by providing a more proximate shopping destination, i.e., better accessibility).
5. Mixed-use projects composed entirely of the above low-VMT project types.
6. In any area of the state, absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact.

Caltrans supports CEQA streamlining for these projects and acknowledges the importance of streamlining them in improving access to destinations, livability, and community vibrancy. Further, Caltrans encourages these projects because they will help achieve VMT reduction and mode shift goals.

Note, however, a land use project near transit may have a significant impact on VMT if it:

1. Has a floor area ratio less than 0.75.
2. Includes more parking than required by the local permitting agency.
3. Is inconsistent with the region’s Sustainable Communities Strategy (i.e., development is outside region’s development footprint, or in area specified as open space).
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

In very limited situations, analysis or mitigation may be appropriate in low VMT areas to address specific multimodal access management issues directly caused by the project such as issues related to line of sight caused by the placement of a driveway. These situations are to be determined based on the details of specific development proposals and their setting and will be addressed in future guidance.

#### 4.1 Caltrans’ Review of Projects Presumed to Have A Less Than Significant Impact

Caltrans will review a proposed land use project in a low VMT area to determine consistency with the OPR SB 743 Technical Advisory’s recommendations and that the proposed project is presumed to have a less than significant transportation impact (using a VMT metric). Where projects will further California’s VMT goals consistent with CARB’s Scoping Plan and OPR’s Technical Advisory, Caltrans may provide comments to underscore that consistency and achievement. For example, Caltrans may send a comment letter to describe how the project

helps achieve state planning priorities contained in state law (i.e., AB 857, 2002 Wiggins) and meets state policy goals on transportation (improving access to destinations), VMT reduction, GHG emissions reduction, and/or betterment of the environment and human health.

## 5. Projects Without Presumption of Less Than Significant Impact

This section addresses how Caltrans will review projects that are not presumed to have a less than significant transportation impact (using a VMT metric).

For residential and office projects, OPR's Technical Advisory recommends VMT per capita or per employee thresholds 15% below existing city or regional VMT per capita. The recommended thresholds align with the reduction in per capita VMT required to achieve GHG reductions sufficient to achieve targets contained in State law. Caltrans suggests use of OPR's recommended thresholds of significance for land use projects and may request mitigation from projects and plans which do not meet those thresholds.

Caltrans' comments on the transportation impacts portion of a particular CEQA document may note methodological deviations from OPR's Technical Advisory and may strongly recommend significance determinations and project changes or mitigation aligned with state GHG and VMT reduction goals as articulated in that guidance and in the California Air Resources Board's Scoping Plan and related documentation.

### 5.1 Caltrans' Review of Projects Without Presumption of Less Than Significant Impact

Caltrans will review a land use project not presumed to be less than significant (as defined by Statute, CEQA Guidelines, or OPR's Technical Advisory) to determine consistency with OPR's Technical Advisory. Where projects would not support reduction of vehicle miles traveled and greenhouse gas emissions, or where VMT analysis deviates from recommendations for analysis thereby preventing a clear determination, Caltrans may provide comments on the analysis, project details or mitigation. Caltrans may comment in the following instances.

1. Where project VMT analysis and significance determination are undertaken in a manner consistent with OPR's Technical Advisory and state GHG emissions reduction goals, and where transportation impacts (using a VMT metric) are found to be less than significant:
  - a. Caltrans may send a comment letter to describe how the project helps achieve state planning priorities codified in state law (i.e., AB 857, 2002 Wiggins) and meet state policy goals on transportation (improving access to destinations), VMT reduction, GHG emissions reduction, and/or betterment of the environment and human health.
2. Where project VMT analysis and significance determination are undertaken in a manner consistent with OPR's Technical Advisory and state GHG emission reduction goals, and the

project is found to have a significant transportation impact (using a VMT metric), Caltrans may provide comments:

- a. Recommending changes in the proposed project or mitigation which would reduce the impact to less than significant
3. Where VMT analysis and significance determination are undertaken in a manner which is inconsistent with OPR's Technical Advisory or state GHG emissions reduction goals, Caltrans may provide comments:
- a. Noting methodological deviations from OPR's Technical Advisory in VMT assessment;
  - b. Recommending significance determinations, project changes or mitigation which is aligned with state GHG reduction goals as articulated in OPR's Technical Advisory and in the California Air Resources Board's Scoping Plan and related documentation;
  - c. Pointing out inconsistency with the region's Sustainable Communities Strategy (development is outside region's development footprint, or in area specified as open space); or
  - d. Suggesting project revisions or mitigation be undertaken to reduce project-generated VMT

## 6. Rural Areas Outside of Metropolitan Planning Organizations (MPOs)

OPR's Technical Advisory indicates significance thresholds for projects in rural areas of non-MPO counties may be best determined on a case-by-case basis. In these rural areas, programmatic VMT mitigation is sometimes the most effective. Caltrans may comment requesting VMT-reducing strategies for the rural area be included programmatically, including at the General Plan level, for example. Caltrans will also recommend establishment of programs or methods to reduce VMT and support appropriate bicycle, pedestrian, and transit infrastructure, services or incentives.

A future update of Caltrans' Transportation Impact Study Guide may add flexibility in the approach to rural areas within MPO counties.

## 7. Mitigating Transportation Impacts

For years, transportation impacts under CEQA often led to mitigation in the form of roadway widening or otherwise addressing traffic operations with the intention of improving automobile level of service. Based on SB 743, the historic approach to mitigating transportation impacts is being modified.

Caltrans reviews projects for consistency with the recommendations in the VMT Mitigation and Alternatives section of OPR's Technical Advisory with a focus on:

- 1) Whether the lead agency considered applicable measures to reduce VMT from the project, and
- 2) Whether the lead agency identified feasible alternatives that could avoid or substantially reduce a project's significant transportation impacts.

As noted above, reducing or mitigating VMT will serve many state goals, including providing more multimodal transportation options and supporting air quality, public health, and climate goals.<sup>1</sup> The TISG Appendix includes a partial list of resources to reference for supporting information on VMT reduction measures. Caltrans supports both on-site and off-site mitigation measures to reduce VMT.

On-site design features that reduce VMT may minimize or eliminate mitigation necessary to achieve a less than significant transportation impact. For example, a project may incorporate transportation demand management strategies (e.g., parking supply reduction, on-street bicycle facilities improvements, or pedestrian network improvements) into project design to reduce project VMT. Some local agencies provide online calculator tools to assess a project's VMT and estimate reduction achieved through project design features.

Where further on-site design features are infeasible or not proven to be effective, direct investments in off-site VMT mitigation may be appropriate and feasible to mitigate VMT associated with a project. Off-site mitigation measures may include programmatic methods that implement mitigation in advance of and in anticipation of transportation impacts generated by land use projects or plans. Programmatic methods may include, but are not necessarily limited to, VMT mitigation banks, VMT mitigation exchanges, or VMT impact fee programs:

1. Jurisdictions that document appropriate nexus and proportionality between a transportation impact fee and VMT reduction may rely on such fees to mitigate VMT

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<sup>1</sup> Documented benefits of VMT reduction are available at <http://opr.ca.gov/ceqa/updates/sb-743/>

transportation impacts from land use development projects. For example, a nexus study that contemplates a capital improvement program consisting of projects that would demonstrably reduce VMT within the jurisdiction's geographic scope and within the buildout time horizon of the proposed project could serve as adequate fair share VMT mitigation.

Similar support for this "fair share" approach comes from CEQA Guidelines and OPR's General Plan Guidelines which advise jurisdictions to collaborate proactively with their regional public and private sector partners to develop and adopt multi-party fair share impact fee programs needed to finance planned transportation infrastructure improvements. The guidelines suggest basing such impact fee programs on multi-modal system improvements with a demonstrated ability to reduce the VMT generated by new development.<sup>2</sup>

2. Jurisdictions can pool fees from individual development projects to facilitate feasible project-level mitigation at a programmatic level, known as a VMT mitigation bank.
3. Jurisdictions can also develop a VMT mitigation exchange which would allow a developer to fund off-site VMT mitigation projects from a pre-approved list of mitigation projects that are proportional in size to the transportation impact (using a VMT metric) from the development project.

Lead Agencies should consider the legal requirements and practical implications of programmatic mitigation strategies. For example, some additional considerations for VMT mitigation exchanges and banks are outlined in a University of California Berkeley research paper (link in Appendix). The considerations include "additionality" (generally meaning the improvements would not have occurred without funding from the VMT mitigation bank), equity (with respect to geographical distribution of beneficial mitigation projects), verifiability, and exhaustion of on-site mitigation strategies.

Caltrans supports efforts to identify and pilot reasonable, feasible, and enforceable programmatic mitigation mechanisms that equitably reduce transportation impacts to the greatest extent feasible.

Caltrans will coordinate with cities, counties, and regional transportation planning agencies to develop and pilot programmatic methods that fund off-site VMT mitigation projects. Such a framework could provide funding necessary for projects that reduce VMT, while providing more

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<sup>2</sup> Governor's Office of Planning and Research. 2017. *General Plan Guidelines Update*. Chapter 9: Implementation. Available at: [http://opr.ca.gov/docs/OPR\\_C9\\_final.pdf](http://opr.ca.gov/docs/OPR_C9_final.pdf). (Page 251)

transportation options, safer connections between new development and the existing community, and a pathway to mitigating transportation impacts from land use projects to less-than-significant levels.

## 8. Appendix

### Links to key resources

1. Governor's Office of Planning and Research December 2018 [Technical Advisory](#) on Evaluating Transportation Impacts in CEQA
2. California Air Resources Board [Scoping Plan-Identified VMT Reductions and Relations to State Climate Goals](#)
3. California Air Resources Board [California's 2017 Climate Change Scoping Plan: the strategy for achieving California's 2030 greenhouse gas target](#)
4. California Air Resources Board [2018 Progress Report: California's Sustainable Communities and Climate Protection Act](#)
5. Public Resources Code, Chapter 2.7: Modernization of Transportation Analysis for Transit-Oriented Infill Projects, [Section 21099](#) (SB 743 in Public Resources Code)
6. California Code of Regulations, Title 14, Division 6, Chapter 3, [Section 15064.3](#) (SB 743-related CEQA Guidelines)
7. VMT Mitigation Resources.  
Strategies to mitigate VMT are available within the following resources. Additional mitigation resources will be added to [Caltrans SB 743 Implementation webpage](#).
  - a. Governor's Office of Planning and Research's CEQA Guidelines Update and Technical Advisory [website](#) has information on VMT reduction strategies, even for rural areas.
  - b. California Air Pollution Control Officers Association's (CAPCOA) [2010 Quantifying GHG Mitigation Measures](#) is a current source of VMT reduction by mitigation strategy.
  - c. A 2018 [research paper](#) from University of California Berkeley School of Law's Center for Law, Energy & the Environment focuses on two innovative models that could be used to implement programmatic VMT mitigation strategies for land use or transportation projects. VMT mitigation "banks" and "exchanges"

are compared, and examples provided of ways to mitigate VMT under CEQA or the mitigation fee act. These models are conceptually similar to existing mitigation frameworks such as regional impact fee programs or habitat conservation banks.

- d. A 2020 white paper prepared by Fehr & Peers [VMT Mitigation Through Banks and Exchanges: Understanding New Mitigation Approaches](#) highlights potential VMT mitigation programs including impact fee programs, mitigation exchange, and mitigation bank.
  - e. State Smart Transportation Initiative (SSTI) 2018 report [Modernizing Mitigation: A Demand-Centered Approach](#) outlines partnerships possible to reduce the demand for driving.
8. Additional Resources
- a. Governor's Office of Planning and Research [Key Resources on SB 743](#): Studies, Reports, Briefs, and Tools

## Mario Suarez

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**From:** Duarte, Claritsa (TRBL) <cduarte@aguacaliente.net>  
**Sent:** Friday, February 14, 2025 1:36 PM  
**To:** Mario Suarez  
**Subject:** Housing Element Programs 10 & 11 General Plan Amendment

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Greetings,

A records check of the Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Thank you,



Claritsa Duarte  
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FEB 10 2025



STATE OF CALIFORNIA

Gavin Newsom, Governor

## NATIVE AMERICAN HERITAGE COMMISSION

February 4, 2025

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**Re: 2025010520 Housing Element Program 10 & 11 General Plan Amendment and Rezone Project, San Bernardino County**

Dear Mr. Suarez:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at:

[https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3.** Contact the NAHC for:
- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@NAHC.ca.gov](mailto:Andrew.Green@NAHC.ca.gov).

Sincerely,

*Andrew Green*

Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

**From:** [Mario Suarez](#)  
**To:** [THPO Consulting](#)  
**Cc:** [Alison Rondone](#)  
**Subject:** RE: Colton - Rezoning Project - CEQA Public Scoping  
**Date:** Wednesday, February 19, 2025 3:47:51 PM  
**Attachments:** [image001.png](#)

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Thank you – email received.

Mario Suarez  
City of Colton  
Planning Division

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**From:** THPO Consulting <[ACBCI-THPO@aguacaliente.net](mailto:ACBCI-THPO@aguacaliente.net)>  
**Sent:** Wednesday, February 19, 2025 1:20 PM  
**To:** Mario Suarez <[msuarez@coltonca.gov](mailto:msuarez@coltonca.gov)>  
**Subject:** RE: Colton - Rezoning Project - CEQA Public Scoping

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Greetings,

A records check of the Tribal Historic Preservation Office’s cultural registry revealed that this project is not located within the Tribe’s Traditional Use Area. Therefore, we defer to the other tribes in the area. This letter shall conclude our consultation efforts.

Best Regards,



Luz Salazar  
*Cultural Resources Analyst*  
[lsalazar@aguacaliente.net](mailto:lsalazar@aguacaliente.net)  
C: (760) 423-3148 | D: (760) 883-1137  
5401 Dinah Shore Drive, Palm Springs, CA 92264

---

**From:** Mario Suarez <[msuarez@coltonca.gov](mailto:msuarez@coltonca.gov)>  
**Sent:** Monday, February 10, 2025 12:32 PM  
**To:** THPO Consulting <[ACBCI-THPO@aguacaliente.net](mailto:ACBCI-THPO@aguacaliente.net)>  
**Subject:** FW: Colton - Rezoning Project - CEQA Public Scoping

This email was sent by a person from outside your organization. Please verify the authenticity of this email before taking further action.

Hello Agua Caliente Band of Cahuilla Indians:

Public Notice was provided over a month ago.

[https://www.ci.colton.ca.us/DocumentCenter/View/9220/02370039-Colton-Housing-Element-Update-NOP\\_\\_1-15-2025-Signed](https://www.ci.colton.ca.us/DocumentCenter/View/9220/02370039-Colton-Housing-Element-Update-NOP__1-15-2025-Signed)

Agenda for February 11, 2025, Public Scoping Meeting is here:

[https://www.ci.colton.ca.us/AgendaCenter/ViewFile/Agenda/\\_02112025-1309?html=true](https://www.ci.colton.ca.us/AgendaCenter/ViewFile/Agenda/_02112025-1309?html=true)

Staff Report for our CEQA Public Scoping Meeting for Environmental Impact Report is here:

<https://www.ci.colton.ca.us/AgendaCenter/ViewFile/Item/3893?fileID=6307>

This is a rezoning at this time, there is no specific project at this time; however, we welcome your concerns and questions.

Best Regards,

**Mario Suarez, AICP, CNU-A**

**Planning Manager**

**909.370.5523 Desk**

[msuarez@coltonca.gov](mailto:msuarez@coltonca.gov)

**Development Services Department**

**Planning Division**

659 N. La Cadena Drive, Colton, CA 92324

Office Hours: Mon-Thursday Public Counter Hours 7:30 a.m. to 5:00 p.m.

Standard Office hours Mon-Thursday from 7:00 a.m. to 6:00 p.m.

Website: <https://www.ci.colton.ca.us/782/Planning-Division>

Directory of Phone Numbers and Contact Information:

<https://www.ci.colton.ca.us/directory.aspx?did=21>



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Jim Woods  
Greystar  
3625 Del Amo Blvd, Suite 270  
Torrance, CA 90503  
Jim.Woods@greystar.com

February 3, 2025

Colton City Council  
650 N La Cadena Drive  
Colton, CA 92324

**Re: Birchway Colton Crossing – Letter of Support for Zone Change**

To the Colton City Council,

It is an honor to write this letter of support for our proposed Project in the City of Colton and to formally request an expansion of the R-O Residential Overlay that will allow for its development. My name is Jim Woods and I am a Regional Director for Greystar ([www.greystar.com](http://www.greystar.com)), one of the world’s largest real estate companies.

When our CEO Bob Faith started Greystar in 1993, he envisioned the need for an institutional rental housing leader— a blue-chip company operating with the highest integrity and character, delivering world-class services to residents, property owners, and investors by doing things the right way. Today, Greystar is a vertically integrated company with services spanning investments, development, construction, and management. To provide a sense of scale, we currently own \$78 billion in assets, have developed more than \$36 billion in assets, and manage over 1,000,000 units and beds worldwide. While our global reach is extensive, we pride ourselves on our strong local presence, with dedicated teams that deeply understand the communities we serve. Throughout this project, I will be your primary point of contact, supported by a skilled and dedicated team with best-in-class expertise.

We are under contract to acquire approximately 6.5 acres at the northeast corner of E. Santo Antonio Dr & Mount Vernon Ave (the “Property”). Our goal is to develop a four-story, 256-unit, Class A garden-style rental apartment community, known as “Birchway Colton Crossing” (the “Project”). These Class A apartment homes will offer high-end features, including quartz counter-tops, stainless-steel appliances, in-unit washers and dryers, spacious closets, private balconies, building-wide Wi-Fi, and multiple color schemes. The landscaped and gated community will feature premium amenities, such as a resort-style pool deck and sundeck lounge, a state-of-the-art fitness center, a coworking lounge, outdoor kitchens, and ample resident parking. We believe this Project will serve as a catalyst for economic development, revitalizing a key corner in the Cooley Ranch neighborhood and providing high-quality housing for the City of Colton.

For the Project to proceed, the Property must be zoned for residential development. The Property comprises two parcels: APN 0276-144-30-0000 (1.27 acres) and APN 0276-144-31-0000 (5.23 acres). Both parcels are currently zoned C-2 General Commercial, with a R-O Residential Overlay applied to the larger parcel, but not to the smaller parcel. Insofar as City Council is supportive of the Project we envision, we kindly request consideration to expand the R-O Residential Overlay to include the entire Property.

We are currently under a limited duration due diligence period to assess the Project's viability, which includes the pathway for necessary zoning. As such, timely attention to this matter would be greatly appreciated. I welcome the opportunity to answer any questions regarding the Project and sincerely thank you for your consideration.

Sincerely,



Jim Woods  
Director

**From:** [Mario Suarez](#)  
**To:** [Kristen Tuosto](#)  
**Cc:** [Alison Rondone](#)  
**Subject:** RE: CEQA: Housing Element Programs 10 & 11 General Plan Amendment and Rezone, City of Colton [CIT-COLT-2025-1]  
**Date:** Monday, February 10, 2025 5:37:51 PM

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Hello:

Thank you for your response. The link to the housing element and answer to your question is here: [https://www.ci.colton.ca.us/DocumentCenter/View/8615/Colton\\_HEU\\_Final\\_9-20-2023](https://www.ci.colton.ca.us/DocumentCenter/View/8615/Colton_HEU_Final_9-20-2023)

At this time there are no projects as part of this General Plan Amendment and Rezone. This is to address the City's Regional Housing Needs Assessment (RHNA) requirements.

We are more than happy to meet with you.

Please let me know of your availability. Remember – this is a time for CEQA Scoping prior to completing a draft EIR.

There will be a “by-right” development for some residential projects and mixed-use projects. However, this does not mean that tribal review of any grading cannot be established.

Thank you,

Mario Suarez, AICP  
Planning Division  
909-370-5523

---

**From:** Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>  
**Sent:** Monday, February 10, 2025 4:07 PM  
**To:** Mario Suarez <msuarez@coltonca.gov>  
**Subject:** CEQA: Housing Element Programs 10 & 11 General Plan Amendment and Rezone, City of Colton [CIT-COLT-2025-1]

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Dear Mario Suarez,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on January 21, 2025.

This effort is located within Serrano ancestral lands and may impact tribal cultural resources, and therefore, YSMN would like to initiate consultation pursuant to CEQA (AB 52 and SB18) and CA PRC 21080.3.1 and is requesting additional information concerning the proposed zoning changes, to include draft text, maps, cultural report, etc.

YSMN is also requesting a draft copy of the Housing Element Programs 10 & 11 General Plan Amendment and Rezone to review the proposed updates.

Furthermore, we want to know if the Housing Element Programs 10 & 11 General Plan Amendment and Rezone would trigger any ground-disturbing 'by-right development' that would preclude the YSMN from consulting on any developments pursuant to CEQA/AB52? We want to ensure that the YSMN can provide mitigation measures for ground-disturbing projects as they appear due to the potential to impact tribal cultural resources in the area.

If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Regards,  
Kristen

**Kristen Tuosto**

Tribal Archaeologist

[Kristen.Tuosto@sanmanuel-nsn.gov](mailto:Kristen.Tuosto@sanmanuel-nsn.gov)

O:(909) 864-8933 x 50-3421

M:(909) 725-1357

26569 Community Center Dr Highland, California 92346



**DEPARTMENT OF WATER RESOURCES**

P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



2/19/2025

Mario Suarez  
Planning Manager  
659 North La Cadena Drive  
Colton CA 92324  
msuarez@coltonca.gov

SCH#2025010520 Housing Element Program 10 & 11 General Plan Amendment and Rezone Notice of Preparation of a Draft EIR (NOP)

Dear Mr. Suarez:

The California Department of Water Resources (DWR) has conducted a review of the City of Colton's Housing Element Program 10 & 11 General Plan Amendment and Rezone Notice of Preparation of a Draft Environment Impact Report (EIR) and appreciate the opportunity to provide the following comments.

### **Project Location and Setting**

This project proposed to amend the City of Colton's General Plan by adding Housing Element Program 10 & 11 and rezone areas for the new Housing Element Program 10 & 11 as needed.

### **General Comment**

DWR supports the City's compliance with Government Code Article 10.6 Housing Element which requires the City to contribute to the attainment of state housing goals, including identifying sites that are suitable for residential development and housing for lower income households. At the same time, DWR has a statutory obligation to provide a reliable source of clean and affordable drinking water through State Water Project (SWP) deliveries. This requires the SWP infrastructure to be maintained in good working order, including the Santa Ana Pipeline (SAPL), a 28-mile-long buried pipeline which conveys water through urbanized San Bernadino County and into Riverside County. In order to guarantee access to the facilities, DWR obtains the necessary property rights to protect and maintain SWP facilities, including the SAPL.

Based on the information provided in this NOP, it is likely that portions of the SAPL transverse some of the parcels identified for potential rezoning to a Mixed-Use Zone. Attached is an aerial view which identifies the location of the SAPL in the project area. We request that the DIER includes an exhibit which indicates the location of SWP facilities in the project area similar to the aerial photo we provide.

A description of DWR Facilities needs to be included as well. We suggest the following be included in the DEIR: *DWR facilities located within Area 4 and 5 include 108-inch I.D.*

Mario Suarez, Planning Manager

2/19/2025

Page 2

*Waterline (Santa Ana Pipeline), Manhole Structures (2 total) and Corrosion Test Stations (3 total).*

### **Specific Comments**

#### **DENSITIES AND AFFORDABILITY ASSUMPTIONS:**

The last paragraph on page 9 explains that Table 4 summarizes the five areas where sites have the potential for rezone and includes the existing and proposed General Plan land use and zoning designation for each site, as well as the range of densities that would be allowed and the maximum capacity for residential units and that exhibits 3 through 6 provide illustrations of the areas proposed for rezone under Program 10 & 11.

Table 4 does not identify existing property rights, such as easements, for the proposed project 's parcels. DWR requests that a column be added which includes existing property rights for each of the properties listed on table 4. The Parcels Numbers for the properties the Santa Ana Pipeline crosses include 0164-28-101, 0164-28-102, 0164-18-108, 0164-18-251, 0164-18-248.

The Assessor's Parcel Numbers for Area 4 and 5 shown in Tables 1 & 4 Potential Sites for Rezone under Program 10/11 Rezone/GPA do not match Exhibit 6. Please identify the correct parcel and update the information accordingly.

Exhibit 6 – Area 4 and 5 are proposed to be rezoned from I-P Industrial Park to MU Mixed Use Downtown areas appear to be located directly over DWR's Santa Ana Pipeline spanning between Warm Creek and Interstate 10. DWR Facilities in this area include the following:

- a. 108-inch I.D. Santa Ana Pipeline, see As-built Drawing No. V-7F1-6, V-7F1-7, V-7F1-8, V-7F1-9, V-7F1-10.
- b. 3 Corrosion Test Stations (Sta. 186+00, 200+54, 207+80), see As-built Drawing No. V-7J1-2.
- c. Air Valve and 24-inch Nozzle Manhole Structure at Sta. 189+00, see As-built Drawing No. V-7L1-1-1 and V-7P2-1.
- d. 24-inch Nozzle Manhole Structure at Sta. 210+00, see As-built Drawing No. V-7P4-2 and V-7P2-1.

In addition, please add to Exhibit 2, Exhibit 3 all DWR facilities listed above,

#### **REGULATORY REQUIREMENTS, PERMITS AND APPROVALS:**

##### *Other Government Agency Approvals*

Please add the Department of Water Resources to the list of *Other Government Agency Approvals*.

Per Title 23, Section 600 et seq. of the California Code of Regulations, DWR right of way

Mario Suarez, Planning Manager

2/19/2025

Page 3

is required to be free of encumbrances that may impact DWR facilities. Under those regulations, improvements within DWR right of way are limited to a greenbelt area or the equivalent. No permanent structures are allowed within DWR right of way. Any improvements proposed within DWR right of way will need to acquire an encroachment permit from DWR. The proposed design plans for parcel numbers including 0164-28-101, 0164-28-102, 0164-18-108, 0164-18-251, 0164-18-248 (shown on Exhibit 6 of NOP) may need to be revised or modified to accommodate DWR right of way where the pipeline crosses through these parcels. All DWR facilities listed above shall be protected in place and will not be relocated or removed for the proposed parcels.

### **NOC Notice**

The NOC for the NOP did not include the Department of Water Resources as a reviewing agency on the Reviewing Agencies Checklist. Please include DWR as a reviewing agency on the checklist.

For inquiries about DWR's encroachment permit requirements, you may email [swp.encroachments@water.ca.gov](mailto:swp.encroachments@water.ca.gov). You can also contact Delia Grijalva by telephone at (916) 621-8646.

Please send all project notifications to DWR at [NotifyDWR@water.ca.gov](mailto:NotifyDWR@water.ca.gov). If you have any questions or need additional information from me, please contact me at [Nancy.Finch@water.ca.gov](mailto:Nancy.Finch@water.ca.gov) or (916) 820-8124.

Sincerely,



Nancy Finch  
Attorney III  
Office of the General Counsel

enclosure



**DWR Manhole Structure**

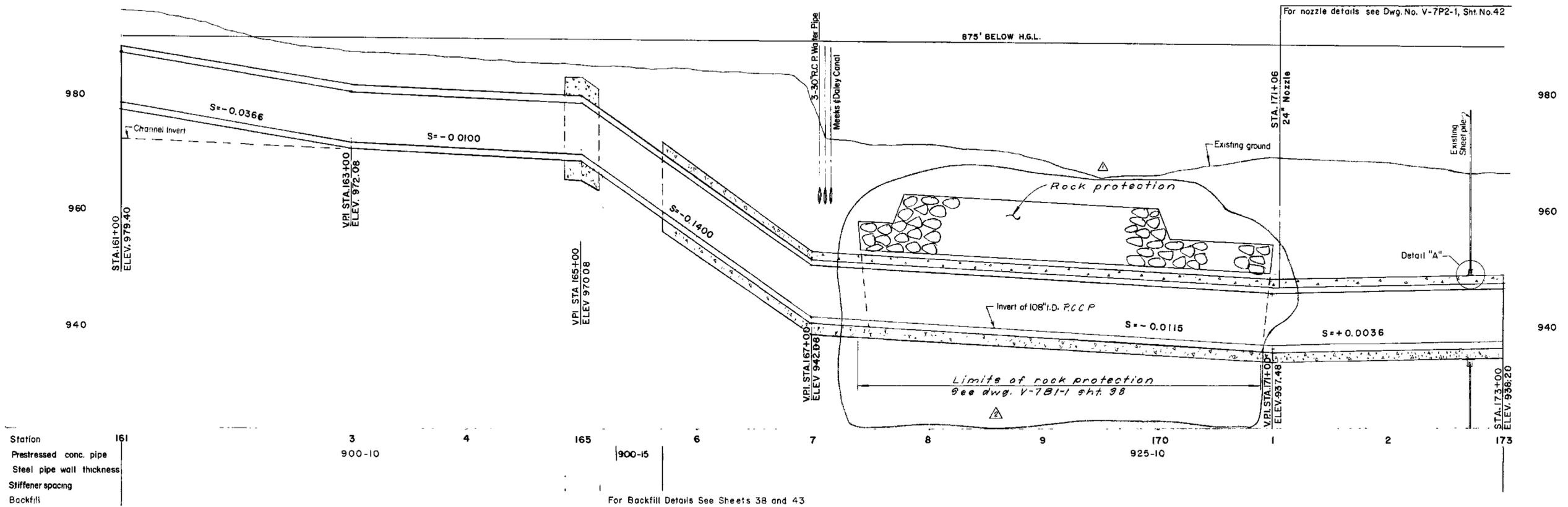
**DWR Corrosion Test Station (MP423.00)**

**DWR 108-inch I.D. Waterline (Santa Ana Pipeline)**

**DWR Corrosion Test Station (MP423.27)**

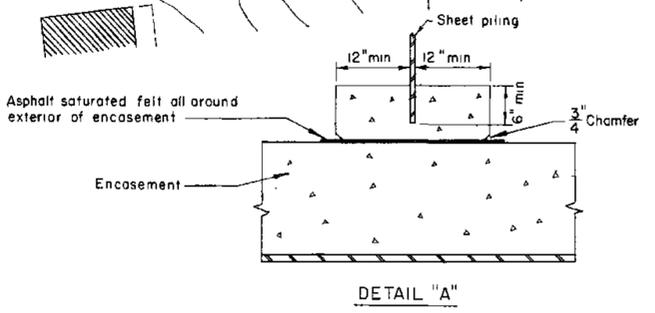
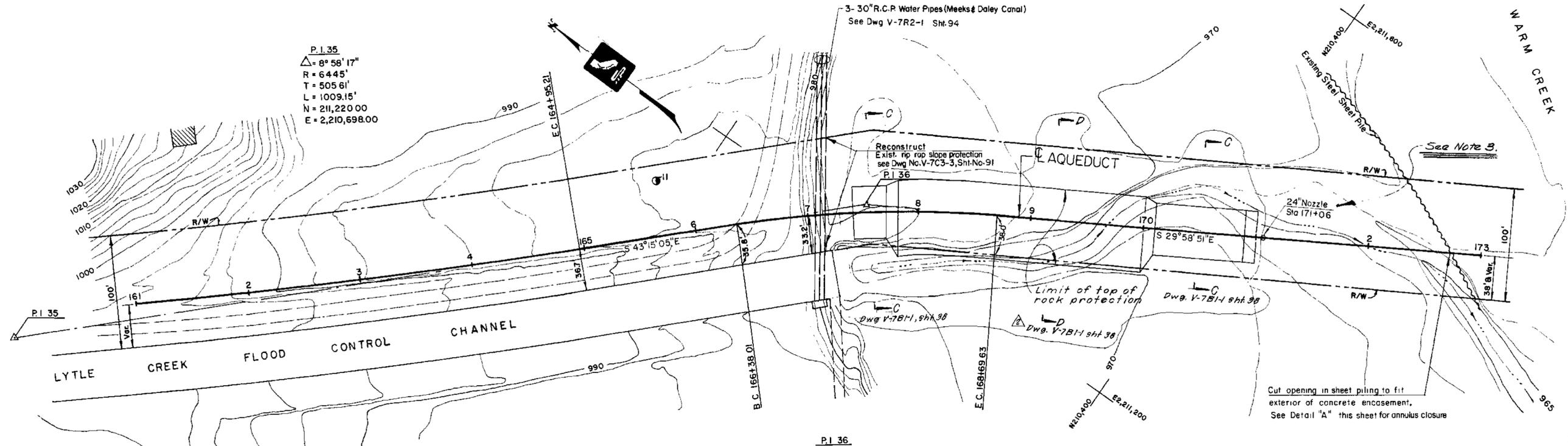
**DWR Manhole Structure**

**DWR Corrosion Test Station (MP423.41)**

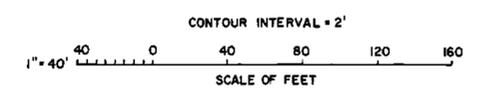


Station 161  
 Prestressed conc. pipe  
 Steel pipe wall thickness  
 Stiffener spacing  
 Backfill

For Backfill Details See Sheets 38 and 43



- NOTES:
1. Provide shored trench between Sta. 165+15 and Sta. 167+30 Per Dwg. No. V-7B1-1, sheet No. 38
  2. For anchor block and encasement dimensions & reinforcement details see encasement schedules per Dwg. No. V-7P4-1, sheet No. 44
  3. Manhole shaft installed by Spec 7A-10, to conform to embankment fill from Lytle Creek Extension constructed by US Corps of Engineers 10, 1975. Refer CofE Spec No. DACW 09-73-B-0047.



REVIEWED—STAFF ENGINEERING, BR.	3	1/2/75	REVIEWED BY DESIGN	6/2/75	1/1/75
	Δ	6-15-71	Added rock protection		
	Δ	6-22-70	Existing Ground Change		
DESIGNED	J.G. Weikel	DRAWN	T.F.	CHECKED	W.D. [Signature]
DATE				REVIEWED	[Signature]

**SAFETY — as Necessary as WATER**

STATE OF CALIFORNIA  
 THE RESOURCES AGENCY  
 DEPARTMENT OF WATER RESOURCES  
 DIVISION OF DESIGN AND CONSTRUCTION

STATE WATER FACILITIES  
 CALIFORNIA AQUEDUCT  
 SANTA ANA DIVISION  
 MILL STREET TO SUGARLOAF MOUNTAIN  
 PLAN AND PROFILE  
 STATION 161+00 TO STATION 173+00

SUBMITTED: [Signature]  
 CHIEF DESIGN SECTION, SEE C.E. NO. 8477

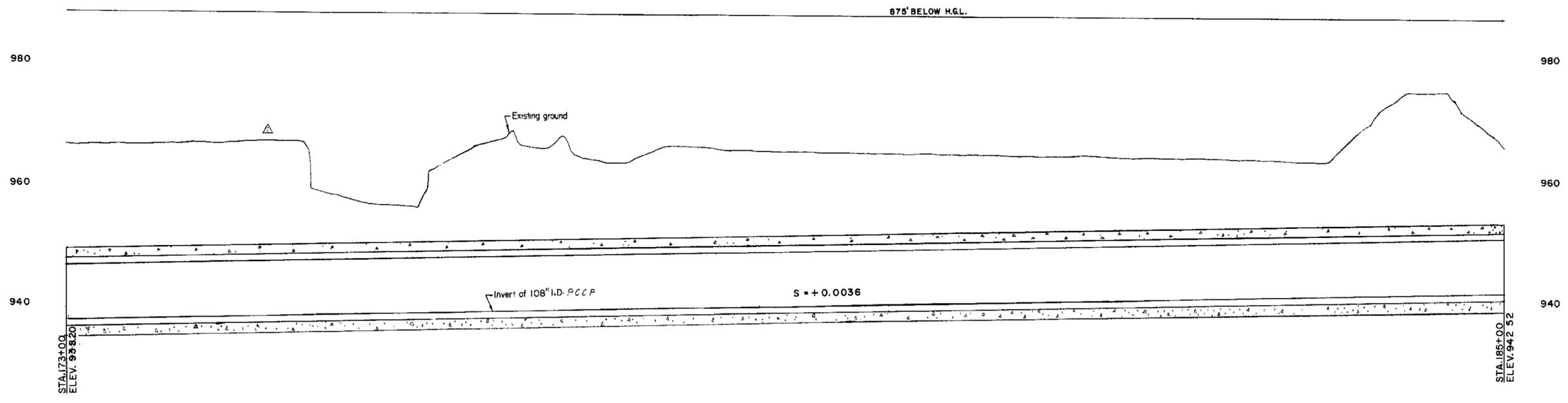
APPROVAL RECOMMENDED: [Signature]  
 CHIEF, S.C. & C. BRANCH 30, DISTRICT 885, C.E. NO. 7181

APPROVED: [Signature]  
 CHIEF, DESIGN BRANCH, DISTRICT 885, C.E. NO. 7181

DATE: APR 27 1970

DRAWING NO. V-7FI-6  
 SHEET NO. 10

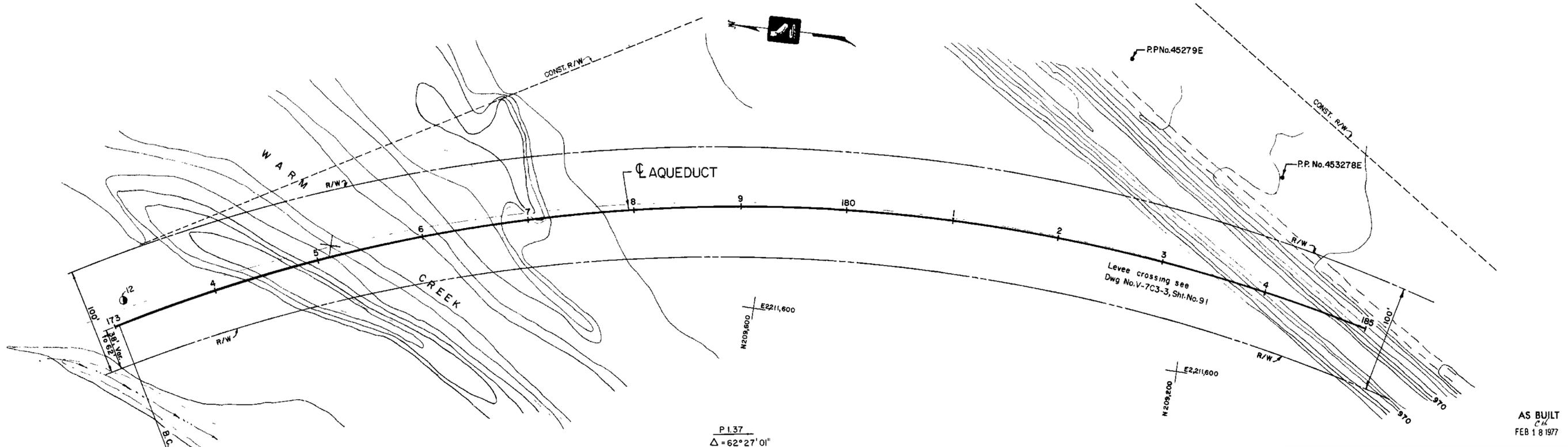
SHEET NO. 10  
 DRAWING NO. V-7FI-6



Station 173 4 175 6 7 8 9 180 1 2 3 4 185  
 Prestressed conc pipe  
 Steel pipe wall thickness  
 Stiffener spacing  
 Backfill

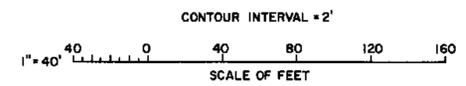
925-10

For Backfill Details See Sheet 44



NOTE: For encasement dimensions & reinforcement details see Dwg. No. V-7P4-1, sheet No. 44

P.I. 37  
 $\Delta = 62^\circ 27' 01''$   
 $R = 1575'$   
 $T = 954.80'$   
 $L = 1716.69'$   
 $N = 209,358.26$   
 $E = 2,211,974.71$



AS BUILT  
 CH  
 FEB 18 1977

**SAFETY — as Necessary as WATER**

STATE OF CALIFORNIA  
 THE RESOURCES AGENCY  
 DEPARTMENT OF WATER RESOURCES  
 DIVISION OF DESIGN AND CONSTRUCTION

STATE WATER FACILITIES  
 CALIFORNIA AQUEDUCT  
 SANTA ANA DIVISION  
 SANTA ANA VALLEY PIPELINE  
 MILL STREET TO SUGARLOAF MOUNTAIN  
 PLAN AND PROFILE  
 STATION 173+00 TO STATION 185+00

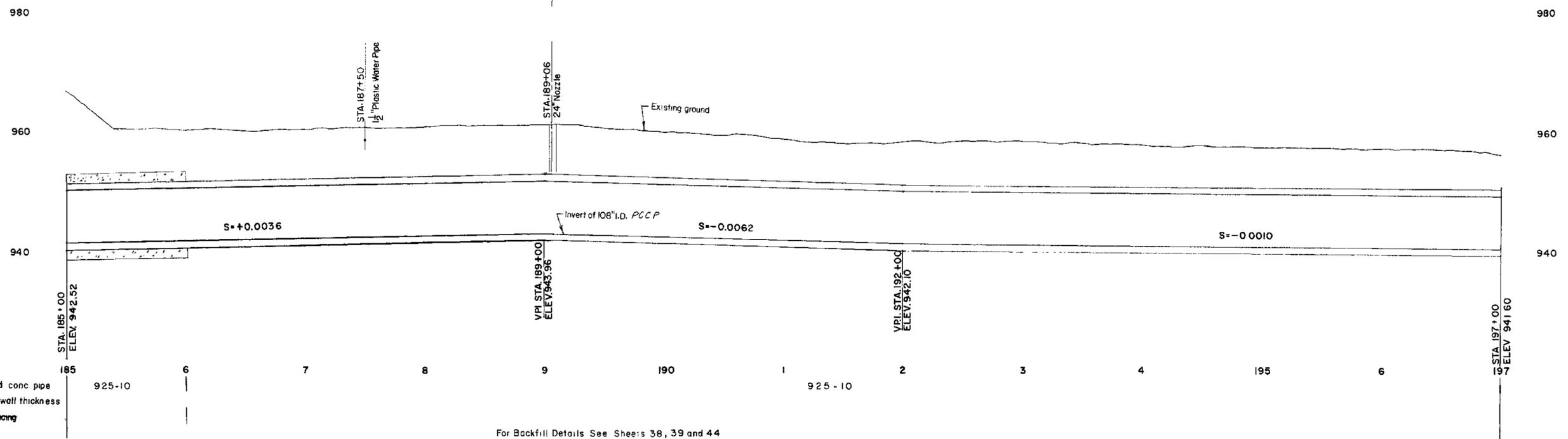
SUBMITTED: <i>[Signature]</i> CHIEF DESIGN SECTION REG. C.E. NO. 8477 APPROVAL RECOMMENDED: <i>[Signature]</i> CHIEF, DIST. DIVISION, REG. C.E. NO. 7914 APPROVAL RECOMMENDED: <i>[Signature]</i> DISTRICT ENGINEER, REG. C.E. NO. 8012	APPROVED: <i>[Signature]</i> DATE: APR 27 1970 DRAWING NO. V-7F1-7 SHEET NO. 11
--	--

REVIEWED—STAFF ENGINEERING, BR.	2 <i>[Signature]</i>	REVIEWED BY DESIGN	2 <i>[Signature]</i>
DESIGNED	J.G. Weikel	DRAWN	T.R.
CHECKED	<i>[Signature]</i>	REVIEWED	<i>[Signature]</i>
DATE		DATE	

SHEET NO. 11  
 DRAWING NO. V-7F1-7

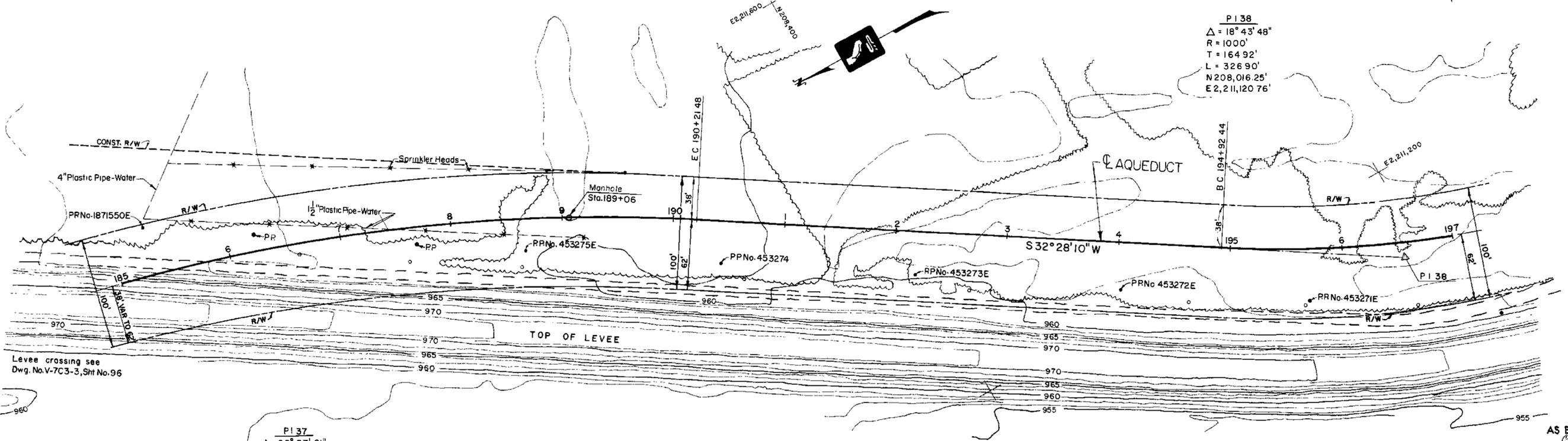
For Air Valve details see Dwg No V-7L1-1, Sht No 76  
 For nozzle details see Dwg No V-7P2-1, Sht No 42

875' BELOW H.G.L.



Station  
 Prestressed conc pipe  
 Steel pipe wall thickness  
 Stiffener spacing  
 Backfill

For Backfill Details See Sheets 38, 39 and 44

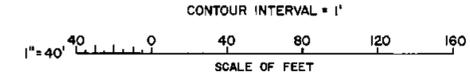


Levee crossing see  
 Dwg. No. V-7C3-3, Sht No. 96

AS BUILT  
 FEB 18 1977

NOTES: 1. For encasement dimensions & reinforcement details, see encasement schedule per Dwg. No. V-7P4-1, sheet No. 44  
 2. Provide shored trench between Sta. 186+15 and Sta. 186+35 and between Sta. 187+55 and Sta. 187+75.

LEGEND  
 P.P. = Power Pole or Telephone Pole



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STATE OF CALIFORNIA  
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 DEPARTMENT OF WATER RESOURCES  
 DIVISION OF DESIGN AND CONSTRUCTION

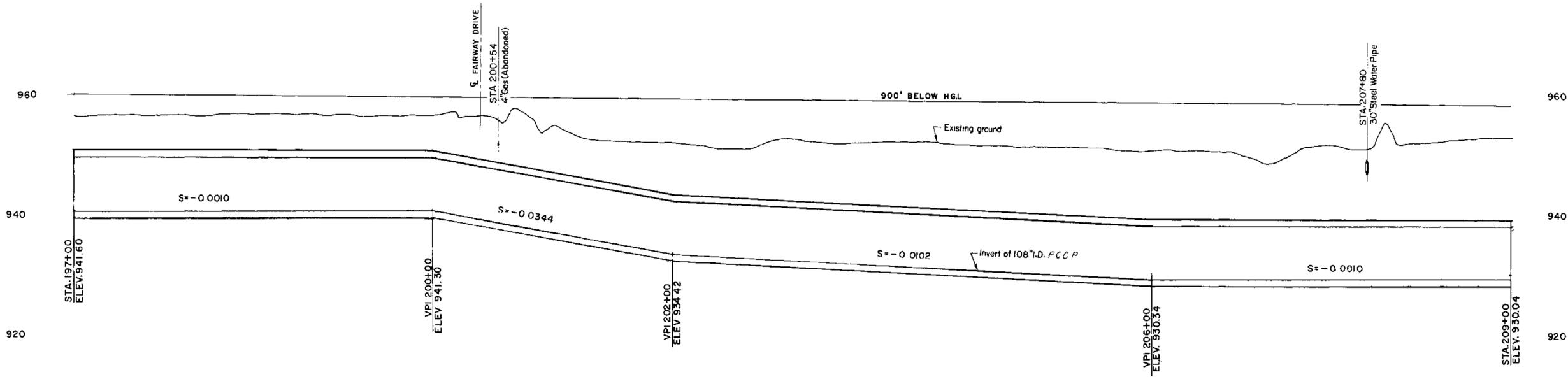
STATE WATER FACILITIES  
 CALIFORNIA AQUEDUCT  
 SANTA ANA DIVISION  
 SANTA ANA VALLEY PIPELINE  
 MILL STREET TO SUGARLOAF MOUNTAIN  
**PLAN AND PROFILE**  
 STATION 185+00 TO STATION 197+00

SUBMITTED: [Signature]  
 CHIEF DESIGN ENGINEER: REG. C.E. NO. 3477  
 APPROVAL RECOMMENDED: [Signature]  
 CHIEF ENGINEER: REG. C.E. NO. 1372

APPROVED: [Signature]  
 DATE: APR 27 1970

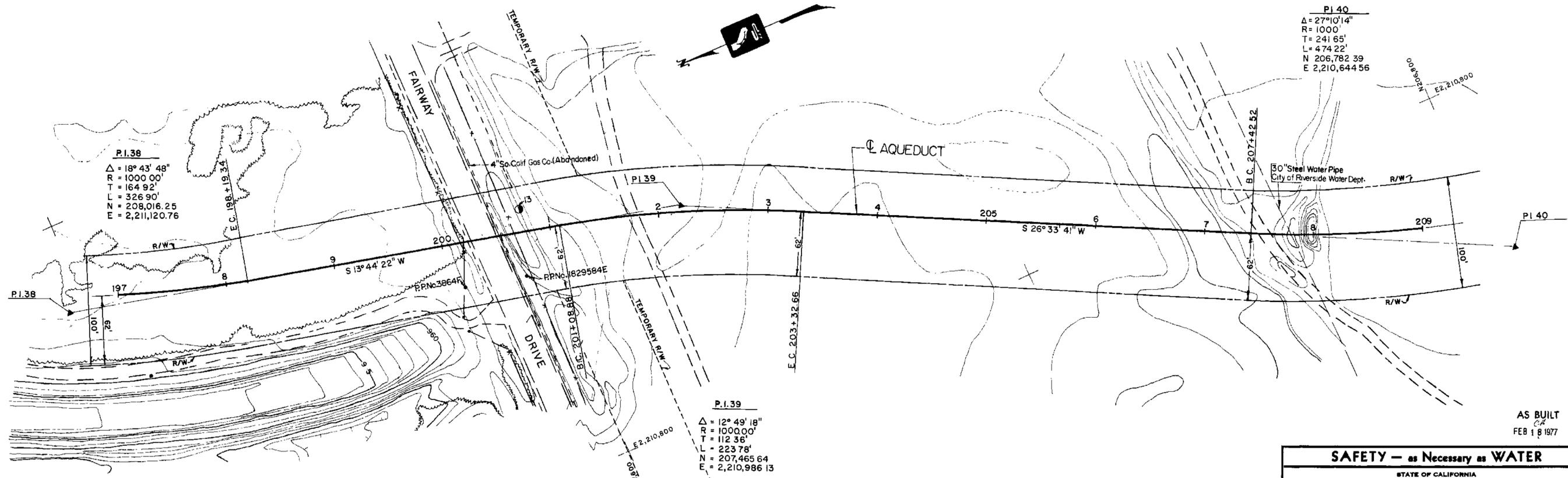
DRAWING NO. V-7FI-8  
 SHEET NO. 12

REVIEWED—STAFF ENGINEERING BR.	2 MAR 73	REVIEWED BY DESIGN	470	MJ
BY: J.G. Weikel	DATE: 6-22-70	DESCRIPTION: Added Air Valve at Sta 189+06	SM	DU
DESIGNED	DRAWN	CHECKED	REVIEWED	APPROVED
	T.R.	[Signature]	[Signature]	[Signature]



Station	197	8	9	200	1	2	3	4	205	6	7	8	209
Prestressed conc pipe				925-10								925-15	
Steel pipe wall thickness								1 1/8"					
Stiffener spacing								18 Feet					
Backfill												12 Feet	

For Backfill Details See Sheets 38 and 39



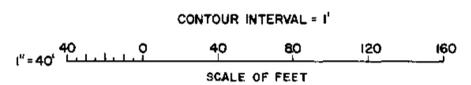
**P.I. 38**  
 $\Delta = 18^\circ 43' 48''$   
 $R = 1000.00'$   
 $T = 164.92'$   
 $L = 326.90'$   
 $N = 208,016.25$   
 $E = 2,211,120.76$

**P.I. 39**  
 $\Delta = 12^\circ 49' 18''$   
 $R = 1000.00'$   
 $T = 112.36'$   
 $L = 223.78'$   
 $N = 207,465.64$   
 $E = 2,210,986.13$

**P.I. 40**  
 $\Delta = 27^\circ 10' 14''$   
 $R = 1000'$   
 $T = 241.65'$   
 $L = 474.22'$   
 $N = 206,782.39$   
 $E = 2,210,644.56$

**LEGEND**  
 P.P. = Power Pole or Telephone Pole

FOR FAIRWAY DRIVE DETOUR DETAILS SEE  
 DWG. NO. V-7M2-1, SHEET NO. 83



AS BUILT  
 FEB 18 1977

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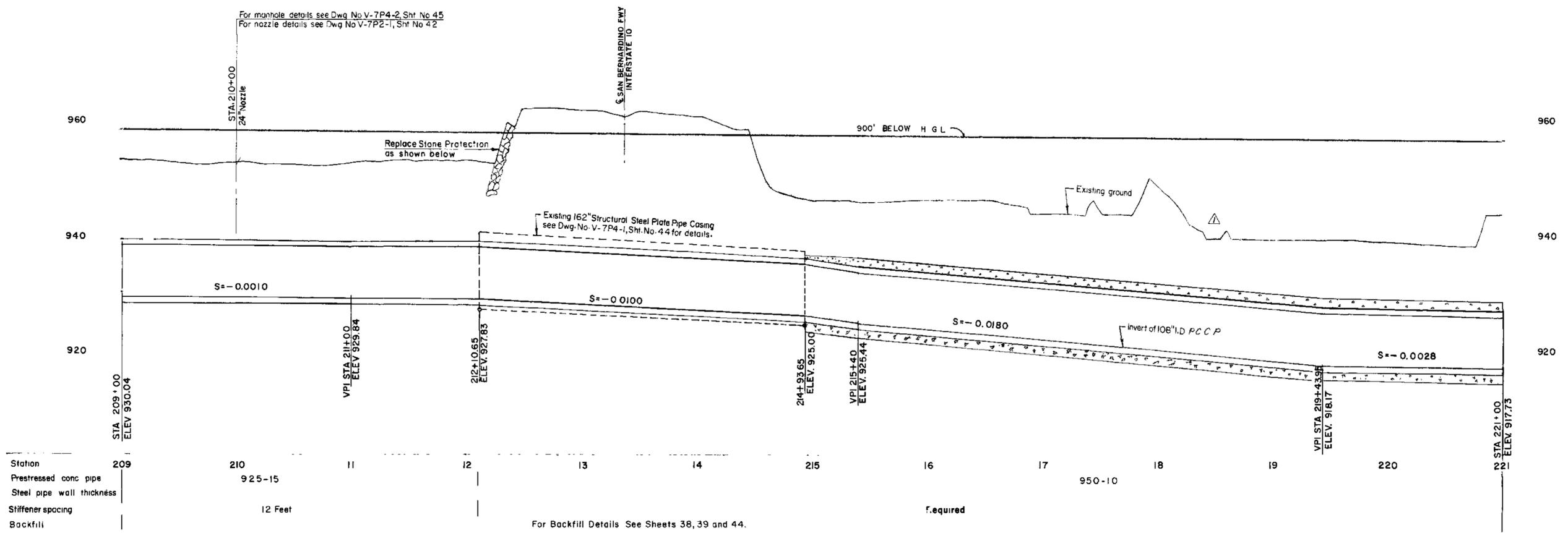
STATE OF CALIFORNIA  
 THE RESOURCES AGENCY  
 DEPARTMENT OF WATER RESOURCES  
 DIVISION OF DESIGN AND CONSTRUCTION

STATE WATER FACILITIES  
 CALIFORNIA AQUEDUCT  
 SANTA ANA DIVISION  
 SANTA ANA VALLEY PIPELINE  
 MILL STREET TO SUGARLOAF MOUNTAIN  
**PLAN AND PROFILE**  
 STATION 197+00 TO STATION 209+00

SUBMITTED: <i>G.M. Rouse</i>	APPROVED: <i>J. J. Wineland</i>
CHIEF DESIGN REVISION: RES. C.E. NO. 2477	DATE: APR 27 1970
APPROVAL RECOMMENDED: <i>David Werkel</i>	CHIEF DESIGN ENGINEER, S.A.S. REG. CE. NO. 4500
DESIGNED: <i>J.G. Werkel</i>	DRAWN: T.R.
CHECKED: <i>David Werkel</i>	REVIEWED: <i>J.G. Werkel</i>
DATE: _____	DATE: _____

DRAWING NO. **V-7FI-9** SHEET NO. **13**

For manhole details see Dwg No V-7P4-2, Sht No 45  
 For nozzle details see Dwg No V-7P2-1, Sht No 42



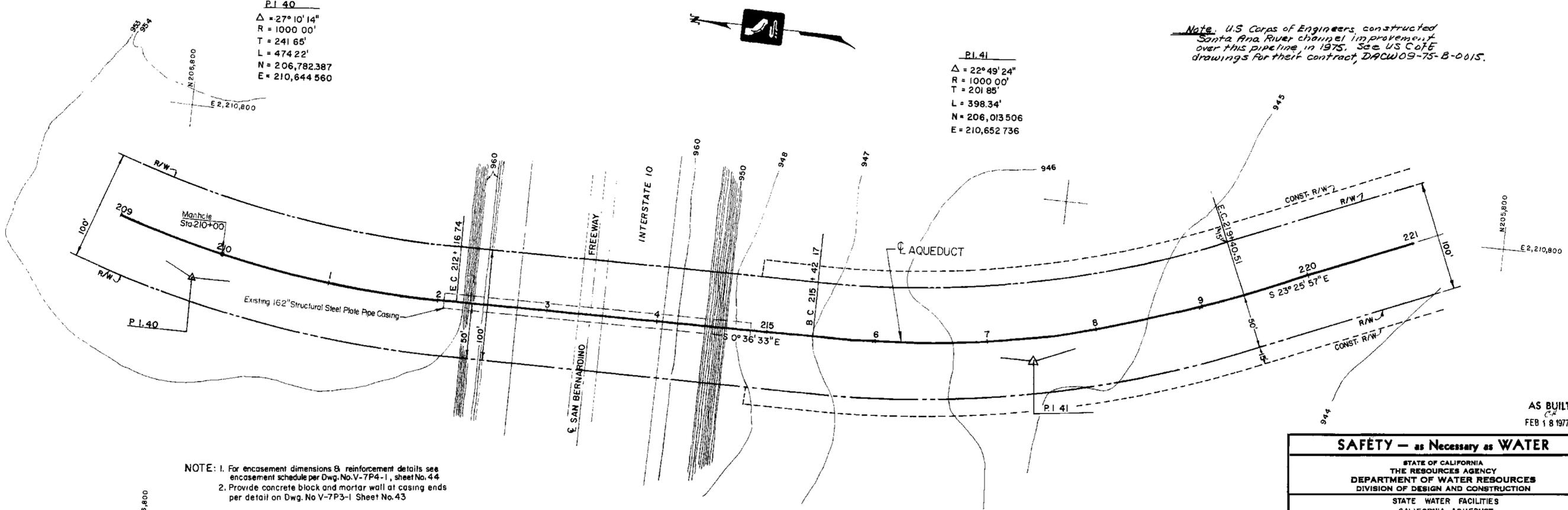
Station	209	210	211	212	213	214	215	216	217	218	219	220	221
Prestressed conc pipe		925-15											
Steel pipe wall thickness													
Stiffener spacing		12 Feet											
Backfill								Required					

For Backfill Details See Sheets 38, 39 and 44.

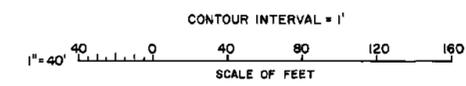
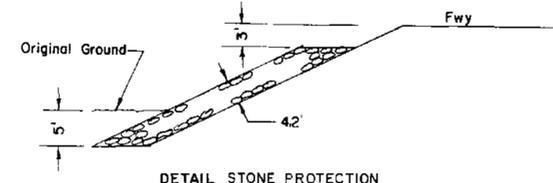
PI 40  
 $\Delta = 27^\circ 10' 14''$   
 $R = 1000.00'$   
 $T = 241.65'$   
 $L = 474.22'$   
 $N = 206,782.387$   
 $E = 210,644.560$

PI 41  
 $\Delta = 22^\circ 49' 24''$   
 $R = 1000.00'$   
 $T = 201.85'$   
 $L = 398.34'$   
 $N = 206,013.506$   
 $E = 210,652.736$

Note: U.S. Corps of Engineers constructed Santa Ana River channel improvement over this pipeline in 1975. See US CofE drawings for their contract, DACW09-75-B-0015.



NOTE: 1. For encasement dimensions & reinforcement details see encasement schedule per Dwg. No. V-7P4-1, sheet No. 44  
 2. Provide concrete block and mortar wall at casing ends per detail on Dwg. No V-7P3-1 Sheet No. 43



AS BUILT  
 FEB 18 1977

**SAFETY — as Necessary as WATER**

STATE OF CALIFORNIA  
 THE RESOURCES AGENCY  
 DEPARTMENT OF WATER RESOURCES  
 DIVISION OF DESIGN AND CONSTRUCTION

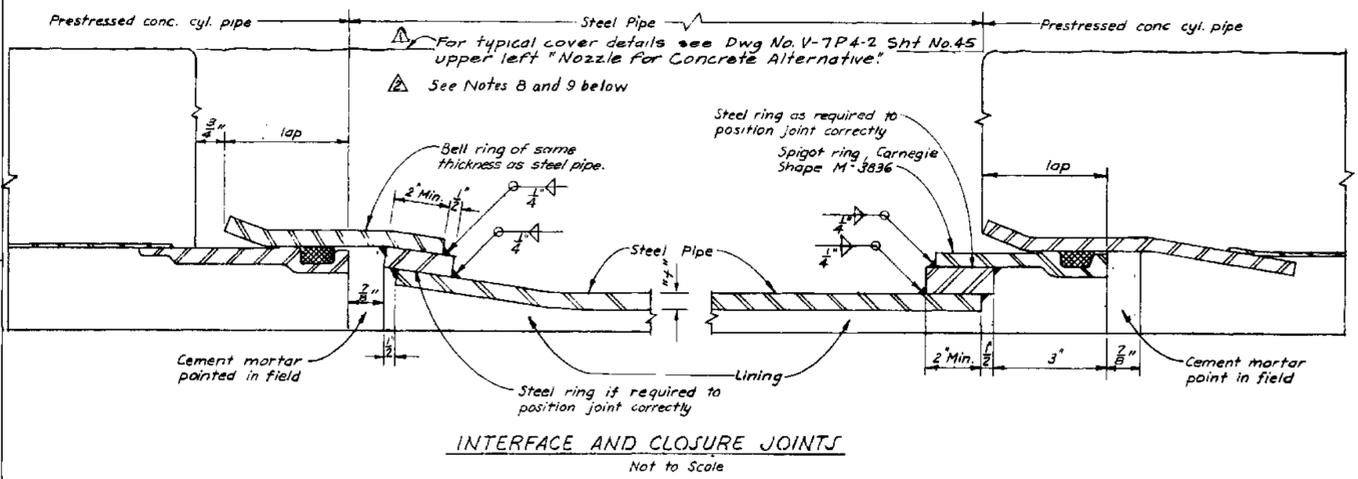
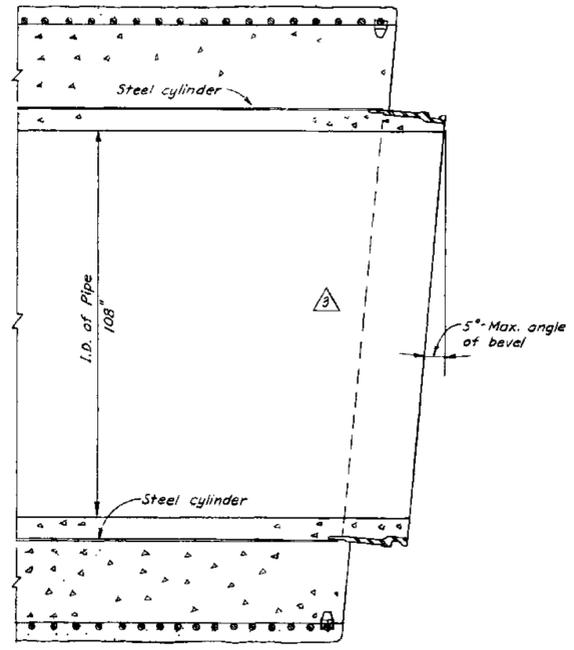
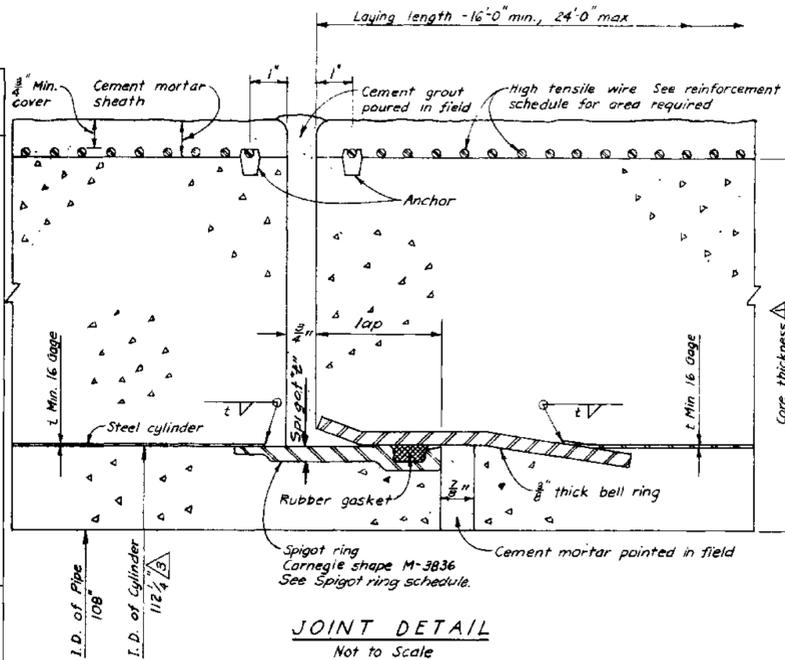
STATE WATER FACILITIES  
 CALIFORNIA AQUEDUCT  
 SANTA ANA DIVISION  
 SANTA ANA VALLEY PIPELINE  
 MILL STREET TO SUGARLOAF MOUNTAIN  
**PLAN AND PROFILE**  
 STATION 209+00 TO STATION 221+00

REVIEWED—STAFF ENGINEERING, BR.	2 10/17/75	REVIEWED BY DESIGN	620 1/12	SUBMITTED: <i>W. Gould</i>	APPROVED: <i>J. J. Wineland</i>	DATE: APR 27 1970
DESIGNED: <i>J.G. Weikel</i>	DATE:	DRAWN: T.R.	CHECKED: <i>David Mack</i>	APPROVAL RECOMMENDED: <i>David Mack</i>	CHIEF, DESIGN BRANCH, DISTRICT REG. C.E. NO. 7122	CHIEF, DESIGN BRANCH, DISTRICT REG. NO. 7227
BY:	DATE:	DATE:	DATE:	DATE:	DRAWING NO. V-7F1-10	SHEET NO. 14

SHEET NO. 14  
 DRAWING NO. V-7F1-10

PRESTRESSED CONCRETE CYLINDER PIPE SCHEDULE

Core Thickness	Pipe Class	Min. conc. strength of wrap, psi	Conc. strength of 28 days psi	Total Area of Class II Wire, in. <sup>2</sup> /ft.								Spigot ring schedule
				One Layer Wrap				Two Layer Wrap				
				#8	#6	$\frac{1}{4}$ "	$\frac{3}{16}$ "	#8	#6	$\frac{1}{4}$ "	$\frac{3}{16}$ "	
	225-10	3000	4500	0.574								
	250-10	3000	4500	0.624								
	275-10	3000	4500	0.684								
	300-10	3000	4500	0.734								
	325-10	3000	4500		0.815							
	350-10	3000	4500		0.875							
	375-15	3000	4500						1.114			
	400-15	3000	4500						1.164			
	425-15	3000	4500						1.214			
	450-15	3000	4500						1.274			
	475-15	3000	4500						1.334			
	500-15	3000	4500						1.389			
	525-15	3400	5000						1.444			
	550-10	3000	4500						1.244			
	575-10	3200	4500						1.308			
	600-10	3200	4500						1.374			
	625-10	3400	4500						1.434			
	625-15	3800	5500						1.654			
	650-10	3400	5000						1.554			
	650-15	3800	5500						1.720			
	675-10	3600	5000						1.626			
	675-15	4000	5500						1.774			
	700-10	3800	5000						1.886			
	700-15	4000	6000						1.888			
	725-10	4000	5000						1.856			
	725-15	4200	5500						1.978			
	725-20	4600	6500						2.236			
	750-10	4000	5500						1.918			
	750-15	4600	6000						2.018			
	775-10	4200	5500						1.998			
	775-15	4600	6000						2.078			
	775-20	4600	6500						2.398			
	800-10	4400	5500						2.068			
	800-15	4800	6000						2.148			
	825-10	4600	5500						2.148			
	850-10	4600	5500						2.208			
	850-15	4800	6000						2.288			
	875-10	4600	6000						2.298			
	875-15	4800	6000						2.428			
	900-10	5000	6000						2.488			
	900-15	5000	6000						2.498			
	925-10	5000	6000						2.570			
	925-15	5000	6000						2.570			
	950-10	5200	6000						2.658			
	950-15	5200	6500						2.658			
	750-25	4000	6500						2.228			
	800-25	4200	6500						2.358			
	900-20	4200	6500						2.368			
	925-20	4200	6500						2.528			
	925-25	4600	6500						2.798			
	950-20	4400	6500						2.598			
	950-25	4800	6500						2.868			



AS BUILT  
C.K.  
FEB 18 1977

- NOTES:
- The numbers under pipe class symbol designate design head and cover. Example: 200-10 = 200' head and 10' cover.
  - Center to center spacing of high tensile wire to be not less than two wire diameters nor more than 1 1/2 inches.
  - All welding to conform to the applicable provisions of the latest edition of the A.S.M.E Boiler and Pressure Vessel Code, Section VIII, Unfired Pressure Vessel.
  - For encasement details and station limits See Dwg. V-7P4-1, Sht. No. 44
  - Steel plate specials required for pipe with outlets. See Dwg. V-7P4-2, Sht. No. 42 and Dwg. V-7P2-5, Sht. No. 46
  - All cylinders to be 16 Gage
  - See plan and profile drawings for pipe wall thickness, for steel plate specials.

- Notes (Continued):
- For steel plate pipe specials with shop applied Cement mortar coating, fill joint recesses with cement grout.
  - For steel plate pipe specials with field applied Cement mortar coating, apply commercial quality Bond Breaker to exposed concrete surfaces of adjacent pipe section, and to any encasement concrete cover thereon, as approved by the engineer.

**SAFETY - as Necessary as WATER**

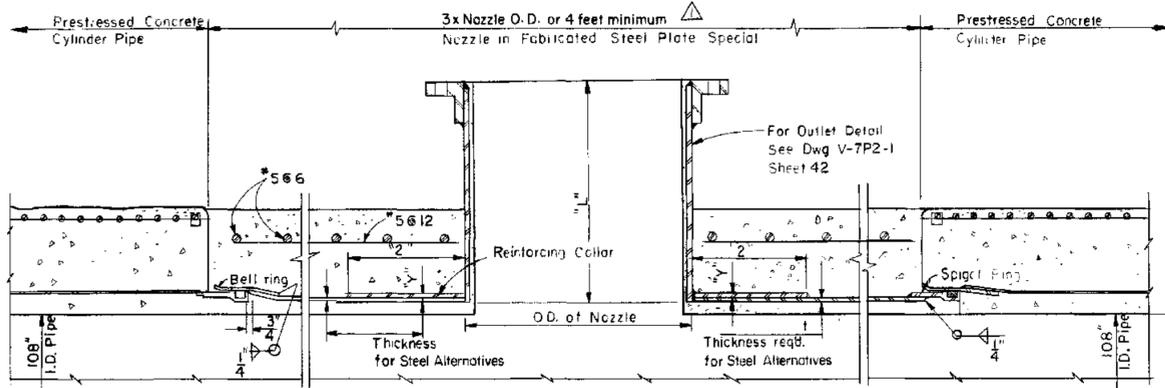
STATE OF CALIFORNIA  
THE RESOURCES AGENCY  
DEPARTMENT OF WATER RESOURCES  
DIVISION OF DESIGN AND CONSTRUCTION

STATE WATER FACILITIES  
CALIFORNIA AQUEDUCT  
SANTA ANA DIVISION  
SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
PRESTRESSED CONCRETE CYLINDER PIPE  
DETAILS

SUBMITTED: *[Signature]* DATE: APR 27 1977  
APPROVAL RECOMMENDER: *[Signature]* DATE: APR 27 1977  
APPROVED: *[Signature]* DATE: APR 27 1977  
DRAWING NO. V-7PI-1 SHEET NO. 41

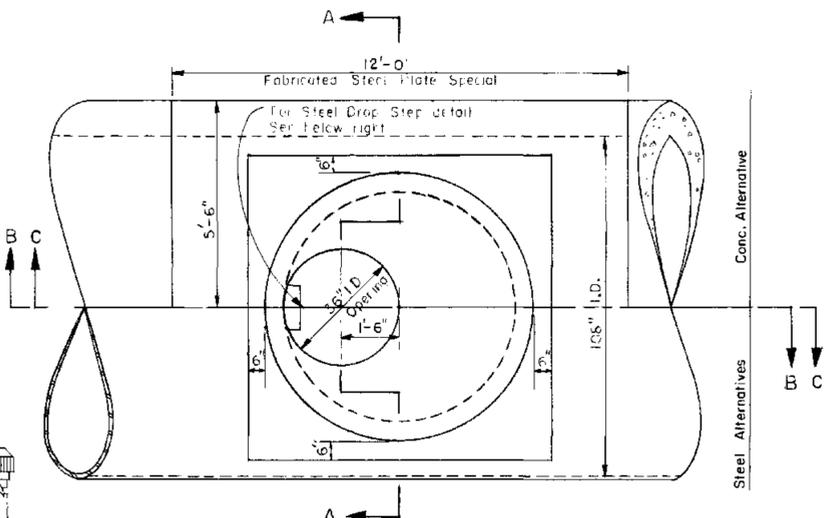
REVIEWED - STAFF ENGINEERING, BR.	3/26/75	REVIEWED BY DESIGN	3/22/75	APPROVED	3/22/75
	2/18/71	Added notes 8 and 9.			
	8/22/70	Revised Pipe Schedule and added cover detail for Closure Joint			
DESIGNED	DATE	DRAWN	CHECKED	REVIEWED	APPROVED
J.G. Weikel		J.G. Weikel	David Madoff	[Signature]	[Signature]



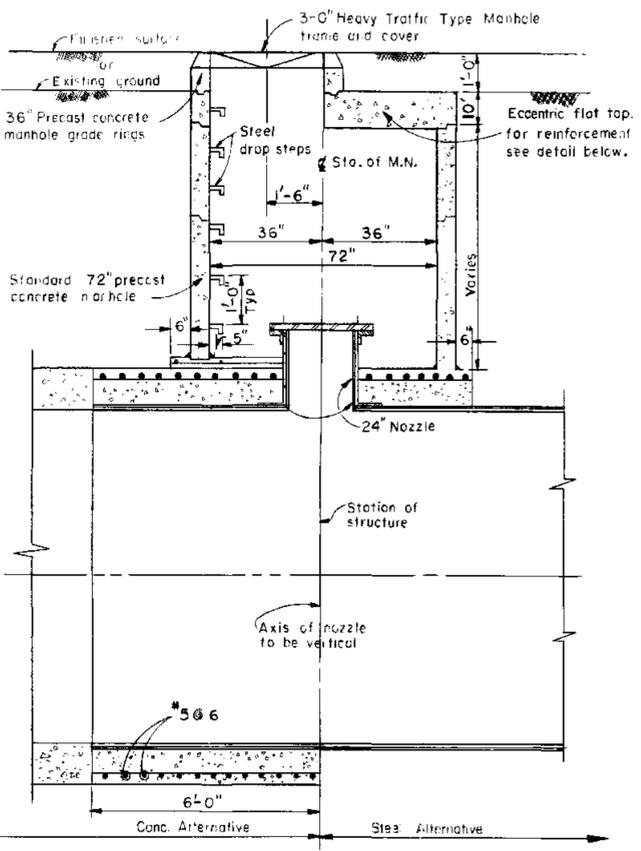


Notes:  
For nozzle detail and dimensions, See Dwg. V-7P2-1 Sheet 42

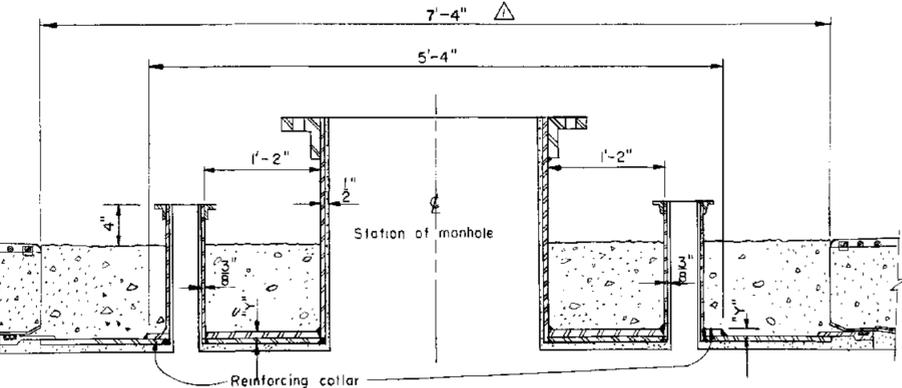
**NOZZLE FOR CONC. ALTERNATIVE**  
Not to Scale



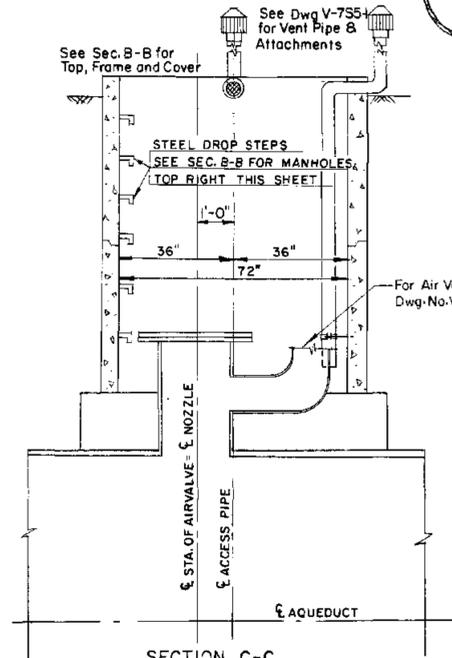
**MANHOLE STRUCTURE PLAN**  
Scale: 1/2" = 1'-0"



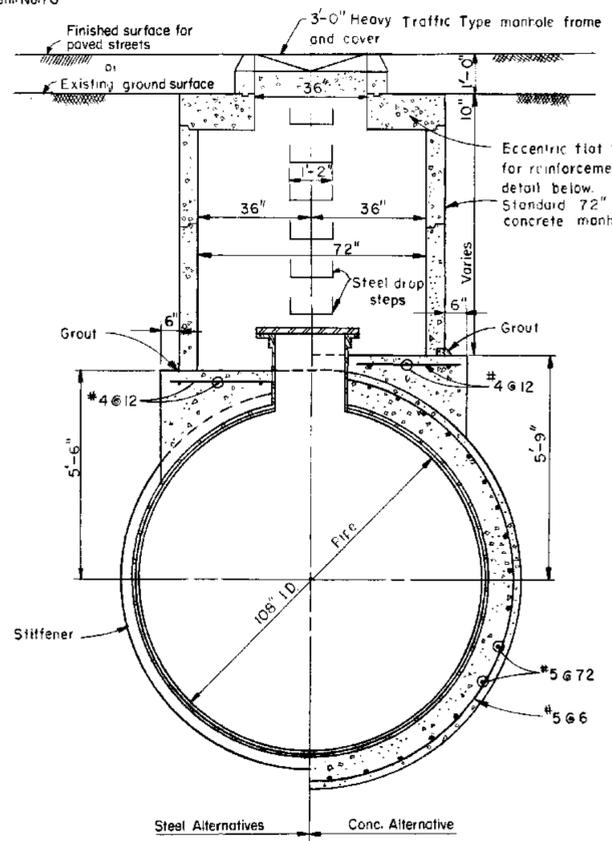
**SECTION B-B FOR MANHOLES**  
Scale: 1/2" = 1'-0"



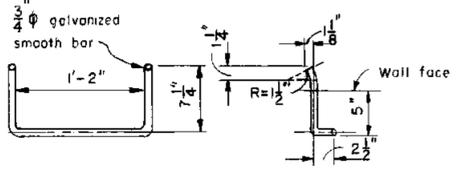
**DETAIL OF 4" NOZZLES ADJACENT TO MANHOLES AT STA. 120+35 & STA. 424+96**  
Not to scale



**SECTION C-C FOR AIRVALVES**  
Scale: 1/2" = 1'-0"

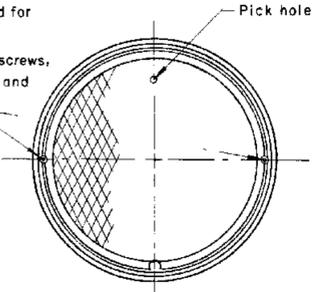


**MANHOLE STRUCTURE SECTION A-A**  
Scale: 1/2" = 1'-0"

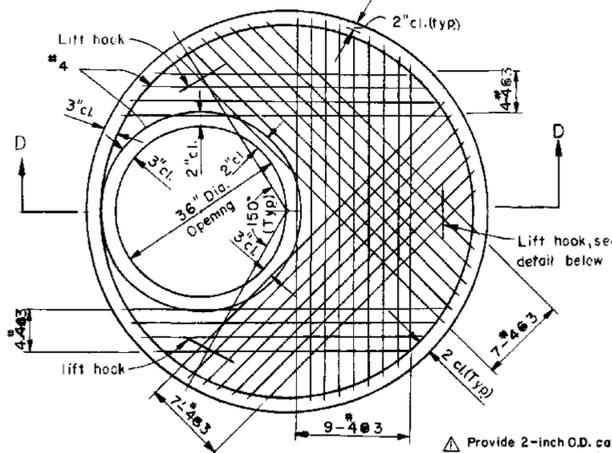


**STEEL DROP STEP DETAIL**  
Scale: 1 1/2" = 1'-0"

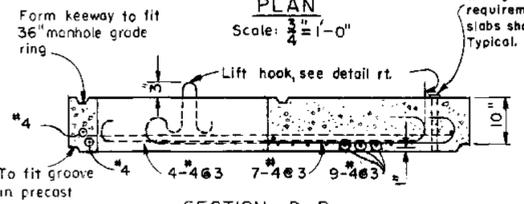
Lifting device shall be provided for all manhole covers as follows:  
Install two 3/4" x 3/4" Allen socket set screws, 90° to pick hole, in holes drilled and tapped 1" in depth.



**TOP OF MANHOLE FRAME & COVER**

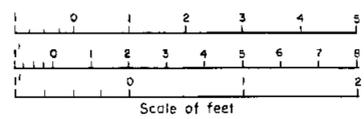


**PLAN**  
Scale: 3/4" = 1'-0"



**SECTION D-D**  
Scale: 3/4" = 1'-0"

**LIFT-HOOK DETAIL**  
No Scale



REVIEWED - STAFF ENGINEERING, BR.	2/17/05	APPROVED BY: [Signature]	6/22/05
REV. DATE DESCRIPTION	6/22/05	Added 2 inch pipe sleeves on Sec. D-D and Changed Length Req'd for steel specials w/ nozzles	W.P.
BY: J.G. Weiher	DATE:	DRAWN: W. Powers	CHECKED: [Signature]

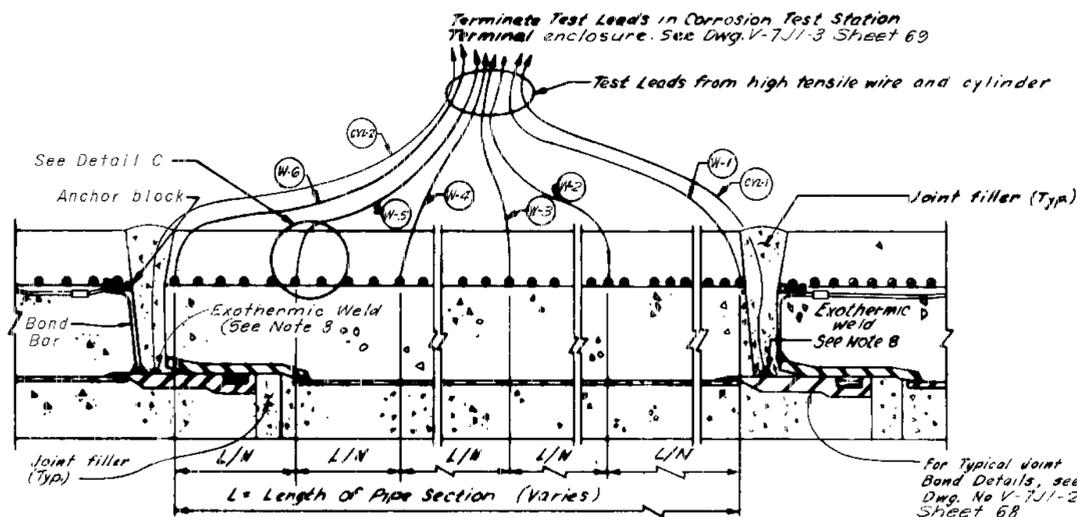
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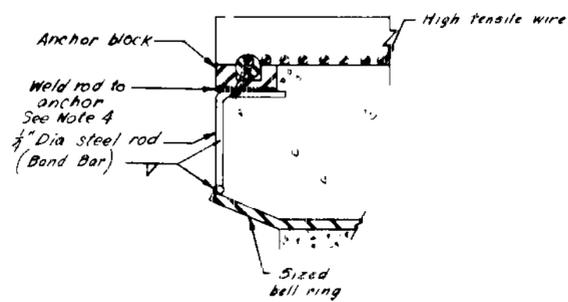
STATE WATER FACILITIES  
CALIFORNIA AQUEDUCT  
SANTA ANA DIVISION  
SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
**MANHOLES AND ACCESS FACILITIES**  
DETAILS

SUBMITTED: [Signature]	APPROVED: [Signature]	DATE: APR 27 1970
CHIEF, DESIGN SECTION, SO. DISTRICT, REG. CE. NO. 4377	CHIEF, DESIGN BRANCH, S.C. DIV. REG. CE. NO. 1287	
APPROVAL RECOMMENDED BY: [Signature]	APPROVAL RECOMMENDED BY: [Signature]	
CHIEF, DESIGN SECTION, S.C. DIV. REG. CE. NO. 1111	CHIEF, DESIGN BRANCH, S.C. DIV. REG. CE. NO. 1287	
DRAWING NO. V-7P4-2	SHEET NO. 45	

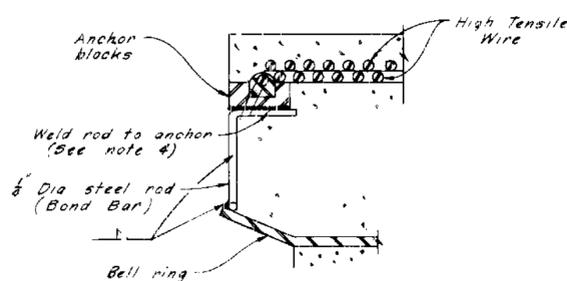
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FEB 18 1977



**△ CORROSION TEST STATION DETAIL (SEE NOTES 1, 2, 4 & 5)**  
 N = NUMBER OF EQUALLY SPACED DIVISIONS WITHIN PIPE SECTION - See Table 2  
 FLOW →

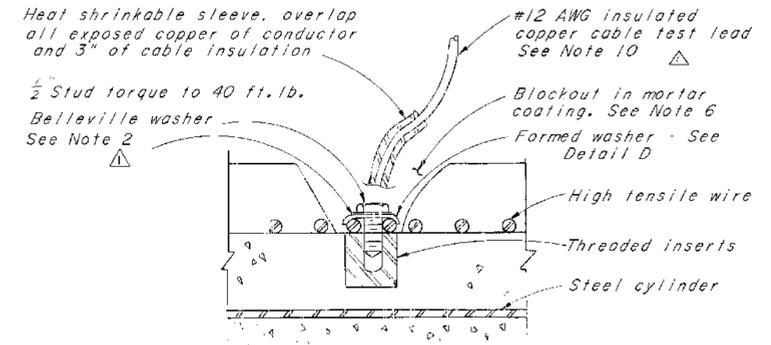


**△ SINGLE WRAP**

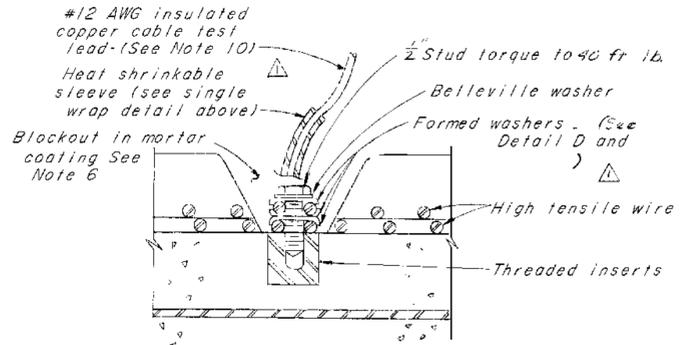


**△ DOUBLE WRAP**

**DETAIL A TYPICAL END CONNECTION**

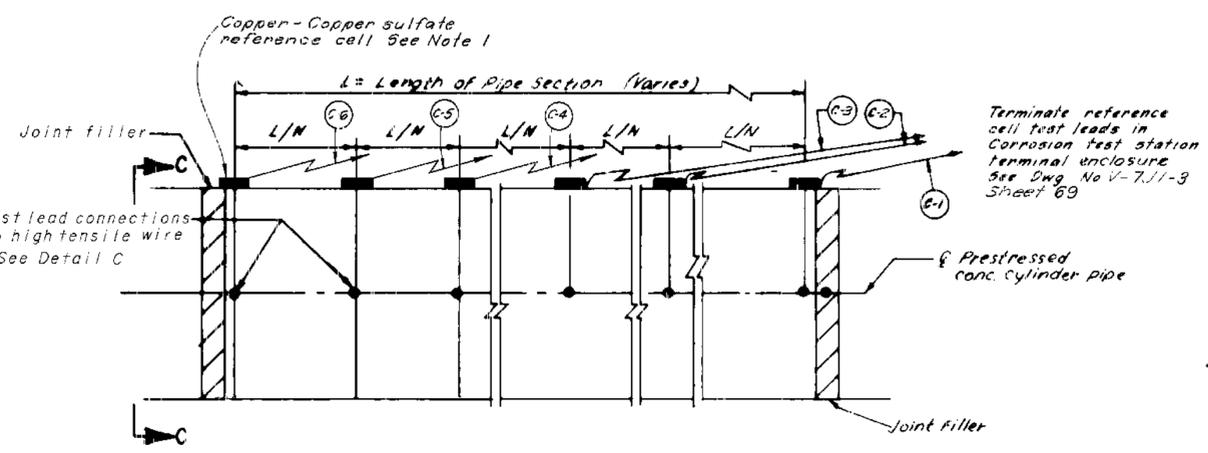


**SINGLE WRAP**



**DOUBLE WRAP**

**DETAIL C TEST LEAD CONNECTION TO HIGH TENSILE WIRE**



**PLAN VIEW (SEE NOTES) BURIED REFERENCE CELL LOCATIONS AT CORROSION TEST STATIONS**

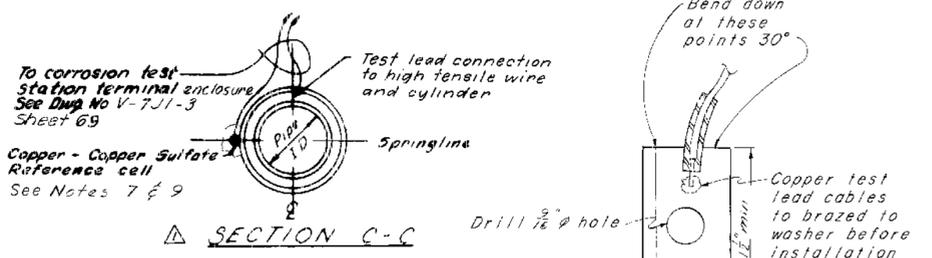
Terminate reference cell test leads in Corrosion test station terminal enclosure See Dwg No V-7J1-3 Sheet 69

- NOTES**
- Number of test connections and reference cells will depend on length of pipe section, and size of high tensile wire wrap. (See Table 2)
  - Prior to installation the formed washer and prestressed wire shall be lightly sand blasted.
  - After connecting high tensile wire to threaded insert the blockout shall be filled with coal tar epoxy to the surface of the mortar coating.
  - Each wrap of prestressing wire shall be bonded to the steel cylinder at each end of each pipe section except pipe sections requiring corrosion test stations.
  - The high tensile wire shall be electrically isolated from the steel cylinder on all pipe sections requiring corrosion test stations, also bond bars shall not be installed.
  - After connecting the copper test lead to the high tensile wire and installing the heat shrinkable sleeve the blockout shall be filled with coal tar epoxy to the surface of the mortar coating.
  - Copper - copper sulfate reference cells for direct burial shall be furnished by the Department and installed by the Contractor. Reference cells shall be placed against mortar coating of pipe.
  - Cover exposed copper and exothermic weld with coal tar epoxy prior to filling joint space.
  - Place a minimum of 12" of native soil around the reference cell. Soil shall be free of rocks and clods.
  - Test leads shall be continuous without splices and shall be of sufficient length to reach the corrosion test station terminal box.

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**TABLE 2 SPACING FOR CORROSION TEST STATIONS**

I D of Pipe	"L" Maximum length of Pipe Section	"N" Number of equally spaced divisions within pipe sections			
		#3 High Tensile Wire	#6 High Tensile Wire	1/2" High Tensile Wire	0.3125" High Tensile Wire
108"	16'	4	3	2	2
	20'	4	4	3	3
	24'	5	4	3	3



**SECTION C-C**

**DETAIL D**

Formed washer to fill prestressed wires

NOT TO SCALE

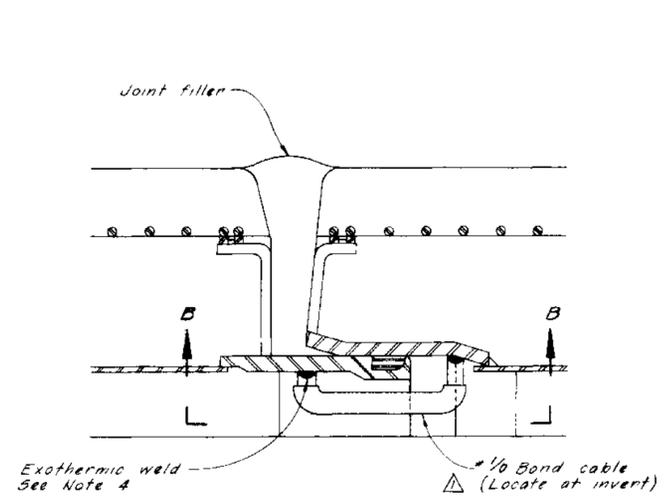
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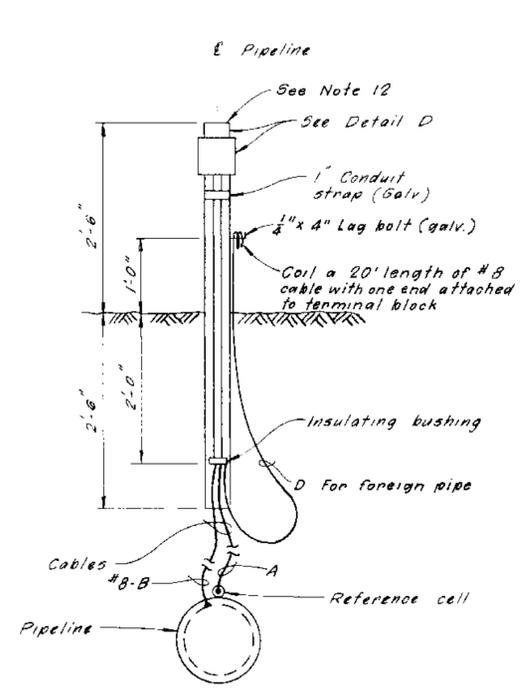
STATE WATER FACILITIES  
CALIFORNIA AQUEDUCT  
SANTA ANA DIVISION  
SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
PRESTRESSED CONCRETE CYLINDER PIPE  
CORROSION CONTROL DETAILS

2	1/20/78				
1	6/22/78	Addendum No. 1 - Delete intermediate Bond Details and revisions			
REV	DATE	DESCRIPTION	DESIGNED	CHECKED	APPROVED
1			W. Maxwell	J. Sharitz	W. P. ...

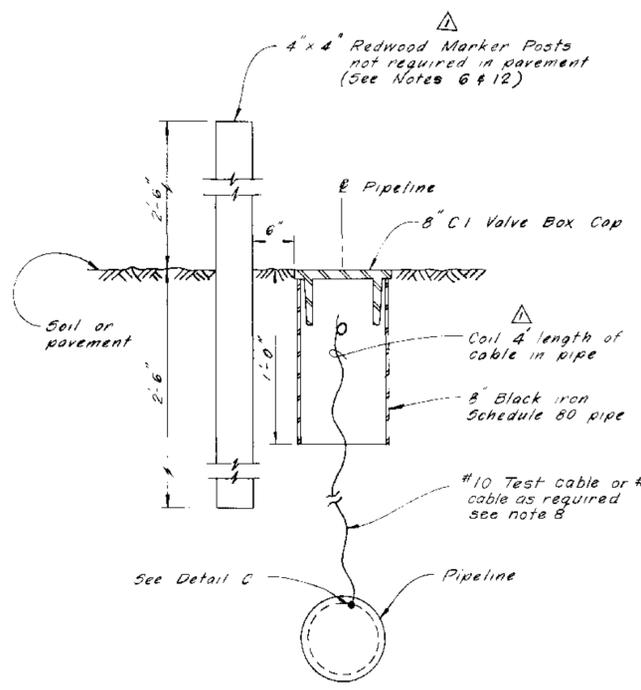
DESIGNED: <i>W. Maxwell</i>	APPROVED: <i>J. Sharitz</i>	DATE: 7/1
APPROVAL/RECOMMENDATION:	APPROVAL/RECOMMENDATION:	
DRAWING NO. V-7J1-1	SHEET NO. 67	



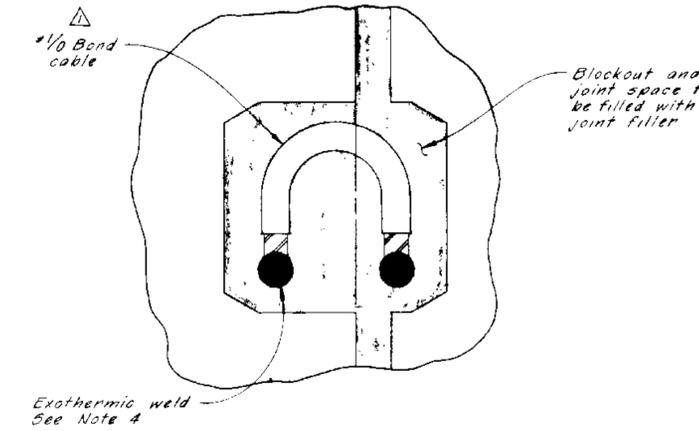
**DETAIL A**  
TYPICAL JOINT BOND DETAIL  
(See Note 3)



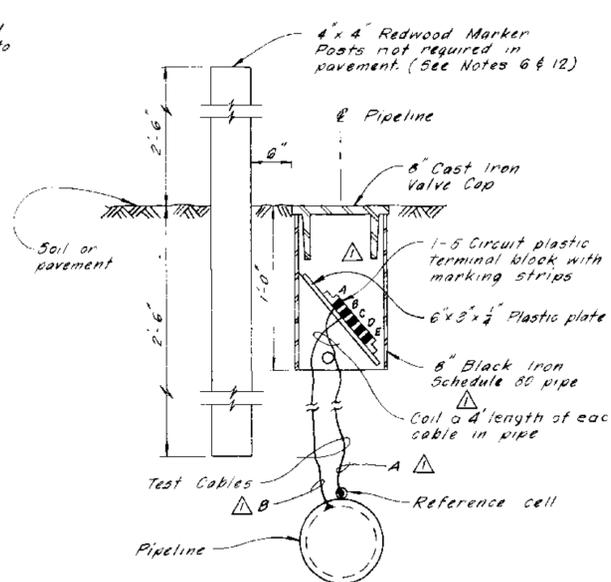
**TYPE 1**  
See Detail 6



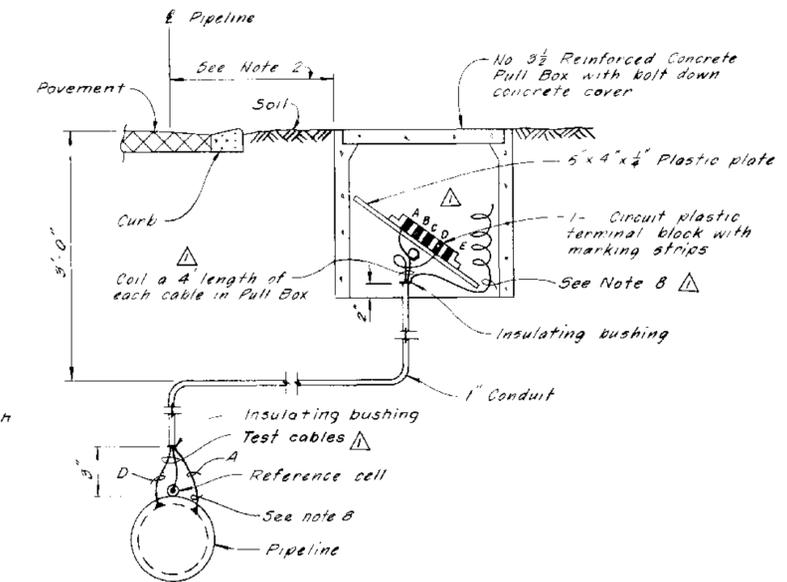
**TYPE 2**



**VIEW B-B**

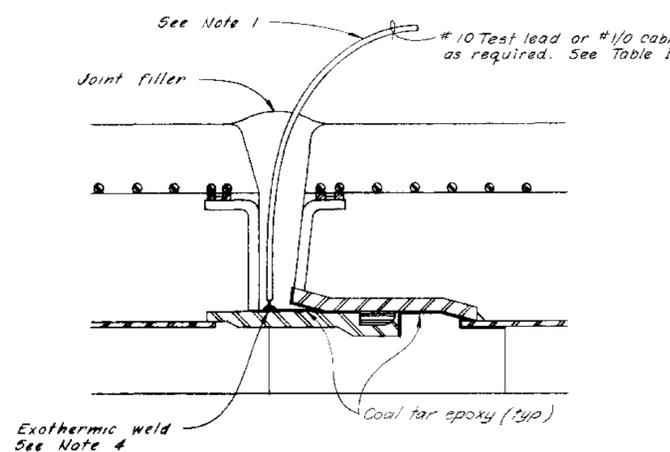


**TYPE 3**  
See Detail 6

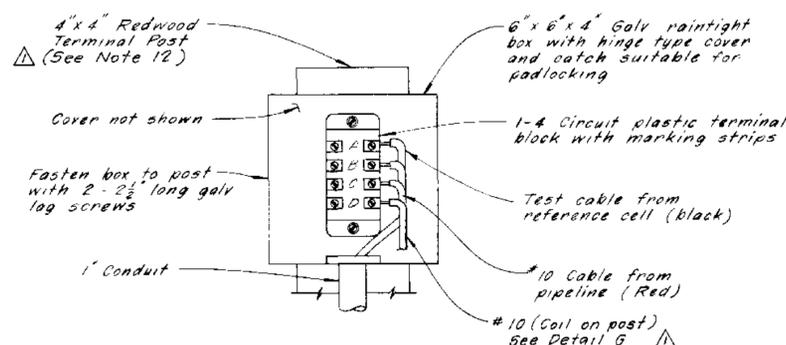


**TYPE 4**  
See Detail 6

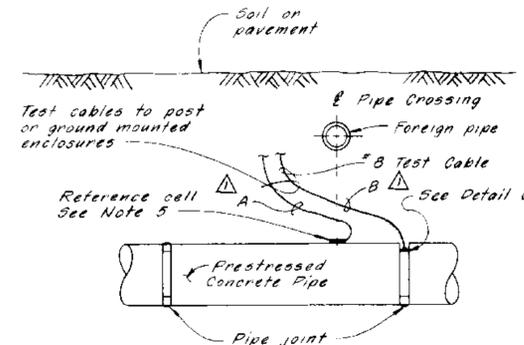
**TYPICAL CORROSION TEST STATIONS**  
(See Table 1  
See Notes 1 thru 6)



**DETAIL C**  
TYPICAL CABLE CONNECTIONS



**DETAIL D**  
CORROSION TEST STATION TERMINAL BOX



**DETAIL G**  
FOREIGN PIPE CROSSING  
(TYPICAL INSTALLATION DETAILS)  
(See Notes 5 & 10)

TABLE 1 LOCATION OF CORROSION TEST STATIONS			
STATION	TYPE	STATION	TYPE
103+69	5***or7***	264+29	3**
106+00	2***	267+00	3**
108+00	5**	275+80	F-4**
110+35	F-4	282+34	F-3**
118+80	2*	286+50	2***
120+30	2*	287+50	5**
125+30	2*	289+93	F-3**
126+30	2*	299+52	F-3**
127+82	F-1**	304+25	F-4**
132+92	F-1**	316+83	F-4**
134+46	F-1**	340+00	2***
137+67	F-3	342+00	5**
139+67	F-3**	357+04	F-1**
152+65	3***	363+25	F-1**
153+70	4**	367+22	F-1**
158+00	5**	384+54	F-4**
160+00	2***	398+47	F-4**
165+70	3**	400+00	5**
186+00	3**	401+00	2***
200+54	F-1**	423+23	F-1**
207+80	F-5**	426+50	4**
212+10	3**		
227+40	3**	440+32	4**
230+50	2***	450+00	2***
248+62	F-1**	451+00	5**
260+45	F-5**		

- \* - Connect test cable at first pipe joint from end of casing pipe. (See Detail C, Dwg V-7J1-3, Sheet 69)
- \*\* - Location of redwood marker post
- \*\*\* - Location of #1/0 cathode cables for future rectifiers at these stations only. (See note 8)
- \*\*\*\* - See Note 7
- F - Indicates foreign pipe crossing (See Detail G) (Reference cells shall be installed at these locations)
- ⊗ - No reference cell installed.

**NOTES**

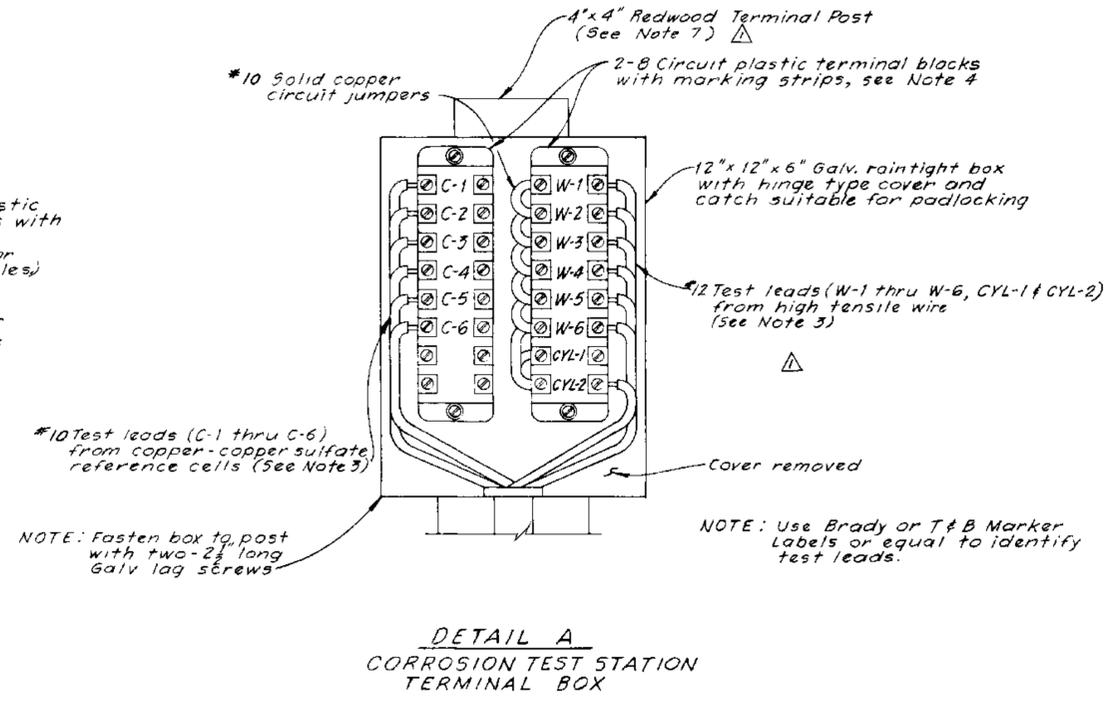
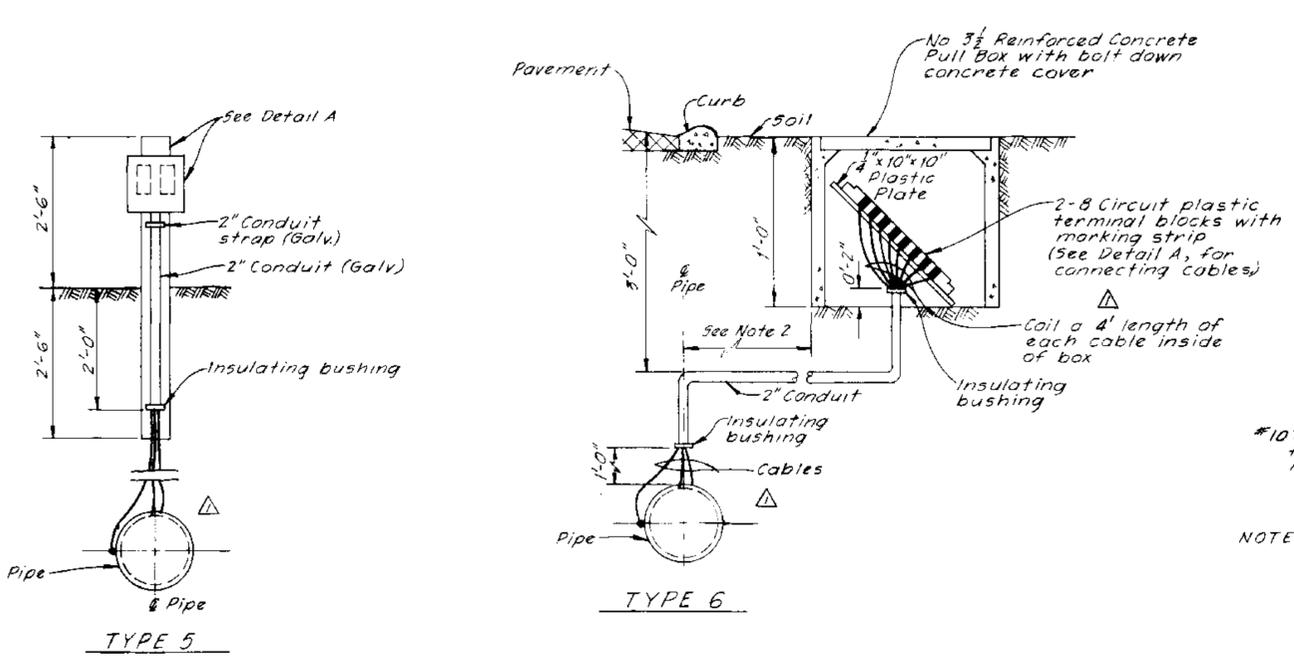
1. Leave slack in cables and test leads near pipe to avoid damage to connections
2. Exact location of posts and ground mounted enclosures will be determined by the Engineer.
3. All rubber gasket joints shall be bonded.
4. Cover all exposed surfaces of copper conductor and exothermic weld with coal tar epoxy prior to filling joint.
5. Locate a single reference cell next to surface of prestressed concrete pipe between the foreign pipe crossing and the prestressed concrete pipe. (See Detail G for reference cell installation.)
6. Redwood marker posts will be required at locations noted on Table 1.
7. Install insulating couplings as required. (See Note 5, Dwg V-7J1-3, sheet 69.)
8. Install a #1/0 Cathode cable to the prestressed concrete pipe for a future rectifier connection. Terminate a coil of cable 4 feet long inside of terminal enclosure and seal end of cable. (See Detail C)
9. Use Brady or T#B marker labels for all leads where leads are color coded, color code tape may be used
10. At foreign pipe crossing with one or more foreign pipes, install one reference cell between each gas or product line (2" or larger) and Department pipe. Reference cells are not required at foreign waterline crossings. See "Detail G". Reference cells shall be furnished by the Department and installed by the contractor.
11. Overcoat prestressed concrete pipe between Sta. 274+00 to Sta. 278+00 with material as specified (nearest full pipe length).
12. All posts shall be stenciled with 2" letters showing stationing.

NOT TO SCALE

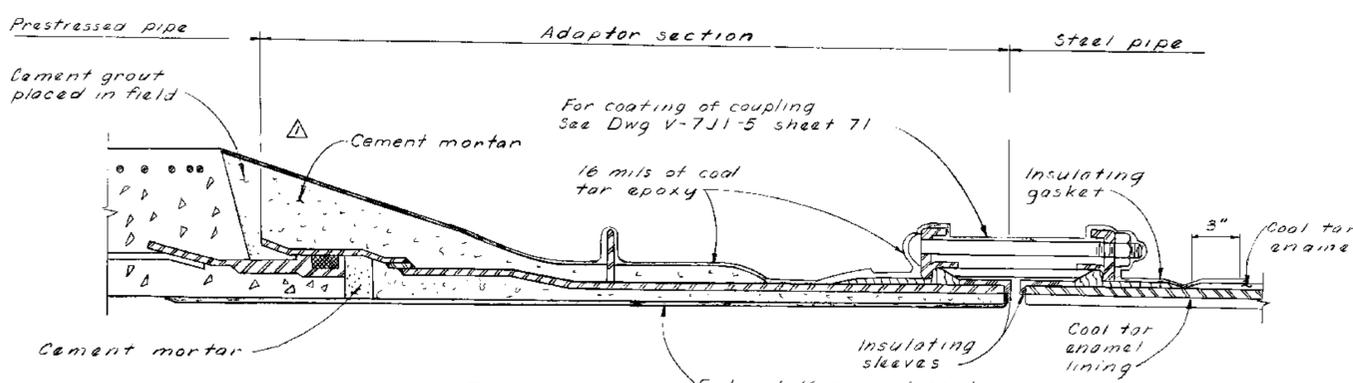
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SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
PRESTRESSED CONCRETE CYLINDER PIPE  
CORROSION CONTROL DETAILS

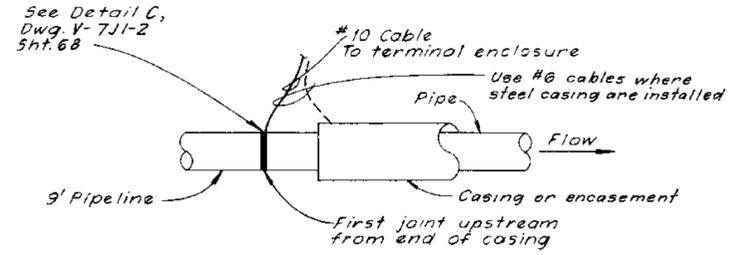
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DRAWING NO.	V-7J1-2			SHEET NO.	68		



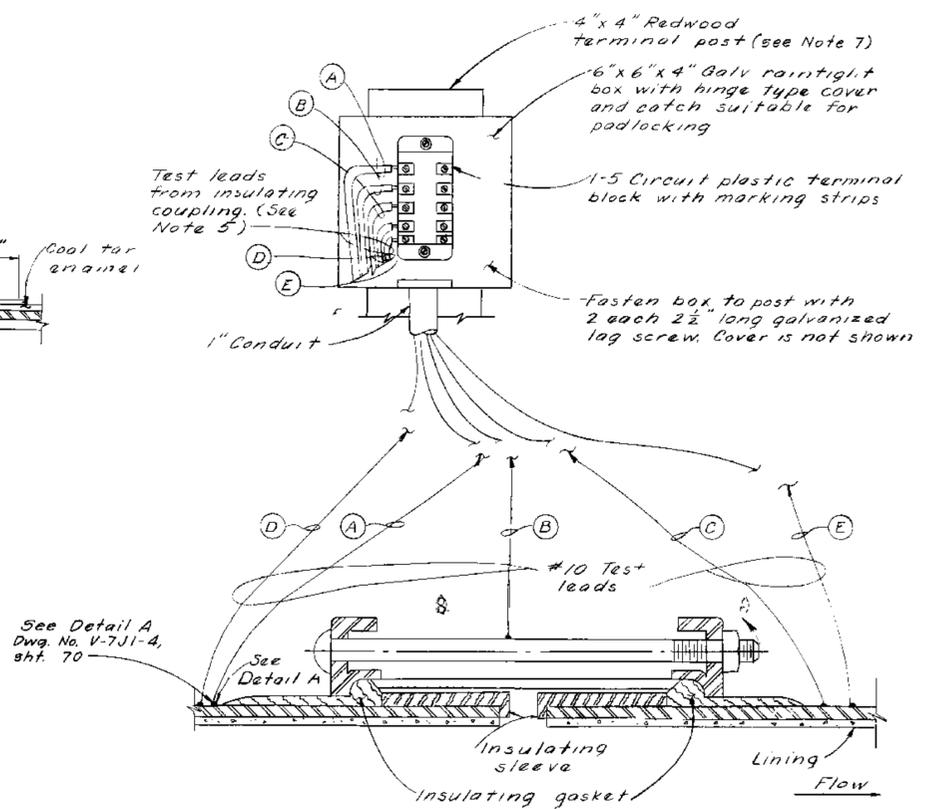
**TYPICAL CORROSION TEST STATIONS**  
See Table I Dwg. V-7J1-2 Sht. 68  
And Dwg. V-7J1-1 Sht. 67 Section C-C



**DETAIL D**  
Concrete pipe to steel pipe adapter with insulating sleeve type coupling



**DETAIL C**  
TYPICAL CABLE CONNECTION TO PIPELINE AT END OF CASING PIPING OR ENCASEMENT (See Table I, Dwg. V-7J1-2 Sht. 68)



**TYPICAL BURIED INSULATED SLEEVE TYPE COUPLING**  
(See Note 5)

Corrosion Test Station Type 7

- NOTES**
- 1 Leave slack in cable near pipe to avoid damage to connections. All cables shall be continuous without joint or splices.
  - 2 Exact location of terminal posts and ground mounted enclosures will be determined by the Engineer.
  - 3 The number of prestressed wire test leads and reference cell test leads will depend on length of pipe sections and size of high tensile wire wrap. See Dwg. V-7J1-1, Sht. 67.
  - 4 The plastic terminal blocks shall have box type terminals with wire range from #22 AWG to #8 AWG and a minimum rating of 25 amperes at 300 volts.
  - 5 Insulating couplings are required at all prestressed concrete pipe to steel pipe connections.
  - 6 The overcoating with coal tar epoxy over mortar lining for adaptor section is not required when steel pipe is mortar lined.
  - 7 All posts shall be stenciled with 2" letter showing stationing.

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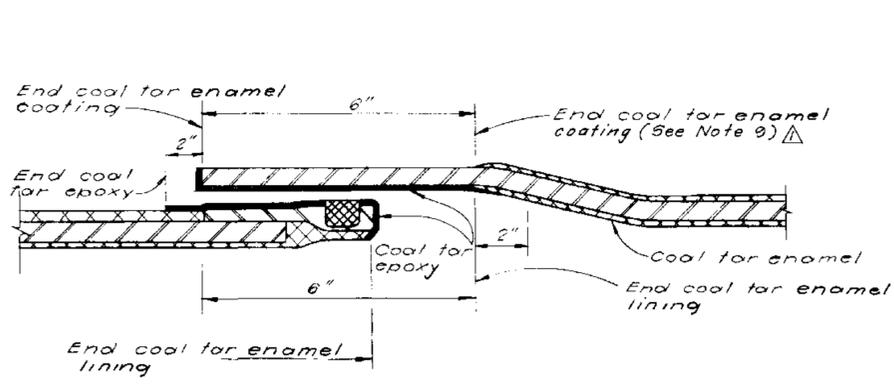
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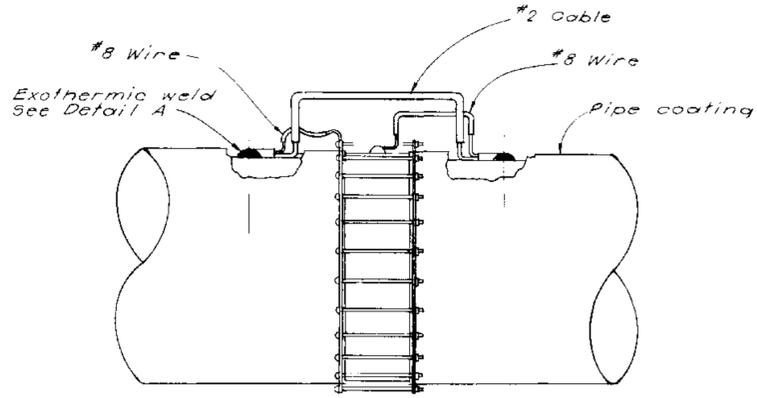
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MILL STREET TO SUGARLOAF MOUNTAIN  
PRESTRESSED CONCRETE CYLINDER PIPE  
CORROSION CONTROL DETAILS

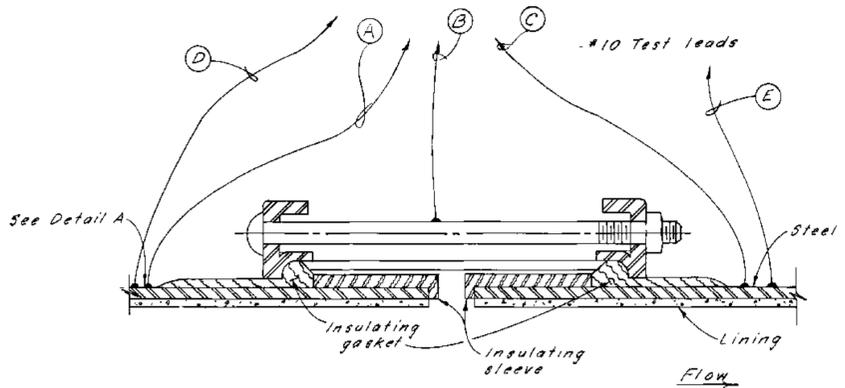
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1	6/22/77	Addendum No 1 - Revised notes and data		671	8/20/77	DESIGNED	CHIEF	REVIEWED	APPROVED	SUBMITTED	APPROVED	DATE
REV	DATE	DESCRIPTION	CHIEF	SUB.	APP'D	DESIGNED	CHIEF	REVIEWED	APPROVED	SUBMITTED	APPROVED	DATE
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DRAWING NO. V-7J1-3										SHEET NO. 69		



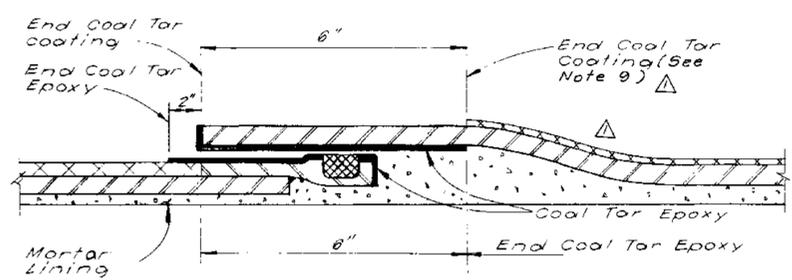
SHOP APPLIED LINING AND COATING DETAILS FOR COAL TAR ENAMEL LINING



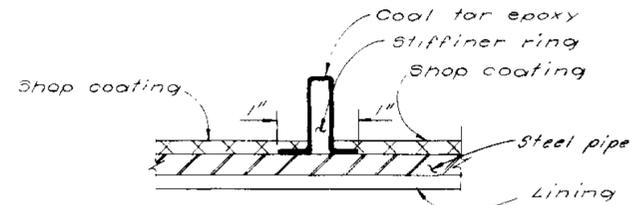
TYPICAL SLEEVE TYPE COUPLING BONDING DETAIL



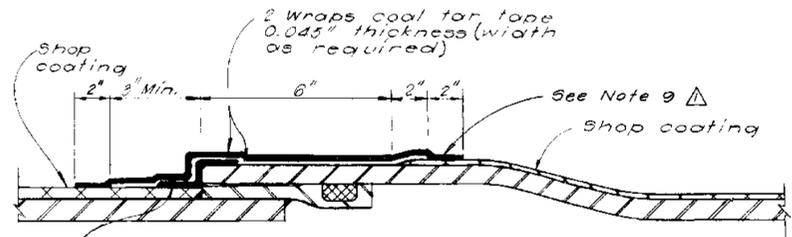
TYPICAL BURIED INSULATED SLEEVE TYPE COUPLING (See Note 5) DETAIL C



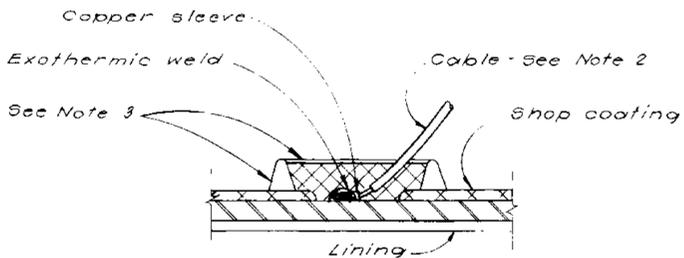
COATING DETAILS FOR CEMENT MORTAR LINING



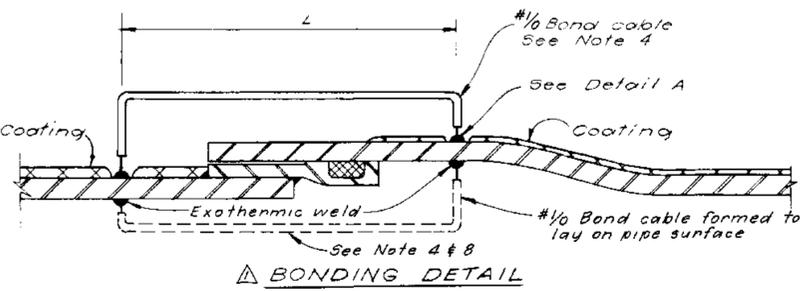
TYPICAL STIFFENER RING COATING DETAILS



FIELD COATING DETAIL

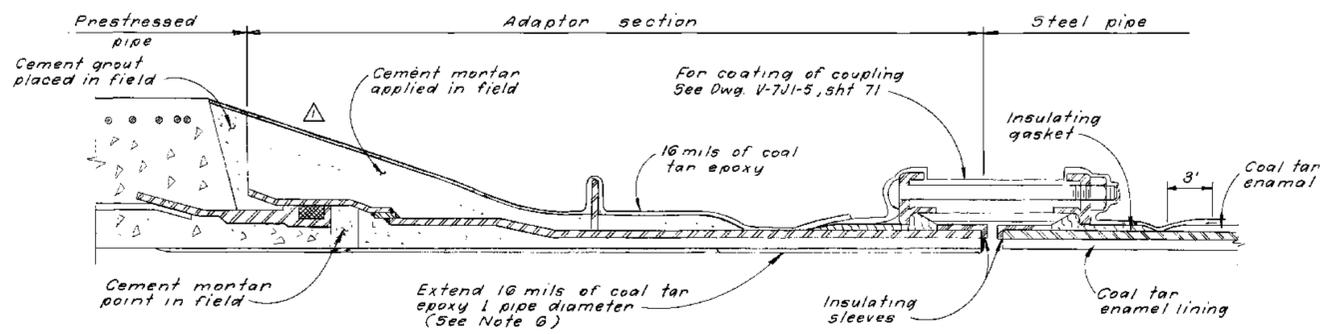


DETAIL A TYPICAL CABLE TO PIPE CONNECTION



TYPICAL RUBBER GASKET JOINT COATING LINING & BONDING DETAILS

See Notes 1 thru 9



DETAIL B (TYP) PRESTRESSED CONCRETE PIPE TO STEEL PIPE ADAPTER WITH INSULATING SLEEVE TYPE COUPLING

NOTES

1. All rubber gasket joints and sleeve type couplings shall be bonded, except insulated sleeve type couplings.
2. Bond wires and cables shall be continuous in length without splices.
3. Build up mold around connection with putty and fill with coal tar epoxy to cover all exposed copper and steel areas.
4. Length of bond cable shall be 6" longer than distance between exothermic welds. Maximum length of bond cable shall be 18".
5. Insulating couplings are required at all prestressed concrete pipe to steel pipe connections.
6. The overcoating with coal tar epoxy over metal lining for adapter section is not required when steel pipe is mortar lined.
7. Use Brady or T & B marker labels or equal to identify all test leads.
8. Install bond cable on interior of pipeline at invert on all pipe installed in casings. Cover all exposed copper, steel area, and cable with coal tar enamel, hand applied, 1/4" minimum.
9. Within all casings a mortar shield is required over the coal tar enamel coating. Extend the exterior coal tar enamel coating and mortar shield to end of each pipe bell within casings. Coal tar tape is not required for pipe joints within casings.

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Not to Scale

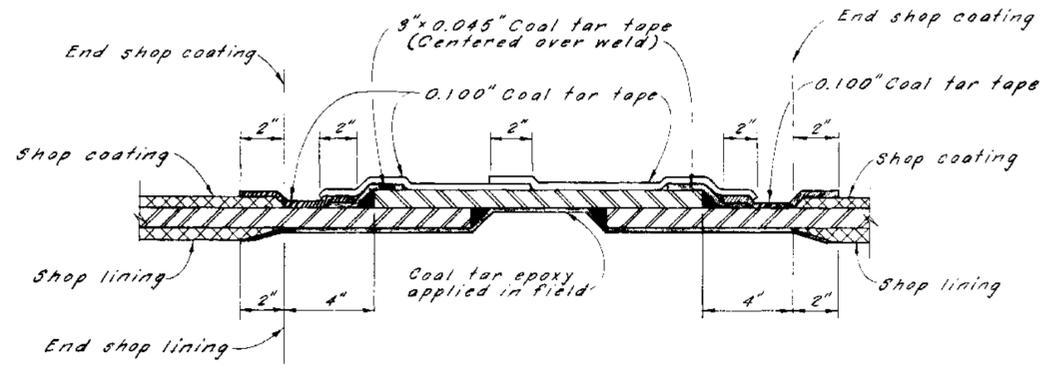
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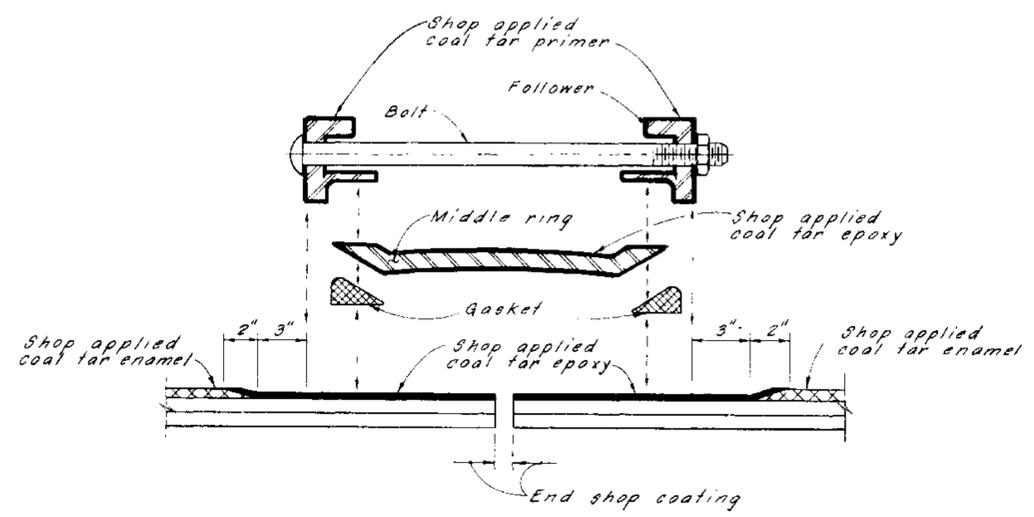
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CALIFORNIA AQUEDUCT  
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SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
STEEL PIPE

CORROSION CONTROL DETAILS

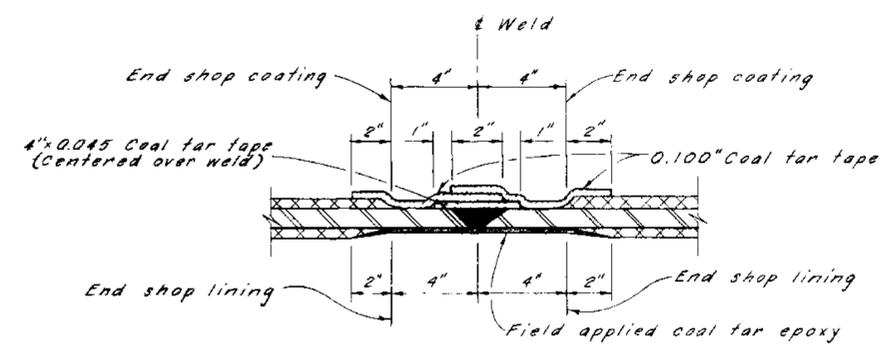
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REV. DATE	DESCRIPTION	REV. DATE	DESCRIPTION	APPROVED:	DATE:	
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4 6/22/76	Addendum No. 1 - Revised notes					
DRAWING NO. V-7J1-4				SHEET NO. 70		



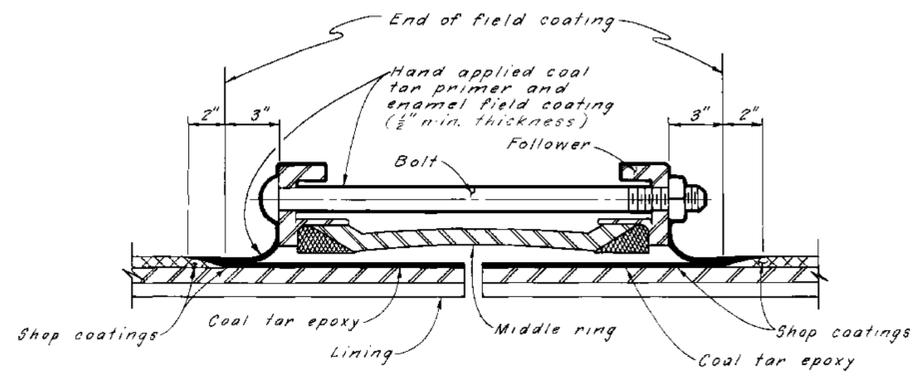
TYPICAL BUTT STRAP FIELD JOINT COATING AND LINING DETAIL



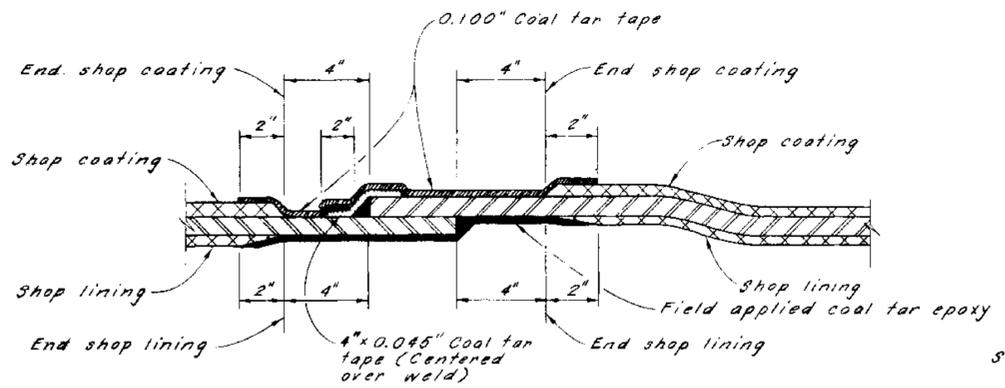
TYPICAL SHOP COATING DETAILS FOR BURIED SLEEVE TYPE COUPLING & PIPE ENDS (ALL ALTERNATES)



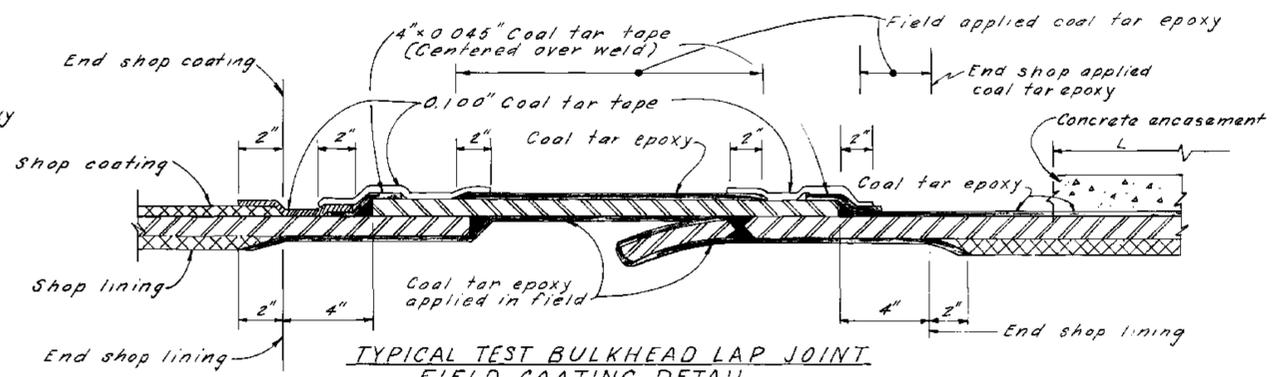
TYPICAL BUTT WELDED FIELD JOINT LINING AND COATING DETAIL



TYPICAL FIELD COATING DETAILS FOR BURIED SLEEVE TYPE COUPLING (ALL ALTERNATES)



TYPICAL LAP-WELDED FIELD JOINT COATING DETAIL



TYPICAL TEST BULKHEAD LAP JOINT FIELD COATING DETAIL

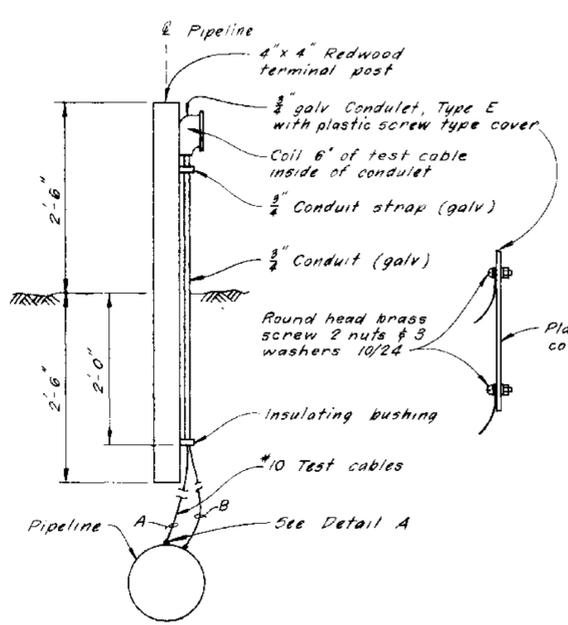
(See Note 1)

**NOTE**  
1. Apply 16 mils of coal tar epoxy after all welding, cutting and testing of Bulkhead. Testing has been completed.

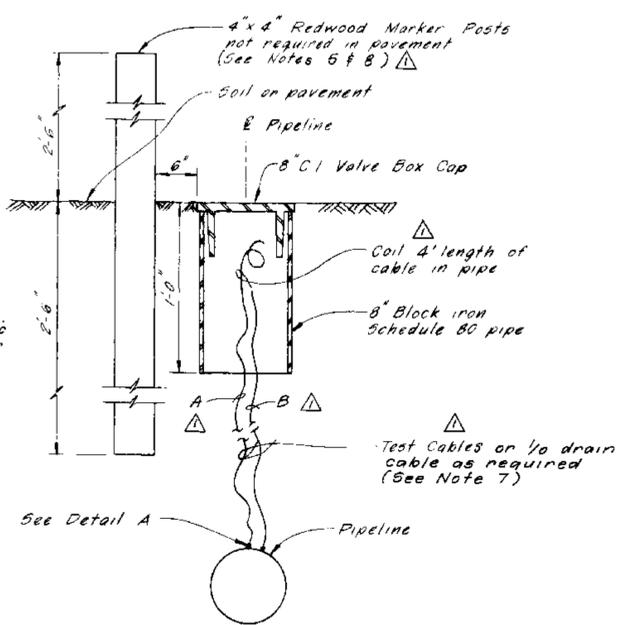
AS BUILT  
FEB 8 1977

Not to Scale

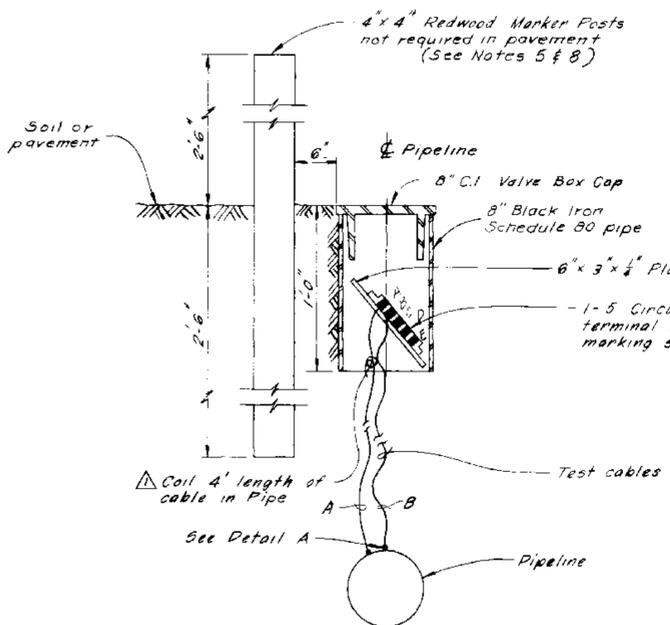
<b>SAFETY — as Necessary as WATER</b>	
STATE OF CALIFORNIA THE RESOURCES AGENCY DEPARTMENT OF WATER RESOURCES DIVISION OF DESIGN AND CONSTRUCTION	
STATE WATER FACILITIES CALIFORNIA AQUEDUCT SANTA ANA DIVISION SANTA ANA VALLEY PIPELINE MILL STREET TO SUGARLOAF MOUNTAIN <b>STEEL PIPE</b> CORROSION CONTROL DETAILS	
DESIGNED: W. Ferguson	DRAWN: R. Lee
CHECKED: W. S. Maxwell	REVIEWED: O. Uhlmer
DATE: 1/20/75	SUB. APPD. 6720
APPROVED: <i>[Signature]</i>	DATE: APR 27 1977
APPROVAL RECOMMENDED: <i>[Signature]</i>	DRAWING NO. V-7J1-5
	SHEET NO. 71



TYPE 1



TYPE 2

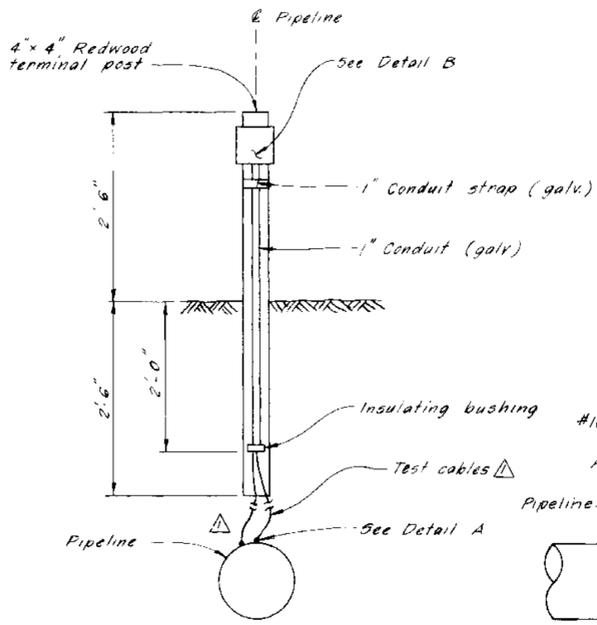


TYPE 3

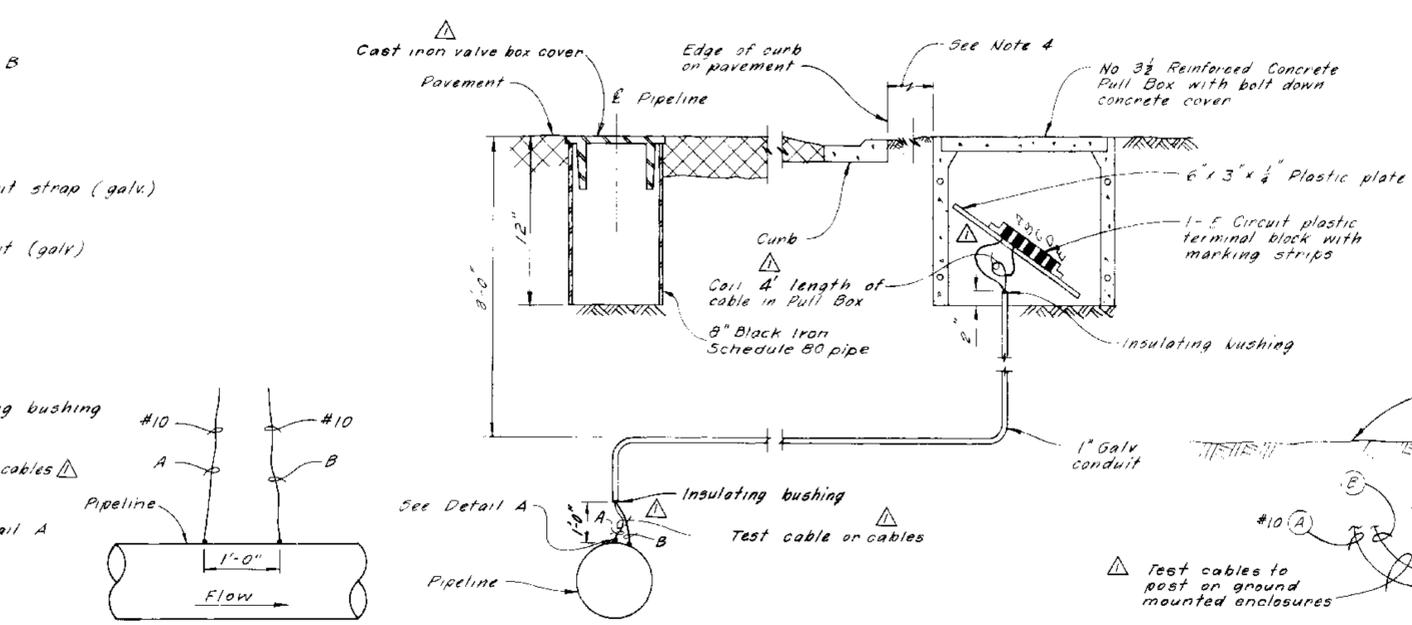
**TABLE I**  
LOCATION OF CORROSION TEST STATION

STATION	TYPE	STATION	TYPE
103 + 69	1** or 4***	264 + 29	4**
106 + 00	2***	267 + 00	4**
108 + 00		275 + 80	F-5**
110 + 35	F-5	282 + 34	F-4**
118 + 80	3*	286 + 50	2***
120 + 30	3*	287 + 50	1**
125 + 30	3*	289 + 93	F-4**
126 + 30	3*	299 + 52	F-4**
127 + 82	F-4**	304 + 25	F-5**
132 + 02	F-4**	315 + 83	F-5**
134 + 46	F-4**	340 + 00	2***
137 + 67	F-3	342 + 00	1**
139 + 67	F-3**	357 + 04	F-4**
152 + 65	4**	363 + 25	F-4**
153 + 70	5**	367 + 22	F-4**
158 + 00		384 + 54	F-5**
160 + 00	2***	398 + 47	F-5**
165 + 70	4**	400 + 00	
186 + 00	4**	401 + 00	2***
200 + 54	F-4**	423 + 23	F-4**
207 + 80	F-4**	426 + 50	4**
212 + 10	4**		
227 + 40	4**	440 + 32	5**
230 + 50	2***	450 + 00	2***
248 + 02	F-4**	451 + 00	1**
260 + 45	F-4**		

\* - Connect test cable to steel pipeline 2 feet from end of casing (see Detail D)  
 \*\* - Location of redwood marker post  
 \*\*\* - Location of #1/2 cathode cables at these stations only (see Note 7)  
 \*\*\*\* - Insulated coupling as required (see Note 6)  
 F - Indicates foreign pipe crossing

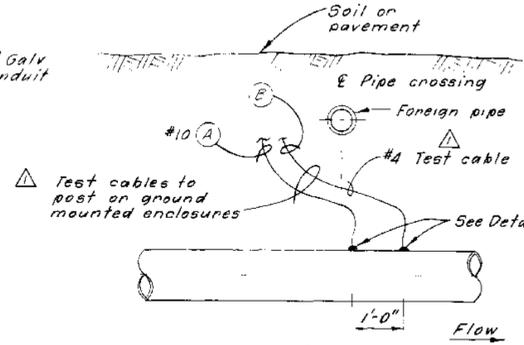


TYPE 4



TYPE 5

DETAIL F TYPICAL TEST CABLE CONNECTION

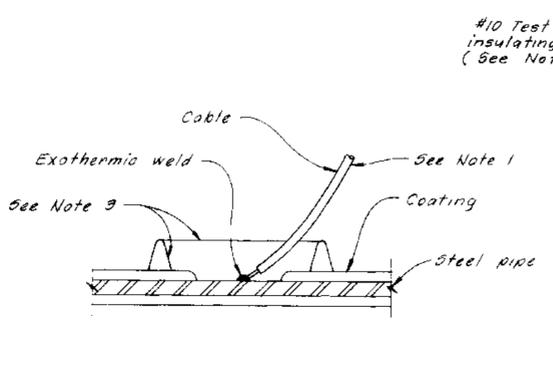


DETAIL E FOREIGN PIPE CROSSING TYPICAL INSTALLATION DETAIL

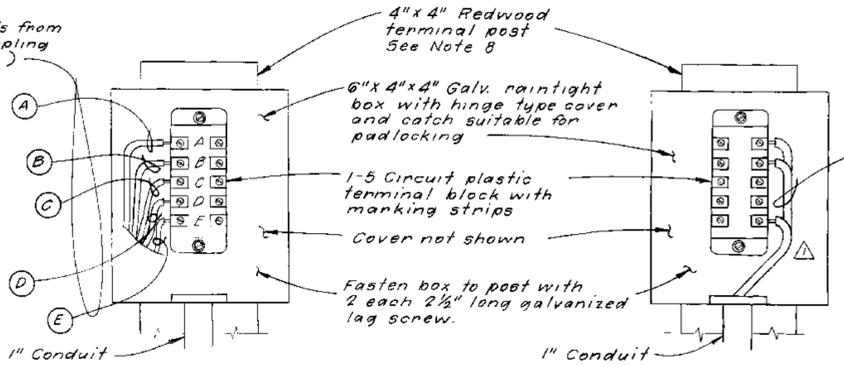
TYPICAL CORROSION TEST STATIONS

See Table I

- NOTES**
- 1 Leave slack in cables and test leads near pipe to avoid damage to connections. All test cables and leads shall be continuous in length without splices.
  - 2 Locate Corrosion Test Stations over top of pipeline unless otherwise shown.
  - 3 Build up mold around connection with putty and fill with cool tar epoxy resin to cover all exposed copper and steel areas.
  - 4 Exact location of terminal enclosures will be determined by the Engineer.
  - 5 Redwood marker posts will be required at locations noted on Table I.
  - 6 Install insulating couplings as required (See Dwg. V-7J1-3, sheet 69 and Detail B this sheet Label each test lead as shown).
  - 7 Install #1/2 cathode drain cables to the steel pipe for future rectifier connections (See Detail A).
  - 8 All post shall be stenciled with 2" letters showing stationing.

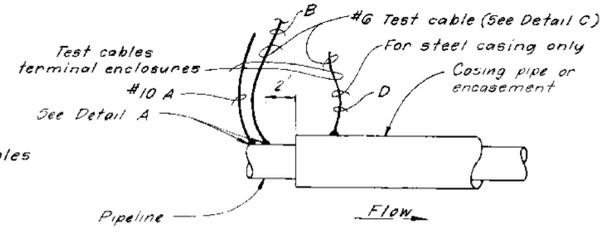


DETAIL A TYPICAL CABLE CONNECTION



DETAIL B CORROSION TEST STATION TERMINAL BOX

DETAIL C CORROSION TEST STATION TERMINAL BOX



DETAIL D TYPICAL CABLE CONNECTION AT CASING PIPING

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This drawing is not to scale

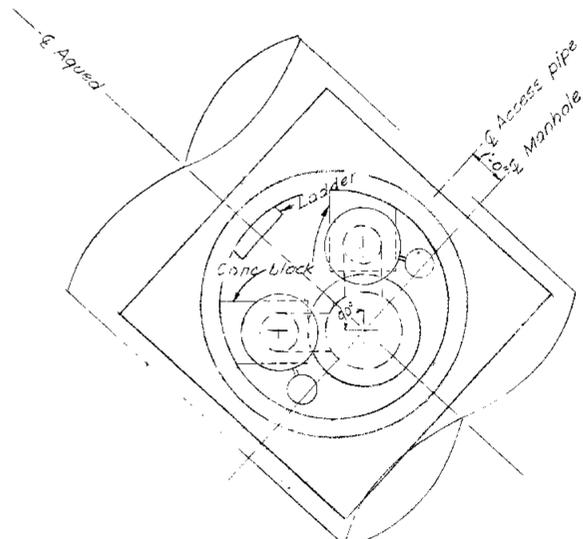
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DEPARTMENT OF WATER RESOURCES  
DIVISION OF DESIGN AND CONSTRUCTION  
STATE WATER FACILITIES  
CALIFORNIA AQUEDUCT  
SANTA ANA DIVISION  
SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
STEEL PIPE

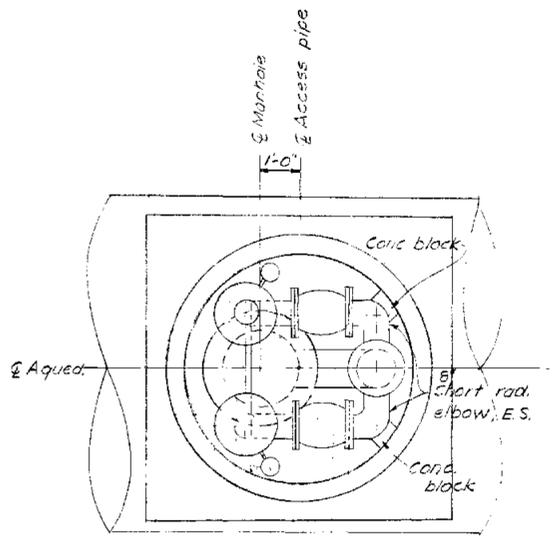
CORROSION CONTROL DETAILS

DESIGNED	DATE	DRAWN	CHECKED	REVIEWED
W. Peterson	12/15/70	P. Lee	W. Peterson	O. Wilmeyer

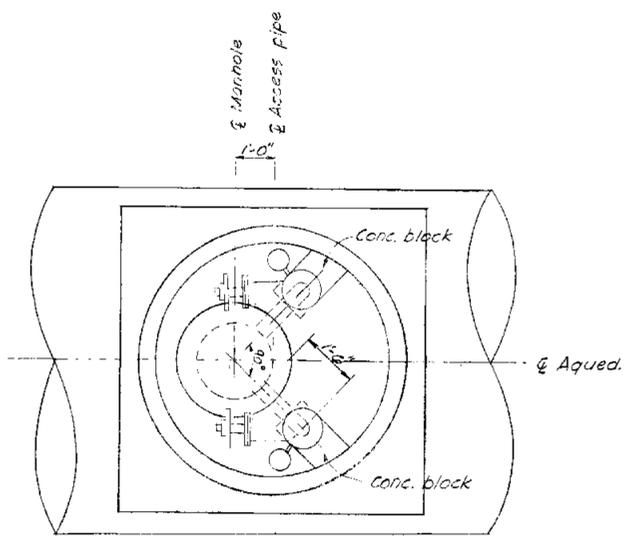
DESIGNED	DATE	DRAWN	CHECKED	REVIEWED
W. Peterson	12/15/70	P. Lee	W. Peterson	O. Wilmeyer



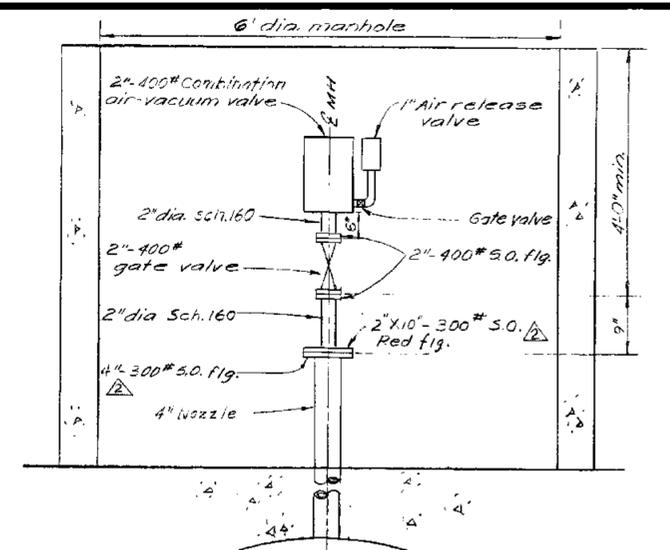
PLAN



PLAN

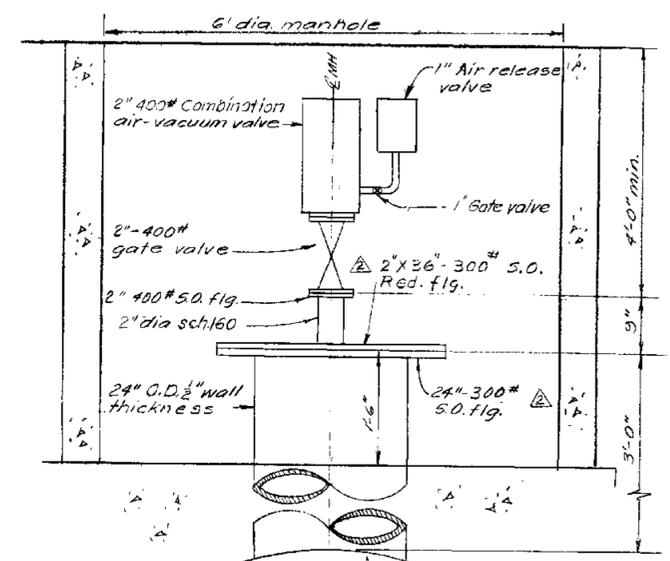


PLAN



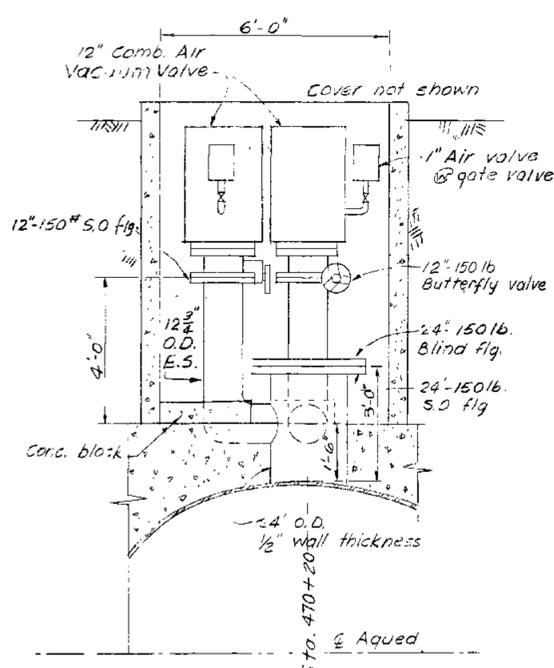
TYPICAL 2" COMBINATION AIR VACUUM VALVE INSTALLATION  
STA. 253+97, 270+03, 305+17 & 313+97

ELEVATION



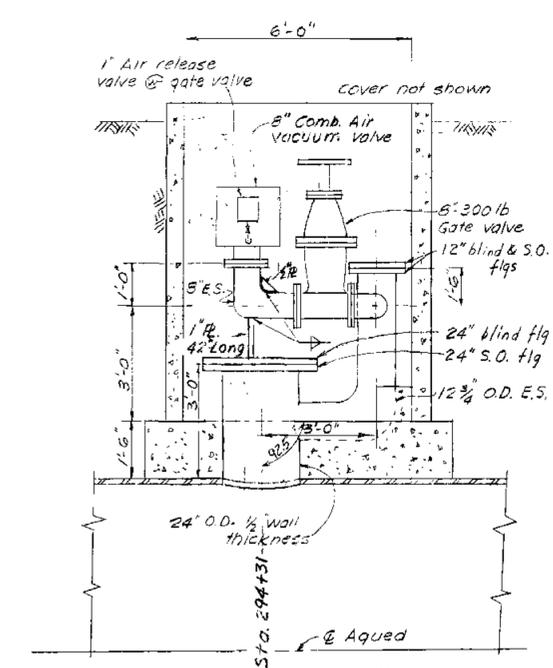
TYPICAL 2" COMBINATION AIR VACUUM VALVE INSTALLATION  
STA. 154+56, 189+06

ELEVATION



ELEVATION

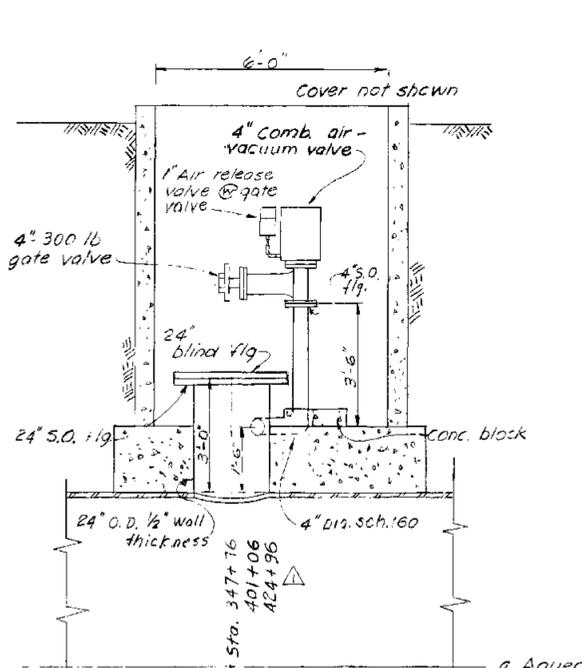
12" AIR-VACUUM VALVE



ELEVATION

8" AIR-VACUUM VALVE

Note: All 8" valves and flanges shall be 300 lbs rating



ELEVATION

4" AIR-VACUUM VALVE

Note: All 4" valves and flanges shall be 300 lbs rating

- NOTES**
1. For details of stl pipe nozzle, see Dwg. V-6P2-1, sht. 42.
  2. For details of access pipe and concrete, see Dwg. V-7P4-2, sht. 45.
  3. For location of pipe encasement and manholes, see plan and profile dwgs.
  4. Valve flanges shall match the mating flanges
  5. All flanges shall be flat face

Not. to scale

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FEB 18 1977

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SANTA ANA DIVISION  
SANTA ANA VALLEY PIPELINE  
MILL STREET TO SUGARLOAF MOUNTAIN  
AIR VALVES

REVIEWED—STAFF ENGINEERING, BR.	DESIGNED E.B. Aghavli	DRAWN L. Lewis	CHECKED C. Wong	REVIEWED A. Hunter	APPROVED J. C. Weinsland	DATE: APR 27 1970.
DESIGNED E.B. Aghavli	DRAWN L. Lewis	CHECKED C. Wong	REVIEWED A. Hunter	APPROVED J. C. Weinsland	DATE: APR 27 1970.	
REV. DATE	DESCRIPTION	SUB.	APPROVED	DATE		
7-3-70	Changed flange rating					
6-22-70	Addition of 2" & 4" Comb air vacuum valves					

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