



**U.S. Department of Housing
and Urban Development**
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Environmental Assessment Determinations and Compliance Findings for HUD-Assisted Projects 24 CFR Part 58

This is a suggested format that may be used by Responsible Entities to document completion of an Environmental Assessment.

Project Information

Project Name: Stanton Apartment Homes (formerly Stanton Inn and Suites)

Responsible Entity: OC Housing & Community Development

Grant Recipient
(if different than Responsible Entity):

State/Local Identifier: CA/059

Preparer: Liza Santos, OC Housing and
Community Development

Certifying Officer Name and Title: Julia Bidwell, Director
OC Housing & Community Development

Grant Recipient
(if different than Responsible Entity):

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Project Location:

The Stanton Apartment Homes Project (referred to throughout this Environmental Assessment as the proposed project, proposed development, or project) is located at 7161 Katella Avenue in the City of Stanton, Orange County, California (refer to Attachment 1, Project Location). The project site consists of 1.01 acres currently occupied by a single building previously managed as the Stanton Inn and Suites Motel (Stanton Inn) and the associated parking lot and amenities. The project site is located on Assessor's Parcel Numbers 079-762-26/61 and is on land zoned as High Density Residential (RH). Transitional and Supportive housing are permitted by right uses in the High Density Residential (RH) zone. The project site is bordered by residential and commercial uses to the north, west, and east. Katella Avenue and other residential buildings border the southern boundary of the proposed development.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed affordable housing development is a partnership between Jamboree Housing Corporation, Orange County (County), the City of Stanton (City), and the State Housing and Community Development's Homekey program. The Homekey program provides critically needed housing units for people experiencing housing throughout the state. Specifically, the program was designed as part of the state's response to protecting individuals experiencing homelessness who were impacted by COVID-19. As a Homekey Tier One project, Stanton Inn is currently operating as interim housing for individuals who are experiencing homelessness or who are at risk of homelessness and who are impacted by the pandemic.

The 1.01-acre project site would convert the existing 72-unit Stanton Inn into a 71-unit residential building with a one-bedroom manager's unit. Residential units would consist of 54 studios and 17 one-bedroom units with kitchenettes reserved for individuals experiencing homelessness earning 30% area median income or below. With the exception to the manager's apartment, all units at the proposed development would be reserved as permanent supportive housing apartments. Conversion of Stanton Inn into affordable housing would occur in two phases. Phase one, the current operational stage for the proposed project, involves transitioning the Stanton Inn into interim housing for individuals experiencing homelessness. Phase two would involve converting the interim housing into permanent supportive housing through substantial rehabilitation of existing facilities so that residents can enjoy residential amenities, landscape improvements, and supportive services. As part of the rehabilitation of the existing facility, an on-site community center will be provided. A vehicle gate for improved site security is also included in the architectural design plans for the proposed development.

Residents would be provided with access to social services through Jamboree Housing Corporation's Community Impact team, Housing with Heart (HWH), as well as the Homekey program. HWH would staff 1.5 full-time Supportive Service Coordinators and 0.75 Supportive Service Case Managers on site to provide care coordination, direct service delivery, and provide case management support.

Services provided to residents are aimed at recovery and wellness. The new on-site community center would facilitate a supportive environment where HWH and other contracted service providers would offer life skill services, hold meetings, and organize community events. A supportive services team would also provide residents with information about available services and programs, help them access programs through referral, coordinate social and supportive services to be provided on site, and

leverage community resources for events. Services would further include case management; life skills training (cooking skills, healthy eating, and money management); substance abuse counseling and treatment; and connections to community resources, such as health care providers. Because the goal for on-site services is to assist in stabilizing residents, the case management team for the proposed project would link residents to expanded community services and opportunities for engagement, as well as re-integration opportunities through vocational, educational, and volunteer programs. Residents in units funded by the Orange County Mental Health Services Act would be supported by Orange County Health Care Agency's Adult and Older Adult Behavioral Health to receive access to services promoting wellness and recovery for adults experiencing homelessness and living with mental illness. Each of these persons would have a dedicated Personal Services Coordinator to manage their case and assist them with reaching their goals. Workshops available to residents would cover topics ranging from resume building, anger management, and nutrition, to arts and crafts and cleaning. Community events organized by the HWH team would include game nights, move nights, a community garden, and winter holiday party, among others. Residents would also have the opportunity to contribute program ideas and provide feedback to social service providers through monthly community meetings, a resident committee, and resident satisfaction surveys.

Supportive services staff would coordinate with health providers and link residents to off-site services where on-site services are lacking. Services that cannot be coordinated to occur on premises would require transportation assistance by the case management staff to ensure that residents can reach needed services regardless of limitations. The project site is located near off-site amenities such as public transit, public parks, a library, a grocery store, and a medical clinic and pharmacy.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

As demand increases for Orange County services and the County's population increases, the need for additional housing and access to government services has also increased.

The proposed project's objectives are as follows:

- Create new affordable, safe, attractive, and service-enriched residences for low-income individuals experiencing homelessness.
- Create a community that fits into and improves the existing neighborhood in style, texture, scale, and relation to the street.

Existing Conditions and Trends [24 CFR 58.40(a)]:

According to the Phase I Environmental Site Assessment (ESA) completed by Bureau Veritas in August 2020, the project site is currently occupied by the Stanton Inn building and associated amenities, such as a pool and parking area. Historical photographs reveal the site has been occupied by a motel, not always the Stanton Inn, since the late 1980s. Until the mid-1980s, the project site was occupied by residential and farm-type buildings. Areas adjacent to the project site are developed with commercial and residential uses, as follows:

- East: General commercial (Alternative Resources Day Program building)
- West: Retail center (Katella Square strip center with various retail)
- North: Residential; Katella Avenue

- South: Residential

Funding Information

Grant Number	HUD Program	Funding Amount
	71 Project Based Vouchers	\$22,237,200 (estimated 20-year amount)

Estimated Total HUD Funded Amount: \$22,237,200

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$24,138,386

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not located adjacent to any military or municipal airports. The nearest municipal airport is John Wayne Airport, located approximately 11.91 miles southeast of the project site (see Attachment 2; see Environmental Review Record [ERR] 1). The Army airfield located at Joint Forces Training Base Los Alamitos is the nearest military airport, situated approximately 1.5 miles west of the project site (see Attachments 2 and 3 and ERR 1).
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Coastal Barrier Resources Act does not apply to this project because no coastal barrier resources protected under this policy occur in California (see Attachment 4). In addition, because the proposed residential project is

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		located approximately 6.78 miles from the coast, it is unlikely to affect coastal resources.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map indicates that the project site does not occur in a flood plain. According to the map, the project site is in an area that has a 0.2% annual chance flood hazard (areas of 1% annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile) (FEMA 2012). Firm Panel 06059 C0117J, Effective December 2009 (see ERR 2; see Attachment 5).
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The proposed project falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) within the South Coast Air Basin. The SCAQMD, according to the U.S. Environmental Protection Agency, is currently in a nonattainment zone for federal ozone (8-hour ozone) and particulate matter from greenhouse gasses (fine particulate matter [PM _{2.5}]). Federal ozone in Orange County has been classified as extreme, and PM _{2.5} has been classified as moderate (EPA 2020). To meet Housing and Urban Development (HUD) air quality guidelines, the proposed project must follow the State Implementation Plan, which describes how an area will meet national and ambient air quality standards. State Implementation Plan guidelines require the proposed project to keep its criteria pollutant emissions below SCAQMD's significance thresholds. The project site's location close to public transportation is consistent with regional

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		<p>efforts to improve transit availability and would reduce the amount of emissions (PM_{2.5}) associated with motor vehicle travel. By developing affordable housing consistent with the growth anticipated by the General Plan and existing zoning and land use designations, the proposed project is in compliance with the regional air quality strategy, the State Implementation Plan, and the Air Quality Management Plan for this locality.</p> <p>Air quality at the project site could be negatively impacted by fugitive dust (coarse particulate matter [PM₁₀]) and other particulate air pollutants (PM_{2.5}) released during construction-related activities, such as land clearing or grading. Exhaust emissions (oxides of nitrogen [NO_x] and carbon monoxide [CO]) released by heavy construction vehicles could also temporarily impact air quality. Adverse impacts to air quality during construction would be managed by implementing mitigation measures for fugitive dust control in compliance with SCQAMD Rule 403. This guideline identifies measures to reduce fugitive dust that are required to be implemented at all construction sites within the South Coast Air Basin (SCQAMD 2005) (Mitigation Measure 1).</p> <p>The California Emissions Estimator Model (CalEEMod) was used to estimate annual criteria air pollutant emissions during the construction and operational phases for the proposed project. Pollutants including PM_{2.5}, PM₁₀, NO_x, and CO levels all fell below de minimis thresholds during the construction- and operational-phase estimates. Daily emissions from the proposed project would not exceed the SCAQMD's regional construction or</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		operation emissions thresholds (SCAQMD 2019) (see Attachment 6; see ERR 3).
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No adverse impacts to California’s designated coastal zones would occur as a result of the proposed development. The project site is located 6.78 miles from the Pacific Ocean and does not exist within a Coastal Zone, as defined by the California Coastal Act (Public Resources Code, Division 20, Section 3000 et seq.)(see Attachment 7; see ERR 4).
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>A Phase I ESA conducted by Bureau Veritas in August 2020 found no recognized environmental conditions, historical recognized environmental conditions, or controlled recognized environmental conditions on the project site. No hazardous substances or petroleum products were observed on site. Underground storage tanks and aboveground storage tanks were not observed on the project site. No vapor mitigation concerns were identified.</p> <p>Bureau Veritas observed a single oil-cooled transformer and a hydraulic elevator during the site reconnaissance. The transformer and hydraulic elevator appeared to be in good condition and installed after 1979. Based on the apparent age of the equipment, Bureau Veritas concluded that the transformer and hydraulic elevator are unlikely to be PCB-contaminated.</p> <p>Asbestos-containing material and lead-based paint (LBP) inspection and sampling were conducted at the project site. Asbestos-containing material testing was conducted by RiskNomics in September 2020. A total of 90 bulk samples were collected and analyzed from throughout the project site to facilitate the inspection. Inspection activities were limited to accessible areas of the building with no</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		<p>destructive investigation of hidden spaces. The roof was not inspected. Sampling was conducted in accordance with U.S. Environmental Protection Agency and OSHA standards and were found negative for asbestos (see Attachment 8). RiskNomics also conducted LBP sampling on the project site. Professionals collected 24 paint-chip samples to evaluate various paints throughout the project site. Lab results revealed that lead levels were below the laboratory's reporting limit and are not classified as LBPs (see Attachment 9; see ERR 5).</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Due to the urban setting surrounding the project site, no federally listed special-status plant or wildlife species are expected to be present on site.</p> <p>Six species classified as Endangered or Threatened by the U.S. Fish and Wildlife Service (USFWS) were identified as possibly occurring on the project site. This list includes a single mammal species, two species of flowering plants, and three avian species. According to USFWS's Information for Planning and Consultation (IPaC) database (USFWS 2020a), although the general habitat ranges of these six species overlap with the project location, their critical habitat areas do not intersect with the project site (see Attachment 10).</p> <p>Therefore, the proposed project would not have any negative impacts on wildlife movement, migration, or nursery sites (see ERR 6).</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Explosive or flammable hazardous materials would not be present at the project site, which was previously operated as a motel. The Phase I ESA conducted by Bureau Veritas did not identify any hazardous materials or petroleum products in accessible interior or exterior areas of the site. Review of stored materials, such as maintenance supplies, did not identify any recognized environmental conditions. Absence of explosive or flammable hazards on the</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		<p>project site were confirmed through interviews with the Key Site Manager and other property management personnel. According to the Phase I ESA, the properties adjoining the project site did not contain any potential aboveground sources of contamination that could potentially impact the project site. Therefore, the proposed development would not expose residents or the surrounding community to dangerous explosive or flammable hazards.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed development is located in an urban setting on land designated as Urban and Built-Up Land by the California Department of Conservation (DOC 2016). Lands adjacent to the project site are also classified as urban. The project site is zoned as High Density Residential housing (RH). Bordering land uses include other residential properties and commercial buildings. As a renovation project, converting the existing Stanton Inn structure into an affordable housing complex would not affect protected farmlands or include activities that would result in the loss of farmland. Therefore, the proposed project complies with the Farmland Protection Policy Act (see Attachment 11).</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Floodplain management would not be adversely impacted by the proposed project because the project site does not occur on a floodplain or floodway. According to FEMA Flood Insurance Rate Map Panel 06059 C0506J, the project would be in an Area of Minimal Flood Hazard (FEMA 2012) (see Attachment 5).</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The California State Historic Preservation Office (SHPO) was consulted in June 2021 to identify the presence of any known historical or cultural resources on the project site. Pursuant to 36 Code of Federal Regulations (CFR) 800.4(d), the SHPO did not find evidence that any historic resources would be impacted by the</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		<p>proposed development. As described in Mitigation Measures 2 and 3, construction activities would cease and an archaeologist would be contacted in the event that historic or cultural resources were discovered on the project site during construction ground-disturbing activities. The SHPO concurred with the County's finding that the project would result in no adverse effect to historic properties.</p> <p>Pursuant to California Public Resources Code Section 21080.3.1 (c), tribes that are traditionally and culturally affiliated with the project site, such as the Kizh Nation, were consulted. Included as Mitigation Measure 3, the Kizh Nation requested that a Native American monitor be present during ground-disturbing activities (see Attachments 12 and 13; see ERR 7).</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Construction Noise. A temporary increase in noise levels would be expected during the renovation phase of the proposed project. Noise would be generated by construction equipment and the delivery of materials among other activities. Increases in ambient noise levels would be restricted to daytime hours and remain within applicable thresholds.</p> <p>Operational Noise The proposed project is not expected to have a negative impact on ambient noise levels during the operational phase. Sources of ambient noise produced by the proposed development during the operational phase would be related to residential land uses. These noise sources may stem from people, car doors slamming, recreational activities, trash collection, and outdoor common areas, among others.</p> <p>Noise level for the project site was calculated using the HUD DNL Electronic Assessment Tool. The project site is located approximately 850 feet east of Knott Avenue. There are no active</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
		<p>rail lines in the project vicinity and the nearest airport is Los Alamitos Airfield, located approximately 2.7 miles west. The HUD noise tool was run based on the Airport Environs Land Use Plan for Joint Forces Training Base Los Alamitos (amended August 2017), the 60 and 65 A-weighted decibel (dBA) noise contours for Los Alamitos Airfield, the published average daily traffic volumes from the Orange County Transportation Authority (for Katella Avenue and Knott Avenue), and speed limit information and building setback measurements from online aerial imagery. Noise at the project site equals but does not exceed the 65 dBA DNL/ L_{dn}. Therefore, this project would comply with the federal standards for noise abatement and control (see Attachment 14; ERR 8).</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not located on or adjacent to any sole-source aquifers. There are no sole-source aquifers designated in Orange County (EPA 2020) (see Attachment 15).</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The National Wetlands Inventory map regulated by USFWS was used to determine the presence of wetlands on the project site (USFWS 2020b). No wetlands were found on the project site. The nearest wetland is a freshwater pond located at the Los Alamitos Racetrack, approximately 2 miles west of the project site (see Attachment 16; see ERR 9).</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site does not contain any rivers protected under the Wild and Scenic Rivers Act. Bautista Creek, located approximately 63 miles east of the project site, is the closest Wild and Scenic waterway to the project site (see Attachment 17; see ERR 10).</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance Determinations
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project would have a beneficial impact to the Stanton community by providing affordable housing and social services to low-income residents and individuals experiencing homelessness. Residents of the affordable housing complex would benefit from social services, such as skill-building workshops, case management services, and life training skills. Negative impacts to the project environment were not found outside of those discussed above, which would be avoided, reduced, or mitigated through incorporation of design features, compliance with applicable regulations and policies, and implementation of mitigation measures. Because the project would not expose residents or community members to adverse environmental impacts or negatively impact social welfare, it would not violate Executive Order 12898 (see ERR 11).

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The project site is 1.01 acres north of Katella Avenue on Assessor’s Parcel Numbers 079-762-26/61. The original General Commercial zoning and land use designation for the proposed development did not support residential land uses (Stanton 2008). However, in November 2020, the City Council for the City of Stanton adopted a zoning change for the project site from Commercial General (CG) to High Density Residential (RH). The City Council also adopted a General Plan Map Amendment changing the land use designation for the project site from CG to RH, which allows Transitional and Supportive Housing. This change approved by the City is consistent with the City’s goals and objectives, and compatible with adjacent land use patterns and uses in the immediate vicinity (See Attachment 18).</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Soil Suitability. Soil information for the project site was acquired through U.S. Department of Agriculture’s Soil Survey Geographic Database and Web Soil Survey (USDA 2021). Soils on the project site are composed of Metz loamy sand, which are characterized by high drainage and low runoff (USDA 1999) (see Attachment 19).</p> <p>Slope and Drainage. The project site is generally flat and lacks slopes that would adversely affect the project. According to the Phase I ESA, the site generally slopes west-southwest. Elevation at the project site is approximately 55 feet above mean sea level. The project does not include any substantial alterations to drainage conditions.</p> <p>Erosion and Stormwater Runoff. Erosion due to stormwater runoff at the project site would be minimized due to the flat topography of the area and the lack of exposed soils. With exception to a small landscaped area along the site border with Katella Avenue, the project site is completely covered by the Stanton Inn and paved parking lot. Stormwater on the project site would flow into storm drains located along Katella Avenue. The City of Stanton maintains a storm drain that flows into Bolsa Chica Channel and then into Huntington Harbor and the Seal Beach National Wildlife Refuge. The City has implemented numerous programs to reduce the amount of pollutants mixing with stormwater and urban runoff.</p> <p>Because the proposed project would involve renovating an existing structure instead of building a new apartment complex, minimal erosion is expected during the construction phase. However, the project would comply with erosion control</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>measures during the construction phase to minimize erosion and stormwater pollution. Best management practices (BMPs) adopted from the Stormwater Quality Management Plan would be incorporated during and after the construction phase of the project (Mitigation Measures 4 and 5). Other low-impact drainage BMPs would include maintaining existing drainage pathways and impervious areas, and retaining natural areas where possible. Runoff from the project site is not anticipated to exceed the capacity of stormwater drainage systems or contribute to stormwater pollution.</p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>3</p>	<p>Hazardous Materials. A Phase I ESA conducted by Bureau Veritas in August 2020 found no recognized environmental conditions, historical recognized environmental conditions, or controlled recognized environmental conditions on the project site. No hazardous substances or petroleum products were observed on site. Underground storage tanks and aboveground storage tanks were not observed on the project site. In addition, no vapor mitigation concerns were identified. Although a hydraulic elevator and transformer were found on site, both were determined to be in good condition and installed after 1979. As a result, Bureau Veritas concluded that these materials did not contain PBCs. RiskNomics was contracted by Bureau Veritas to conduct asbestos-containing material and LBP testing on the existing Stanton Inn building. Sampling of materials potentially containing asbestos and paint chips collected from throughout the property revealed the project location does not contain asbestos or lead.</p> <p>Site Safety. The project would be constructed consistent with the current Orange County requirements for fencing, lighting, and other features related to site safety. No impacts related to hazards, nuisance, or site safety would occur.</p> <p>Noise. A temporary increase in noise would occur during the construction phase of the proposed project. Increased noise levels would adhere to limits set by Orange County for construction impacts on noise-sensitive land uses. Noise increases would occur during daylight hours, with no adverse impacts anticipated.</p> <p>Operational noise sources would include project-generated traffic and recreational spaces. However, based on the relatively small size of the proposed project, only minimal increases in noise should be expected. Operational noise would comply with Orange County Noise Control Ordinances.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Energy Consumption	2	To obtain building permits, the project would be required to meet the minimum energy consumption standards as outlined in the California Building Code, Title 24, 2001 Energy Efficiency Standards. The proposed project would not pursue Leadership in Energy and Environmental Design (LEED) certification, but energy efficiency at the project site is likely to increase as older appliances and lighting fixtures are replaced with newer and more-efficient electronics.

SOCIOECONOMIC

Employment and Income Patterns	1	The proposed project has the potential to create temporary employment opportunities during the renovation phase. Income patterns in the community would benefit from conversion of the Stanton Inn into an affordable housing community, which would include 54 studios and 17 one -bedroom units for individuals experiencing homelessness and earning at or below 30% area mean income. Residents would have access to social services, such as case management, adult education services and workshops, community events, and behavioral healthcare. On-site Case Managers and Supportive Service Coordinators would implement these services. The goal of these services is for residents to successfully retain their housing, make progress in their recovery, and become independent.
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Demographic Character Changes, Displacement	1	Because the proposed project would be built in an area already occupied by residential and commercial land uses, the development would not adversely affect community character. The project would have a beneficial impact on the City of Stanton because it proposes converting the Stanton Inn building into affordable housing units. The existing Stanton Inn would be renovated, and a new community center would be built on the same 1.01-acre project site. Therefore, the proposed development would not result in the displacement of existing businesses or residences in the area. Increasing affordable housing units supports the housing priorities detailed in the Orange County Consolidated Plan by creating accommodations for individuals experiencing homelessness. As a result, the proposed project would have a positive impact on community character while remaining compliant with existing land use designations and design.
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COMMUNITY FACILITIES AND SERVICES

Educational and Cultural Facilities	2	Negative impacts on educational facilities in the City is not foreseen because the target population for the proposed project does not include families with children. Given the availability of educational institutions in the area and the low probability of residents with children, adverse impacts to schools are not anticipated.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>The project is located near multiple educational facilities, as follows:</p> <ul style="list-style-type: none"> • Cerritos Elementary School, approximately 1.3 miles northwest of the project site • Carver Elementary School, approximately 2.1 miles east of the project site • Western High School, approximately 2 miles north of the project site • Alamitos Intermediate School, approximately 3 miles southeast of the project site • Alternative Resource Day Program Inc., located immediately east of the project site on the eastern border
Commercial Facilities	2	<p>No adverse impacts to surrounding commercial facilities are anticipated. The project site is bordered by residential, retail, and commercial uses. The businesses located on the western project boundary would not be impacted by the proposed development.</p>
Health Care and Social Services	2	<p>Increases in the local population could increase demand for health care and social services in the community.</p> <p>The project site is situated near numerous health care facilities, including the following (City of Stanton 2021):</p> <ul style="list-style-type: none"> • Anaheim General Medical Center, approximately 1.7 miles north of the project site at 3400 W. Ball Road, Anaheim, CA 92804 • West Anaheim Medical Center, approximately 2.3 miles northeast of the project site at 3033 W. Orange Avenue, Anaheim, CA 92804 • Cypress Urgent Care, approximately 0.5 miles west of the project site at 6876 Katella Avenue, Cypress, CA 90630 • Marque Urgent Care, approximately 3.1 miles north of the project site at 8970 Knott Avenue, Buena Park, CA 90620 • Medpost Urgent Care of Cypress, approximately 2.3 miles northwest of the project site at 10165 Valley View Street, Cypress, CA 90630 <p>Adverse impacts on healthcare and social services are not anticipated due to the relatively small size of the project and availability of service providers near the proposed development.</p>
Solid Waste Disposal / Recycling	2	<p>Trash receptacles serviced by CR&R Environmental Services were observed on the project site during the site visit. CR&R Incorporated is an environmental services organization that serves Orange, Los Angeles, San Bernardino, Imperial, and Riverside Counties. CR&R manages an extensive network of processing facilities that properly dispose of solid waste,</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>recyclables, green waste, food waste, construction and demolition waste, and electronic waste, among other materials.</p> <p>Because the proposed project would involve the renovation of an existing structure, solid waste generated during the construction phase would be minimized. All generated waste would be properly disposed of and recycled where possible. The amount of solid waste generated by the proposed project during the operational phase would be a fraction of the throughput taken to Orange County landfills daily. As a result, adverse impacts from solid waste disposal associated with the proposed project are not anticipated.</p>
Waste Water / Sanitary Sewers	2	<p>Wastewater and sewage generated by the proposed development during the operational phase would be serviced by the City of Stanton. The City’s Public Works Department (City of Stanton 2021) maintains sewer lines and manages treatment through a combination of in-house personnel and private contractors. Wastewater generated by the City is treated by the Orange County Water District. After treatment by the Orange County Water District, water flows to the Groundwater Replenishment System where it undergoes further purification (OCWD 2021). The proposed project would not require the construction of additional sewage infrastructure. Negative impacts to wastewater systems and sanitary sewers servicing the project site are not anticipated.</p>
Water Supply	2	<p>The City of Stanton would provide water to the project site. Golden State Water Company supplies water to the City and other West Orange County cities, with currently 27,200 customers across seven cities. According to the Golden State Water Company’s website, “water delivered to customers in the West Orange County System is a blend of groundwater pumped from the Orange County Groundwater Basin and imported from the Colorado River Aqueduct and State Water Project (imported and distributed by Metropolitan Water District of Southern California)” (GSWC 2021).</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The project site is in proximity to public safety providers, as follows:</p> <ul style="list-style-type: none"> • Cypress Police Department, approximately 3.8 miles northwest of the project site at 5275 Orange Avenue, Cypress, CA 90630 • Orange County Sheriff-Coroner Department, approximately 0.8 miles east of the project site at 11100 Cedar Street, Stanton, CA 90680 • Orange County Fire Authority Fire Station #63, approximately 2.8 miles north of the project site at 9120 Holder Street, Buena Park, CA 90620

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<ul style="list-style-type: none"> • Anaheim Fire Department, approximately 2.1 miles northeast of the project site at 3100 W. Orange Avenue, Anaheim, CA 92804 • Orange County Fire Authority Fire Station #46, approximately 1.2 miles east of the project site at 7871 Pacific Street, Stanton, CA 90680 <p>Because existing police and fire departments sufficiently serve the project area, the development is not expected to increase demand for public safety services in the community.</p>
Parks, Open Space and Recreation	2	<p>Recreational spaces in proximity to the project site include the following:</p> <ul style="list-style-type: none"> • Stanton Central Park, approximately 0.8 miles northeast of the project site at 10660 Western Avenue, Stanton, CA 90680 • Stanton Park, approximately 2 miles east of the project site at 7800 Katella Avenue, Stanton, CA 90680 • Harry M. Dotson Park approximately 1.7 miles northeast of the project site at 10350 Fern Avenue, Stanton, CA 90680 • Chapman Sports Park, approximately 1.6 miles south of the project site at Chapman Avenue and Knott Street, Garden Grove, CA 92841 • Maple Grove Park North, approximately 1.7 miles southeast of the project site at 6221 Orangewood Avenue, Cypress, CA 90630 <p>Given the relatively small size of the proposed project, an adverse impact to parks, open spaces, and recreational areas is not anticipated.</p>
Transportation and Accessibility	2	<p>The proposed project is within walking distance of several bus stops located along Katella Avenue. The nearest bus stop is approximately 0.11 miles east of the project site, along Katella Avenue, and is serviced by bus line 50. Another bus stop located approximately 0.16 miles east of the project site, at the intersection of S. Knott Avenue and Katella Avenue, is serviced by bus route 25. These bus routes could take residents to stores, libraries, and other amenities located near the proposed project. Transportation to visit medical professionals and receive social services off site would be organized or provided by housing development staff.</p> <p>Pre-existing urban development and readily available public transit near the project site would reduce transportation and accessibility issues, such as limited parking and traffic. Because few residents are likely to own multiple vehicles, there would be ample parking for visitors and staff.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	3	<p>The project site does not encompass any unique natural features. Federally protected natural resources, such as rivers, wetlands, coastal zones, and endangered species, are not present on the project site or adjacent properties (U.S. National Park Service 2019). Therefore, the proposed project would not result in the alteration of water resources that could potentially result in substantial erosion or siltation on or off site, or result in downstream flooding. Because the project would involve conversion of an existing building, groundwater recharge at the project site could be reduced. Recharge would still occur in vegetated green spaces on the project site.</p> <p>Mitigation measures employing BMPs would be required during and post-construction to minimize potential adverse contributions to stormwater pollution (Mitigation Measures 4 and 5).</p>
Vegetation, Wildlife	2	<p>Although the proposed project is located within the ranges of six endangered or threatened species of mammals, birds, and flowering plants, none of these species are found on the project site because it is developed and in an urbanized area. According to the USFWS IPaC database (USFWS 2020a), the project site is situated outside of critical habitat areas for the endangered or threatened species that have these areas defined (see ERR 5).</p> <p>The project site is largely absent of vegetation, although plant life, such as bushes, trees, grasses, and weeds, can be found on the borders of the site.</p>
Other Factors		

Additional Studies Performed:

- *Phase I Environmental Assessment*, Prepared by Bureau Veritas, August 2020
- *Lead-Based Paint Screening*, Prepared by Bureau Veritas, September 2020
- *Asbestos Inspection Report*, Prepared by Bureau Veritas, September 2020

Field Inspection (Date and completed by):

- *Phase I Environmental Assessment*, Prepared by Bureau Veritas, August 2020
- *Lead-Based Paint Screening*, Prepared by Bureau Veritas, September 2020
- *Asbestos Inspection Report*, Prepared by Bureau Veritas, September 2020

List of Sources, Agencies, and Persons Consulted [40 CFR 1508.9(b)]:

- CCC (California Coastal Commission). 2019. "Maps – Coastal Zone Boundary: Orange County." <https://coastal.ca.gov/maps/czb/>.
- City of Stanton. 2008. *City of Stanton General Plan*. Accessed June 2021. <https://www.cityoforange.org/391/General-Plan>.
- City of Stanton. 2021. "About Us/Moving to Stanton." Accessed June 2021. <http://www.ci.stanton.ca.us/about-us/moving-to-stanton>.
- City of Stanton. 2021. "Departments/Public Works and Engineering." Accessed June 2021. <http://www.ci.stanton.ca.us/departments/public-works-and-engineering>.
- DOC (California Department of Conservation). 2016. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- EPA (U.S. Environmental Protection Agency). 2020. "Current Nonattainment Counties for all Criteria Pollutants." July 31, 2020. Accessed August 2020. <https://www3.epa.gov/airquality/greenbook/ancl.html>.
- EPA. 2020. "Sole Source Aquifers for Drinking Water." Last updated January 14, 2020. Accessed May 2021. <https://www.epa.gov/dwssa>.
- FEMA (Federal Emergency Management Agency). 2012. "FEMA Flood Map Service Center: Flood Insurance Rate Map for Irvine, California." <https://msc.fema.gov/portal/search#searchresultsanchor>.
- GSWC (Golden State Water Company). 2021. "Los Alamitos, West Orange County." Accessed June 2021. <https://www.gswater.com/los-alamitos>.
- OCWD (Orange County Water District). 2021. "Purification Process." Accessed June 2021. <https://www.ocwd.com/gwrs/the-process/>.
- SCAQMD (South Coast Air Quality Management District). 2005. "Rule 403: Fugitive Dust." As amended through June 3, 2005. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.
- SCAQMD. 2019. "South Coast AQMD Air Quality Significance Thresholds." April 2019. Accessed May 2021. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.
- USDA (U.S. Department of Agriculture). 1999. "Metz Series." June 1999. https://soilseries.sc.egov.usda.gov/OSD_Docs/M/METZ.html.
- USDA. 2021. "Web Soil Survey." USDA Natural Resources Conservation Service. Accessed June 2021. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.

USFWS (U.S. Fish and Wildlife Service). 2019. "Coastal Barrier Resources System Mapper." Updated July 31, 2019. Accessed May 2021. <https://www.fws.gov/cbra/maps/Mapper.html>.

USFWS. 2020a. "Information for Planning and Consultation (IPaC)." Accessed May 2021. <https://ecos.fws.gov/ipac/location/JACZBM6PXJE25B3BXOS33AMDBE/resources#endangered-species>.

USFWS. 2020b. "National Wetlands Inventory, Surface Waters and Wetlands Map." Accessed May 2021. <https://www.fws.gov/wetlands/data/mapper.html>.

U.S. National Park Service. 2019. "Interactive map of NPS Wild and Scenic Rivers." Accessed May 2021. <https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daee0e353142>.

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

The Draft Environmental Assessment will be made available for public review and comment beginning on June 30, 2021 and concluding on July 16, 2021.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project would not contribute to a significant cumulative impact under the National Environmental Policy Act because it would consist of an urban development project consistent with the site's General Plan land use and zoning designations and would be located near existing transit services. State and local planning guidelines encourage the development of urban housing in areas served by transit and near commercial and cultural amenities because this type of development contributes less to cumulative effects on the environment in comparison to development of previously undisturbed sites in more remote locations with fewer transit connections, many of which contain native vegetation and wildlife species.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Site identification has proven to be a major obstacle in providing affordable housing units. Residential sites available at reasonable cost are extremely limited, and sites that do not meet cost and land use criteria are generally eliminated as alternatives. This project site was chosen from several properties based on feasibility, location, and affordability. Physical and social constraints were also considered in identifying and rejecting alternatives. No other build alternatives are analyzed or included in this environmental document.

No Action Alternative [24 CFR 58.40(e)]:

The No Action Alternative would not build any additional housing at the project site. There are no benefits to the physical or human environment by not taking the federal action associated with this project. Physical impacts to the environment would occur in urban areas whether units are subsidized with federal funds or built at market rates. If an affordable project were not constructed on this site, the social benefits of providing new affordable housing opportunities on an urban infill parcel would not occur.

The proposed project must acquire all required permits and approvals prior to construction; therefore, the proposed project would be consistent with all land use plans, policies, and regulations for the

project site. Not building on this site could potentially result in more housing constructed outside of the urban area in agricultural and undeveloped areas, contributing to urban sprawl, regional traffic congestion, and regional air quality issues.

Summary of Findings and Conclusions:

Jamboree Housing Corporation is proposing the renovation and conversion of the existing Stanton Inn and Suites into an affordable housing community. The project would consist of 71 affordable housing units with one managers unit. Social services would be provided through Housing with Heart, the Community Impact Team at Jamboree Housing Corporation. The proposed project would contribute to the increased density and availability of low-income housing in an area that would encourage multi-modal activity. The proximity of existing transit options to the project site would reduce long-term air emissions and energy use associated with motor vehicle travel.

Because the project is located within a developed urban area, the project would be adequately served by utilities and public services. The project would conform to all applicable federal, state, and regional regulations associated with land use compatibility, air emissions, water quality, geologic hazards, and related environmental resources addressed herein. Based on the analyses of environmental issues contained in this document, the proposed project is not expected to have significant environmental impacts.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Air Quality – Fugitive Dust

Mitigation Measure 1

The project shall implement the following, as applicable to the project:

- **Backfilling:** Stabilize backfill material when not actively handling, stabilize backfill material during handling, and stabilize soil at completion of activity.
- **Clearing and Grubbing:** Maintain stability of soil through pre-watering of site prior to clearing and grubbing, stabilize soil during clearing and grubbing activities, and stabilize soil immediately after clearing and grubbing activities.
- **Clearing Forms:** Use water spray, sweeping and water spray, or a vacuum system to clear forms.
- **Crushing:** Stabilize surface soils prior to operation of support equipment and stabilize material after crushing.
- **Cut and Fill:** Pre-water soils prior to cut and fill activities, and stabilize soil during and after cut and fill activities.
- **Demolition – Mechanical/Manual:** Stabilize wind erodible surfaces to reduce dust, stabilize surface soil where support equipment and

vehicles will operate, stabilize loose soil and demolition debris, and comply with Air Quality Management District Rule 1403.

- **Disturbed Soil:** Stabilize disturbed soil throughout the construction site, and stabilize disturbed soil between structures.
- **Earth-Moving Activities:** Pre-apply water to depth of proposed cuts, re-apply water as necessary to maintain soil in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction, and stabilize soil once earth-moving activities are complete.
- **Importing/Exporting of Bulk Materials:** Stabilize material while loading to reduce fugitive dust emissions, maintain at least 6 inches of freeboard on haul vehicles, stabilize material while transporting and unloading to reduce fugitive dust emissions, and comply with Vehicle Code Section 23114.
- **Landscaping:** Stabilize soils, materials, slopes.
- **Road Shoulder Maintenance:** Apply water to unpaved shoulders prior to clearing, and apply chemical dust suppressants and/or washed gravel to maintain a stabilized surface after completing road shoulder maintenance.
- **Screening:** Pre-water material prior to screening, limit fugitive dust emissions to opacity and plume length standards, and stabilize material immediately after screening.
- **Staging Areas:** Stabilize staging areas during use, and stabilize staging area soils at project completion.
- **Stockpiles/Bulk Material Handling:** Stabilize stockpiled materials. Stockpiles within 100 yards of off-site occupied buildings must not be greater than 8 feet in height, or must have a road bladed to the top to allow water truck access, or must have an operational water irrigation system that is capable of complete stockpile coverage.
- **Traffic Areas for Construction Activities:** Stabilize all off-road traffic and parking areas, stabilize all haul routes, and direct construction traffic over established haul routes.
- **Trenching:** Stabilize surface soils where trencher or excavator and support equipment will operate, and stabilize soils at the completion of trenching activities.
- **Truck Loading:** Pre-water material prior to loading and ensure that freeboard exceeds 6 inches (CVC 23114).
- **Turf Overseeding:** Apply sufficient water immediately prior to conducting turf vacuuming activities to meet opacity and plume length standards, and cover haul vehicles prior to exiting the site.
- **Unpaved Roads/Parking Lots:** Stabilize soils to meet the applicable performance standards and limit vehicular travel to established unpaved roads (haul routes) and parking lots.
- **Vacant Land:** In instances where vacant lots are 0.10 acres or larger and have a cumulative area of 500 square feet or more that are driven over and/or used by motor vehicles and/or off-road vehicles, prevent motor vehicle and off-road-vehicle trespassing, parking, and

access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees, or other effective control measures.

Historic Preservation (Cultural Resources)

Mitigation Measure 2 In the event that previously unidentified cultural resources are encountered during ground-disturbing activities associated with project construction, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology shall be contacted immediately to evaluate the find. If the discovery proves to be significant under the National Environmental Policy Act, additional work, such as data recovery excavation, may be warranted to mitigate potential adverse effects.

Mitigation Measure 3 The developer shall be required to retain the services of a qualified Native American monitor(s) during construction-related ground-disturbing activities. The tribal representative from the Gabrieleño Band of Mission Indians – Kizh Nation defines ground disturbance to include pavement removal, potholing, grubbing, weed abatement, boring, grading, excavation, or trenching within the project site. The monitor must be approved by the tribal representative and shall be present on site during the construction phases that involve ground-disturbance activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archaeological resources. If archaeological or cultural resources are encountered, they shall be documented by the Native American monitor and collected for preservation.

Unique Natural Features, Water Resources

Mitigation Measure 4 The proposed project shall include best management practices (BMPs) designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by Orange County). Construction (temporary) BMPs for the proposed project shall include hydroseeding, straw mulch, velocity dissipation devices, silt fencing, fiber rolls, storm drain inlet protection, wind erosion control, and stabilized construction entrances.

Mitigation Measure 5 Prior to construction commencing, the applicant shall provide evidence to Orange County of a Waste Discharge Identification number generated from the State Regional Water Quality Control Board’s Stormwater Multiple Application & Reports Tracking System. This serves as the Regional Water Quality Control Board’s approval or permit under the National Pollutant Discharge Elimination System construction stormwater quality permit.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: *Liza Santos* Date: June 25, 2021

Name/Title/Organization: Liza Santos/Housing Development Compliance Administrator/
OC Housing and Community Development

Certifying Officer Signature: *Julia Bidwell* Date: June 25, 2021

Name/Title: Julia Bidwell/Director, OC Housing & Community Development

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

ENVIRONMENTAL REVIEW RECORDS (ERRS)

ERR No. 1. Airport Hazards



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

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Airport Hazards (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/airport-hazards>

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Click here to enter text.

→ *Work with the RE/HUD to develop mitigation measures. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project area is located approximately 12 miles from the nearest civilian airport, John Wayne Airport, and about 1.5 miles from the nearest military airport at Joint Forces Training Base Los Alamitos (see Attachments 2 and 3).

ERR No. 2. Floodplain Management



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Floodplain Management (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/floodplain-management>

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD’s floodplain management regulations in Part 55?

Yes

Provide the applicable citation at [24 CFR 55.12\(c\)](#) here. If project is exempt under [55.12\(c\)\(6\)](#) or [\(8\)](#), provide supporting documentation.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary.

No → Continue to Question 2.

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs).

Does your project occur in a floodplain?

No → Continue to the Worksheet Summary below.

Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway → Continue to Question 3, Floodways

Coastal High Hazard Area (V Zone) → Continue to Question 4, Coastal High Hazard Areas

500-year floodplain (B Zone or shaded X Zone) → Continue to Question 5, 500-year Floodplains

100-year floodplain (A Zone) → The 8-Step Process is required. Continue to Question 6, 8-Step Process

3. **Floodways**

Is this a functionally dependent use?

Yes

The 8-Step Process is required. Work with HUD or the RE to assist with the 8-Step Process.
→ *Continue to Worksheet Summary.*

- No → *Federal assistance may not be used at this location unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

4. Coastal High Hazard Area

Is this a critical action such as a hospital, nursing home, fire station, or police station?

- Yes → *Critical actions are prohibited in coastal high hazard areas unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

- No

Does this action include new construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?

- Yes, there is new construction of something that is not a functionally dependent use.
New construction must be designed to FEMA standards for V Zones at 44 CFR 60.3(e) (24 CFR 55.1(c)(3)(i)).

→ *Continue to Question 6, 8-Step Process*

- No, this action concerns only existing construction.

Existing construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.

→ *Continue to Question 6, 8-Step Process*

5. 500-year Floodplain

Is this a critical action?

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

- Yes → *Continue to Question 6, 8-Step Process*

6. 8-Step Process.

Is this 8-Step Process required? Select one of the following options:

- 8-Step Process applies.

This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD's elevation requirements.

→ *Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.*

- 5-Step Process is applicable per 55.12(a)(1-3).

Provide the applicable citation at 24 CFR 55.12(a) here.

[Click here to enter text.](#)

→ *Work with the RE/HUD to assist with the 5-Step Process. Continue to Worksheet Summary.*

- 8-Step Process is inapplicable per 55.12(b)(1-4).

Provide the applicable citation at 24 CFR 55.12(b) here.

[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

FEMA Firm Map 06059C0117J, effective date 12/3/2009 (See Attachment 5): Project is not in a floodplain.

ERR No. 3. Air Quality



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

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Air Quality (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/air-quality>

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes → Continue to Question 2.

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.

2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

Follow the link below to determine compliance status of project county or air quality management district:

<https://www.epa.gov/green-book>

No, project’s county or air quality management district is in attainment status for all criteria pollutants

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project’s management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed *de minimis* or *threshold* emissions.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ *Continue to Question 4. Explain how you determined that the project would not exceed de minimis or threshold emissions in the Worksheet Summary.*

- 4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

Project emissions were calculated using the CalEEMod Air Quality Model. Emissions will be below *de minimis* thresholds for criteria pollutants (see Attachment 6).

ERR No. 4. Coastal Zone Management Act



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Coastal Zone Management Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/coastal-zone-management>

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samoa	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

- Yes → Continue to Question 2.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

2. Does this project include activities that are subject to state review?

- Yes → Continue to Question 3.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

3. Has this project been determined to be consistent with the State Coastal Management Program?

- Yes, with mitigation. → The RE/HUD must work with the State Coastal Management Program to develop mitigation measures to mitigate the impact or effect of the project.
- Yes, without mitigation. → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.
- No → Project cannot proceed at this location.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project is not located in a coastal zone management area (see Attachment 7).

ERR No. 5. Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

Contamination and Toxic Substances (Multifamily and Non-Residential Properties) – PARTNER

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General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.hudexchange.info/programs/environmental-review/site-contamination		

1. How was site contamination evaluated? ¹ Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

→ Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- No

Explain:

¹ HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD’s toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

Click here to enter text.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes.

→ Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.

3. Mitigation

Work with the RE/HUD to identify the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ Provide all mitigation requirements² and documents. Continue to Question 4.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

Click here to enter text.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

→ Continue to the Worksheet Summary.

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Asbestos containing material (ACM) and lead-based paint (LBP) inspection and sampling were conducted at the proposed project site. Asbestos testing was conducted by RiskNomics in September 2020. A total of 90 bulk samples were collected and analyzed from throughout the proposed project site to facilitate the inspection. Inspection activities were limited to accessible areas of the building with no destructive investigation of hidden spaces. The roof was not inspected. Sampling was conducted in accordance with EPA and OSHA standards and were found negative for asbestos. RiskNomics also conducted LBP sampling on the project site. Professionals collected 24 paint chip samples to evaluate various paints throughout the project site. Lab results revealed that lead levels were below the laboratory's reporting limit and are not classified as LBPs (see Attachments 8 and 9).

Are formal compliance steps or mitigation required?

Yes

No

ERR No. 6. Endangered Species Act



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Endangered Species Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/endangered-species>

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.

Explain your determination:

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, the activities involved in the project have the potential to affect species and/or habitats.

→ Continue to Question 2.

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#).

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.

→ Continue to Question 3.

3. Recommend one of the following effects that the project will have on federally listed species or designated critical habitat:

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ **Partner entities should not contact the Services directly.** *If the RE/HUD agrees with this recommendation, they will have to complete Informal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ **Partner entities should not contact the Services directly.** *If the RE/HUD agrees with this recommendation, they will have to complete Formal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

The range of six threatened or endangered species overlap with the project site. However, according to the U.S. Fish and Wildlife Service's IPaC database, the project site is located outside of critical habitat areas for the endangered or threatened species that have these areas defined. Furthermore, the project site is currently developed and within a fully urbanized area; therefore, no species or critical habitat occur at the site and there would be no impacts to listed species or critical habitat (see Attachment10).

Include all documentation supporting your findings in your submission to HUD.

According to US Fish and Wildlife Service's IPaC webpage, 6 federally-listed species occur within the proposed project site. Since the project site occurs in a highly developed urban area and does not overlap with critical habitat for these species, the proposed development is not expected to have adverse impacts on any federally-listed species.

See Attachment 10.

ERR No. 7. Historic Preservation



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Historic Preservation (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/historic-preservation>

Threshold

Is Section 106 review required for your project?

- No, because a Programmatic Agreement states that all activities included in this project are exempt. (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

- Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

The Section 106 Process

After determining the need to do a Section 106 review, HUD or the RE will initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Only RE or HUD staff may initiate the Section 106 consultation process. Partner entities may gather information, including from SHPO records, identify and evaluate historic properties, and make initial assessments of effects of the project on properties listed in or eligible for the National Register of Historic Place. Partners should then provide their RE or HUD with all of their analysis and documentation so that they may initiate consultation.

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if the RE or HUD should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that only HUD or the RE may initiate consultation with Tribes. Partner entities may prepare a draft letter for the RE or HUD to use to initiate consultation with tribes, but may not send the letter themselves.

List all organizations and individuals that you believe may have an interest in the project here:

- 1) State Historic Preservation Office (complete, see Attachment 12)
- 2) Indian Tribes, including Tribal Historic Preservation Officers
 - a. Gabrieleño Band of Mission Indians, Kizh Nation

→ Continue to Step 2.

Step 2 - Identify and Evaluate Historic Properties

Provide a preliminary definition of the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

7165 Katella Ave
Stanton, CA 90680

See EA Figure 1.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to HUD's website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

[Click here to enter text.](#)

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

Yes → Provide survey(s) and report(s) and continue to Step 3.

Additional notes:

[Click here to enter text.](#)

No → Continue to Step 3.

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below to recommend to the RE or HUD.

Please note: this is a recommendation only. It is **not the official finding, which will be made by the RE or HUD, but only your suggestion as a Partner entity.**

No Historic Properties Affected

Document reason for finding:

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Document reason for finding and provide any comments below.

Comments may include recommendations for mitigation, monitoring, a plan for unanticipated discoveries, etc.

[Click here to enter text.](#)

Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)

[Click here to enter text.](#)

Provide any comments below:

Comments may include recommendations for avoidance, minimization, and/or mitigation.

[Click here to enter text.](#)

Remember to provide all documentation that justifies your National Register Status determination and recommendations along with this worksheet.

ERR No. 8. Noise (EA Level Reviews)



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Noise (EA Level Reviews) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control>

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ Continue to Question 2.

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ Continue to Question 2.

- None of the above

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

- There are no noise generators found within the threshold distances above.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

- Noise generators were found within the threshold distances.

→ Continue to Question 3.

3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

- Acceptable (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 65 dBA DNL/ L_{dn}.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.

If project is new construction:

Is the project in a largely undeveloped area¹?

No

Yes → **The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i).**

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.

Unacceptable: (Above 75 decibels)

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.

If project is new construction:

The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Work with HUD or the RE to either complete an EIS or obtain a waiver signed by the appropriate authority.

→ Continue to Question 4.

4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Work with the RE/HUD on the development of the mitigation measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Mitigation as follows will be implemented:

[Click here to enter text.](#)

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

→ Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.
Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here: Mitigation will not be necessary since the project falls within the acceptable HUD noise threshold of 65 dBA.

[Click here to enter text.](#)

→ Continue to the Worksheet Summary.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

The noise level for the project site was calculated using the HUD DNL Electronic Assessment Tool. The noise level at the projects site is 65 decibels (dBA), the acceptable HUD noise threshold (Attachment 13).

The proposed project site is located approximately 850 feet east of Knott Avenue. There are no active rail lines in the project vicinity and the nearest airport is Los Alamitos Airfield, located about 2.7 miles west. The HUD noise tool was run based on the Airport Environs Land Use Plan for Joint Forces Training Base Los Alamitos (Amended August 2017), the 60 and 65 dBA noise contours for Los Alamitos Airfield, the published ADT traffic volumes from the Orange County Transportation Authority (for Katella Avenue and Knott Avenue), and speed limit information and building setback measurements from online aerial imagery. Noise at the project site equals but does not exceed the 65 dBA DNL/ L_{dn}. Therefore, this project would comply with the federal, state, and local standards for noise abatement and control (see ERR 8).

Include all documentation supporting your findings in your submission to HUD.

See HUD DNL Electronic Assessment Tool, Attachment 14.

ERR No. 9. Wetlands



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Wetlands (CEST and EA) – Partner

<https://www.hudexchange.info/environmental-review/wetlands-protection>

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance?

The term "new construction" includes draining, dredging, channelizing, filling, diking, impounding, and related activities and construction of any structures or facilities.

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact a wetland as defined in E.O. 11990?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes → *Work with HUD or the RE to assist with the 8-Step Process.* *Continue to Question 3.*

3. Does Section 55.12 state that the 8-Step Process is not required?

No, the 8-Step Process applies.

This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD’s elevation requirements.

→ *Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.*

5-Step Process is applicable per 55.12(a).

Provide the applicable citation at 24 CFR 55.12(a) here.

[Click here to enter text.](#)

→ *Work with the RE/HUD to assist with the 5-Step Process. This project may require mitigation or alternations. Continue to Worksheet Summary.*

8-Step Process is inapplicable per 55.12(b).

Provide the applicable citation at 24 CFR 55.12(b) here.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

8-Step Process is inapplicable per 55.12(c).

Provide the applicable citation at 24 CFR 55.12(c) here.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project area is not in or adjacent to a wetland (see Attachment 16).

ERR No. 10. Wild and Scenic Rivers

Wild and Scenic Rivers (CEST and EA) – PARTNER

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297
References		
https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers		

1. Is your project within proximity of a NWSRS river as defined below?

Wild & Scenic Rivers: These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

No

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

→ Continue to Question 2.

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *The RE/HUD must work with the Managing Agency to identify mitigation measures to mitigate the impact or effect of the project on the river.*

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project area is not located near a wild and scenic river (see Attachment 17).

Are formal compliance steps or mitigation required?

Yes

No

ERR No. 11. Environmental Justice



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
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Environmental Justice (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/environmental-justice>

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

Explain:

[Click here to enter text.](#)

→ *The RE/HUD must work with the affected low-income or minority community to decide what mitigation actions, if any, will be taken. Provide any supporting documentation.*

No

Explain:

Air Quality: With the implementation of mitigation measures required for the control of fugitive dust at construction sites, no disproportionate impacts to low income and/or minority communities would occur as a result of impacts to air quality.

Erosion and Storm Water Runoff: With the implementation of stormwater mitigation measures outlined in a Stormwater Management Plan, no disproportionate impacts to low income and/or minority communities would occur as a result of erosion, drainage, and stormwater runoff.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

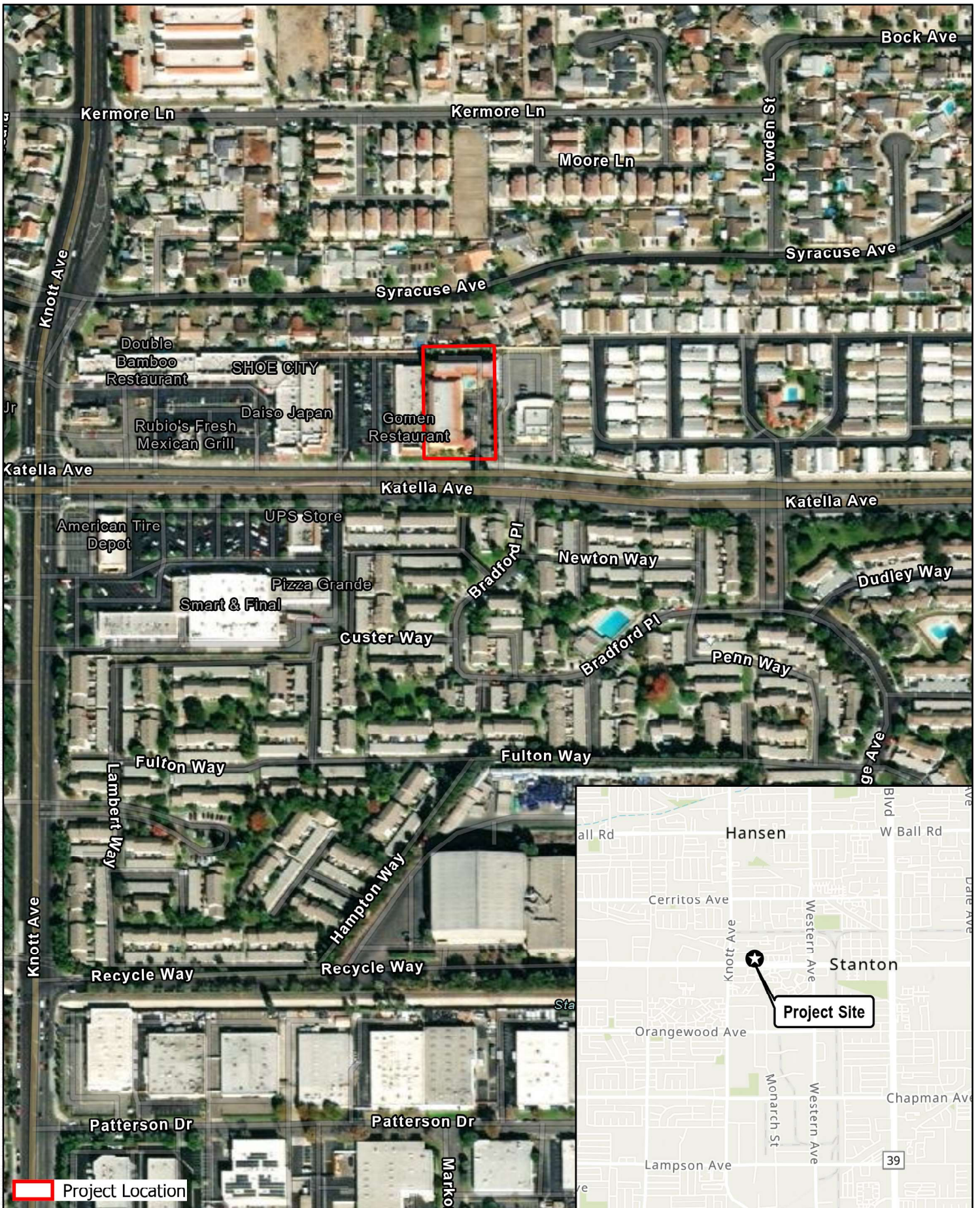
Air Quality: Construction activities such as grading may cause temporary adverse impacts to air quality from fugitive dust during construction of the residential community; however, with the implementation of air quality mitigation measures required for fugitive dust required by SCQAMD Rule 403 (see Mitigation Measure 1 in Environmental Assessment), impacts to air quality would be minimized or avoided. Therefore, no disproportionate impacts to low income and/or minority communities would occur as a result of fugitive dust.

Erosion/ Drainage/ Storm Water Runoff: Construction activities may temporarily increase impacts from erosion, drainage, and stormwater runoff. However, with the implementation of best management practices per the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by Orange County) and the requirements of the National Pollutant Discharge Elimination System construction stormwater quality permit (see Mitigation Measures 4 and 5 in Environmental Assessment), the potential temporary impacts would be minimized and kept on-site to the greatest extent possible. Therefore, no disproportionate impacts to low income and/or minority communities would occur as a result of erosion, drainage, and stormwater runoff.

Include all documentation supporting your findings in your submission to HUD.

Assessment of the environmental factors for the proposed development revealed that the project would not have adverse impacts to land development, community facilities and services, or natural features. The project would have minor beneficial impacts to socioeconomic aspects of the surrounding community and target population.

Attachment 1. Project Location



Attachment 2. Proximity to Civilian Airport

Ruler

Line Path Polygon Circle 3D path 3D polygon

Measure the distance between two points on the ground

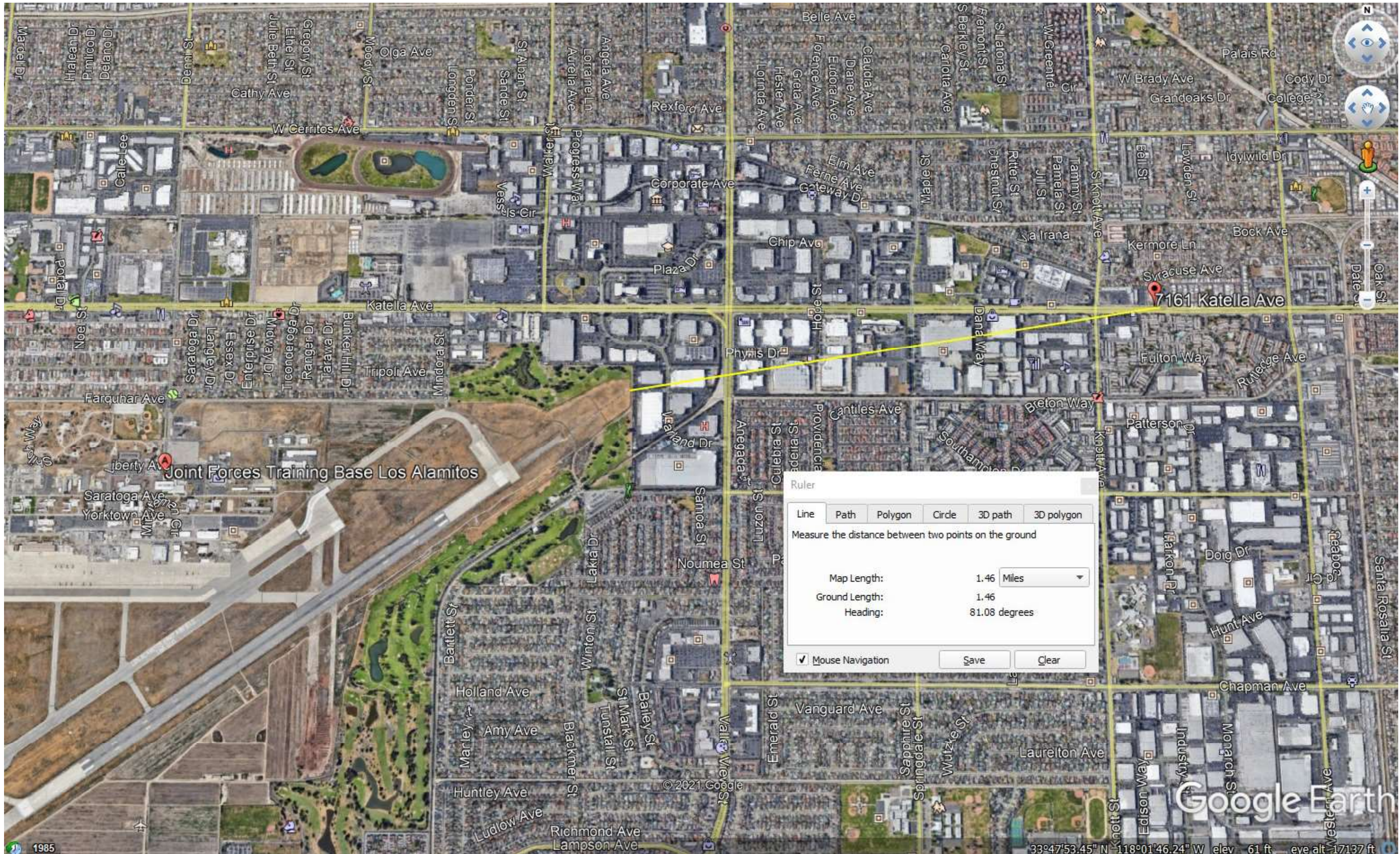
Map Length: 11.91 Miles

Ground Length: 11.91

Heading: 137.45 degrees

Mouse Navigation Save Clear

Attachment 3. Proximity to Military Airport



Joint Forces Training Base Los Alamitos

7161 Katella Ave

Ruler

Line Path Polygon Circle 3D path 3D polygon

Measure the distance between two points on the ground

Map Length: 1.46 Miles

Ground Length: 1.46

Heading: 81.08 degrees

Mouse Navigation

Save Clear

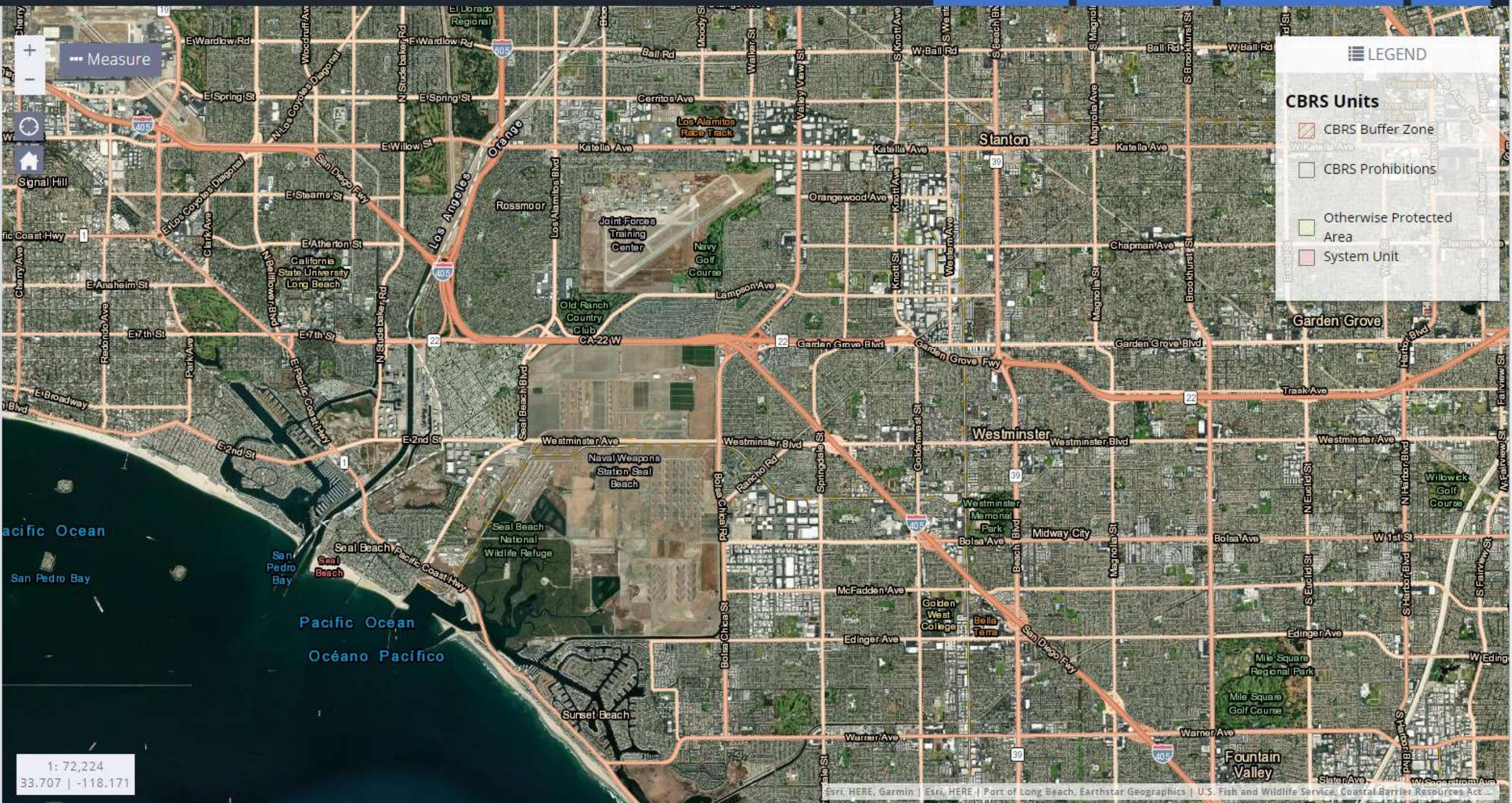
Google Earth

33°47'53.45" N 118°01'46.24" W elev 61 ft eye alt 17137 ft

1985

Attachment 4. Coastal Barrier Resources Map

BASEMAPS
MAP LAYERS
 CBRS Units
[Click here to learn more about CBRS Units.](#)

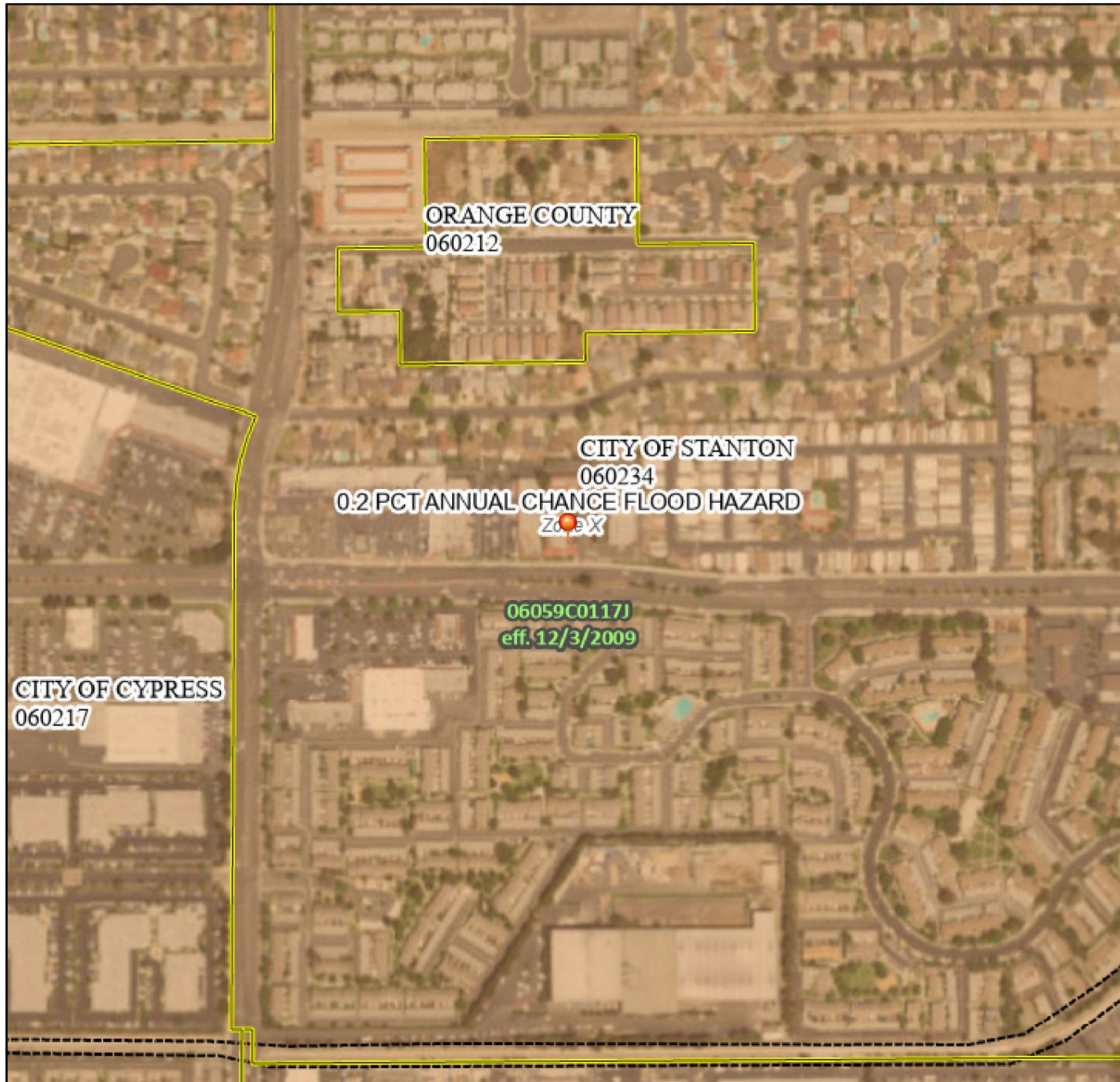


Attachment 5. FEMA Flood Map

National Flood Hazard Layer FIRMette



118°0'48"W 33°48'26"N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | | |
|------------------------------------|--|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
<i>Zone A, V, A99</i> |
| | | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i> |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> |
| | | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i> |
| | | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i> |
| | | Area with Flood Risk due to Levee <i>Zone D</i> |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard <i>Zone D</i> |
| | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| MAP PANELS | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| MAP PANELS | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |
| | | The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location. |



0 250 500 1,000 1,500 2,000 Feet 1:6,000

118°0'10"W 33°47'56"N

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **4/22/2021 at 11:44 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Attachment 6. CalEEMod Air Quality Model

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

**Stanton Inn Remodel Project
Orange County, Annual**

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	72.00	Dwelling Unit	1.01	72,000.00	206

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	30
Climate Zone	8			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	531.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 72 apartment units

Construction Phase - Based on limited information available, conservatively assumed the 72 units will be constructed (rather than just remodeled), so Building Construction and Architectural Coatings phases

Off-road Equipment - Default construction equipment

Off-road Equipment - Default construction equipment (conservative since mix based on new construction rather than just remodel)

Off-road Equipment - Default construction equipment

Grading - No additional acreage to be graded assumed

Demolition - No demolition assumed

Trips and VMT - Default construction vehicle trips

On-road Fugitive Dust - Default

Architectural Coating - Default

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Default trip rates

Woodstoves - No fireplaces assumed

Consumer Products - Default

Area Coating - Default

Landscape Equipment - Default

Energy Use - Default

Water And Wastewater - Default

Solid Waste - Default

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	PhaseEndDate	1/10/2023	11/29/2022
tblConstructionPhase	PhaseEndDate	12/13/2022	11/15/2022
tblConstructionPhase	PhaseStartDate	12/28/2022	11/16/2022
tblConstructionPhase	PhaseStartDate	3/9/2022	2/9/2022
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberGas	61.20	0.00
tblFireplaces	NumberNoFireplace	7.20	72.00
tblFireplaces	NumberWood	3.60	0.00
tblLandUse	LotAcreage	1.89	1.01
tblWoodstoves	NumberCatalytic	3.60	0.00
tblWoodstoves	NumberNoncatalytic	3.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	2-1-2022	4-30-2022	0.4284	0.4284
2	5-1-2022	7-31-2022	0.4858	0.4858
3	8-1-2022	9-30-2022	0.3221	0.3221
		Highest	0.4858	0.4858

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420
Energy	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	109.4470	109.4470	4.9500e-003	1.2900e-003	109.9541
Mobile	0.1848	0.2150	1.9321	4.4700e-003	0.4793	3.0700e-003	0.4824	0.1279	2.8600e-003	0.1308	0.0000	412.5483	412.5483	0.0252	0.0174	418.3490
Waste						0.0000	0.0000		0.0000	0.0000	6.7231	0.0000	6.7231	0.3973	0.0000	16.6561
Water						0.0000	0.0000		0.0000	0.0000	1.4883	22.6678	24.1561	0.1543	3.7800e-003	29.1391
Total	0.4942	0.2606	2.6906	4.7500e-003	0.4793	0.0102	0.4895	0.1279	9.9600e-003	0.1379	8.2113	545.8760	554.0873	0.5829	0.0224	575.3403

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420
Energy	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	109.4470	109.4470	4.9500e-003	1.2900e-003	109.9541
Mobile	0.1848	0.2150	1.9321	4.4700e-003	0.4793	3.0700e-003	0.4824	0.1279	2.8600e-003	0.1308	0.0000	412.5483	412.5483	0.0252	0.0174	418.3490
Waste						0.0000	0.0000		0.0000	0.0000	6.7231	0.0000	6.7231	0.3973	0.0000	16.6561
Water						0.0000	0.0000		0.0000	0.0000	1.4883	22.6678	24.1561	0.1543	3.7800e-003	29.1391
Total	0.4942	0.2606	2.6906	4.7500e-003	0.4793	0.0102	0.4895	0.1279	9.9600e-003	0.1379	8.2113	545.8760	554.0873	0.5829	0.0224	575.3403

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Building Construction	Building Construction	2/9/2022	11/15/2022	5	200	
2	Architectural Coating	Architectural Coating	11/16/2022	11/29/2022	5	10	

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 145,800; Residential Outdoor: 48,600; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	7	52.00	8.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1649	1.2503	1.2726	2.2100e-003		0.0589	0.0589		0.0569	0.0569	0.0000	181.5769	181.5769	0.0316	0.0000	182.3675
Total	0.1649	1.2503	1.2726	2.2100e-003		0.0589	0.0589		0.0569	0.0569	0.0000	181.5769	181.5769	0.0316	0.0000	182.3675

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.3200e-003	0.0376	0.0130	1.5000e-004	5.0400e-003	3.5000e-004	5.3900e-003	1.4500e-003	3.3000e-004	1.7900e-003	0.0000	15.0509	15.0509	8.6000e-004	2.1600e-003	15.7157
Worker	0.0157	0.0118	0.1627	4.9000e-004	0.0571	3.1000e-004	0.0574	0.0152	2.9000e-004	0.0155	0.0000	44.8262	44.8262	1.1200e-003	1.1300e-003	45.1900
Total	0.0170	0.0494	0.1756	6.4000e-004	0.0621	6.6000e-004	0.0628	0.0166	6.2000e-004	0.0172	0.0000	59.8772	59.8772	1.9800e-003	3.2900e-003	60.9057

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1649	1.2503	1.2726	2.2100e-003		0.0589	0.0589		0.0569	0.0569	0.0000	181.5767	181.5767	0.0316	0.0000	182.3673
Total	0.1649	1.2503	1.2726	2.2100e-003		0.0589	0.0589		0.0569	0.0569	0.0000	181.5767	181.5767	0.0316	0.0000	182.3673

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.3200e-003	0.0376	0.0130	1.5000e-004	5.0400e-003	3.5000e-004	5.3900e-003	1.4500e-003	3.3000e-004	1.7900e-003	0.0000	15.0509	15.0509	8.6000e-004	2.1600e-003	15.7157
Worker	0.0157	0.0118	0.1627	4.9000e-004	0.0571	3.1000e-004	0.0574	0.0152	2.9000e-004	0.0155	0.0000	44.8262	44.8262	1.1200e-003	1.1300e-003	45.1900
Total	0.0170	0.0494	0.1756	6.4000e-004	0.0621	6.6000e-004	0.0628	0.0166	6.2000e-004	0.0172	0.0000	59.8772	59.8772	1.9800e-003	3.2900e-003	60.9057

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2253					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0200e-003	7.0400e-003	9.0700e-003	1.0000e-005		4.1000e-004	4.1000e-004		4.1000e-004	4.1000e-004	0.0000	1.2766	1.2766	8.0000e-005	0.0000	1.2787
Total	0.2263	7.0400e-003	9.0700e-003	1.0000e-005		4.1000e-004	4.1000e-004		4.1000e-004	4.1000e-004	0.0000	1.2766	1.2766	8.0000e-005	0.0000	1.2787

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5000e-004	1.1000e-004	1.5600e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4310	0.4310	1.0000e-005	1.0000e-005	0.4345
Total	1.5000e-004	1.1000e-004	1.5600e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4310	0.4310	1.0000e-005	1.0000e-005	0.4345

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Architectural Coating - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2253					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0200e-003	7.0400e-003	9.0700e-003	1.0000e-005		4.1000e-004	4.1000e-004		4.1000e-004	4.1000e-004	0.0000	1.2766	1.2766	8.0000e-005	0.0000	1.2787
Total	0.2263	7.0400e-003	9.0700e-003	1.0000e-005		4.1000e-004	4.1000e-004		4.1000e-004	4.1000e-004	0.0000	1.2766	1.2766	8.0000e-005	0.0000	1.2787

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.5000e-004	1.1000e-004	1.5600e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4310	0.4310	1.0000e-005	1.0000e-005	0.4345
Total	1.5000e-004	1.1000e-004	1.5600e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4310	0.4310	1.0000e-005	1.0000e-005	0.4345

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1848	0.2150	1.9321	4.4700e-003	0.4793	3.0700e-003	0.4824	0.1279	2.8600e-003	0.1308	0.0000	412.5483	412.5483	0.0252	0.0174	418.3490
Unmitigated	0.1848	0.2150	1.9321	4.4700e-003	0.4793	3.0700e-003	0.4824	0.1279	2.8600e-003	0.1308	0.0000	412.5483	412.5483	0.0252	0.0174	418.3490

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	391.68	353.52	294.48	1,272,352	1,272,352
Total	391.68	353.52	294.48	1,272,352	1,272,352

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.544795	0.058861	0.186903	0.129401	0.024381	0.006522	0.014242	0.004855	0.000656	0.000385	0.024332	0.000723	0.003942

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	66.6080	66.6080	4.1300e-003	5.0000e-004	66.8605
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	66.6080	66.6080	4.1300e-003	5.0000e-004	66.8605
NaturalGas Mitigated	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936
NaturalGas Unmitigated	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	802773	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936
Total		4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	802773	4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936
Total		4.3300e-003	0.0370	0.0157	2.4000e-004		2.9900e-003	2.9900e-003		2.9900e-003	2.9900e-003	0.0000	42.8390	42.8390	8.2000e-004	7.9000e-004	43.0936

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	276036	66.6080	4.1300e-003	5.0000e-004	66.8605
Total		66.6080	4.1300e-003	5.0000e-004	66.8605

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	276036	66.6080	4.1300e-003	5.0000e-004	66.8605
Total		66.6080	4.1300e-003	5.0000e-004	66.8605

6.0 Area Detail

6.1 Mitigation Measures Area

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420
Unmitigated	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2602					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0224	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420
Total	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2602					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0224	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420
Total	0.3051	8.5600e-003	0.7427	4.0000e-005		4.1100e-003	4.1100e-003		4.1100e-003	4.1100e-003	0.0000	1.2129	1.2129	1.1700e-003	0.0000	1.2420

7.0 Water Detail

7.1 Mitigation Measures Water

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	24.1561	0.1543	3.7800e-003	29.1391
Unmitigated	24.1561	0.1543	3.7800e-003	29.1391

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	4.69109 / 2.95743	24.1561	0.1543	3.7800e-003	29.1391
Total		24.1561	0.1543	3.7800e-003	29.1391

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	4.69109 / 2.95743	24.1561	0.1543	3.7800e-003	29.1391
Total		24.1561	0.1543	3.7800e-003	29.1391

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	6.7231	0.3973	0.0000	16.6561
Unmitigated	6.7231	0.3973	0.0000	16.6561

Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	33.12	6.7231	0.3973	0.0000	16.6561
Total		6.7231	0.3973	0.0000	16.6561

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	33.12	6.7231	0.3973	0.0000	16.6561
Total		6.7231	0.3973	0.0000	16.6561

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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Stanton Inn Remodel Project - Orange County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

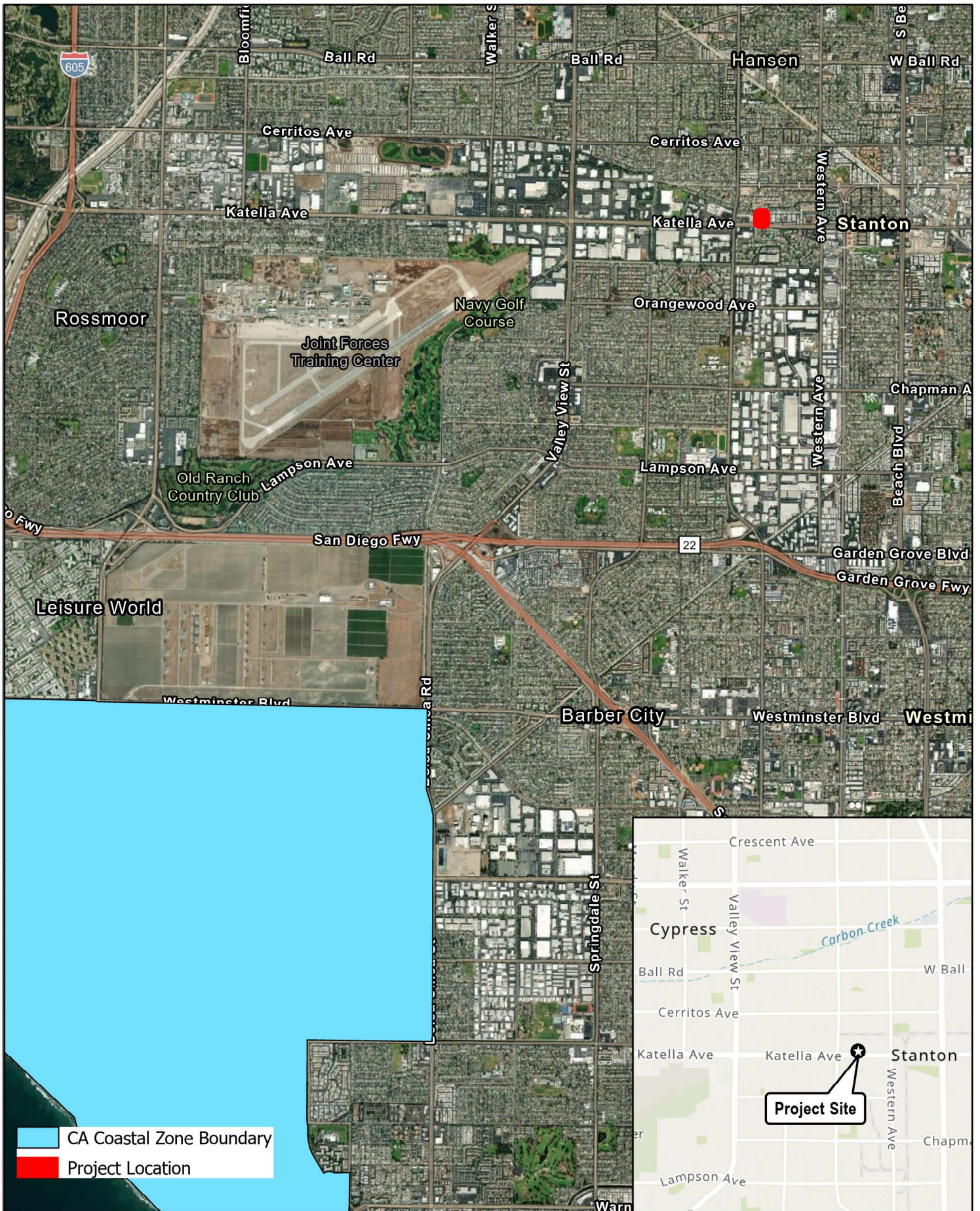
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Attachment 7. Coastal Zone Management Boundary



CA Coastal Zone Boundary
 Project Location

Attachment 8. Asbestos Report

September 22, 2020

Jamboree Housing Corporation
17701 Cowan Avenue, Suite 200
Irvine, California 92614
Victoria Ramirez

RE: Asbestos Inspection at:
Stanton Inn & Suites
7161 Katella Avenue
Stanton, California 90680
Bureau Veritas Project No.: 145984.20R000-001.086

Dear Ms. Ramirez:

Bureau Veritas, with the assistance of their subcontractor RiskNomics, LLC, has completed an Asbestos Inspection that included on site observations of the accessible areas of Stanton Inn & Suites (the "Project"). The inspection was conducted by Andrew Olcott, a State of California Certified Asbestos Consultant (CAC) with assistance from Dan Prater, a State of California Certified Site Surveillance Technician (CSST) in training, on September 9, 2020. The inspection consisted of a walk-through and visual observations of the accessible areas for suspect asbestos-containing materials (ACM), assessing the ACM for condition, friability, and quantity, and the collection of bulk samples.

A total of ninety (90) bulk samples were collected and analyzed to facilitate the inspection. All materials sampled as part of this inspection were found to have no asbestos detected by laboratory analysis via polarized light microscopy (PLM). Non-ACM at the Project includes:

- Drywall, Joint Compound, and Texture
- 4" Ceramic Wall Tile, Grout, and Mastic
- Bath Caulk
- Popcorn Ceiling Texture
- 9" Ceramic Floor Tile, Grout, and Thin Set
- 12" Floor Tile and Mastic
- 24" Ceramic Tile and Grout
- 12" Ceramic Tile, Grout, and Thin Set
- Deck Coating and Concrete
- Gray Cove Base and Adhesive
- 12" Black Floor Tile and Mastic
- Stucco and Paint

Please refer to the attached report prepared by RiskNomics, LLC for additional documentation regarding the inspection including laboratory results and a sample location drawing.

Based on the results of the inspection, Bureau Veritas offers the following recommendations:

- Suspected ACM subsequently identified or encountered in non-functional, inaccessible areas during renovation or demolition should be assumed to contain asbestos unless testing confirms otherwise.

The independent conclusions represent our professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client or their representative has been assumed to be correct and complete. The conclusions presented are based on the data provided, observations, and conditions that existed on the date of the on site visit.

This report has been prepared for and is exclusively for the use and benefit of the Client identified on the cover page of this report. The purpose for which this report shall be used shall be limited to the use as stated in the contract between the client and Bureau Veritas.

This report, or any of the information contained therein, is not for the use or benefit of, nor may it be relied upon by any other person or entity, for any purpose without the advance written consent of Bureau Veritas. Any reuse or distribution without such consent shall be at the client's or recipient's sole risk, without liability to Bureau Veritas.



ASBESTOS INSPECTION REPORT

Jamboree Station

7161 Katella Avenue
Stanton, CA 90680

Inspection Date: **September 9, 2020**

Prepared for:

Bureau Veritas North America

10461 Mill Run Circle, Suite 1100
Owings Mills, MD 21117

Prepared by:

Andrew J. Olcott

California Certified Asbestos Consultant (CAC) 04-3525
(Expires on 2/19/2021)

Project Number: 20RN1814

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EXECUTIVE SUMMARY

RiskNomics, LLC (RiskNomics) has contracted with Bureau Veritas North America (Client) to conduct an asbestos inspection of the Jamboree Station located at 7161 Katella Avenue in Stanton, California. The objective of the survey was to provide information to the Client of asbestos-containing materials that may be impacted during upcoming renovation and/or demolition activities. Inspection activities were limited to accessible areas of the building with no destructive investigation of hidden spaces (inside wall cavities, hard deck ceilings, etc.). The roof was not inspected.

Inspection activities were performed September 9, 2020, by Andrew Olcott, a State of California Certified Asbestos Consultant (CAC) with assistance from Dan Prater, a State of California Certified Site Surveillance Technician (CSST) in-training. Copies of current Certifications can be found in Appendix C.

Inspection, sampling, material condition assessments, and analytical procedures for asbestos-containing building materials were performed in general accordance with the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) - EPA Title 40, Code of Federal Regulations (CFR), Part 61 Subpart M (40 CFR Part 61, Subpart M), the EPA AHERA regulation (40 CFR Part 763), and the California Occupational Safety and Health Administration (Cal/OSHA) (Title 8, Section 1529) guidelines. A total of ninety (90) bulk samples were collected and analyzed to facilitate the inspection.

Asbestos was identified within the following materials:

Material	Location	Percentage/ Type*	Material Condition	Quantity	NEHSAP Category
All Sampled Materials were Negative for Asbestos					

Asbestos containing material (ACM) as defined by the EPA and OSHA are materials with an asbestos concentration of greater than 1% (>1%) as analyzed by polarized light microscopy (PLM). In addition, ACM is designated as follows for NESHAP compliance:

Friable asbestos – material which can be crumbled, pulverized or reduced to powder by hand pressure, a.k.a. Regulated Asbestos Containing Materials (RACM)

Category I non-friable – includes resilient floor coverings, asphalt roofing products, gaskets and packings.

Category II non-friable – any non-friable ACM that is not in Category I (i.e. transite siding material).

* Laboratory analytical data sheets should be reviewed for potential asbestos content within individual layers of a sample for each material. Analysis of an individual layer of a material may exceed 1% while the composite analysis of the material as a whole is below 1%. Laboratory analytical data sheets are presented within Appendix A.

INTRODUCTION

RiskNomics, LLC (RiskNomics) has contracted with Bureau Veritas North America (Client) to conduct an asbestos inspection of the Jamboree Station located at 7161 Katella Avenue in Stanton, California. The objective of the survey was to provide information to the Client of asbestos-containing materials that may be impacted during upcoming renovation and/or demolition activities. Inspection activities were limited to accessible areas of the building with no destructive investigation of hidden spaces (inside wall cavities, hard deck ceilings, etc.). The roof was not inspected.

The buildings and areas inspected included the following:

Jamboree Station Units and Areas Inspected
Units: 101, 105, 110, 227, 231, 321, 323
Common Areas: Lobby, Registration, Offices, Equipment & Mechanical Rooms, Breakfast Room, Public Restrooms, Laundry Room, Sauna Room, Fitness Center & Exterior

Inspection activities were performed September 9, 2020, by Andrew Olcott, a State of California Certified Asbestos Consultant (CAC) with assistance from Dan Prater, a State of California Certified Site Surveillance Technician (CSST) in-training. Copies of current Certifications can be found in Appendix C.

SAMPLED SUSPECT ASBESTOS CONTAINING MATERIALS - NEGATIVE

Samples of the following suspect materials were collected and found to be Negative for asbestos:

Jamboree Station 7161 Katella Avenue, Stanton, CA			
Sample #	Material	Friable/ Non- Friable	Condition
01 – 07	Drywall, Joint Compound & Texture	NF	Intact
08 – 10	4" Ceramic Wall Tile, Grout & Mastic	NF	Intact
11 – 13	Bath Caulk	NF	Intact
14 – 20	Popcorn Ceiling Texture	F	Intact
21 – 23	9" Ceramic Floor Tile, Grout & Thin Set	NF	Intact
24 – 26	12" Floor Tile & Mastic	NF	Intact
27 – 29	24" Ceramic Tile & Grout	NF	Intact
30 – 32	12" Ceramic Tile, Grout & Thin Set	NF	Intact
33 – 35	Deck Coating & Concrete	NF	Intact
36 – 38	Gray Cove Base & Adhesive	NF	Intact
39 – 41	12" Black Floor Tile & Mastic	NF	Intact
42 – 48	Stucco & Paint	NF	Intact

ASBESTOS SAMPLING AND ANALYTICAL PROCEDURES

Sampling Procedures

Representative bulk samples of suspect asbestos containing building materials were randomly collected throughout the building. Homogenous material determination was based on the following criteria:

- Similar physical characteristics (same color and texture, etc.)
- Application (sprayed-on, troweled-on, assembly into a system etc.)
- Material function (Thermal insulation, floor tile, wallboard system etc.)

The bulk samples were collected on the inspection date(s). Condition assessments were performed by the accredited inspectors during the inspection.

PLM Analysis Methodology

Laboratory services were provided by EMC Labs, Inc., located in Phoenix, Arizona, a National Voluntary Laboratory Accreditation Program (NVLAP) certified laboratory (NVLAP code #101928-0).

PLM samples were analyzed utilizing the Environmental Protection Agency's Test Methods: Methods for the determination of Asbestos in Bulk Building Materials (EPA 600/R-93/116, July 1993) and the McCrone Research Institute's The Asbestos Particle Atlas as method references. Additional treatment and tests may be required to accurately define composition (i.e. ashing, extraction, acetone treatment, and TEM).

Analysis was performed by using the bulk sample for visual observation and slide preparation(s) for microscopic examination and identification. The samples analyzed for asbestos (chrysotile, amosite, crocidolite, anthophyllite, and actinolite/ tremolite), fibrous non-asbestos constituents (mineral wool, cellulose, etc.) and non-fibrous constituents. Using a stereoscope, the microscopist visually estimated relative amounts of each constituent by determining the volume of each constituent in proportion to the total volume of the sample.

FINDINGS

Interpretation of Asbestos Results

Federal OSHA and EPA define an ACM as any material containing >1% asbestos. The lower limit of reliable detection for asbestos using the PLM analytical method is 1.0% by volume. If "<1%" appears in this report, it should be interpreted as meaning that asbestos was present in the sample, but the exact percentage is unknown.

Furthermore, per EPA NESHAP regulations, friable material with PLM-derived asbestos concentration of <10% must be assumed to be ACM until it is point counted to more precisely

determine the actual asbestos content. If this material is found to contain less than 1% asbestos by point counting, then it may be disposed of as non-hazardous waste. Any sample can be subjected to the more stringent Point Count Method of analysis to more precisely determine the actual asbestos content.

Although a material may contain asbestos at <1%, it **DOES NOT** relieve contractors from performing exposure assessments (personal air monitoring) on their employees per the OSHA Asbestos Standard (29 CFR 1926.1101) and should not be interpreted as asbestos is not present. Although a reading may indicate "<1%", airborne asbestos concentrations still may exceed the OSHA Permissible Exposure Limit (PEL) depending on the work activity.

The following materials contain Asbestos in concentrations exceeding 1%

- All Sampled Materials were Negative for Asbestos

CONCLUSIONS AND RECOMMENDATIONS

Results of the sample analysis confirmed asbestos was not identified within any of the materials expected to be impacted. Any materials uncovered during renovation or demolition activities that are not addressed in this inspection report, or presumed asbestos containing materials (PACM), must be sampled by an accredited asbestos inspector prior to any disturbance, or they must be treated as asbestos containing (ACM).



Andrew J. Olcott
Vice President, Operations

DISCLAIMER

The content presented in this report is based on data collected during the site inspection and survey, review of pertinent regulations, requirements, guidelines and commonly followed industry standards, and information provided by the Client, their clients, agents, and representatives.

In occupied facilities and areas, destructive investigation may not have been performed in order to protect the materials aesthetics while the facility was in operation. This may include, but not be limited to: penetration into walls and hard lid ceilings; and investigation that may irreparably damage mirrors and similar components.

The work has been conducted in an objective and unbiased manner and in accordance with generally accepted professional practice for this type of work. RiskNomics believes the data and



analysis to be accurate and relevant, but cannot accept responsibility for the accuracy or completeness of available documentation or possible withholding of information of other parties.

This hazardous materials survey report is designed to aid the property owner, architect, construction manager, general contractor, and asbestos abatement contractor in locating ACM. This report is not intended for, and may not be utilized, as a bidding document or as an abatement project specification document.

Sample#	Sample Location	Layer#	Description	Asbestos Type	Asbestos%
1	OFFICE STORAGE	1	LAYER 1 Drywall, White/ Brown	None Detected	
1	OFFICE STORAGE	2	LAYER 2 Texture, White/ Off White	None Detected	
2	BREAKFAST RM	1	LAYER 1 Drywall, White/ Brown	None Detected	
2	BREAKFAST RM	2	LAYER 2 Joint Compound, White	None Detected	
2	BREAKFAST RM	3	LAYER 3 Texture, White/ Beige	None Detected	
3	110	1	LAYER 1 Drywall, White/ Brown	None Detected	
3	110	2	LAYER 2 Joint Compound, White	None Detected	
3	110	3	LAYER 3 Texture, White/ Off White	None Detected	
4	231	1	LAYER 1 Drywall, White/ Brown	None Detected	
4	231	2	LAYER 2 Joint Compound, White	None Detected	
4	231	3	LAYER 3 Texture, White/ Off White	None Detected	
5	STORAGE 2ND FL	1	LAYER 1 Drywall, White/ Brown	None Detected	
5	STORAGE 2ND FL	2	LAYER 2 Joint Compound, White	None Detected	
5	STORAGE 2ND FL	3	LAYER 3 Texture, White/ Off White	None Detected	
6	323	1	LAYER 1 Drywall, White/ Brown	None Detected	
6	323	2	LAYER 2 Joint Compound, White	None Detected	
6	323	3	LAYER 3 Texture, White/ Off White	None Detected	
7	STORAGE 3RD FL	1	LAYER 1 Drywall, White/ Brown	None Detected	
7	STORAGE 3RD FL	2	LAYER 2 Joint Compound, White	None Detected	
7	STORAGE 3RD FL	3	LAYER 3 Texture, White/ Beige	None Detected	
8	BATH	1	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	None Detected	
8	BATH	2	LAYER 2 Grout, White	None Detected	
8	BATH	3	LAYER 3 Mastic, Yellow	None Detected	
9	BATH	1	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	None Detected	
9	BATH	2	LAYER 2 Grout, White	None Detected	

Sample#	Sample Location	Layer#	Description	Asbestos Type	Asbestos%
9	BATH	3	LAYER 3 Mastic, Yellow	None Detected	
10	BATH	1	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	None Detected	
10	BATH	2	LAYER 2 Grout, White	None Detected	
10	BATH	3	LAYER 3 Mastic, Yellow	None Detected	
11	BATH	1	Caulk, White	None Detected	
12	BATH	1	Caulk, White	None Detected	
13	BATH	1	Caulk, White	None Detected	
14	110	1	Popcorn Ceiling, White	None Detected	
15	MAIDS QUARTERS	1	Popcorn Ceiling, White	None Detected	
16	LAUNDRY	1	Popcorn Ceiling, White	None Detected	
17	231	1	Popcorn Ceiling, White	None Detected	
18	STORAGE 2ND FL	1	Popcorn Ceiling, White	None Detected	
19	323	1	Popcorn Ceiling, White	None Detected	
20	STORAGE 3RD FL	1	Popcorn Ceiling, White	None Detected	
21	110 BATH	1	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	None Detected	
21	110 BATH	2	LAYER 2 Grout, Beige	None Detected	
22	231 BATH	1	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	None Detected	
22	231 BATH	2	LAYER 2 Grout, Beige	None Detected	
22	231 BATH	3	LAYER 3 Thin Set, Gray	None Detected	
23	323 BATH	1	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	None Detected	
23	323 BATH	2	LAYER 2 Thin Set, Gray	None Detected	
23	323 BATH	3	LAYER 3 Compound, White	None Detected	
24	MAIDS QUARTERS	1	LAYER 1 12"x12" Vinyl Floor Tile, Beige	None Detected	
24	MAIDS QUARTERS	2	LAYER 2 Mastic, Yellow	None Detected	
25	MAIDS QUARTERS	1	LAYER 1 12"x12" Vinyl Floor Tile, Beige	None Detected	
25	MAIDS QUARTERS	2	LAYER 2 Mastic, Yellow	None Detected	
26	MAIDS QUARTERS	1	LAYER 1 12"x12" Vinyl Floor Tile, Beige	None Detected	
26	MAIDS QUARTERS	2	LAYER 2 Mastic, Yellow	None Detected	
27	LOBBY	1	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	None Detected	

Sample#	Sample Location	Layer#	Description	Asbestos Type	Asbestos%
27	LOBBY	2	LAYER 2 Grout, Gray	None Detected	
28	FITNESS/LAUNDRY	1	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	None Detected	
28	FITNESS/LAUNDRY	2	LAYER 2 Grout, Gray	None Detected	
29	FITNESS/LAUNDRY	1	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	None Detected	
29	FITNESS/LAUNDRY	2	LAYER 2 Grout, Gray	None Detected	
30	LAUNDRY	1	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	None Detected	
30	LAUNDRY	2	LAYER 2 Grout, Beige	None Detected	
30	LAUNDRY	3	LAYER 3 Thin Set, Lt. Gray	None Detected	
31	101	1	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	None Detected	
31	101	2	LAYER 2 Grout, Lt. Gray	None Detected	
31	101	3	LAYER 3 Caulk, Off White	None Detected	
32	101	1	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	None Detected	
32	101	2	LAYER 2 Grout, Lt. Gray	None Detected	
32	101	3	LAYER 3 Thin Set, Off White	None Detected	
33	2ND FL	1	LAYER 1 Deck Coating, Brown/ Off White	None Detected	
33	2ND FL	2	LAYER 2 Concrete, Gray	None Detected	
34	3RD FL	1	LAYER 1 Deck Coating, Brown/ Off White	None Detected	
34	3RD FL	2	LAYER 2 Concrete, Gray	None Detected	
35	3RD FL	1	LAYER 1 Deck Coating, Brown/ Off White	None Detected	
35	3RD FL	2	LAYER 2 Concrete, Gray	None Detected	
36	HALL	1	LAYER 1 Cove Base, Gray	None Detected	
36	HALL	2	LAYER 2 Adhesive, Lt. Yellow	None Detected	
37	HALL	1	LAYER 1 Cove Base, Gray	None Detected	
37	HALL	2	LAYER 2 Adhesive, Lt. Yellow	None Detected	

Sample#	Sample Location	Layer#	Description	Asbestos Type	Asbestos%
38	HALL	1	LAYER 1 Cove Base, Gray	None Detected	
38	HALL	2	LAYER 2 Adhesive, Lt. Yellow	None Detected	
39	ROOF ACCESS	1	LAYER 1 12"x12" Floor Tile, Black/ Off White	None Detected	
39	ROOF ACCESS	2	LAYER 2 Mastic, Tan	None Detected	
40	ROOF ACCESS	1	LAYER 1 12"x12" Floor Tile, Black/ Off White	None Detected	
40	ROOF ACCESS	2	LAYER 2 Mastic, Tan	None Detected	
41	ROOF ACCESS	1	LAYER 1 12"x12" Floor Tile, Black/ Off White	None Detected	
41	ROOF ACCESS	2	LAYER 2 Mastic, Tan	None Detected	
42	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
42	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
43	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
43	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
44	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
44	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
45	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
45	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
46	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
46	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
47	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
47	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	
48	EXTERIOR	1	LAYER 1 Stucco, Tan	None Detected	
48	EXTERIOR	2	LAYER 2 Stucco Paint, Beige	None Detected	



APPENDIX A

LABORATORY ANALYTICAL DATA

EMC LABS, INC.

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 Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report
0242754

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	RISKNOMICS	Job# / P.O. #:	20RN1814
Address:	8777 E. VIA DE VENTURA, SUITE 188	Date Received:	09/11/2020
	SCOTTSDALE, AZ 85258	Date Analyzed:	09/17/2020
Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-001 1	OFFICE STORAGE	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Fibrous Glass Gypsum Quartz Carbonates Mica	10% 2% 88%
		LAYER 2 Texture, White/ Off White	No	None Detected	Carbonates Quartz Perlite Binder/Filler	 100%
0242754-002 2	BREAKFAST RM	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Fibrous Glass Gypsum Quartz Carbonates Mica	10% 2% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Cellulose Fiber Carbonates Mica Quartz Binder/Filler	<1% 99%
		LAYER 3 Texture, White/ Beige	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-003 3	110	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Fibrous Glass Gypsum Quartz Carbonates Mica	10% 2% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Carbonates Mica Quartz Binder/Filler	 100%
		LAYER 3 Texture, White/ Off White	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%
0242754-004 4	231	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Gypsum Quartz Carbonates Mica	12% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Cellulose Fiber Carbonates Mica Quartz Binder/Filler	<1% 99%
		LAYER 3 Texture, White/ Off White	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-005 5	STORAGE 2ND FL	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Gypsum Quartz Carbonates Mica	12% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Cellulose Fiber Carbonates Mica Quartz Binder/Filler	1% 99%
		LAYER 3 Texture, White/ Off White	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%
0242754-006 6	323	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Gypsum Quartz Carbonates Mica	12% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Cellulose Fiber Carbonates Mica Quartz Binder/Filler	<1% 99%
		LAYER 3 Texture, White/ Off White	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-007 7	STORAGE 3RD FL	LAYER 1 Drywall, White/ Brown	No	None Detected	Cellulose Fiber Fibrous Glass Gypsum Quartz Carbonates Mica	10% 2% 88%
		LAYER 2 Joint Compound, White	No	None Detected	Carbonates Mica Quartz Binder/Filler	 100%
		LAYER 3 Texture, White/ Beige	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler	 100%
0242754-008 8	BATH	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler	 100%
		LAYER 2 Grout, White	No	None Detected	Carbonates Mica Quartz Binder/Filler	 100%
		LAYER 3 Mastic, Yellow	No	None Detected	Carbonates Quartz Binder/Filler	 100%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-009 9	BATH	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
		LAYER 3 Mastic, Yellow	No	None Detected	Cellulose Fiber Carbonates Quartz Binder/Filler <1% 99%
0242754-010 10	BATH	LAYER 1 4"x4" Ceramic Wall Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, White	No	None Detected	Carbonates Gypsum Quartz Binder/Filler 100%
		LAYER 3 Mastic, Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-011 11	BATH	Caulk, White	No	None Detected	Silicone 100%
0242754-012 12	BATH	Caulk, White	No	None Detected	Silicone 100%

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Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-013 13	BATH	Caulk, White	No	None Detected	Silicone 100%
0242754-014 14	110	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
0242754-015 15	MAIDS QUARTERS	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
0242754-016 16	LAUNDRY	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
0242754-017 17	231	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%
0242754-018 18	STORAGE 2ND FL	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler 100%

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Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-019 19	323	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler	100%
0242754-020 20	STORAGE 3RD FL	Popcorn Ceiling, White	No	None Detected	Carbonates Mica Quartz Binder/Filler	100%
0242754-021 21	110 BATH	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	No	None Detected	Quartz Gypsum Binder/Filler	100%
		LAYER 2 Grout, Beige	No	None Detected	Carbonates Quartz Gypsum Binder/Filler	100%
0242754-022 22	231 BATH	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	No	None Detected	Quartz Gypsum Binder/Filler	100%
		LAYER 2 Grout, Beige	No	None Detected	Carbonates Quartz Gypsum Binder/Filler	100%
		LAYER 3 Thin Set, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Carbonates	100%

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	SCOTTSDALE, AZ 85258	Date Analyzed:	09/17/2020
Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-023 23	323 BATH	LAYER 1 9"x9" Ceramic Floor Tile, Off White/ Lt. Brown	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Thin Set, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 3 Compound, White	No	None Detected	Carbonates Mica Quartz Perlite Binder/Filler 100%
0242754-024 24	MAIDS QUARTERS	LAYER 1 12"x12" Vinyl Floor Tile, Beige	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-025 25	MAIDS QUARTERS	LAYER 1 12"x12" Vinyl Floor Tile, Beige	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%

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	SCOTTSDALE, AZ 85258	Date Analyzed:	09/17/2020
Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-026 26	MAIDS QUARTERS	LAYER 1 12"x12" Vinyl Floor Tile, Beige	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Yellow	No	None Detected	Cellulose Fiber <1% Carbonates Quartz Binder/Filler 99%
0242754-027 27	LOBBY	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
0242754-028 28	FITNESS/LAUNDRY	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%

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Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-029 29	FITNESS/LAUNDRY	LAYER 1 24"x24" Ceramic Tile, Lt. Gray	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
0242754-030 30	LAUNDRY	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Beige	No	None Detected	Quartz Gypsum Mica Carbonates Binder/Filler 100%
		LAYER 3 Thin Set, Lt. Gray	No	None Detected	Quartz Carbonates Gypsum Mica Binder/Filler 100%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-031 31	101	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Lt. Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 3 Caulk, Off White	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-032 32	101	LAYER 1 12"x12" Ceramic Tile, Beige/ Off White	No	None Detected	Quartz Gypsum Binder/Filler 100%
		LAYER 2 Grout, Lt. Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 3 Thin Set, Off White	No	None Detected	Cellulose Fiber Carbonates Mica Quartz Binder/Filler 99%

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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents	
0242754-033 33	2ND FL	LAYER 1 Deck Coating, Brown/ Off White	No	None Detected	Fibrous Glass Quartz Carbonates Binder/Filler	40% 60%
		LAYER 2 Concrete, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler	 100%
0242754-034 34	3RD FL	LAYER 1 Deck Coating, Brown/ Off White	No	None Detected	Fibrous Glass Quartz Carbonates Binder/Filler	40% 60%
		LAYER 2 Concrete, Gray	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler	 100%
0242754-035 35	3RD FL	LAYER 1 Deck Coating, Brown/ Off White	No	None Detected	Fibrous Glass Quartz Carbonates Binder/Filler	40% 60%
		LAYER 2 Concrete, Gray	No	None Detected	Fibrous Glass Quartz Gypsum Carbonates Mica Binder/Filler	1% 99%

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
 Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report
0242754

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	RISKNOMICS	Job# / P.O. #:	20RN1814
Address:	8777 E. VIA DE VENTURA, SUITE 188	Date Received:	09/11/2020
	SCOTTSDALE, AZ 85258	Date Analyzed:	09/17/2020
Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-036 36	HALL	LAYER 1 Cove Base, Gray	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Adhesive, Lt. Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-037 37	HALL	LAYER 1 Cove Base, Gray	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Adhesive, Lt. Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-038 38	HALL	LAYER 1 Cove Base, Gray	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Adhesive, Lt. Yellow	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-039 39	ROOF ACCESS	LAYER 1 12"x12" Floor Tile, Black/ Off White	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Tan	No	None Detected	Cellulose Fiber Carbonates Quartz Binder/Filler <1% 99%

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0242754

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Address:	8777 E. VIA DE VENTURA, SUITE 188	Date Received:	09/11/2020
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Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-040 40	ROOF ACCESS	LAYER 1 12"x12" Floor Tile, Black/ Off White	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Tan	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-041 41	ROOF ACCESS	LAYER 1 12"x12" Floor Tile, Black/ Off White	No	None Detected	Carbonates Quartz Binder/Filler 100%
		LAYER 2 Mastic, Tan	No	None Detected	Carbonates Quartz Binder/Filler 100%
0242754-042 42	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%

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Laboratory Report
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Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	RISKNOMICS	Job# / P.O. #:	20RN1814
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Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-043 43	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%
0242754-044 44	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%
0242754-045 45	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
 Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report
0242754

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	RISKNOMICS	Job# / P.O. #:	20RN1814
Address:	8777 E. VIA DE VENTURA, SUITE 188	Date Received:	09/11/2020
	SCOTTSDALE, AZ 85258	Date Analyzed:	09/17/2020
Collected:	09/09/2020	Date Reported:	09/17/2020
Project Name:	JAMBOREE-7161 KATELLA AVE	EPA Method:	EPA 600/R-93/116
Address:		Submitted By:	DANIEL PRATER
		Collected By:	

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0242754-046 46	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%
0242754-047 47	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%
0242754-048 48	EXTERIOR	LAYER 1 Stucco, Tan	No	None Detected	Quartz Gypsum Carbonates Mica Binder/Filler 100%
		LAYER 2 Stucco Paint, Beige	No	None Detected	Quartz Carbonates Binder/Filler 100%

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
 Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report
0242754

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Address:		Submitted By:	DANIEL PRATER
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Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
---------------------	--------------------	------------------------------------	----------------------	----------------------	------------------------------



Analyst - Octavio Gavarreteayestas



Signatory - Lab Director - Kurt Kettler

Distinctly stratified, easily separable layers of samples are analyzed as subsamples of the whole and are reported separately for each discernible layer. All analyses are derived from calibrated visual estimate and measured in area percent unless otherwise noted. The report applies to the standards or procedures identified and to the sample(s) tested. The test results are not necessarily indicated or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. These reports are for the exclusive use of the addressed client and that they will not be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special written permission. The report shall not be reproduced except in full, without written approval by our laboratory. The samples not destroyed in testing are retained a maximum of thirty days. The laboratory measurement of uncertainty for the test method is approximately less than 1 by area percent. Accredited by the National Institute of Standards and Technology, Voluntary Laboratory Accreditation Program for selected test method for asbestos. The accreditation or any reports generated by this laboratory in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government. Polarized Light Microscopy may not be consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials.

CHAIN OF CUSTODY
 EMC Labs, Inc.
 9830 S. 51st St., Ste B-109
 Phoenix, AZ 85044
 (800) 362-3373 Fax (480) 893-1726

LAB#: 242754
 TAT: 4 days
 Rec'd: SEP 11 P.M.

COMPANY NAME: RISKNOMICS
880 Seven Hills Drive, #180
Henderson, NV 89052
 CONTACT: Andy Olcott 602-881-9665
 Phone/Fax: 480-315-1100 SCAN COC
 Email: aolcott@risknomicsllc.com

BILL TO: (If Different Location)

Now Accepting: **VISA - MASTERCARD** Price Quoted: \$ _____ / Sample \$ _____ / Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)

1. **TURNAROUND TIME:** [4hr rush] [8hr rush] [1-Day] [2-Day] [3-Day] [5-Day] [6-10 Day]

****Prior confirmation of turnaround time is **required**

****Additional charges for rush analysis (please call marketing department for pricing details)

****Laboratory analysis may be subject to delay if credit terms are not met

4 days

2. **TYPE OF ANALYSIS:** [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]

3. **DISPOSAL INSTRUCTIONS:** [Dispose of samples at EMC] / [Return samples to me at my expense]

(If you do not indicate preference, EMC will dispose of samples 60 days from analysis.)

4. Project Name: Jamboree - 7161 Katella Ave
 P.O. Number: _____ Project Number: 20RN1814

EMC SAMPLE #	CLIENT SAMPLE #	DATE & TIME SAMPLED	LOCATION/MATERIAL TYPE	Samples Accepted Yes / No	AIR SAMPLE INFO / COMMENTS		
					ON	OFF	FLOW RATE
1	1	9/9		Y N			
48	48		Attached	Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			
				Y N			

SPECIAL INSTRUCTIONS:

Sample Collector: (Print) Diana Federico (Signature) [Signature]
 Relinquished by: [Signature] Date/Time: 9/10/20 Received by: Diana Federico Date/Time: 9/11/20
 Relinquished by: Diana Federico Date/Time: 9/11/20 Received by: [Signature] Date/Time: 9/11/20
 Relinquished by: _____ Date/Time: _____ Received by: _____ Date/Time: _____

** In the event of any dispute between the above parties for these services or otherwise, parties agree that jurisdiction and venue will be in Phoenix, Arizona and prevailing party will be entitled to attorney's fees and court costs. Rev. 09/01/08

242754



ASBESTOS INSPECTION FIELD DATA SHEET

Page ___ of ___

Project #: _____
 Name: _____
 Location: _____

Inspector Name and License #: _____
 Date of Inspection: _____
 Inspector Signature: _____

Sample #	Material Description	Sample/Material Location	Qty SF/LF	Friable NF/F	Damage ND/D/SD
24	12x12 Vinyl Ft	Mails Quarters	1000	NF	ND
25			↓		
26	24"x24" Ceramic tile	Lobby Elev/Landng	10000		
27			↓		
28			↓		
29			↓		
30	12"x12" Ceramic	Lobby	2000		
31			101		
32			101		
33	Deck Coating	2nd Floor	6000		
34			3rd Floor		
35			↓		
36	Grey Conc Base	Hall	1000		
37			↓		
38			↓		
39	12'x10' Black Ft	Roof access	200		
40			↓		
41	Stucco	Ext	10000	F	ND
42			↓		
43			↓		
44			↓		
45			↓		
46			↓		
47			↓		
48			↓		

242754



ASBESTOS INSPECTION FIELD DATA SHEET

Page ___ of ___

Project #: 20RN1814
 Name: Jamboree
 Location: 7161 Ketchik Ave

Inspector Name and License #: _____
 Date of Inspection: 9-9-20
 Inspector Signature: [Signature]

Sample #	Material Description	Sample/Material Location	Qty SF/LF	Friable NF/F	Damage ND/D/SD
1	DU/CL/INT	office storage	5000	F	ND
2		Breakfast Room			
3		110			
4		231			
5		Storage 2nd Floor			
6		323			
7		Storage 3rd Floor			
8	4"x4" Ceramic Wall tile	Bath	2000	NF	ND
9					
10					
11	Bath Caulk	Bath	100	NF	
12					
13					
14	Popcorn Ceiling	110	2000	F	
15		maids Quarters			
16		Laundry			
17		231			
18		Storage 2nd Floor			
19		323			
20		Storage 3rd Floor			
21	9"x9" Ceramic FT	110 Bath	9000	NF	ND
22		231 Bath			
23		323 Bath			



APPENDIX B

SAMPLE LOCATION MAP

PLUMBING NOTES
 REF. TITLE 24 PART 5:

1. ALL PLUMBING SHALL BE IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

2. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURER'S INSTALLATION INSTRUCTIONS.

3. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

4. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

5. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

6. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

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9. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

10. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

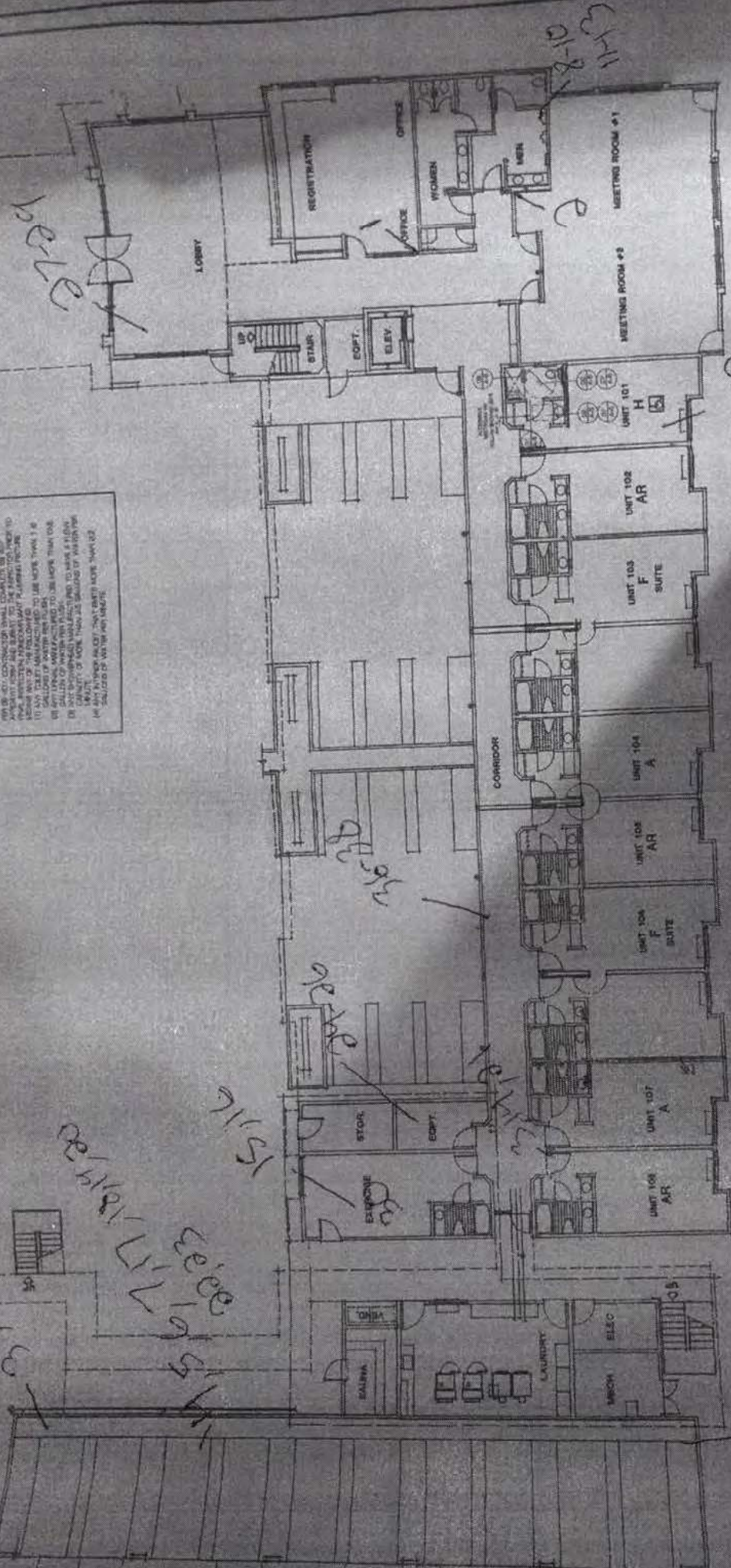
11. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

12. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

13. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

14. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).

15. ALL PLUMBING SHALL BE INSTALLED IN ACCORDANCE WITH THE 2015 INTERNATIONAL PLUMBING CODE (IPC) AND THE 2015 INTERNATIONAL RESIDENTIAL CODE (IRC).



FIRST FLOOR PLAN - PROPOSED
SCALE: 1/8" = 1'-0"

pellet

pellet

pellet

pellet

pellet 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

Storage

Storage

EXISTING MECHANICAL HVAC/ELECTRICAL PLUMBING WILL BE REMAIN THE SAME - NO CHANGE (FIELD VERIFY)
 EXISTING STRUCTURAL WILL BE REMAIN THE SAME - NO CHANGE (FIELD VERIFY)



APPENDIX C

EMPLOYEE CREDENTIALS

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Andrew J Olcott

Name

Certification No. **04-3525**

Expires on **02/19/21**



This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

If you have any questions regarding this report, please contact me below at (800) 733-0660, Ext. 6454.

Sincerely,



Ron Melchior
Manager of Expanded Environmental Services
Bureau Veritas

Attachments: Asbestos Inspection Report prepared by RiskNomics, LLC

Attachment 9. Lead-Based Paint Report

September 22, 2020

Jamboree Housing Corporation

17701 Cowan Avenue, Suite 200
Irvine, California 92614
Victoria Ramirez

RE: Lead-Based Paint Screening at:
Stanton Inn & Suites
7161 Katella Avenue
Stanton, California 90680
Bureau Veritas Project No.: 145984.20R000-001.182

Dear Ms. Ramirez:

Bureau Veritas, with the assistance of their subcontractor RiskNomics, LLC, has completed Lead-Based Paint Screening that included on site observations of the accessible areas of Stanton Inn & Suites (the "Project"). The inspection was conducted by Daniel Prater, California Lead Sampling Technician, on September 9, 2020. Samples were analyzed by EMG Labs, Inc. located in Phoenix, Arizona, an American Industrial Hygiene Association accredited laboratory (Certification #101586).

Lead-based paint components are defined as any component with lead concentration of 0.5% by weight using laboratory analysis. A total of twenty-four (24) paint chip samples were collected to evaluate various paints throughout the Project. Laboratory analysis results show that lead levels were below the laboratory's reporting limit and are not classified as lead-based paint.

Please refer to the attached report prepared by RiskNomics, LLC for supporting documentation including an inventory of surfaces sampled and laboratory analysis results.

The independent conclusions represent our professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client or their representative has been assumed to be correct and complete. The conclusions presented are based on the data provided, observations, and conditions that existed on the date of the on site visit.

This report has been prepared for and is exclusively for the use and benefit of the Client identified on the cover page of this report. The purpose for which this report shall be used shall be limited to the use as stated in the contract between the client and Bureau Veritas.

This report, or any of the information contained therein, is not for the use or benefit of, nor may it be relied upon by any other person or entity, for any purpose without the advance written consent of Bureau Veritas. Any reuse or distribution without such consent shall be at the client's or recipient's sole risk, without liability to Bureau Veritas.

If you have any questions regarding this report, please contact me below at (800) 733-0660, Ext. 6454.

Sincerely,



Ron Melchior
Manager of Expanded Environmental Services
Bureau Veritas

Attachments: Limited Scope Lead Inspection and Paint Chip Sampling Report prepared by RiskNomics, LLC





September 22, 2020

Mr. Ron Melchior
Program Manager
Bureau Veritas North America
10461 Mill Run Circle, Suite 1100
Owings Mills, MD 21117

**RE: Limited Scope Lead Inspection and Paint Chip Sampling at:
Jamboree Station – 7161 Katella Avenue, Stanton, CA
RiskNomics Job #20RN1814**

SUMMARY

RiskNomics LLC (RiskNomics) was retained by Bureau Veritas North America (BVNA) (Client) to perform paint chip sampling of the paint expected to be impacted during renovation and/or demolition activities at the Jamboree Station at 7161 Katella Avenue in Stanton, California. The inspection was performed prior to any construction related activities, with paint selected for testing based on the observations of the on-site technician.

The inspection and sampling were conducted by Dan Prater, California Lead Sampling Technician, on September 9, 2020. Samples were analyzed by EMC Labs, Inc., located in Phoenix, Arizona, an American Industrial Hygiene Association accredited Laboratory (certification #101586).

PAINT CHIP SAMPLING

A paint sample is taken by using a sharp knife, chisel, or equivalent to cut a section of paint at least one inch square, and remove it from the substrate with as little substrate material as possible. The paint chip is then placed into a sample container and labeled as to location. The sample(s) are then shipped to a lab where it is analyzed by an approved analytical method, such as atomic absorption, computer-enhanced x-ray fluorescence, or atomic emission spectroscopy. EMC Labs, Inc., in Phoenix, Arizona was utilized for the analysis of paint chips using EPA Method SW-846 7000B.

LBP components are defined as any component with readings at or above 1.0 milligrams per square centimeter (mg/cm²) using an X-Ray Fluorescence Lead in Paint Analyzed (XRF), or 0.5% by weight using laboratory analysis (the Department of Housing and Urban Development - HUD standard for LBP). OSHA considers any amount of lead in paint as lead containing.

Results of the paint chip analysis are as follows:

Lead Paint Sampling Summary Table								
Sample No.	Component	Substrate	Condition	Color	Location	Quantity	Reporting Limit	Results (% by wt)
1	Wall	Drywall	Intact	Gray	Storage Room – Interior	NA	0.012%	BRL*
2	Wall	Drywall	Intact	Tan	Breakfast Room – Interior	NA	0.024%	BRL
3	Window Sill	Drywall	Intact	Tan	Breakfast Room – Interior	NA	0.059%	BRL
4	Wall	Drywall	Intact	White	Unit 110 Bath – Interior	NA	0.010%	BRL
5	Wall	Drywall	Intact	White	Laundry – Interior	NA	0.029%	BRL
6	Floor	Concrete	Intact	Gray	Walkway – Interior	NA	0.038%	BRL
7	Door	Metal	Intact	Yellow	Hallway – Interior	NA	0.156%	BRL
8	Door	Wood	Intact	Green	Storage Room – Interior	NA	0.073%	BRL
9	Door	Wood	Intact	Light Brown	Unit 101 Entry – Interior	NA	0.046%	BRL
10	Door	Metal	Intact	Brown	Garage Entry – Interior	NA	0.057%	BRL
11	Door	Wood	Intact	White	Breakfast Room – Interior	NA	0.022%	BRL
12	Door	Metal	Intact	Gray	Kitchen – Interior	NA	1.33%	BRL
13	Door	Wood	Intact	Tan	Bathroom – Interior	NA	0.040%	BRL
14	Door	Wood	Intact	Brown	Electrical Room – Interior	NA	0.019%	BRL
15	Wall	Plaster (Stucco)	Intact	Yellow	Building – Exterior	NA	0.096%	BRL
16	Wall	Drywall	Intact	White	Carport – Exterior	NA	0.028%	BRL
17	Floor	Concrete	Intact	Brown	Lobby Entry – Interior	NA	0.019%	BRL
18	Wall	Drywall	Intact	Yellow	Lobby – Interior	NA	0.034%	BRL
19	Trim	Wood	Intact	Yellow	Lobby – Interior	NA	0.183%	BRL
20	Baseboard	Wood	Intact	White	Lobby Hallway – Interior	NA	0.055%	BRL
21	Crown Molding	Wood	Intact	White	Breakfast Room – Interior	NA	0.153%	BRL
22	Ceiling	Drywall	Intact	White	Unit 101 – Interior	NA	0.053%	BRL
23	Door Frame	Wood	Intact	White	Kitchen – Interior	NA	0.116%	BRL
24	Door Frame	Metal	Intact	Brown	Electrical Room – Interior	NA	0.444%	BRL

* - Below Reporting Limit

Removal or disturbance of material with any detectable amount of lead must be handled in accordance with Occupational Safety and Health Administration (OSHA) regulations. The OSHA Lead standard, 29 CFR 1926.62 requires that a Negative Initial Determination for lead exposure be made with paint that contains any detectable lead. Paint with less than 0.5% lead should be treated within the OSHA guidelines, but with reasonable work practices should not generate lead exposures over the OSHA action level.



If you have any questions or concerns, please feel free to contact me at (602) 881-9665.

Sincerely,
RiskNomics

Andrew J. Olcott
Vice President, Operations

Christian Matecki
California Lead Inspector/Assessor #LRC-00002569

Laboratory Analytical Data Sheets



9830 South 51st Street, Suite B-109 / PHOENIX, ARIZONA 85044 / 480-940-5294 or 800-362-3373 / FAX 480-893-1726
emclab@emclabs.com

LEAD (Pb) IN PAINT CHIP SAMPLES
 EMC SOP METHOD #L01/1 EPA SW-846 METHOD 7420

EMC LAB #: L82000		DATE RECEIVED: 09/11/20			
CLIENT: Risknomics		REPORT DATE: 09/17/20			
		DATE OF ANALYSIS: 09/15/20			
CLIENT ADDRESS: 331 E. Orange Drive Casa Grande, AZ 85122		P.O. NO.:			
PROJECT NAME: Jamboree		PROJECT NO.: 20RN1814			
EMC # L82000-	SAMPLE DATE /20	CLIENT SAMPLE #	DESCRIPTION	REPORTING LIMIT (%Pb by weight)	%Pb BY WEIGHT
1	09/09	1	Gray / Storage Room / DW	0.012	BRL
2	09/09	2	Tan / Breakfast Room / DW	0.024	BRL
3	09/09	3	Tan / Breakfast Room / Window Sill / DW	0.059	BRL
4	09/09	4	White / 110 Bath / DW	0.010	BRL
5	09/09	5	White Gloss / Laundry / DW	0.029	BRL
6	09/09	6	Gray / Concrete / Walkway	0.038	BRL
7	09/09	7	Yellow / Steel / Hall Door	0.156	BRL
8	09/09	8	Green / Storage Door / Wood	0.073	BRL

^ = Dilution Factor Changed * = Excessive Substrate May Bias Sample Results BRL = Below Reportable Limits # = Very Small Amount Of Sample Submitted, May Affect Result

This report applies to the standards or procedures identified and to the samples tested only. The test results are not necessarily indicative or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. Unless otherwise noted, all quality control analyses for the samples noted above were within acceptable limits.

Where it is noted that a sample with excessive substrate was submitted for laboratory analysis, such analysis may be biased. The lead content of such sample may, in actuality, be greater than reported. EMC makes no warranty, express or implied, as to the accuracy of the analysis of samples noted to have been submitted with excessive substrate. Resampling is recommended in such situations to verify original laboratory results. EMC Labs, Inc. (ID 101586) is accredited by the AIHA Laboratory Accreditation Programs, LLC (AIHA-LAP, LLC) in the Environmental Lead accreditation program(s) for Paint, Settled Dust by Wipe, Soil and Airborne Dust Fields of Testing as documented by the Scope of Accreditation Certificate and associated Scope. AIHA-LAP, LLC accreditation complies with the ISO/IEC Standard 17025:2005. requirements.

These reports are for the exclusive use of the addressed client and are rendered upon the condition that they will not be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special written permission. Samples not destroyed in testing are retained a maximum of sixty (60) days.

ANALYST: _____
 Jason Thompson

QA COORDINATOR: _____
 Kurt Kettler



9830 South 51st Street, Suite B-109 / PHOENIX, ARIZONA 85044 / 480-940-5294 or 800-362-3373 / FAX 480-893-1726
emclab@emclabs.com

LEAD (Pb) IN PAINT CHIP SAMPLES
EMC SOP METHOD #L01/1 EPA SW-846 METHOD 7420

EMC LAB #: L82000		DATE RECEIVED: 09/11/20			
CLIENT: Risknomics		REPORT DATE: 09/17/20			
		DATE OF ANALYSIS: 09/15/20			
CLIENT ADDRESS: 331 E. Orange Drive Casa Grande, AZ 85122		P.O. NO.:			
PROJECT NAME: Jamboree		PROJECT NO.: 20RN1814			
EMC # L82000-	SAMPLE DATE /20	CLIENT SAMPLE #	DESCRIPTION	REPORTING LIMIT (%Pb by weight)	%Pb BY WEIGHT
9	09/09	9	Light Brown / 101 Entry Door / Wood	0.046	BRL
10	09/09	10	Brown / Garage Entry Door / Metal	0.057	BRL
11	09/09	11	White / Breakfast Room Door / Wood	0.022	BRL
12	09/09	12	Gray / Kitchen Door / Steel	1.33	BRL
13	09/09	13	Tan / Bath Door / Wood	0.040	BRL
14	09/09	14	Brown / Electrical Room Door / Wood	0.019	BRL
15	09/09	15	Yellow / Building Ext / Stucco	0.096	BRL
16	09/09	16	White / Garage / DW	0.028	BRL

^ = Dilution Factor Changed * = Excessive Substrate May Bias Sample Results BRL = Below Reportable Limits # = Very Small Amount Of Sample Submitted, May Affect Result

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ANALYST: _____

Jason Thompson

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9830 South 51st Street, Suite B-109 / PHOENIX, ARIZONA 85044 / 480-940-5294 or 800-362-3373 / FAX 480-893-1726
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LEAD (Pb) IN PAINT CHIP SAMPLES
EMC SOP METHOD #L01/1 EPA SW-846 METHOD 7420

EMC LAB #: L82000		DATE RECEIVED: 09/11/20			
CLIENT: Risknomics		REPORT DATE: 09/17/20			
		DATE OF ANALYSIS: 09/15/20			
CLIENT ADDRESS: 331 E. Orange Drive Casa Grande, AZ 85122		P.O. NO.:			
PROJECT NAME: Jamboree		PROJECT NO.: 20RN1814			
EMC # L82000-	SAMPLE DATE /20	CLIENT SAMPLE #	DESCRIPTION	REPORTING LIMIT (%Pb by weight)	%Pb BY WEIGHT
17	09/09	17	Brown / Lobby Entry Floor / Concrete	0.019	BRL
18	09/09	18	Yellow / Lobby / DW	0.034	BRL
19	09/09	19	Yellow / Lobby / Wood Trim	0.183	BRL
20	09/09	20	White / Wood / Covebase	0.055	BRL
21	09/09	21	White / Crown Molding / Wood	0.153	BRL
22	09/09	22	White / 101 Ceiling / DW	0.053	BRL
23	09/09	23	White / Door Frame Kitchen / Wood	0.116	BRL
24	09/09	24	Brown / Electrical / Door Frame / Metal	0.444	BRL

^ = Dilution Factor Changed * = Excessive Substrate May Bias Sample Results BRL = Below Reportable Limits # = Very Small Amount Of Sample Submitted, May Affect Result

This report applies to the standards or procedures identified and to the samples tested only. The test results are not necessarily indicative or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. Unless otherwise noted, all quality control analyses for the samples noted above were within acceptable limits.

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ANALYST: _____

Jason Thompson

QA COORDINATOR: _____

Kurt Kettler

CHAIN OF CUSTODY

EMC Labs, Inc.
9830 S. 51st St., Ste B-109
Phoenix, AZ 85044
(480) 940-5294 Fax (480) 893-1726

LAB# 282000
TAT: 4 day
Rec'd: 9/11/2020

COMPANY NAME: Risknomics
Address: _____
CONTACT: Andy Olcott
Phone/Fax: 486552696
Email: Aolcott@risknomicsllc.com

BILL TO: (If Different Location)

Now Accepting: **VISA - MASTERCARD** Price Quoted: \$ _____ / Sample \$ _____ / Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)

1. **TURNAROUND TIME:** [Same Day Rush] [1-2 Days] [3-4 Days] [6-10 Days]

****Prior confirmation of turnaround time is required
****Additional charges for rush analysis (please call marketing department for pricing details)
****Laboratory analysis may be subject to delay if credit terms are not met

2. **TYPE OF ANALYSIS:** [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]

3. **DISPOSAL INSTRUCTIONS:** [Dispose of samples at EMC] / [Return samples to me at my expense]
(If you do not indicate preference, EMC will dispose of samples 30 days from analysis.)

4. Project
Name: jAMBOREE
P.O. Number: _____ Project
Number: 20RN1814

EMC SAMPLE #	CLIENT SAMPLE #	DATE & TIME SAMPLED	LOCATION/MATERIAL TYPE	Samples Accepted Yes / No	AIR SAMPLE INFO / COMMENTS		
					ON	OFF	FLOW RATE
1	1	9/9/20	GRAY/STORAGE ROOM/DW	N			
2	2	9/9/20	TAN/BREAKFAST ROOM/DW	N			
3	3	9/9/20	TAN/BREAKFASTROOM/WINDOWSILL/DW	N			
4	4	9/9/20	WHITE/110 BATH/ DW	N			
5	5	9/9/20	WHITE GLOSS/LAUNDRY/DW	N			
6	6	9/9/20	GREY/CONCRETE/WALKWAY	N			
7	7	9/9/20	YELLOW/STEEL/ HALL DOOR	N			
8	8	9/9/20	GREEN/STORAGE DOOR/WOOD	N			
9	9	9/9/20	LIGHT BRWON/101 ENTRY DOOR/ WOOD	N			
10	10	9/9/20	BROWN/GARAGE ENTRY DOOR/ METEAL	N			
11	11	9/9/20	WHITE/BREAKFAST ROOM DOOR/ WOOD	N			
12	12	9/9/20	GREY/ KITCHEN DOOR/STEEL	N			
13	13	9/9/20	TAN/BATH DOOR/ WOOD	N			
14	14	9/9/20	BROWN/ LOBBY ENTRY FLOOR/ CONCRETE	N			
15	15	9/9/20	YELLOW/ BUILDONG EXT/ STUCCO	N			

SPECIAL INSTR16UCTIONS:
Sample Collector: (Print) Den Pater (Signature) [Signature]
Relinquished by: [Signature] Date/Time: _____ Received by: [Signature] Date/Time: 9/11/2020 10:50
Relinquished by: [Signature] Date/Time: 9/11/2020 Received by: _____ Date/Time: _____
Relinquished by: _____ Date/Time _____ Received by: _____ Date/Time: _____

CHAIN OF CUSTODY

EMC Labs, Inc.
9830 S. 51st St., Ste B-109
Phoenix, AZ 85044
(480) 940-5294 Fax (480) 893-1726

LAB#: L22000
TAT: 4 days
Rec'd: 9/11/2020

COMPANY NAME: Risknomics
Address: _____
CONTACT: Andy Olcott
Phone/Fax: 486552696
Email: Aolcott@risknomicsllc.com

BILL TO: _____
(If Different Location)

Now Accepting: **VISA - MASTERCARD** Price Quoted: \$ _____ / Sample \$ _____ / Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)

1. TURNAROUND TIME: [Same Day Rush] [1-2 Days] [3-5 Days] [6-10 Days]

****Prior confirmation of turnaround time is required

****Additional charges for rush analysis (please call marketing department for pricing details)

****Laboratory analysis may be subject to delay if credit terms are not met

2. TYPE OF ANALYSIS: [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]

3. DISPOSAL INSTRUCTIONS: [Dispose of samples at EMC] / [Return samples to me at my expense]

(If you do not indicate preference, EMC will dispose of samples 30 days from analysis.)

4. Project

Name: JAMBOREE

P.O. Number: _____ Project

Number: 20RN1814

EMC SAMPLE #	CLIENT SAMPLE #	DATE & TIME SAMPLED	LOCATION/MATERIAL TYPE	Samples Accepted Yes / No	AIR SAMPLE INFO / COMMENTS		
					ON	OFF	FLOW RATE
<u>16</u>	<u>16</u>	<u>9/9/20</u>	<u>WHITE/GARAGE/ DW</u>	<u>N</u>			
<u>17</u>	<u>17</u>	<u>9/9/20</u>	<u>BROWN/ LOBBY ENTRY FLOOR/ CONCRETE</u>	<u>N</u>			
<u>18</u>	<u>18</u>	<u>9/9/20</u>	<u>YELLOW/LOBBY/DW</u>	<u>N</u>			
<u>19</u>	<u>19</u>	<u>9/9/20</u>	<u>YELLOW/LOBBY/WOOD TRIM</u>	<u>N</u>			
<u>20</u>	<u>20</u>	<u>9/9/20</u>	<u>WHITE/WOOD/COVE BVASE</u>	<u>N</u>			
<u>21</u>	<u>21</u>	<u>9/9/20</u>	<u>WHITE/CROWN MOLDING/WOOD</u>	<u>N</u>			
<u>22</u>	<u>22</u>	<u>9/9/20</u>	<u>WHITE/101 CEILING/ DW</u>	<u>N</u>			
<u>23</u>	<u>23</u>	<u>9/9/20</u>	<u>WHITE/DOOR FRAME KITCHEN/WOOD</u>	<u>N</u>			
<u>24</u>	<u>24</u>	<u>9/9/20</u>	<u>BROWN/ELECTRICAL DOOR FRAME/METAL</u>	<u>N</u>			
				<u>N</u>			
				<u>N</u>			
				<u>N</u>			
				<u>N</u>			
				<u>N</u>			
				<u>N</u>			

SPECIAL INSTRUCTIONS:

Sample Collector: (Print) _____ (Signature) _____ 10:00

Relinquished by: _____ Date/Time: _____ Received by: Andy Olcott Date/Time: 9/11/2020

Relinquished by: Andy Olcott Date/Time: 9/11/2020 10:50 Received by: _____ Date/Time: _____

Relinquished by: _____ Date/Time: _____ Received by: _____ Date/Time: _____

Sample Location Map

SECTION 15.01.01.01 (1) SHALL BE REPLACED BY A FULLER PLAN APPLICANT TO REPLACE ALL EXISTING PLUMBING FITTINGS AS PROPOSED AND AVAILABLE FOR USE OR BECOME AVAILABLE TO THE WATERWORKS PLUMBING FITTINGS AS A CONDITION FOR APPROVAL OF A FINAL BUILDING PERMIT FOR ALL EXISTING PLUMBING FITTINGS IN THAT ROOM.

A. 1/2" B. 3/4" C. FOR ALL OTHERS OR APPROVED TO A ROOM A. 1/2" B. 3/4" C. FOR ALL OTHERS OR APPROVED TO A ROOM PLUMBING FITTINGS AND THAT REQUIRE A BAZING PERMIT. THE BUILDING PERMIT APPLICANT SHALL REPLACE ALL EXISTING PLUMBING FITTINGS IN THAT ROOM.

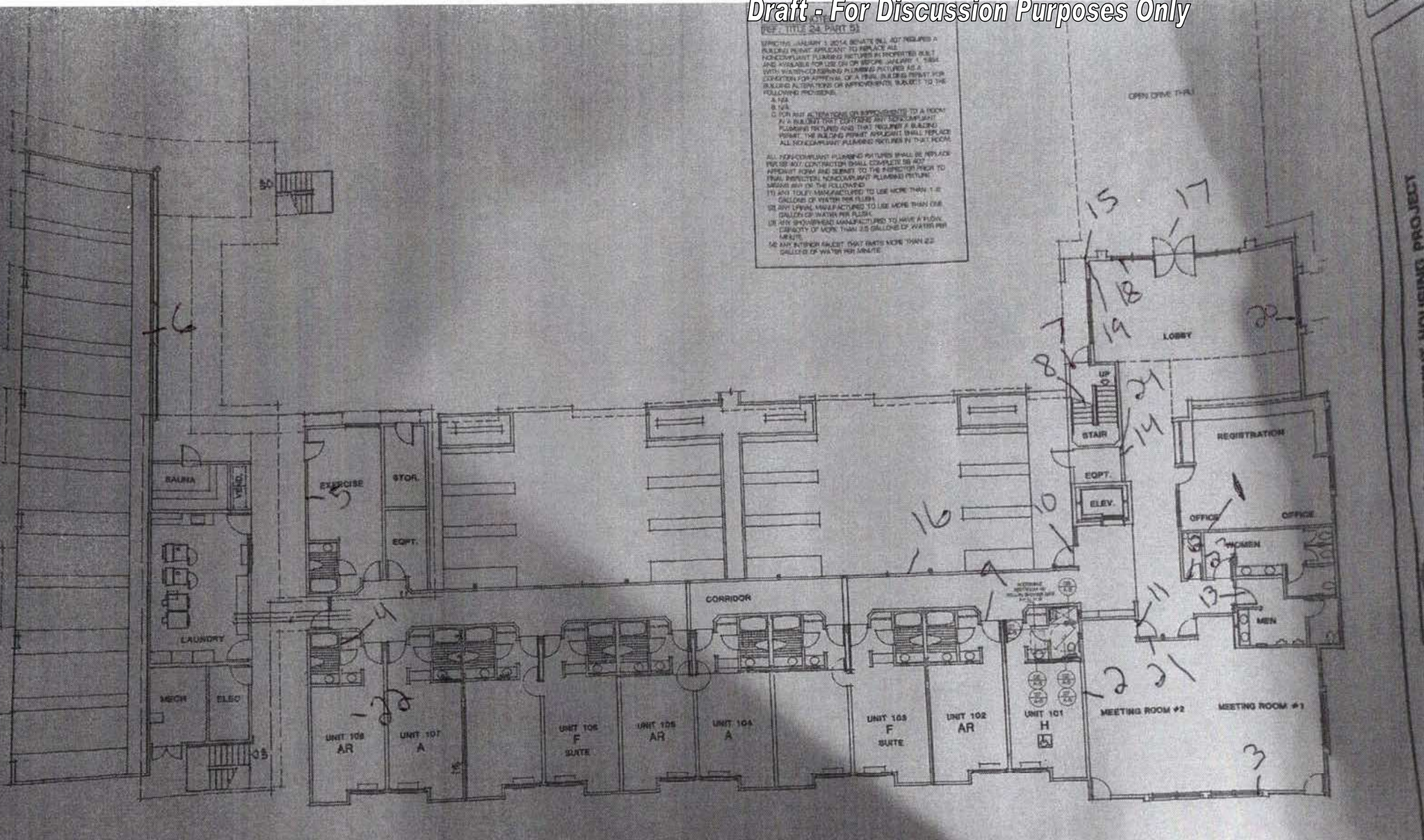
ALL EXISTING PLUMBING FITTINGS SHALL BE REPLACED PER THE CONTRACTOR SHALL COMPLETE TO BE APT. APPROVED FROM AND SUBJECT TO THE PROVISIONS OF THE FINAL INSPECTOR. EXISTING PLUMBING FITTINGS SHALL BE REPLACED BY ONE OF THE FOLLOWING:

(1) AND TOILET MANUFACTURED TO USE MORE THAN 1.6 GALLONS OF WATER PER FLUSH.

(2) ANY URINAL MANUFACTURED TO USE MORE THAN ONE GALLON OF WATER PER FLUSH.

(3) NEW SPINDLED MANUFACTURED TO HAVE A FLOW CAPACITY OF MORE THAN 85 GALLONS OF WATER PER MINUTE.

(4) ANY EXTERIOR SILENT TOILET MORE THAN 22 GALLONS OF WATER PER MINUTE.



FIRST FLOOR PLAN - PROPOSED
SCALE 1/8" = 1'-0"

EXISTING MECHANICAL/ HVAC/ ELECTRICAL/ PLUMBING WILL BE REMAIN THE SAME - NO CHANGE (FIELD VERIFY)
EXISTING STRUCTURAL WILL BE REMAIN THE SAME - NO CHANGE (FIELD VERIFY)

EXISTING HOUSING PROJECT



Employee Credentials



STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH



LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:



Daniel Prater

CERTIFICATE TYPE:

Lead Sampling Technician

NUMBER:

LRC-00003978

EXPIRATION DATE:

11/6/2020

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at www.cdph.ca.gov/programs/clppb or calling (800) 597-LEAD.



STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH



LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:



Christian Matecki

CERTIFICATE TYPE:

Lead Inspector/Assessor

NUMBER:

LRC-00002569

EXPIRATION DATE:

12/6/2020

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at www.cdph.ca.gov/programs/clppb or calling (800) 597-LEAD.

Attachment 10. USFWS IPaC Database Search

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Orange County, California



Local office

Carlsbad Fish And Wildlife Office

☎ (760) 431-9440

📅 (760) 431-5901

2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385

<http://www.fws.gov/carlsbad/>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME

STATUS

Pacific Pocket Mouse *Perognathus longimembris pacificus* Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/8080>

Birds

NAME

STATUS

California Least Tern *Sterna antillarum browni* Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/8104>

Coastal California Gnatcatcher *Polioptila californica californica* Threatened

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/8178>

Western Snowy Plover *Charadrius nivosus nivosus* Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/8035>

Flowering Plants

NAME

STATUS

Salt Marsh Bird's-beak *Cordylanthus maritimus* ssp. *maritimus* Endangered

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/6447>

Ventura Marsh Milk-vetch *Astragalus pycnostachyus* var. *lanosissimus* Endangered

lanosissimus

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/1160>

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE.)

"BREEDS ELSEWHERE" INDICATES
THAT THE BIRD DOES NOT LIKELY
BREED IN YOUR PROJECT AREA.)

<p>Allen's Hummingbird <i>Selasphorus sasin</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637</p>	Breeds Feb 1 to Jul 15
<p>Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470</p>	Breeds Jan 15 to Jun 10
<p>Long-billed Curlew <i>Numenius americanus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5511</p>	Breeds elsewhere
<p>Rufous Hummingbird <i>selasphorus rufus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002</p>	Breeds elsewhere
<p>Tricolored Blackbird <i>Agelaius tricolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3910</p>	Breeds Mar 15 to Aug 10
<p>Whimbrel <i>Numenius phaeopus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483</p>	Breeds elsewhere
<p>Wrentit <i>Chamaea fasciata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Allen's Hummingbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Costa's Hummingbird
BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



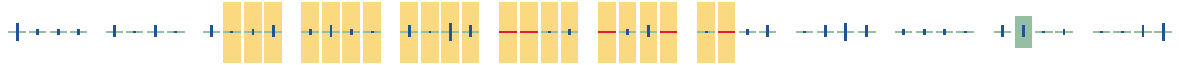
Long-billed Curlew
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Rufous Hummingbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



Tricolored Blackbird
BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



NOT FOR CONSULTATION

Whimbrel
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Wrentit
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting

point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

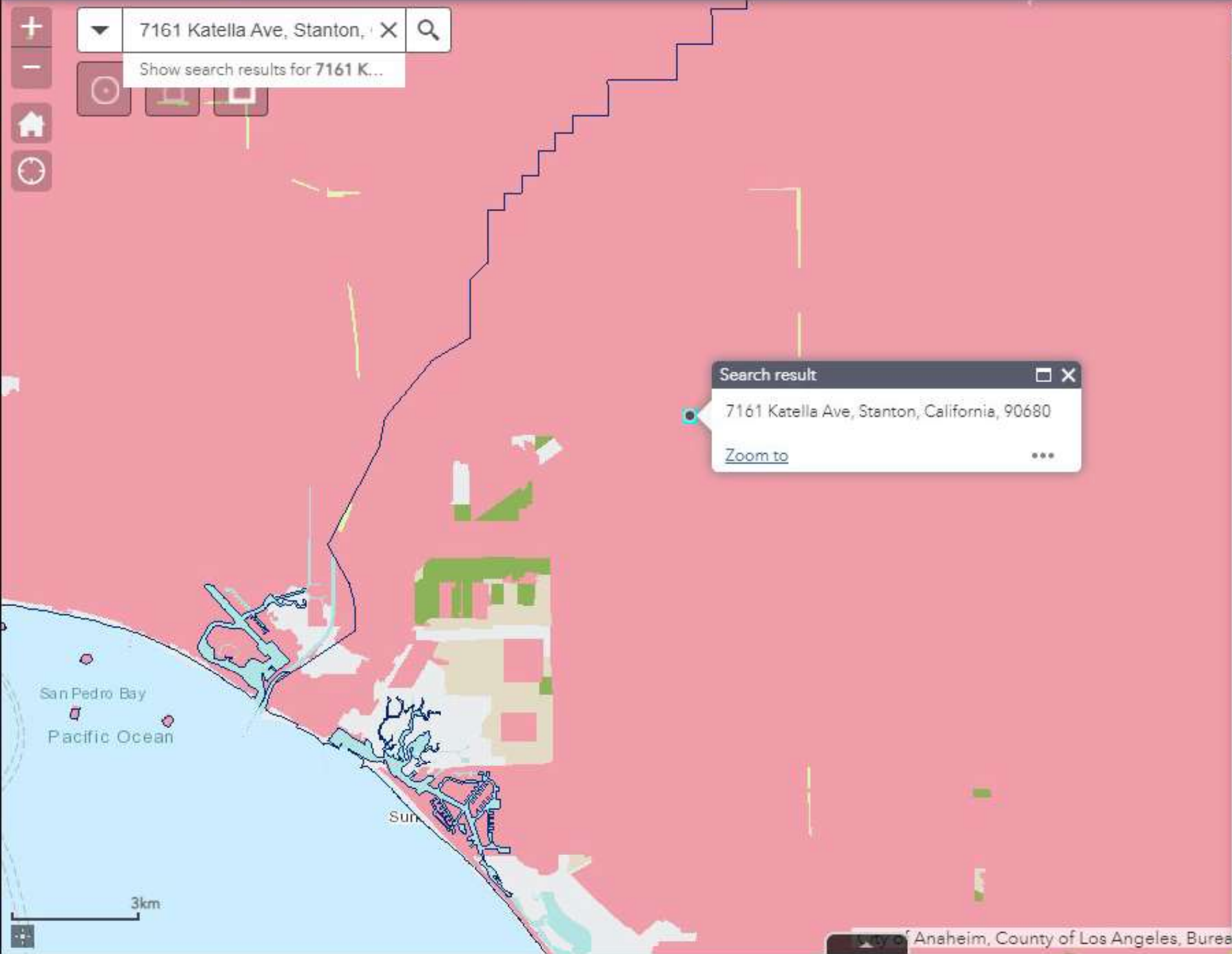
Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Attachment 11. California Important Farmland Finder

7161 Katella Ave, Stanton, X

Show search results for 7161 K...



Search result
7161 Katella Ave, Stanton, California, 90680
[Zoom to](#)

Legend

County Boundaries

County Boundaries
□

California Important Farmland: Most Recent

Most Recent

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Grazing Land
- Farmland of Local Importance
- Farmland of Local Potential
- Other Land
- Confined Animal Agriculture
- Nonagricultural or Natural Vegetation
- Vacant or Disturbed Land
- Rural Residential Land
- Semi-agricultural and Rural Commercial Land
- Urban and Built-Up Land
- Water Area
- Irrigated Farmland
- Nonirrigated Farmland

Attachment 12. State Historic Preservation Office Letter



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

June 8, 2021

[VIA EMAIL]

Refer to HUD_2021_0608_002

Ms. Liza Santos
Housing Development Compliance Administrator
Housing & Community Development
County of Orange
1501 St. Andrews Place, First Floor
Santa Ana, CA 92705

Re: Stanton Inn and Suites Project Homekey Adaptive Reuse to Housing for the Homeless
Rehabilitation Project at 7161 Katella Avenue, Stanton, CA

Dear Ms. Santos:

The California State Historic Preservation Officer received the consultation submittal for the above referenced undertaking for our review and comment pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations found at 36 CFR Part 800. The regulations and advisory materials are located at www.achp.gov.

You have informed us that the County of Orange intends to use funding from the U.S. Department of Housing and Urban Development (HUD) to adapt the Stanton Inn and Suites, located at 7161 Katella Avenue in Stanton, into housing units for the homeless.

The County has "determined that no historic property will be adversely affected," by the project. The SHPO does not objection to this finding, but because there are no historic properties in the undertaking area of potential effects the SHPO recommends and does not object to a finding of *No historic properties affected* pursuant to 36 CFR §800.4(d).

We appreciate the County of Orange's consideration of historic properties in the project planning process. If you have questions, please contact Shannon Lauchner Pries, Historian II, with the Local Government & Environmental Compliance Unit at (916)445-7013 or by email at shannon.pries@parks.ca.gov.

Note that we are only sending this letter in electronic format. Please confirm receipt of this letter. If you would like a hard copy mailed to you, respond to this email to request a hard copy be mailed.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Attachment 13. Tribal Consultation

Santos, Liza

From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Thursday, June 10, 2021 1:54 PM
To: Santos, Liza
Subject: Re: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

sounds good

Thank you

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized—the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”

On Thu, Jun 10, 2021 at 12:34 PM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Thank you for you response. One more thing, I need for you to acknowledge that consultation was concluded with the approval of the mitigation measure by replying to this emai.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Gabrieleno Administration <admin@gabrielenoindians.org>

Sent: Thursday, June 10, 2021 12:32 PM

To: Santos, Liza <Liza.Santos@occr.ocgov.com>

Subject: Re: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Liza

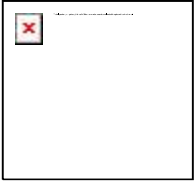
I just confirmed with Mr. Salas if these are the mitigations you will be using we are good.

Thank you

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”

On Tue, Jun 8, 2021 at 11:49 AM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Thank you for the update.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Gabrieleno Administration <admin@gabrielenoindians.org>

Sent: Tuesday, June 8, 2021 11:41 AM

To: Santos, Liza <Liza.Santos@occr.ocgov.com>

Subject: Re: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Liza

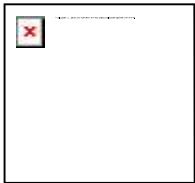
We are trying our best to get back to everyone as soon as possible. We have been very overwhelmed. We will get back to you as soon as possible.

Thank you

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”

On Tue, Jun 8, 2021 at 11:00 AM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Hi there.

We are finalizing to send the Concurrence Request packet to SHPO today. I would like to follow up with you if you had a chance to review the mitigation measure language and if it's good to go for both Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation projects so we can add them to the packets. The Developer is applying for a first-come-first-serve basis addition funding through the state for the projects and could only submit their applications with the completed NEPAs.

The Gabrieleno Band of Mission Indians – Kizh Nation agreed to a mitigation measure to monitor grading activities in case cultural resources are unearthed. This MM is shown below.

The applicant will be required to retain the services of a qualified Native American Monitor(s) during construction related ground disturbance activities. The Tribal Representative from the Gabrieleno Band of Mission Indians – Kizh Nation defines ground disturbance to include, but not limited to, pavement removal, potholing, grubbing, weed abatement, boring, grading, excavation, or trenching within the project area. The monitor must be approved by the Tribal Representative and will be present on-site during the construction phases that involve ground disturbance activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archaeological resources. If archaeological or cultural resources are encountered, they will be documented by the Native American monitor and collected for preservation.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Santos, Liza

Sent: Wednesday, June 2, 2021 12:11 PM

To: Gabrieleno Administration <admin@gabrielenoindians.org>

Subject: RE: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Thank you (Brandy?). 😊

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Gabrieleno Administration <admin@gabrielenoindians.org>

Sent: Wednesday, June 2, 2021 12:07 PM

To: Santos, Liza <Liza.Santos@occr.ocgov.com>

Subject: Re: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hello Liza

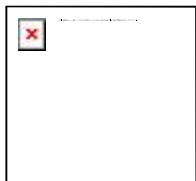
I will check in with Mr. Salas to see what he would like to do.

Thank you

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



The region where Gabrieleno culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleno who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleno are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleno, the community simply would not have survived.”

On Wed, Jun 2, 2021 at 11:52 AM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Would the activities I provided on an earlier email be considered as ground disturbance to you?

If so, please confirm if you would you like us to use the same mitigation measure that we have been using for both Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation as well and confirm that the consultation has been concluded.

The Gabrieleno Band of Mission Indians – Kizh Nation agreed to a mitigation measure to monitor grading activities in case cultural resources are unearthed. This MM is shown below.

The applicant will be required to retain the services of a qualified Native American Monitor(s) during construction related ground disturbance activities. The Tribal Representative from the Gabrieleno Band of Mission Indians – Kizh Nation defines ground disturbance to include, but not limited to, pavement removal, potholing, grubbing, weed abatement, boring, grading, excavation, or trenching within the project area. The monitor must be approved by the Tribal Representative and will be present on-site during the construction phases that involve ground disturbance activities. The on-site monitoring shall end when the project site

grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archaeological resources. If archaeological or cultural resources are encountered, they will be documented by the Native American monitor and collected for preservation.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Gabrieleno Administration <admin@gabrielenoindians.org>

Sent: Wednesday, June 2, 2021 11:41 AM

To: Santos, Liza <Liza.Santos@occr.ocgov.com>

Subject: Re: Follow up: Tahiti Motel and Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

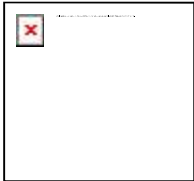
Hello Liza

We would like to consult if there is any type of ground disturbance taking place.

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



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On Wed, Jun 2, 2021 at 11:06 AM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Hello,

Just want to circle back with you to see if Gabrieleno Band of Mission Indians - Kizh Nation would like to consult on this project and the Stanton Inn and Suite Conversion/Rehabilitation.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Santos, Liza

Sent: Thursday, May 13, 2021 7:01 PM

To: Gabrieleno Administration <admin@gabrielenoindians.org>

Subject: RE: Tahiti Motel Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Hello,

Regarding the ground disturbance for Tahiti Motel, the following was provided by MFRG-ICON, the contractor, to describe the site work for the new community building on the adjacent City-owned lot.

In reference to the site soil disturbance for Tahiti new community building.

MFRG-ICON will demo the existing asphalt, and haul away the debris. During the removal we will be utilizing all feasible dust control measures. The subgrade will then be excavated to the new footprint of the community room. Footers will be created for the foundation. The soil will then be compacted to required rating. We will then install termite control to the foundation soils. Once compaction and termite treatment are completed we will pour new concrete.

Asphalt work will work similarly to the concrete. There will not be a need for termite treatment under the asphalt. Compaction will be completed as necessary requirements implement.

In all landscaped areas the existing asphalt will be removed along with the necessary subgrade. New soils will be imported to those areas as necessary to create a better grade for the landscaping specified in the plans.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705

From: Gabrieleno Administration <admin@gabrielenoindians.org>

Sent: Tuesday, May 11, 2021 11:11 AM

To: Santos, Liza <Liza.Santos@occr.ocgov.com>

Subject: Re: Tahiti Motel Conversion/Rehabilitation Affordable Housing Project Tribal Consultation

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

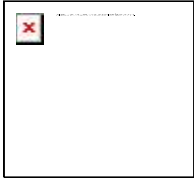
Hello Liza

Thank you for your email. Will there be any type of ground disturbance tasking place?

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”

On Fri, May 7, 2021 at 8:19 PM Santos, Liza <Liza.Santos@occr.ocgov.com> wrote:

Good Evening:

Please see the attached Stanton Inn and Suites Conversion/Rehabilitation Affordable Housing Project Tribal Consultation Letter and Enclosures.

Thank you.

~liza~



Liza Santos

Housing Development Compliance Administrator
714.480.2881 | Liza.Santos@occr.ocgov.com

OC Housing & Community Development

1501 E. St. Andrew Place, First Floor, Santa Ana, CA 92705



Attachment 14. Noise Calculations

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > DNL Calculator

DNL Calculator

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview \(/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/\)](#).

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	Stanton Inn - 7161 Katella Avenue, Stanton CA
Record Date	06/14/2021
User's Name	Mike Greene

Road # 1 Name:	Katella Avenue
-----------------------	-----------------------

Road #1

Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	85	85	85
Distance to Stop Sign	0	0	0
Average Speed	45	40	35
Average Daily Trips (ADT)	29100	600	300
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	57	49	64
Calculate Road #1 DNL	65	Reset	

Road # 2 Name:	Knott Avenue
-----------------------	---------------------

Road #2

Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
---------------------	---	--	---

Effective Distance	850	850	850
Distance to Stop Sign	0	0	0
Average Speed	40	35	30
Average Daily Trips (ADT)	27160	560	280
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	41	33	49
Calculate Road #2 DNL	50	Reset	

 Airport Noise Level

Loud Impulse Sounds?

 Yes No

 Combined DNL for all
Road and Rail sources

 Combined DNL including Airport

Combined DNL including Airport

N/A

Site DNL with Loud Impulse Sound

Calculate

Reset

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative:** Cancel the project at this location
- **Other Reasonable Alternatives:** Choose an alternate site
- **Mitigation**
 - Contact your **Field or Regional Environmental Officer** (</programs/environmental-review/hud-environmental-staff-contacts/>)
 - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
 - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
 - Incorporate natural or man-made barriers. See *The Noise Guidebook* (</resource/313/hud-noise-guidebook/>)
 - Construct noise barrier. See the **Barrier Performance Module** (</programs/environmental-review/bpm-calculator/>)

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (</resource/3822/day-night-noise-level-assessment-tool-user-guide/>)

Day/Night Noise Level Assessment Tool Flowcharts (</resource/3823/day-night-noise-level-assessment-tool-flowcharts/>)

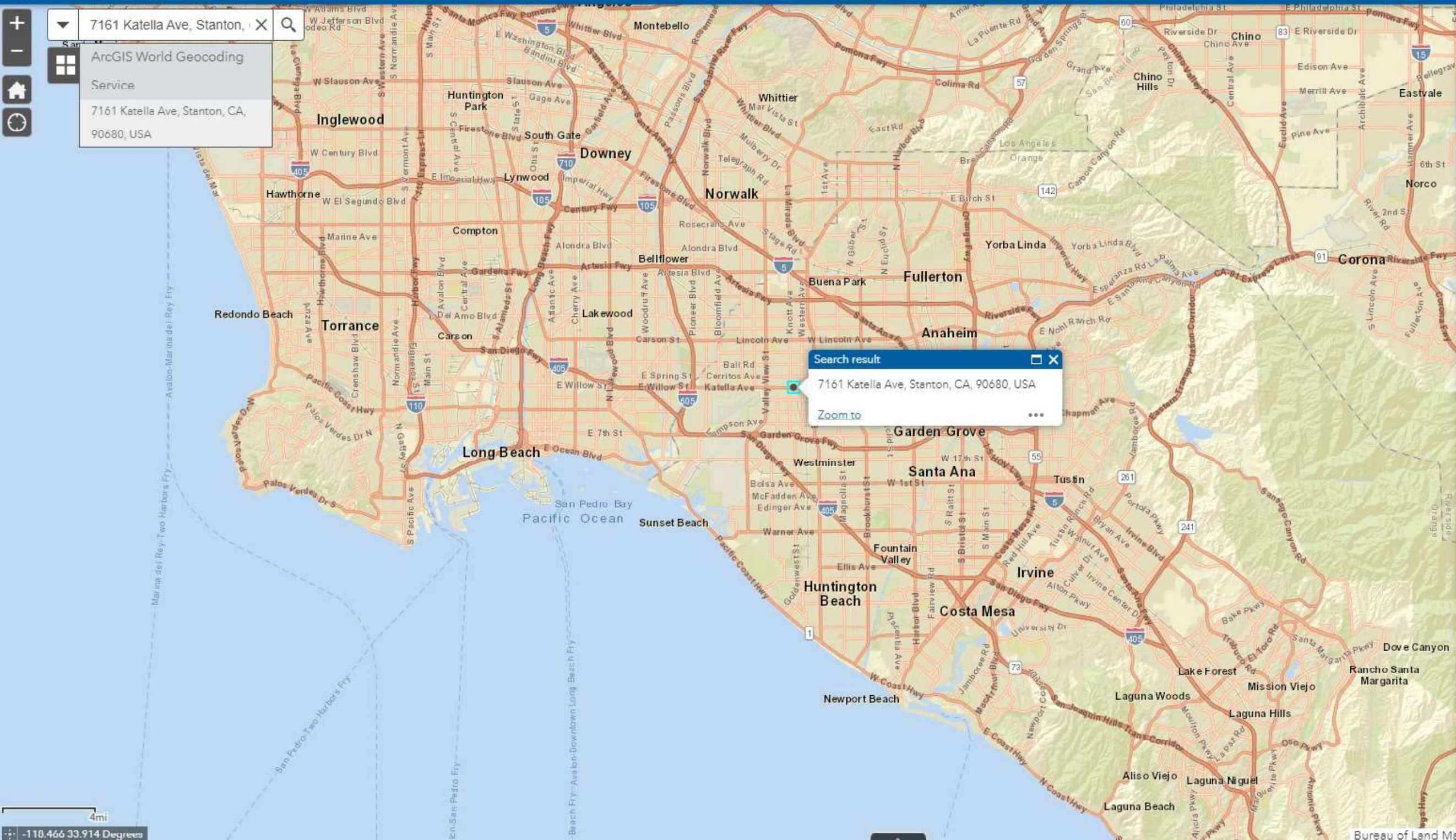
Attachment 15. Sole Source Aquifers Map

7161 Katella Ave, Stanton, CA, 90680, USA

ArcGIS World Geocoding Service

Legend

Sole_Source_Aquifers

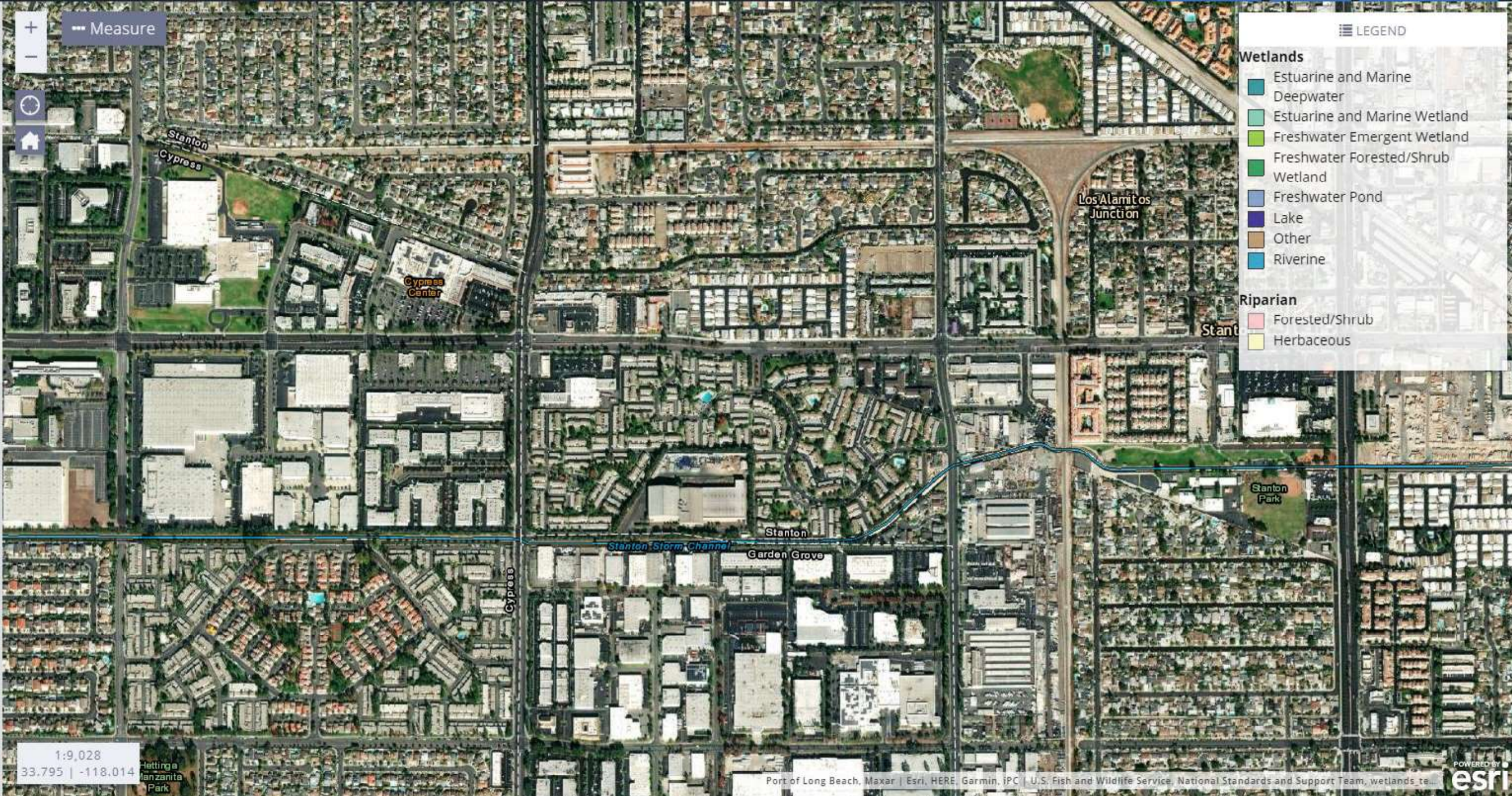


Attachment 16. National Wetlands Inventory Map

BASEMAPS >

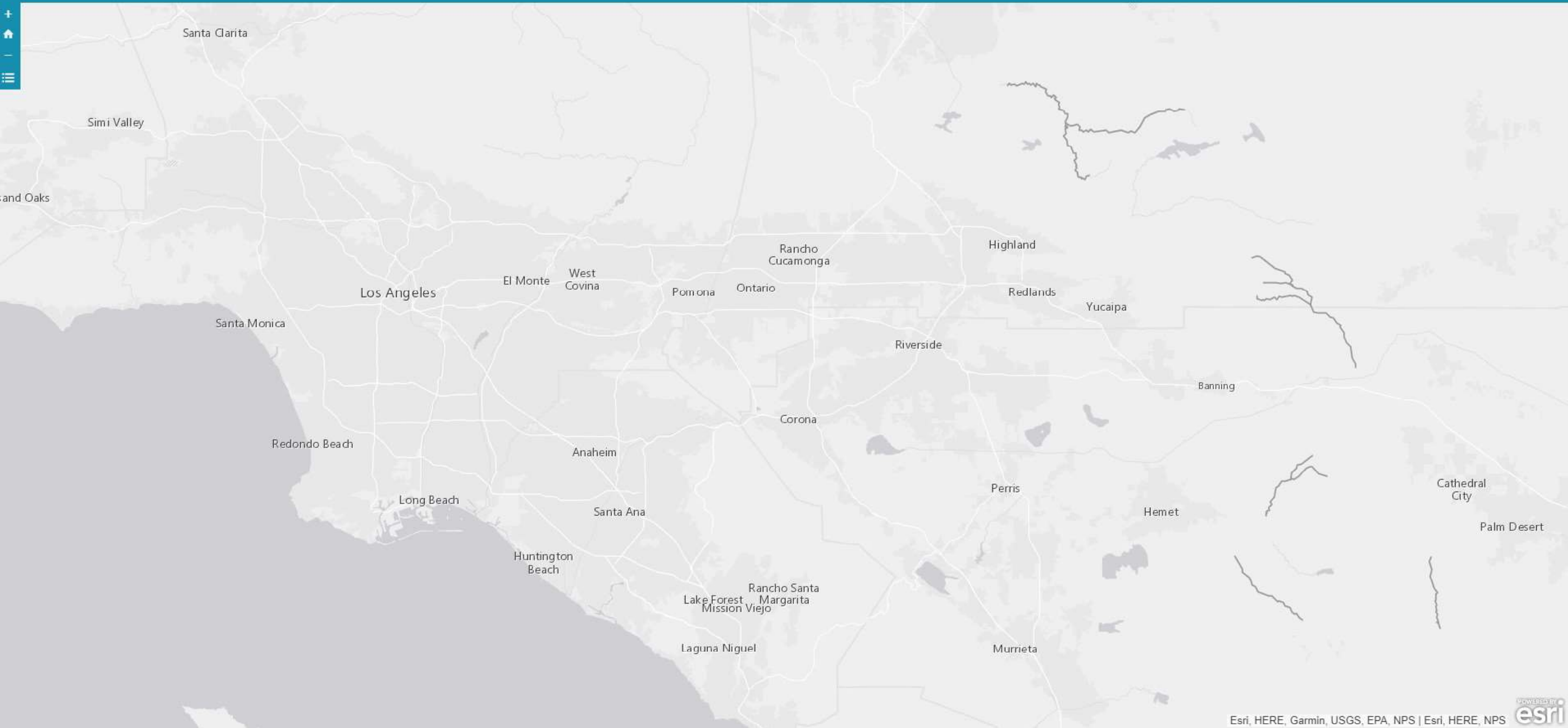
MAP LAYERS >

- Wetlands
- Riparian
- Riparian Mapping Areas
- Data Source
 - Source Type
 - Image Scale
 - Image Year
- Areas of Interest
- FWS Managed Lands
- Historic Wetland Data



1:9,028
33.795 | -118.014

Attachment 17. Wild and Scenic Rivers Map



Attachment 18: City of Stanton Conformity Determination



7800 Katella Avenue
Stanton, CA 90680



P | (714) 890-4237
F | (714) 890-1443



www.ci.stanton.ca.us

Date:

April 26, 2021

**2020 Supportive Housing
NOFA**

**OC Housing and Community
Development**

Exhibit 4-26

Subject: Evidence of Compliance with Zoning for 11850 Beach Boulevard (Tahiti Hotel) and 7161 Katella (Stanton Inn and Suites) located in the City of Stanton.

11850 Beach Boulevard – Tahiti Hotel: This property is in the General Commercial, General Mixed-Use Overlay Zone. The property has a land use designation of General Mixed Use. The General Mixed Use (GLMX) zone allows transitional and supportive housing as permitted by right uses. This use is also contemplated and identified in the General Plan and no further action is necessary as this use is compatible and complies with both the zoning ordinance and the General Plan as currently designated.

7161 Katella – Stanton Inn and Suites: This property was zoned Commercial General with a General Plan designation of General Commercial. This zoning and General Plan designation does not support residential land uses. The property is surrounded on the north, south and east sides by residential zoning and immediately to the east is an adult, residential care facility. On November 10, 2020, the City Council of the City of Stanton adopted a Zone Change from CG, Commercial General to RH, High Density Residential and to adopt a General Plan Map Amendment to change the land use designation from General Commercial to High Density Residential.

Transitional and Supportive housing are permitted by right uses in the High Density Residential zone. This change approved by the City is consistent with the City's goals and objectives and compatible with adjacent land use patterns and uses in the immediate vicinity.

Attached please find a copy of the Adopted Resolution No. 20-45, approving General Plan Map Amendment GPA 20-01 to change the designation from General Commercial to High Density Residential. Also, please find attached a copy of Ordinance 1106 approving Zone Change ZC 20-02 to amend the City's Zoning Map from CG, Commercial General to RH, High Density residential.

Should you have any questions or need clarifications, please feel free to contact me at (714)890-4235 or via email at jilley@ci.stanton.ca.us.

Sincerely,

Jennifer A. Lilley, AICP
Community and Economic Development Director

Attachment 19. U.S. Department of Agriculture Soil Map

Search

Map Unit Legend

Orange County and Part of Riverside County, California (CA678)

Orange County and Part of Riverside County, California (CA678)

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
163	Metz loamy sand	1.0	100.0%
Totals for Area of Interest		1.0	100.0%

Soil Map

Scale (not to scale)