

August 9, 2012 JN 10-104260

Steve Chan, P.E., STE
District Hazardous Branch (South Region)
Office of Environmental Engineering and Corridor Studies
California Department of Transportation – District 7
100 S. Main Street
Los Angeles, CA 90012

RE: State Route 57/State Route 60 Confluence at Grand Avenue Overcrossing – Supplemental Hazardous Materials Update Technical Memorandum

Dear Mr. Chan:

RBF Consulting (RBF) has prepared a Supplemental Hazardous Materials Update Technical Memorandum for the State Route 57 (SR-57)/State Route 60 (SR-60) Confluence at Grand Avenue Overcrossing (herein referenced as the proposed project) in an effort to identify the change in hazardous materials-related impacts, per the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), for the revised Alternatives 2 and 3. The major project revisions include the addition of a through lane along the confluence for both Alternatives 2 and 3. The information presented in this memorandum is based on the Phase I Initial Site Assessment (ISA), dated January 2009 (revisal of December 2008), and is intended to be supplemental to the Phase I ISA. Further, this memorandum includes recommended language changes provided by WKE in August 2012 pertaining to the implementation phasing noted in the recommendations presented in the ISA. Please attach this Supplemental Hazardous Materials Update Technical Memorandum to the Phase I ISA, dated January 2009 (revisal of December 2008). Note that this Memorandum replaces the previous April 17, 2012 Supplemental Hazardous Materials Technical Memorandum.

Should you have any questions with respect to the review of the subject memorandum, please do not hesitate contact me at 949/855-3687, <a href="mailto:Rbeck@rbf.com">Rbeck@rbf.com</a>, or Kristen Bogue at 949/855-5747, <a href="mailto:kbogue@rbf.com">kbogue@rbf.com</a>.

Respectfully,

Richard Beck, CEP, REA

Project Manager/Environmental Assessor

Planning/Environmental Services

Kristen Bogue, CEI, REA

Environmental Assessor

Planning/Environmental Services



# **TECHNICAL MEMORANDUM**

**Date**: August 9, 2012 (Revisal of April 17, 2012)

To: Monica Kling, MS 500

From: Richard Beck, REA, MS 435; Kristen Bogue, CEI; MS 455

Subject: State Route 57/State Route 60 Confluence at Grand Avenue Overcrossing –

Supplemental Hazardous Materials Update Technical Memorandum

This Technical Memorandum was prepared in an effort to identify the change in hazardous materials-related impacts, per the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), for the revised Alternatives 2 and 3 for the State Route (SR) 57/SR-60 Confluence at Grand Avenue Overcrossing (herein referenced as the proposed project). The major project revisions include the addition of a through lane along the confluence for both Alternatives 2 and 3. The information presented in this Memorandum is based on the Phase I Initial Site Assessment (ISA), dated January 2009 (revisal of December 2008) (2009 Phase I ISA), and is intended to be supplemental to the 2009 Phase I ISA. Due to the age of the approved ISA, RBF conducted a follow-up site visit in order to verify that the adjoining land uses have not changed.

### **Existing Conditions**

<u>Project Location</u>: The subject site is located within the cities of Industry and Diamond Bar, County of Los Angeles, State of California (Sections 3, 9, 10, 16, and 17, R.9W, T.2S, San Bernardino Base and Meridian [SBBM]) (refer to <u>Figure 1</u>, <u>Regional Vicinity</u>). This interchange and associated connector ramps are located along an approximate two-mile common alignment of the SR-57/SR-60 Confluence (refer to <u>Figure 2</u>, <u>Site Vicinity</u>). Additionally, the subject site includes the Diamond Bar Golf Course (Golf Course) located at 22751 East Golden Springs Drive.

Grand Avenue is a major north-south arterial road that connects the cities of Diamond Bar and Industry over the SR-57/SR-60 Confluence. The Grand Avenue Overcrossing provides full access to the SR-57/SR-60 freeway, with four (4) lanes to the north of the interchange and six (6) lanes to the south of the interchange. The surrounding land uses consist of vacant land, commercial, recreational, residential, and transportation uses.

## **Changes to Build Alternatives**

The project proposes changes to the originally analyzed Alternatives 1, 2, 3A, and 3B, which have been re-numbered to Build Alternatives 2 and 3. Proposed changes resulted from the addition of one through lane along the confluence. Refer to Figures 3a through 3c, Site Plan Alternative 2, and Figures 4a through 4c, Site Plan Alternative 3, for an illustration of proposed changes. The proposed areas of disturbance and right-of-way (R/W) take for Alternatives 2 and 3 have been reduced, particularly to the south within the Golf Course areas. Previously, the Alternatives proposed the disturbance of the Golf Course's maintenance vard area. maintenance yard area includes one (1) structure used for storage purposes, two (2) aboveground storage tanks (ASTs), and one (1) closed (filled) underground storage tank (UST). The revised areas of R/W acquisition proposed by Alternatives 2 and 3 would not include the Golf Course maintenance yard area; refer to Attachment A, Right-of-Way Acquisition -Alternative 3 (note that Alternative 3 has been included in the attachments as a worst case scenario, as it requires a greater amount of R/W acquisition than Alternative 2). As depicted in Attachment A, a Southern California Edison (SCE) easement is noted overlying a portion of a structure in the maintenance storage area. SCE currently has an easement along the Golf Course and over the maintenance storage structure. The overhead SCE easement would be realigned as part of the proposed project. However, no modifications to the maintenance yard area would occur as part of the revised Alternatives 2 and 3. Also, the proposed areas of disturbance within the western portion of the Golf Course would be slightly reduced as part of the revised Alternatives.

# **Changes to the Existing Conditions**

An updated site visit was conducted on September 13, 2011 in order to confirm that the subject site and surrounding uses have not changed since the approval of the 2009 Phase I ISA. The following summarizes the differences in the site visit findings:

### On-Site Observations

Methodology and Limiting Conditions. The site visit was updated on September 13, 2011. The methodology and limiting conditions have not changed since the approval of the 2009 Phase I ISA. The objective of the site reconnaissance is still to obtain information indicating the likelihood of identifying RECs, including hazardous substances and petroleum products in connection with the property (including soils, surface water, and groundwater). During the September 13, 2011 site inspection, RBF performed a visual observation of readily accessible areas of the subject site (along the proposed roadway alignment), similar to that conducted for the 2009 Phase I ISA. RBF did not examine the interior of on-site structures.

Description of On-Site Structures and/or Uses. The site visit confirmed that on-site structures and uses have not changed since the approval of the 2009 Phase I ISA. The subject site consists of transportation and recreational land uses similar to 2009. Acquired R/W currently consists of ornamental vegetation, areas of the Golf Course, and vacant land. Roadways located within the subject site consist of Grand Avenue, SR-60, SR-57, Diamond Bar Boulevard, Golden Springs Drive, and associated on- and off-ramps. Six (6) on-site bridge structures are located within the boundaries of the subject site. One (1) bridge structure consists of the Grand Avenue Overcrossing; four (4) bridge structures consist of flyover ramps associated with the SR-57/SR-60 Confluence; and one (1) bridge structure consists of Diamond Bar Boulevard Undercrossing.

Five (5) structures are located within the boundaries of the Golf Course. Two (2) structures, located within the eastern portion of the Golf Course, consist of the Pro Shop and Coffee Shop. Two (2) structures used for restroom uses are included in this area. Additionally, one (1) structure located within the northwestern portion of the golf course, adjoining the SR-57/SR-60 Confluence, is located within the Golf Course maintenance yard area. Two (2) ASTs containing diesel were observed. Also, Mr. Jose Lerma (Maintenance Supervisor at the Golf Course) noted that one (1) UST was filled and closed in the maintenance yard area prior to his employment (2000).

Geologic, Hydrogeologic, and Topographic Conditions. The geologic, hydrogeologic, and topographic conditions have not changed since the approval of the 2009 Phase I ISA.

Asbestos Containing Material. The September 13, 2011 site visit confirmed the presence of the six (6) on-site bridge structures (the overcrossing, flyovers, and undercrossing) potentially containing asbestos containing materials (ACMs). However, two (2) of the three (3) Golf Course structures potentially containing ACMs referred to in the approved 2009 Phase I ISA would not be modified as part of the proposed project.

Lead-Based Paints. The September 13, 2011 site visit confirmed the presence of the six (6) onsite bridge structures (the overcrossing, flyovers, and undercrossing) potentially containing leadbased paints (LBPs). However, two (2) of the three (3) Golf Course structures potentially containing LBPs referred to in the approved 2009 Phase I ISA would not be modified as part of the proposed project.

Lead in Soil. Conditions have not changed since the approval of the 2009 Phase I ISA.

Solid Waste Disposal. Conditions have not changed since the approval of the 2009 Phase I ISA.

Utilities. Conditions have not changed since the approval of the 2009 Phase I ISA.

Polychlorinated Biphenyls (PCBs). Conditions have not changed since the approval of the 2009 Phase I ISA.

Chemical Storage Tanks (ASTs and USTs). During the September 13, 2011 site inspection, the subject site was inspected for fill pipes, vent pipes, areas of abnormal or heavy staining, manways, manholes, access covers, concrete pads not homogenous with surrounding surfaces, concrete build-up areas potentially indicating pump islands, abandoned pumping equipment, or fuel pumps. Based on the approved 2009 Phase I ISA and physical observations made during the September 13, 2011 site inspection, the on-site golf course currently maintains two (2) ASTs within the maintenance/storage yard and one (1) closed (filled) UST. Physical evidence (patched asphalt) was observed suggesting the location of the UST and the observed location of the ASTs, these tanks appeared to be outside of the R/W acquisition area.

Spills. Conditions have not changed since the approval of the 2009 Phase I ISA.

Wells. Conditions have not changed since the approval of the 2009 Phase I ISA.

Pits, Ponds, Lagoons. Conditions have not changed since the approval of the 2009 Phase I ISA.

Septic Systems. Conditions have not changed since the approval of the 2009 Phase I ISA.

#### Off-Site Observations

Current/Past Uses of Adjoining Properties. Conditions have not changed since the approval of the 2009 Phase LISA.

Utilities. Conditions have not changed since the approval of the 2009 Phase I ISA.

Chemical Storage Tanks. Conditions have not changed since the approval of the 2009 Phase I ISA.

Hazardous Materials. Conditions have not changed since the approval of the 2009 Phase I ISA.

# Changes in the Findings Identified in the Approved 2009 Phase I ISA

The following analysis is based on the approved 2009 Phase I ISA conducted for the subject site. The 2009 Phase I ISA was prepared in general accordance with ASTM Standard Practice E 1527-05 and the scope of services, and subject to the limitations thereof. This scope of work did not include any work to satisfy the conditions of a Phase I ISA update (i.e., records search, interviews, etc.), nor did RBF conduct any soil subsurface investigations. RBF's opinions are solely based on our review of the 2009 Phase I ISA, as it was approved by the California Department of Transportation (Department) and the updated site visit, conducted on September 13, 2011.

<u>Lead In Soil</u>. Impacts pertaining to aerially deposited lead contamination would be similar to that previously analyzed in the 2009 Phase I ISA.

<u>Underground Storage Tank</u>. The UST located in the Golf Course maintenance yard area would no longer be located within the proposed area of disturbance for either Build Alternative 2 or 3. No impacts would occur with regard to on-site USTs for the revised Alternatives.

<u>Groundwater Contamination</u>. Impacts pertaining to groundwater contamination would be similar to that previously analyzed in the 2009 Phase I ISA.

<u>Lead-Based Paints</u>. Impacts pertaining to the removal of yellow paint or thermoplastic traffic stripes and lead-based paints (LBPs) associated with on-site bridge structures would be similar to that previously analyzed in the 2009 Phase I ISA.

LBPs associated with on-site structures would no longer be of concern, as the maintenance building at the Golf Course would not be altered as part of the revised Alternatives. Additionally, the Coffee Shop and the Pro Shop associated with the Golf Course would not be modified as part of the proposed project. However, the project's Environmental Document contains mitigation to contribute funding to the Golf Course which could be used for the future modification of structures.

<u>Asbestos Containing Materials</u>. Impacts pertaining to asbestos-containing materials (ACMs) associated with on-site bridge structures would be similar to that previously analyzed in the 2009 Phase I ISA.

ACMs associated with on-site structures located within the Golf Course would no longer be of concern, as the maintenance building at the Golf Course would not be altered as part of the revised Alternatives. Additionally, the Coffee Shop and the Pro Shop associated with the Golf Course would not be modified as part of the proposed project. However, the project's Environmental Document contains mitigation to contribute funding to the Golf Course which could be used for the future modification of structures.

<u>Aboveground Storage Tank</u>. As the ASTs would no longer be located within the proposed area of disturbance for both Build Alternatives 2 and 3, no impacts would occur with regard to the onsite ASTs.

<u>Pole-mounted Transformers and Electrical Boxes</u>. Impacts pertaining to transformers and high voltage power boxes would be similar to that previously analyzed in the 2009 Phase I ISA.

# Changes in Opinions Identified in the Approved 2009 Phase I ISA

Similar to the originally analyzed Alternative 2 and 3, it is the opinion of RBF that the following opinions remain applicable to the revised Alternatives 2 and 3 (note that there has been slight modification to the original language in order to clarify timing of these measures):

- ◆ Areas of exposed soils within the State's R/W, which will be disturbed during excavation/grading activities, should be sampled and tested for lead prior to during the PA/EDPS&E phase and during the WBS 165 stage for the project, so that any special handling, treatment, or disposal provisions associated with aerially deposited lead may be included in construction documents (if aerially deposited lead is present). It is RBF's opinion that areas of exposed soils within the State's R/W has likely resulted in aerially deposited lead contamination in on-site soils and, therefore, resulting in an REC.
- ♦ Should construction require dewatering activities, or if groundwater is expected to be encountered on-site, a qualified hazardous materials consultant with Phase II and Phase III experience should review all available files for the reported addresses 206 South Diamond Bar, 301 South Diamond Bar Boulevard, 22628 East Golden Springs Drive, and 23525 East Palomino Drive (if available) as well as files associated with the undocumented historic UST reported at the off-site address 525 Grand Avenue during the PA/EDPS&E phase.

It is the opinion of RBF that the off-site regulatory properties 206 South Diamond Bar, 301 South Diamond Bar Boulevard, 22628 East Golden Springs Drive, 23525 East Palomino Drive (dry cleaner facility), and 525 Grand Avenue have likely resulted in groundwater contamination underlying the subject site. Thus off-site regulatory properties have resulted in an REC.

◆ Due to the age of the on-site structures (including bridge structures), LBPs may be present and should be tested during the <u>PA/EDPS&E</u> phase. As RBF did not observe evidence of chipping paints during the February 13, 2007, August 15, 2007, and April 8, and September 13, 2011 site inspections, it is the opinion of RBF that the potential presence of LBPs at the subject site is *de minimus*, as indicated in the Phase I ISA.

- ♦ Should construction activities result in the removal of yellow paint or thermoplastic traffic stripes, the age of the traffic striping and the presence of lead and/or chromium should be determined during the PA/EDPS&E phase.
- Pursuant to SCAQMD regulations, an asbestos survey must be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and Cal OSHA certified building inspector to determine the levels of asbestos in structures (including bridge structures) should renovation or demolition occur and should be tested during the PA/EDPS&E phase. As RBF did not observe evidence of exposed ACMs during the February 13, 2007, August 15, 2007, and April 8, 2008, and September 13, 2011 site inspections, it is the opinion of RBF that the potential presence of ACMs at the subject site is de minimus, as indicated in the Phase I ISA.
- Any transformers and/or high voltage power boxes to be relocated during site construction/demolitions should be conducted under the purview of the local utility purveyor to identify proper handling procedures regarding potential PCBs. Should an on-site transformer (that may be required to be relocated as part of the project) be located under bare soil, the underlying soils should be sampled by a qualified hazardous materials specialist during the <a href="PA/EDPS&E">PA/EDPS&E</a> phase. It is the opinion of RBF that on-site pole-mounted transformers, that are located over bare soil, are highly likely to have resulted in a past release of PCBs. It is RBF's opinion that the on-site transformers, located over bare soil, have resulted in an REC at the subject site.

It is the opinion of RBF that the following opinions, originally applicable, no longer apply to the revised Alternatives 2 and 3 due to avoidance design features:

- ◆ The exact location of the reported UST located at 22751 East Golden Springs Drive should be confirmed prior to R/W acquisition or the PA/ED phase, whichever is earlier. It is the opinion of RBF that the presence of the UST at 22751 East Golden Springs Drive is de minimus, as indicated in the Phase LISA.
- ◆ If the on-site ASTs need to be removed or relocated upon project implementation, the appropriate local regulatory agency should be notified and work conducted following all local and state requirements. During the February 13, 2007, August 15, 2007, April 8, 2008, and September 13, 2011 site inspections, RBF observed multiple ASTs located in secondary containment (concrete). It is the opinion of RBF that the existence of the on-site ASTs is de minimus, as indicated in the Phase LISA.

# Changes in Conclusions Identified in the Approved 2009 Phase I ISA

There are no changes to the conclusions identified in the approved 2009 Phase I ISA. Similar to the originally analyzed Alternatives, it is the opinion of RBF that the following evidence of RECs in connection with the subject site remain applicable to the revised Alternatives 2 and 3:

- ♦ It is RBF's opinion that areas of exposed soils within the State's R/W has likely resulted in aerially deposited lead contamination in on-site soils and, therefore, resulting in an REC.
- It is the opinion of RBF that the off-site regulatory properties 206 South Diamond Bar, 301 South Diamond Bar Boulevard, 22628 East Golden Springs Drive, and 23525 East Palomino Drive (dry cleaner facility), and 525 Grand Avenue have likely resulted in groundwater contamination underlying the subject site. Thus off-site regulatory properties have resulted in an REC.
- ♦ It is the opinion of RBF that on-site pole-mounted transformers located over bare soil are highly likely to have resulted in a past release of PCBs. It is RBF's opinion that the on-site transformers located over bare soil have resulted in an REC at the subject site.

Should you have any questions with respect to the review of the subject letter, please do not hesitate contact me at 949/855-3687, <a href="mailto:Rbeck@rbf.com">Rbeck@rbf.com</a>, or Kristen Bogue at 949/855-5747, kbogue@rbf.com.

Sincerely,

Richard Beck, CEP, CEM, CEI

Project Manager/Environmental Professional

Planning/Environmental Services

Kristen Bogue, CEI

Environmental Professional

Planning/Environmental Services

### Attachments:

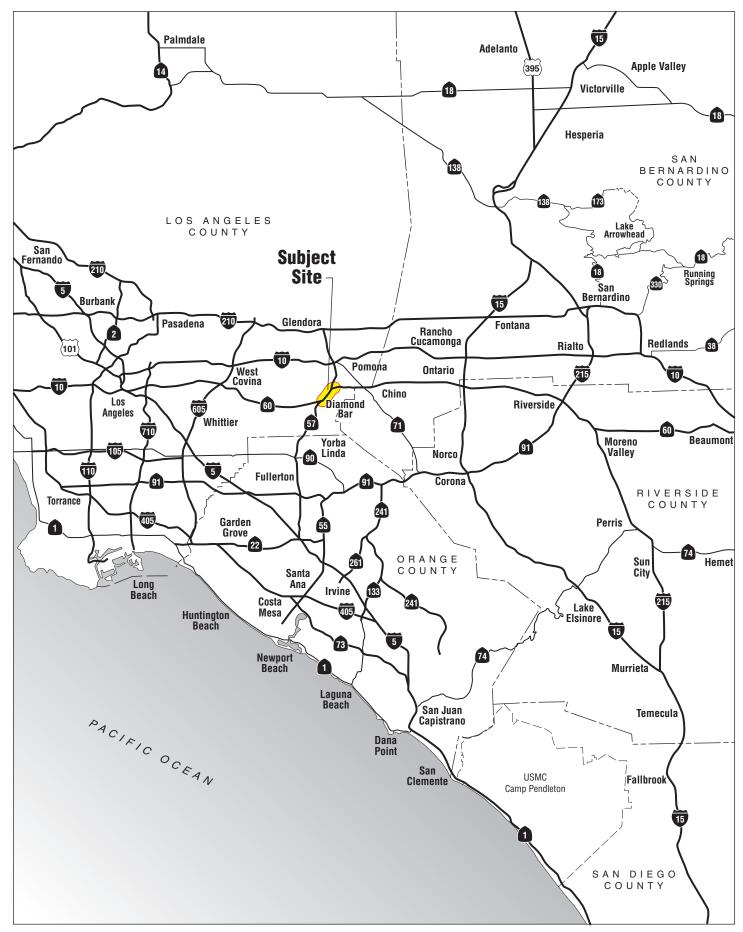
Figure 1 – Regional Vicinity

Figure 2 – Site Vicinity

Figures 3a through Figure 3c – Site Plan Alternative 2

Figures 4a through Figure 4c – Site Plan Alternative 3

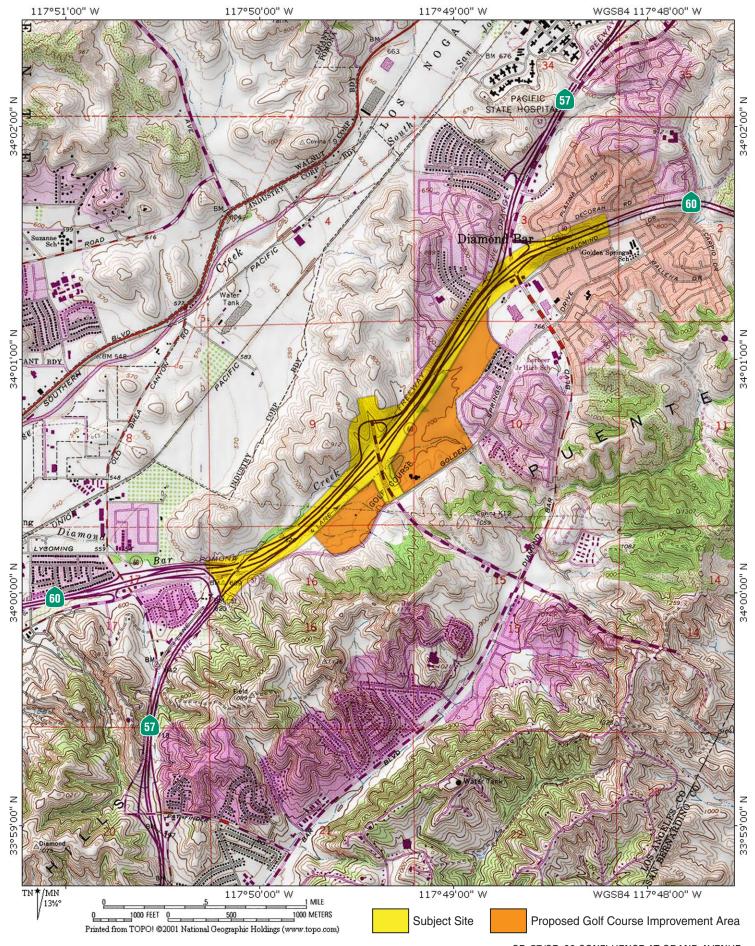
Attachment A – Right-of-Way Acquisition – Alternative 3





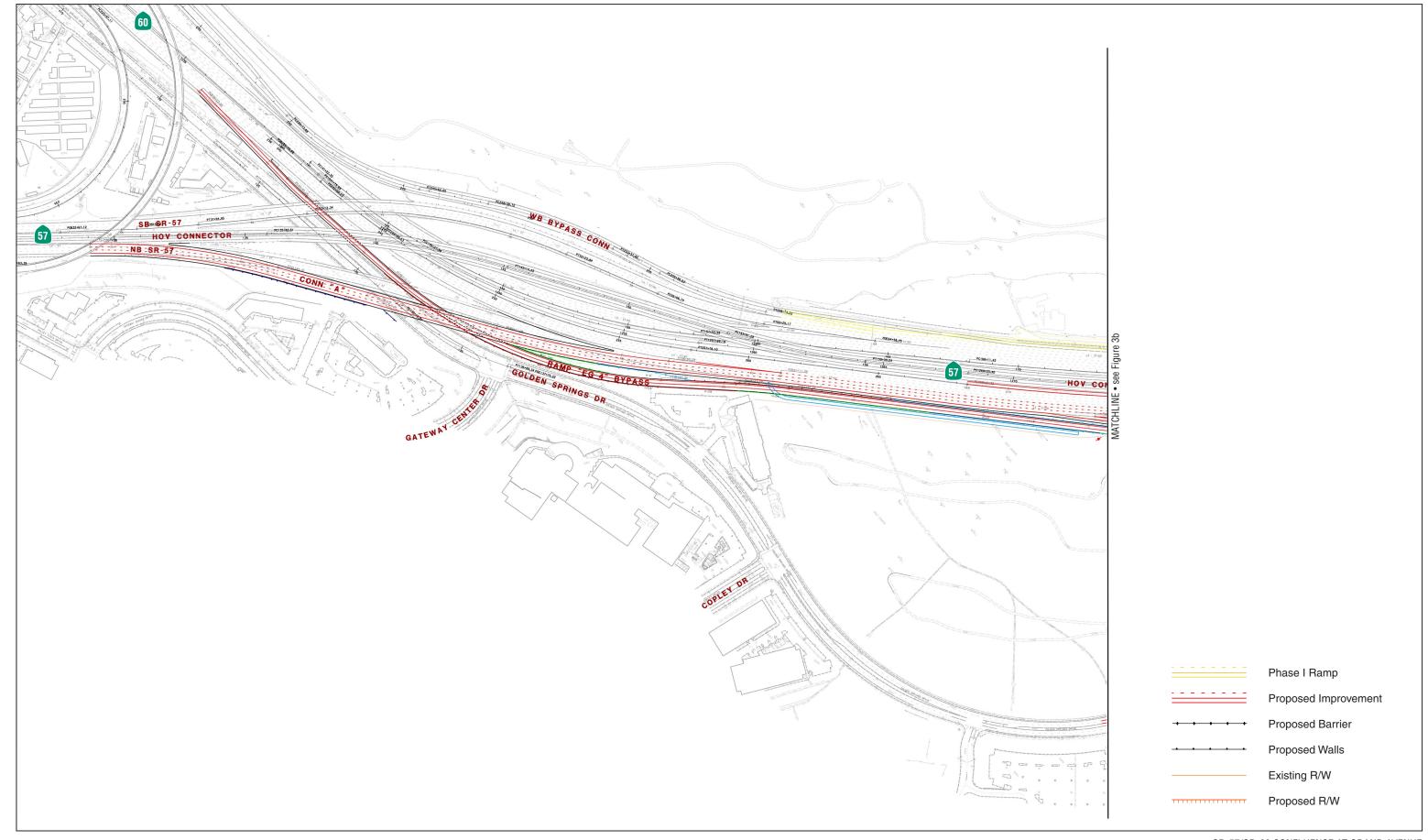
SR-57/SR-60 CONFLUENCE AT GRAND AVENUE OVERCROSSING PROJECT • PHASE I ISA ADDENDUM

**Regional Vicinity** 



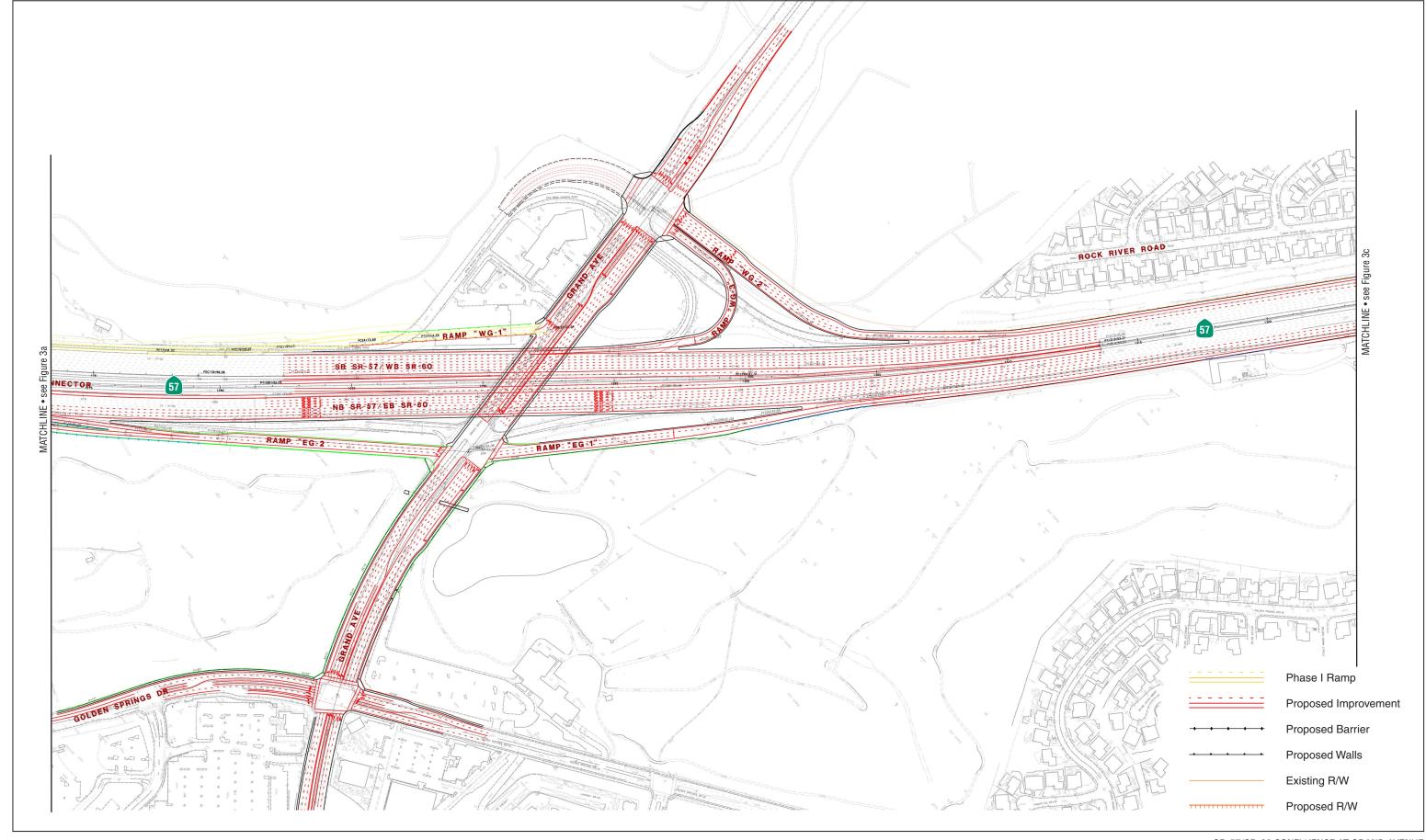


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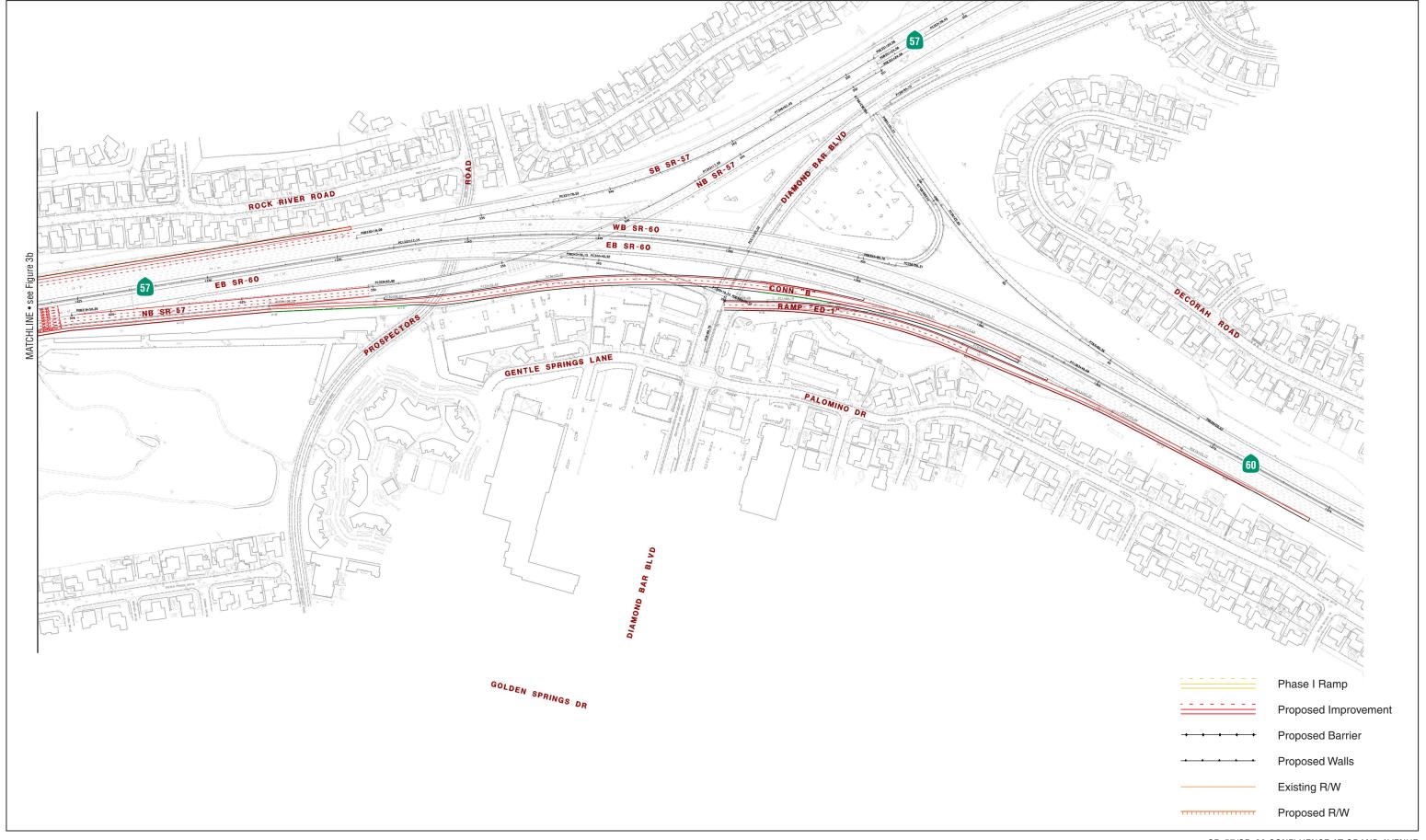


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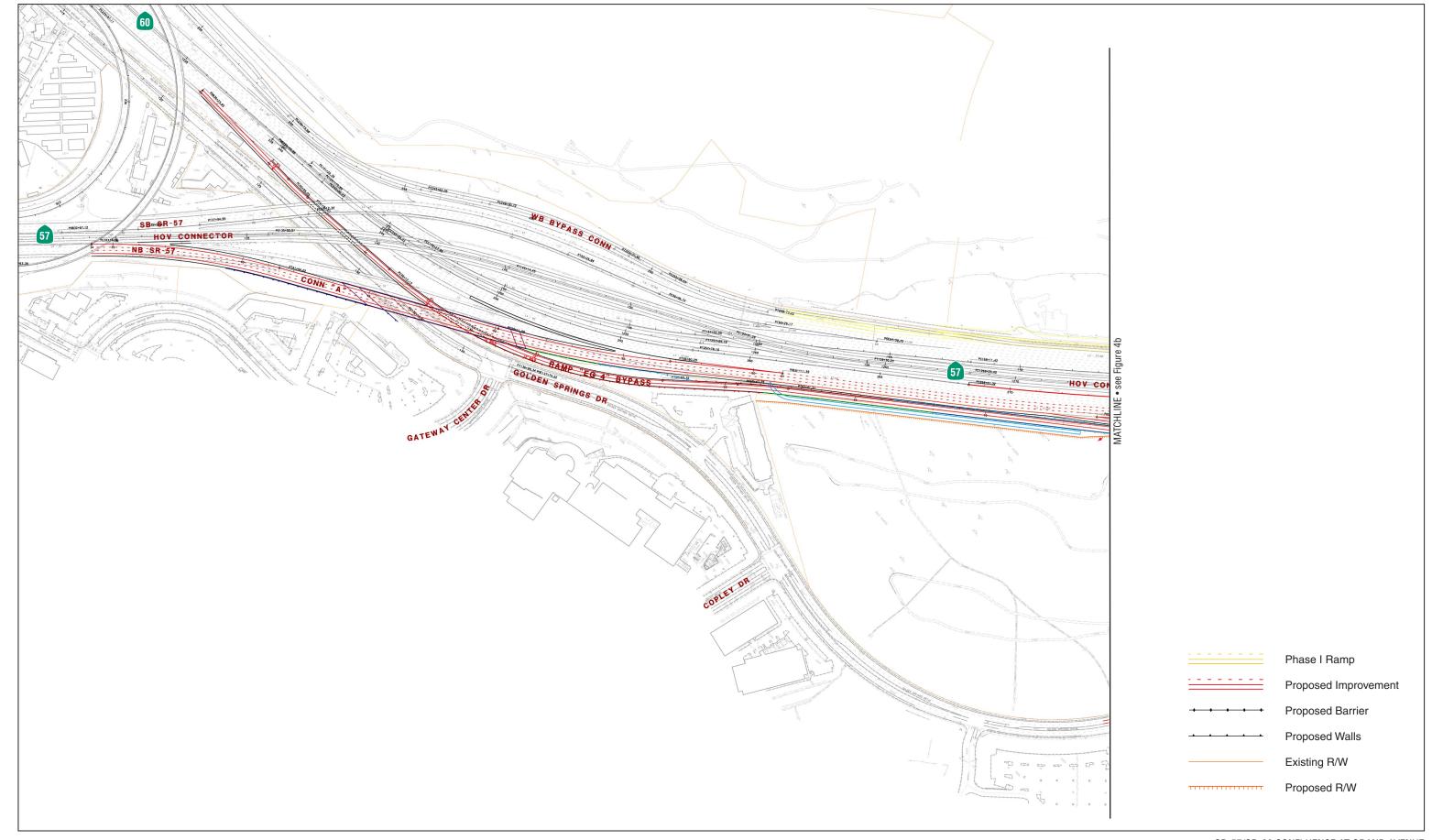
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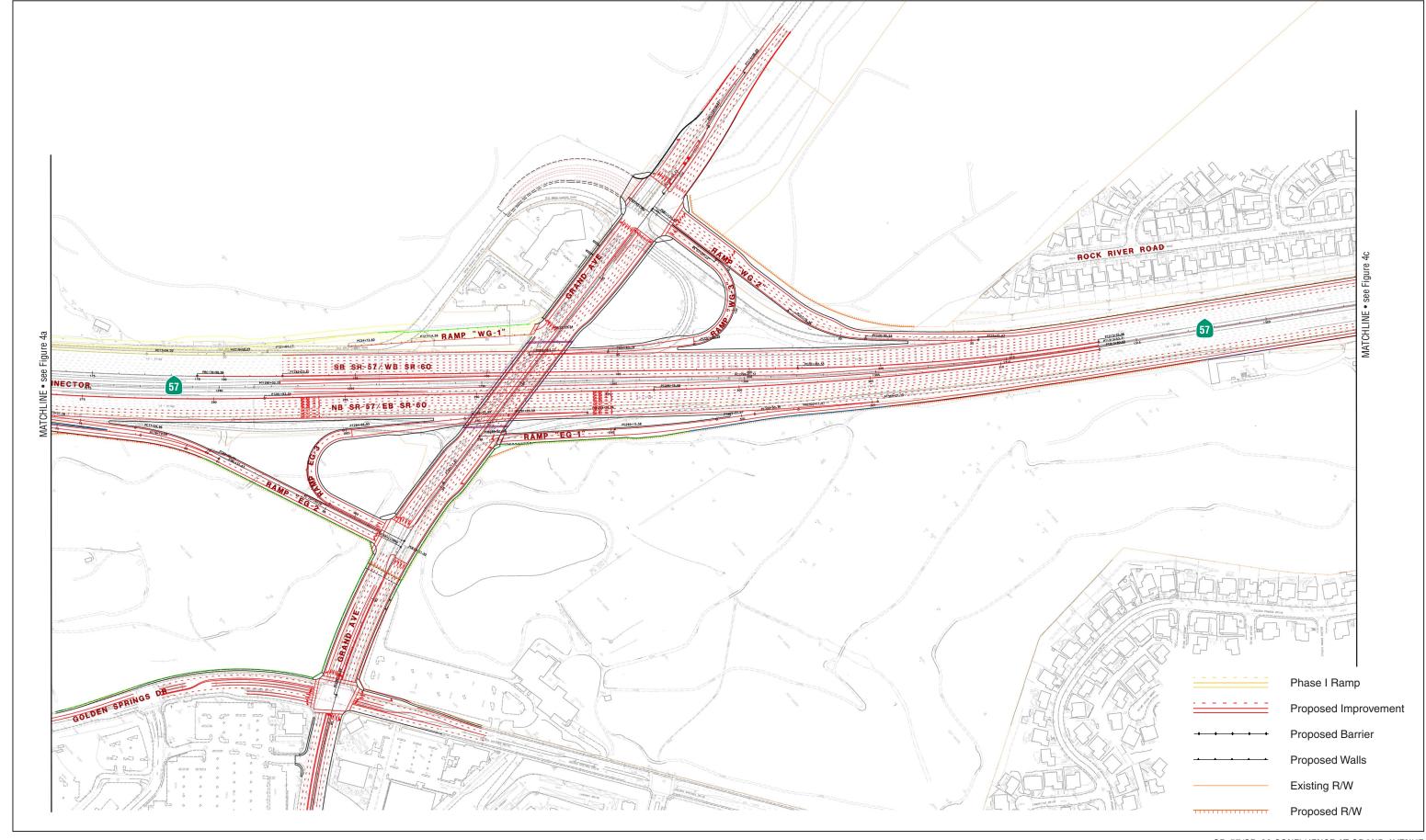




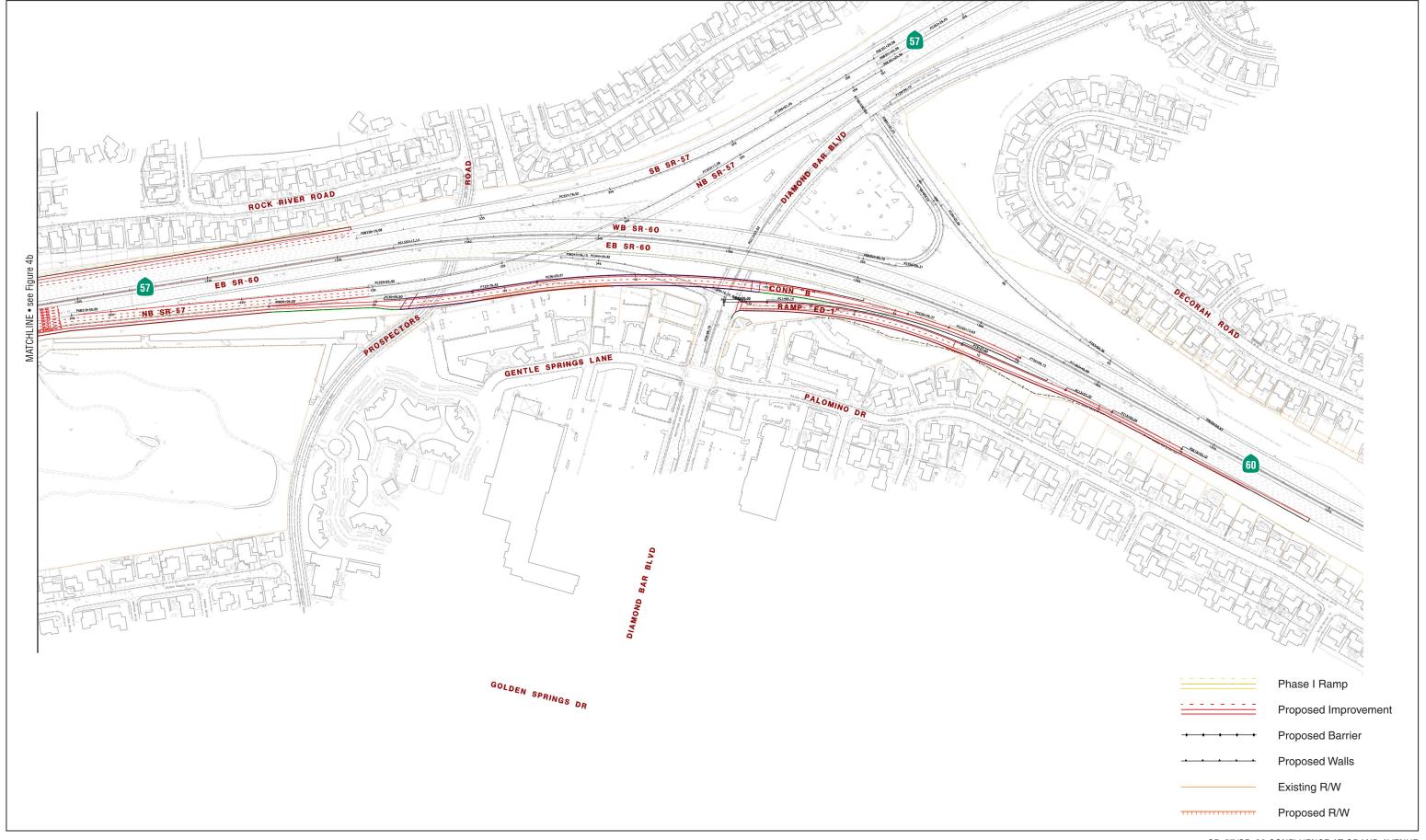


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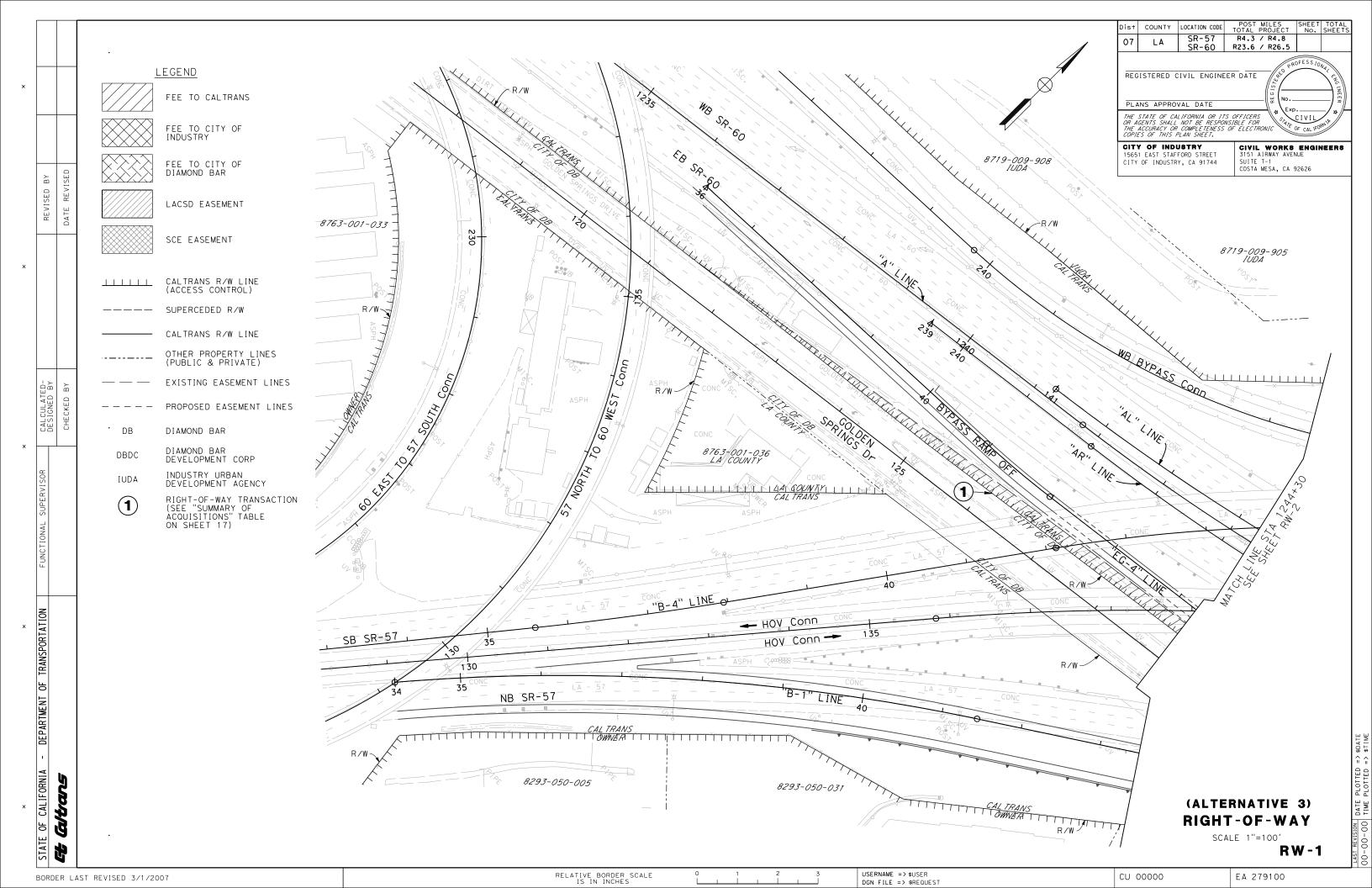
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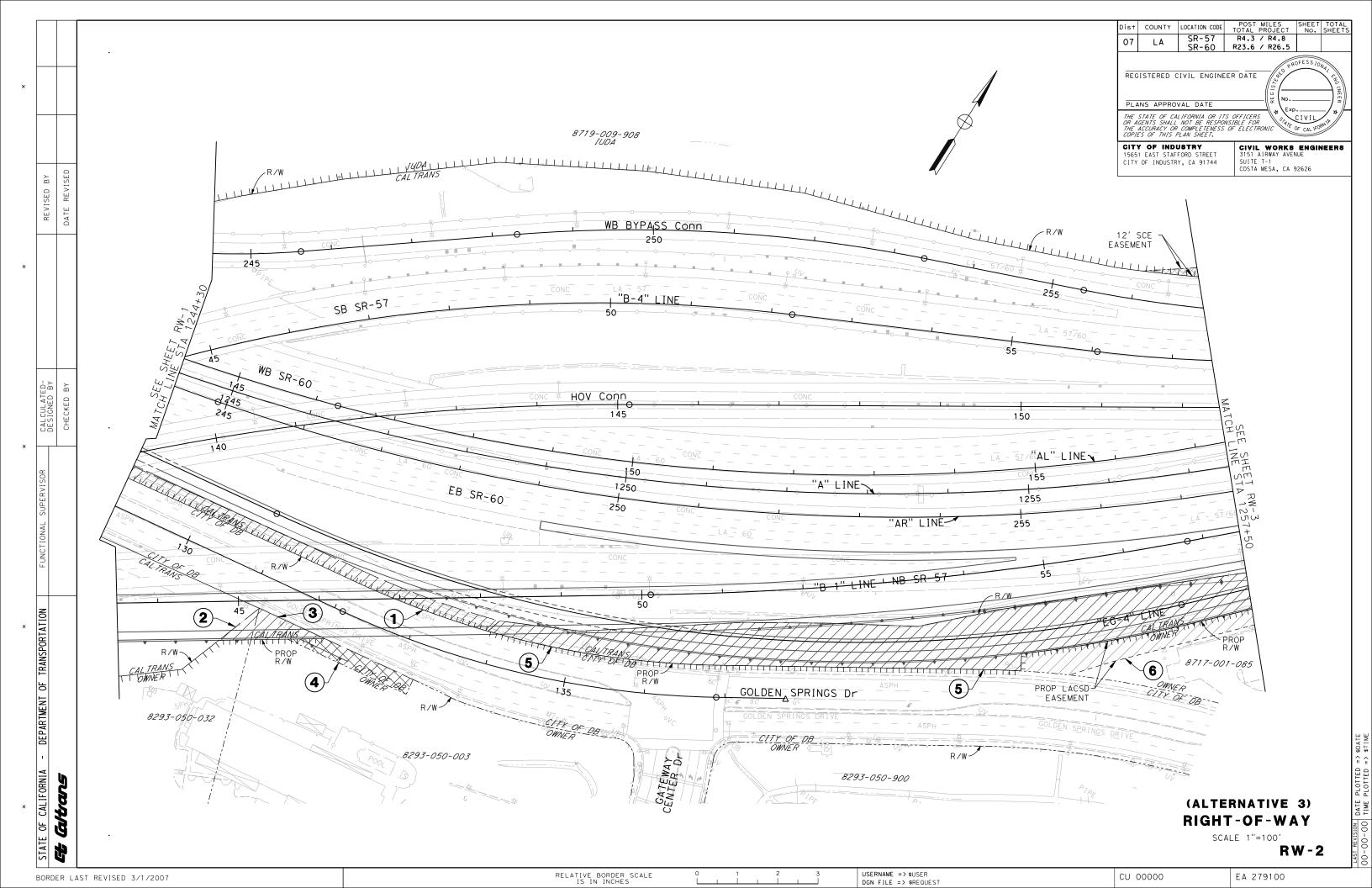


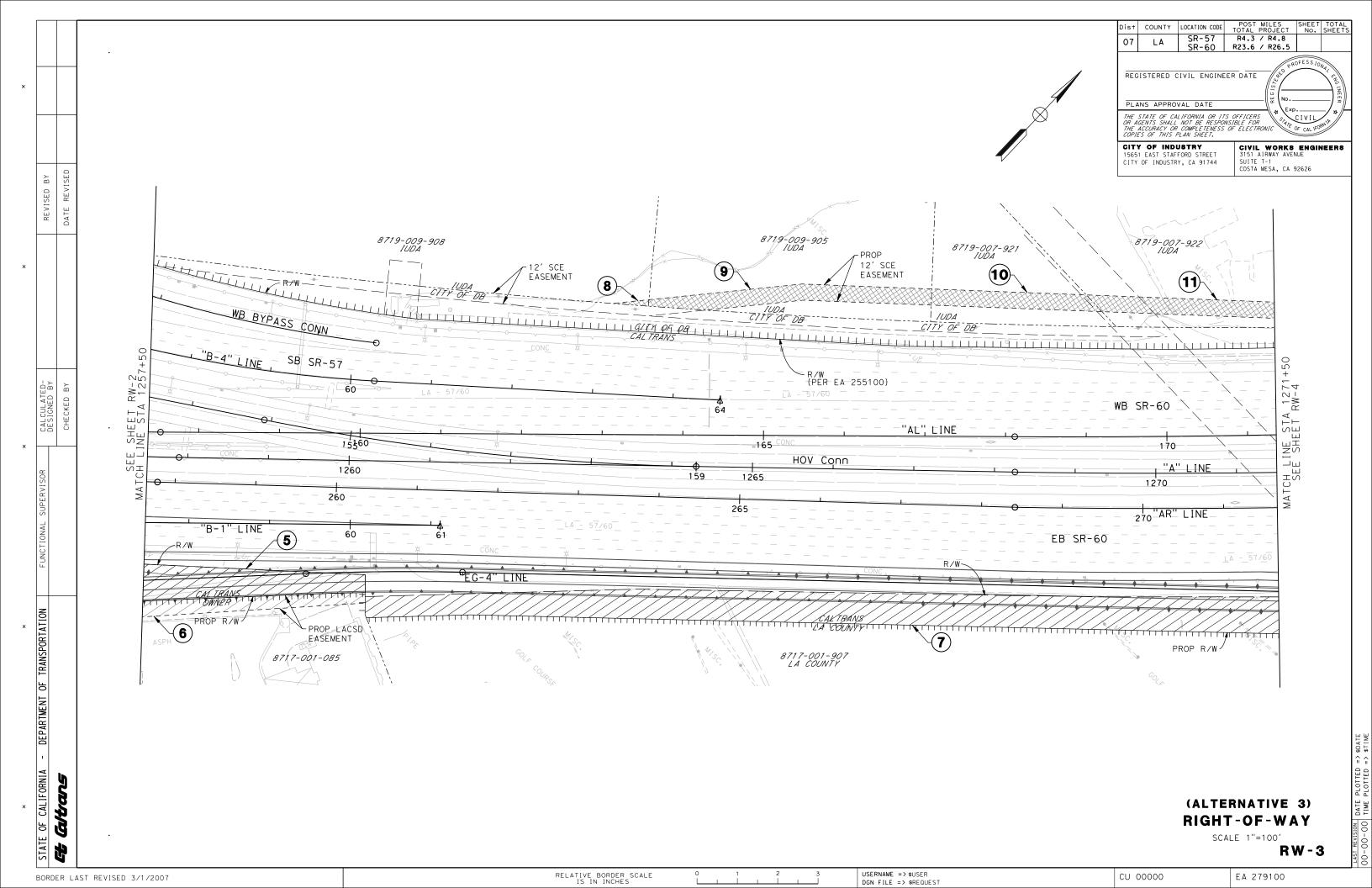


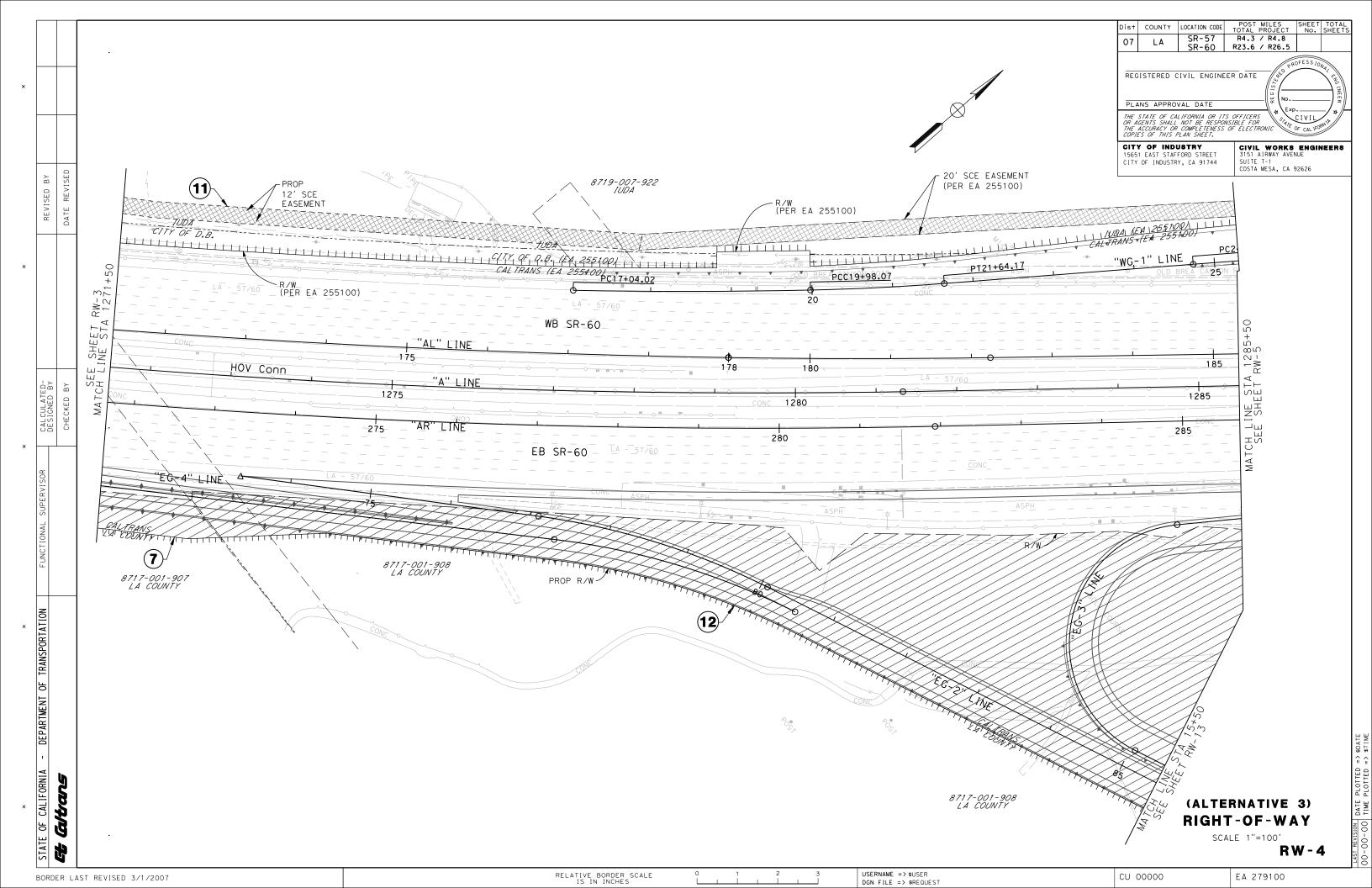


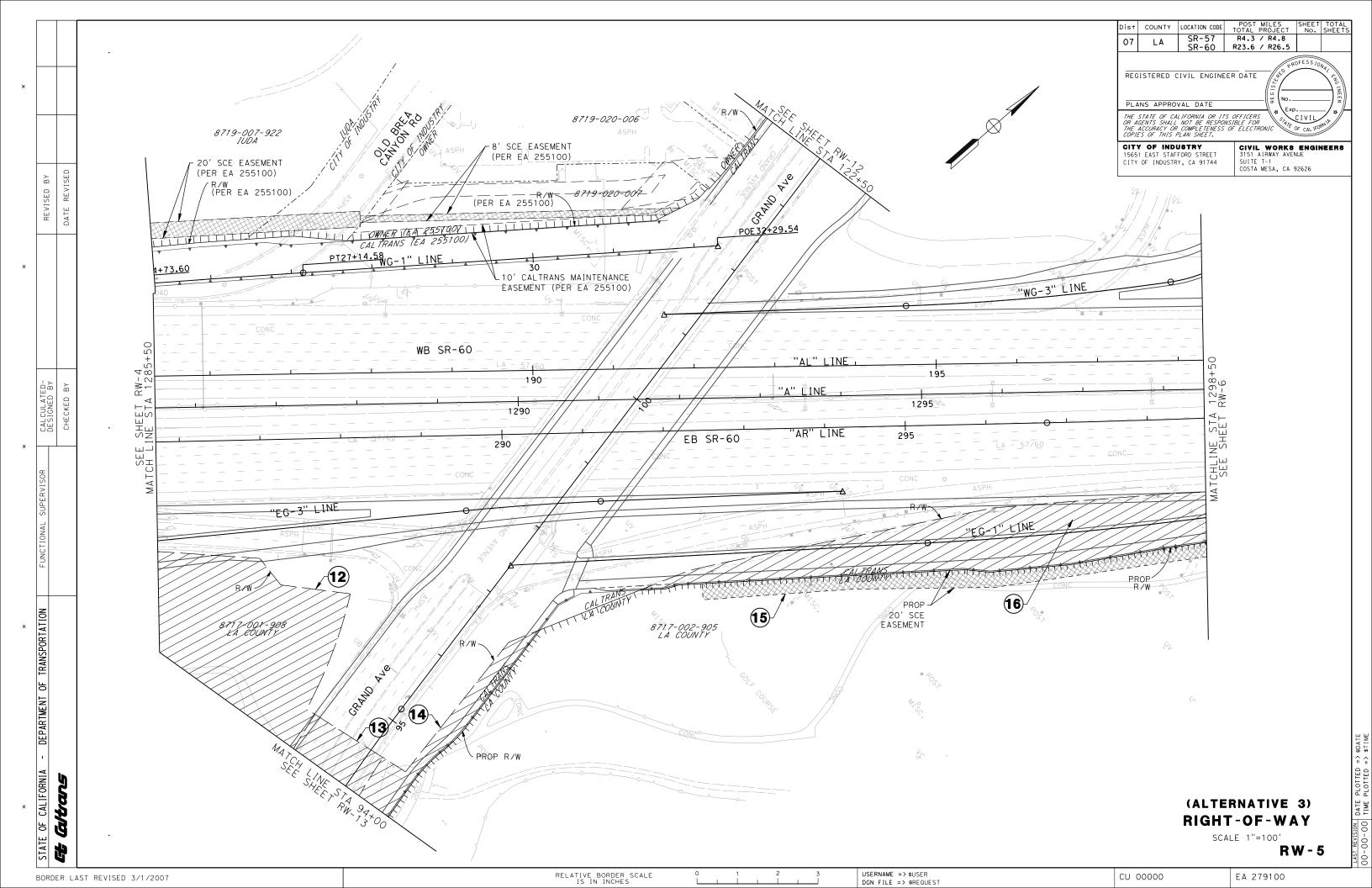


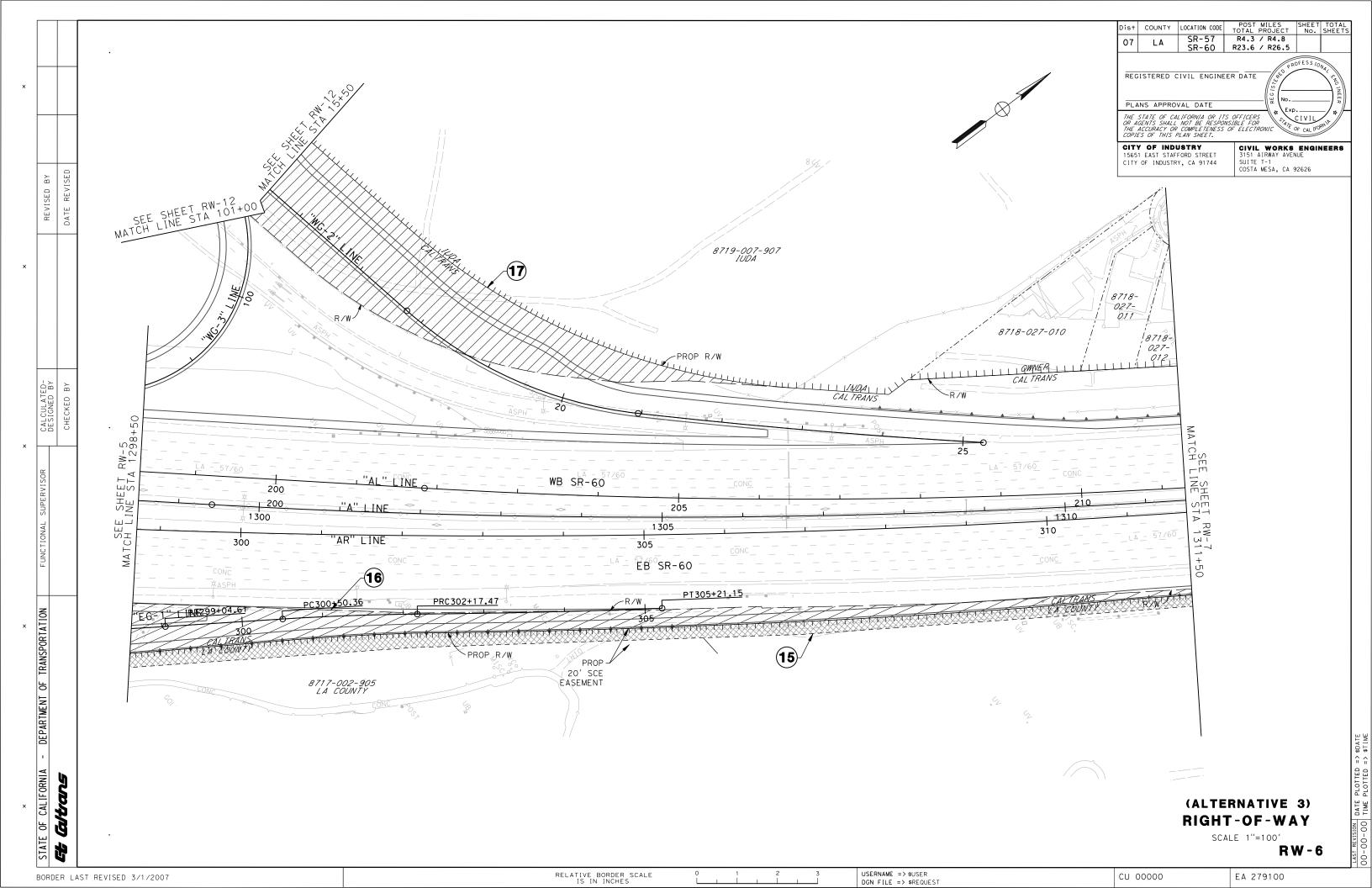


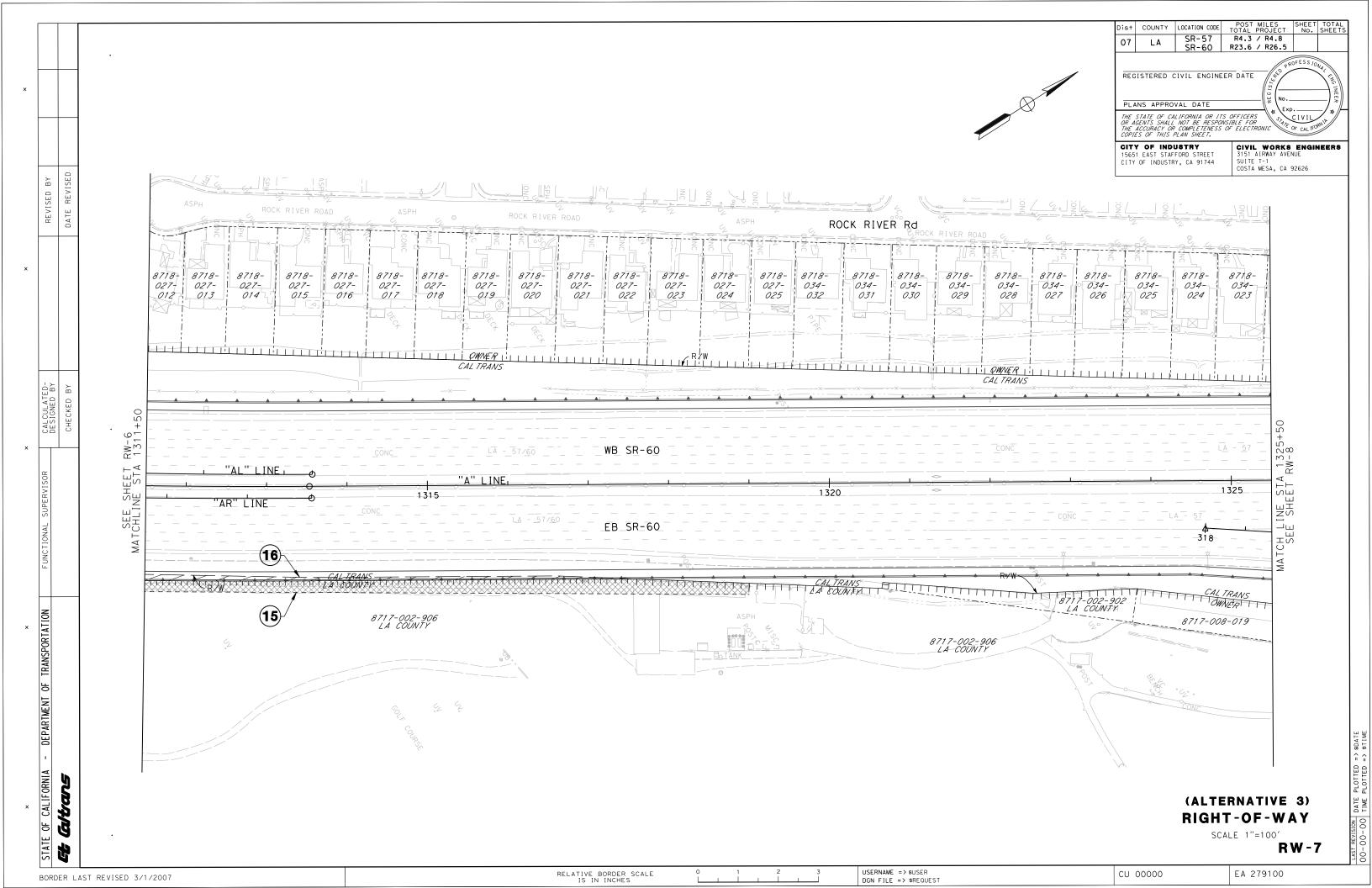


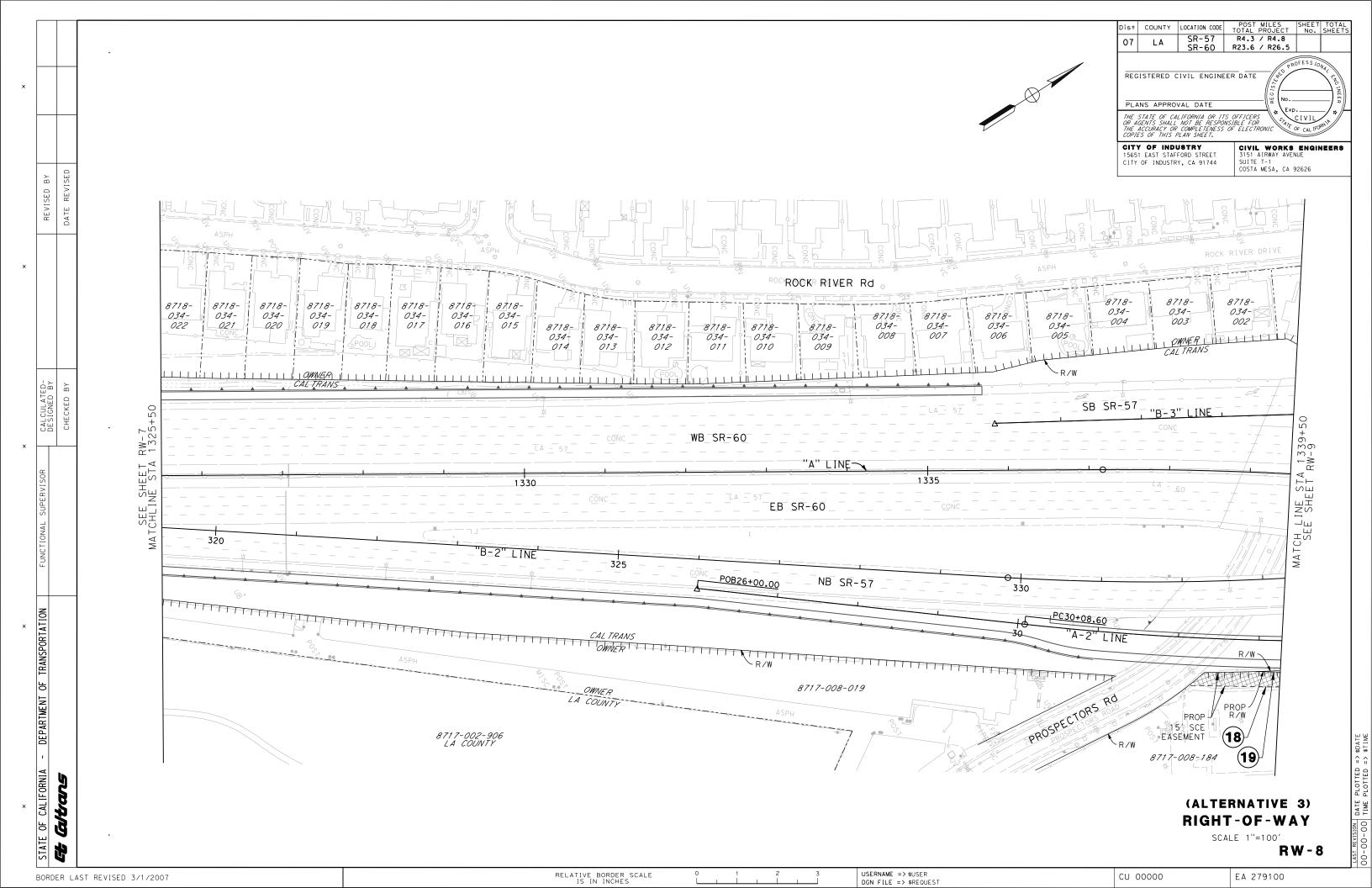


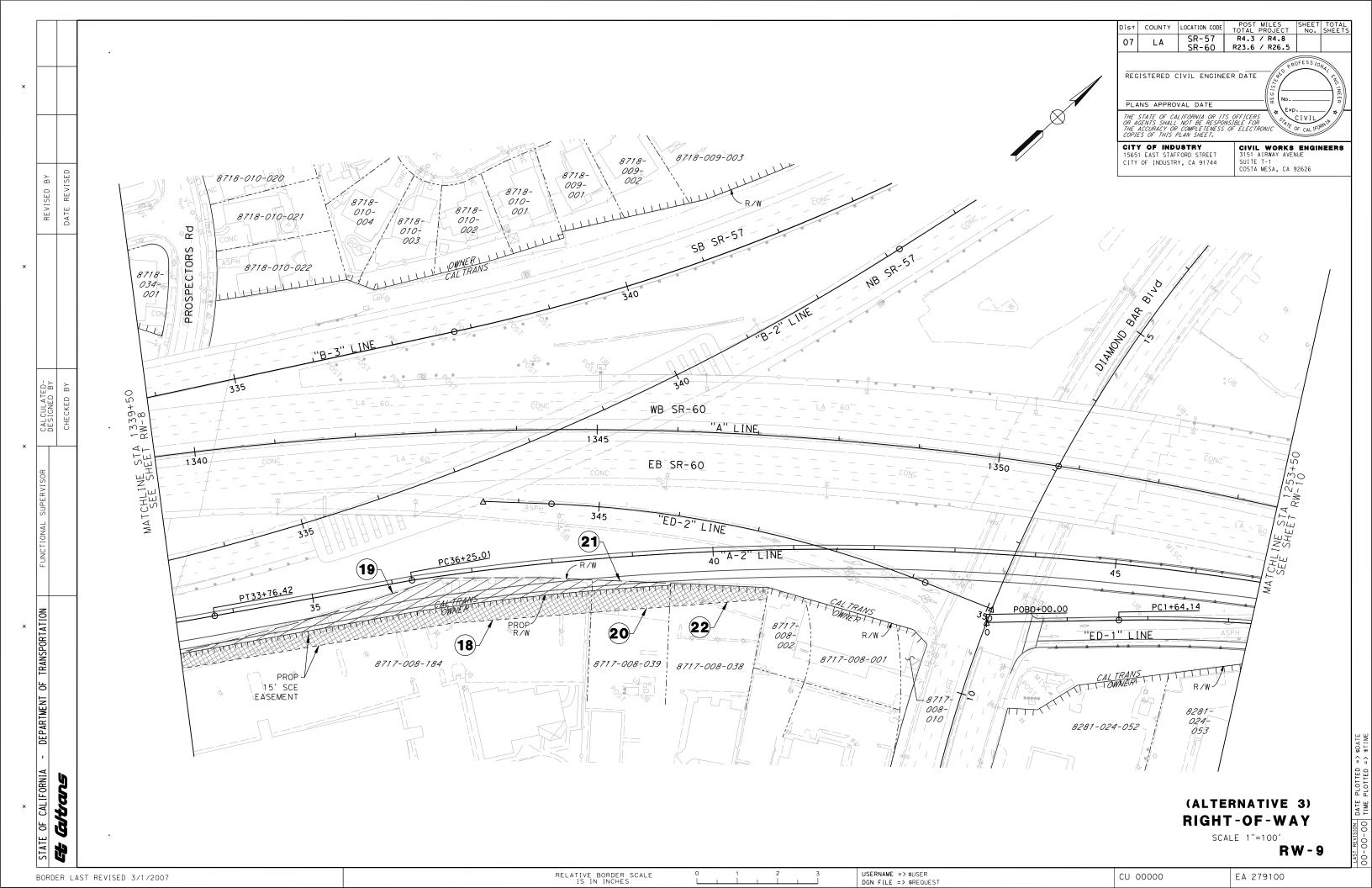


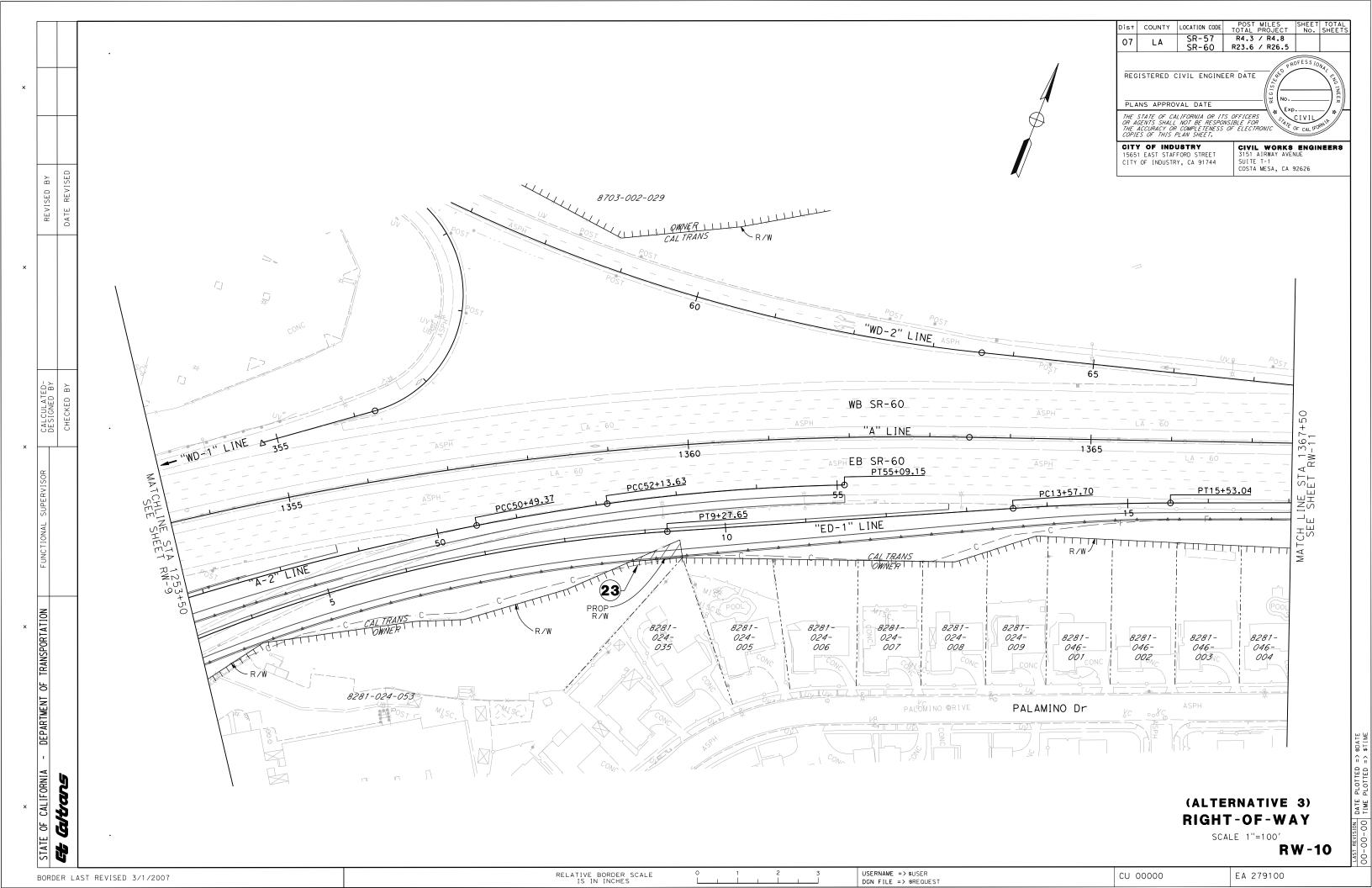


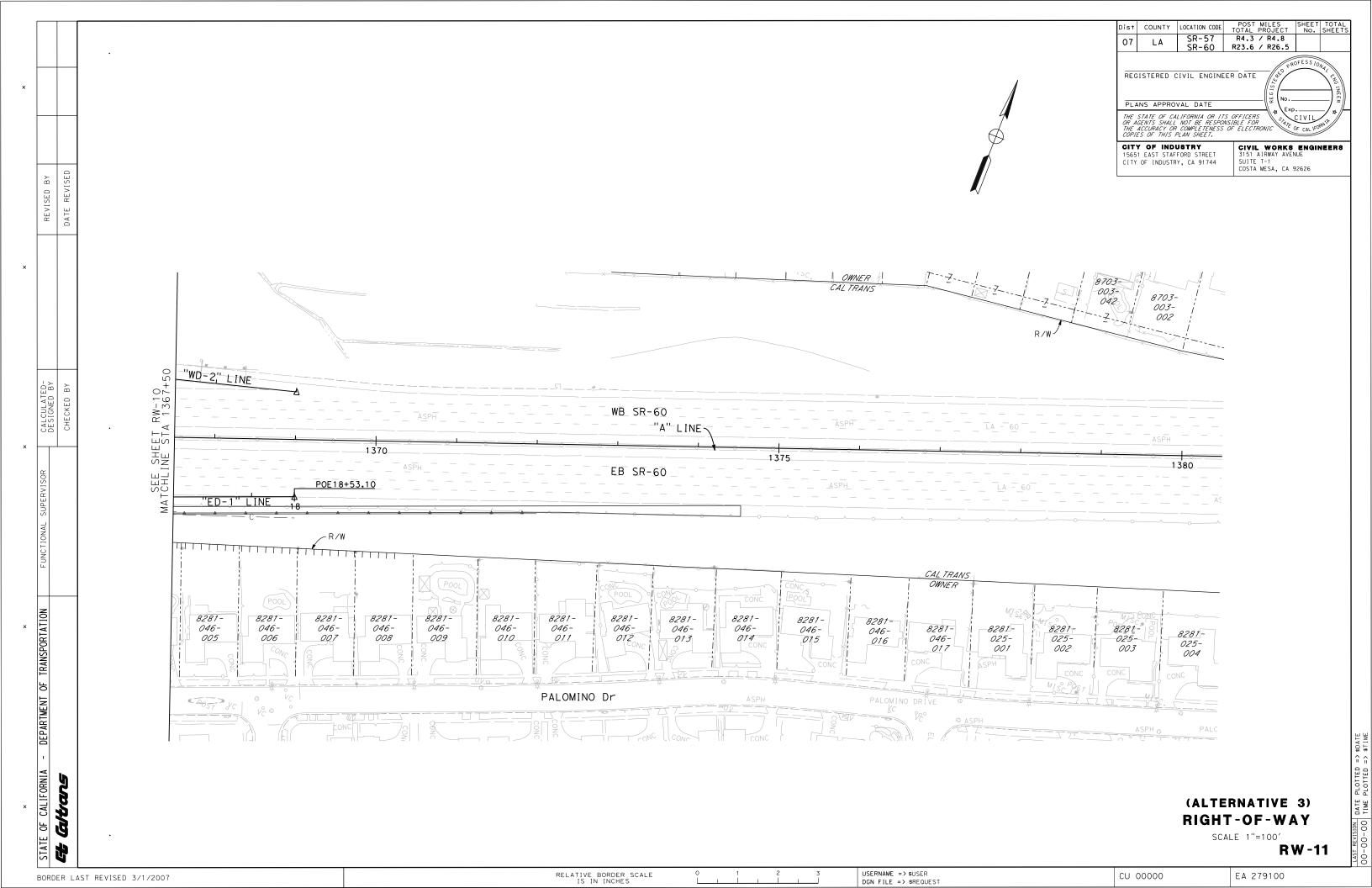


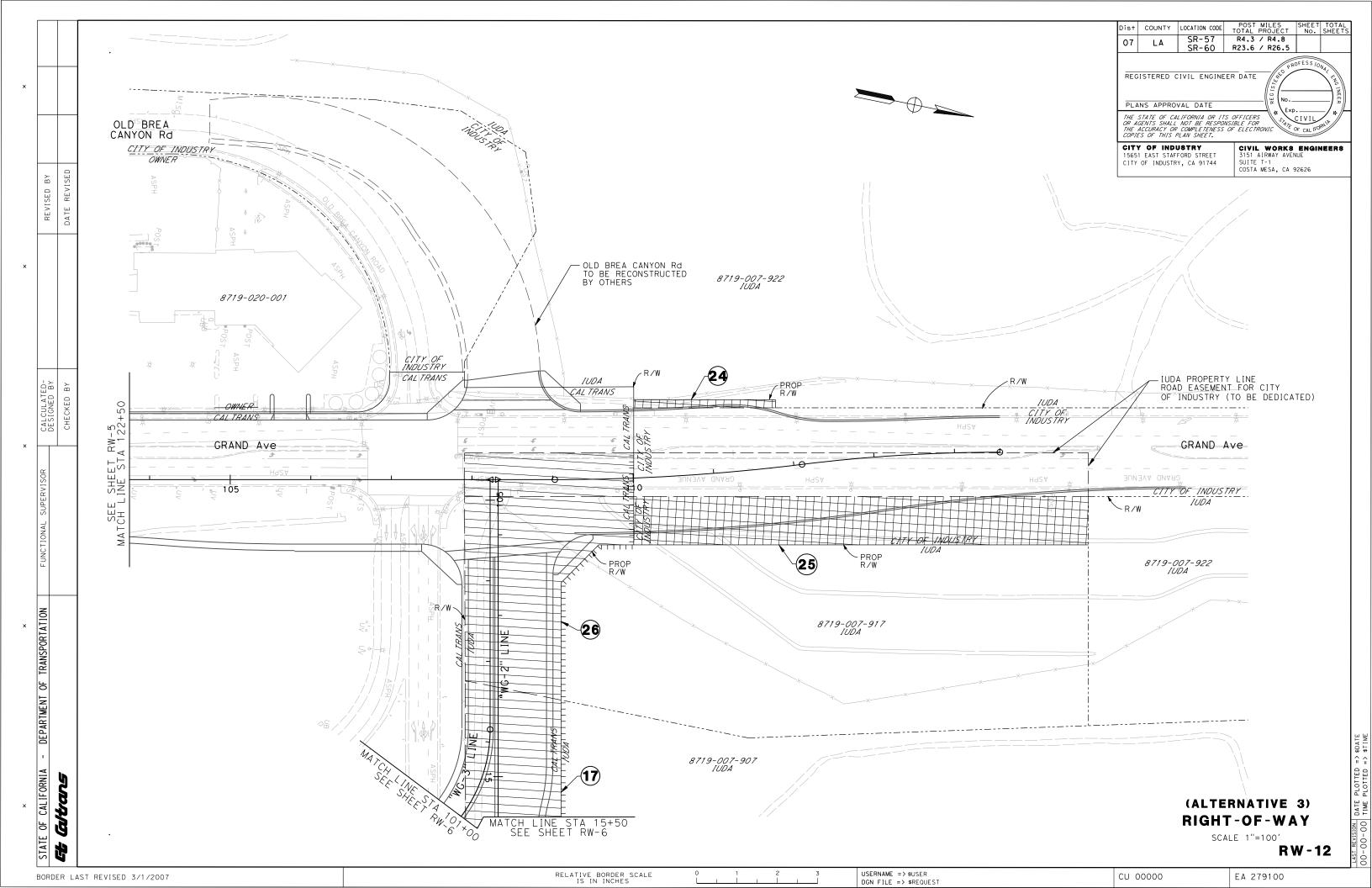












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REGISTERED CIVIL ENGINEER DATE

PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS
OR AGENTS SHALL NOT BE RESPONSIBLE FOR
THE ACCURACY OR COMPLETENESS OF ELECTRONIC
COPIES OF THIS PLAN SHEET.

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15651 EAST STAFFORD STREET
CITY OF INDUSTRY, CA 91744
COSTA MESA.
COSTA MESA.

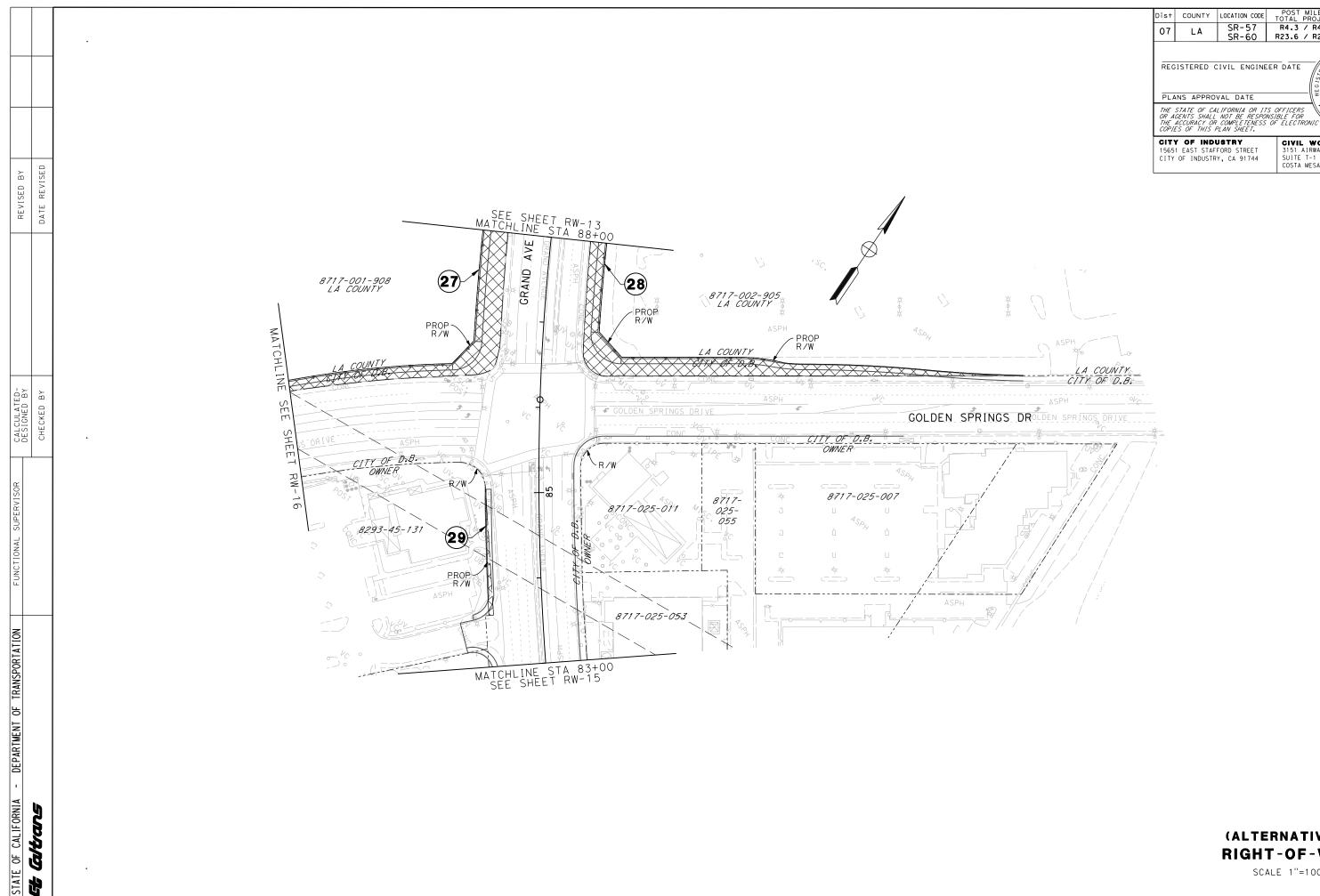
CIVIL WORKS ENGINEERS
3151 AIRWAY AVENUE
SUITE T-1
COSTA MESA, CA 92626

(ALTERNATIVE 3) RIGHT-OF-WAY

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(ALTERNATIVE 3) RIGHT-OF-WAY

SCALE 1"=100'

RW-14

BORDER LAST REVISED 3/1/2007

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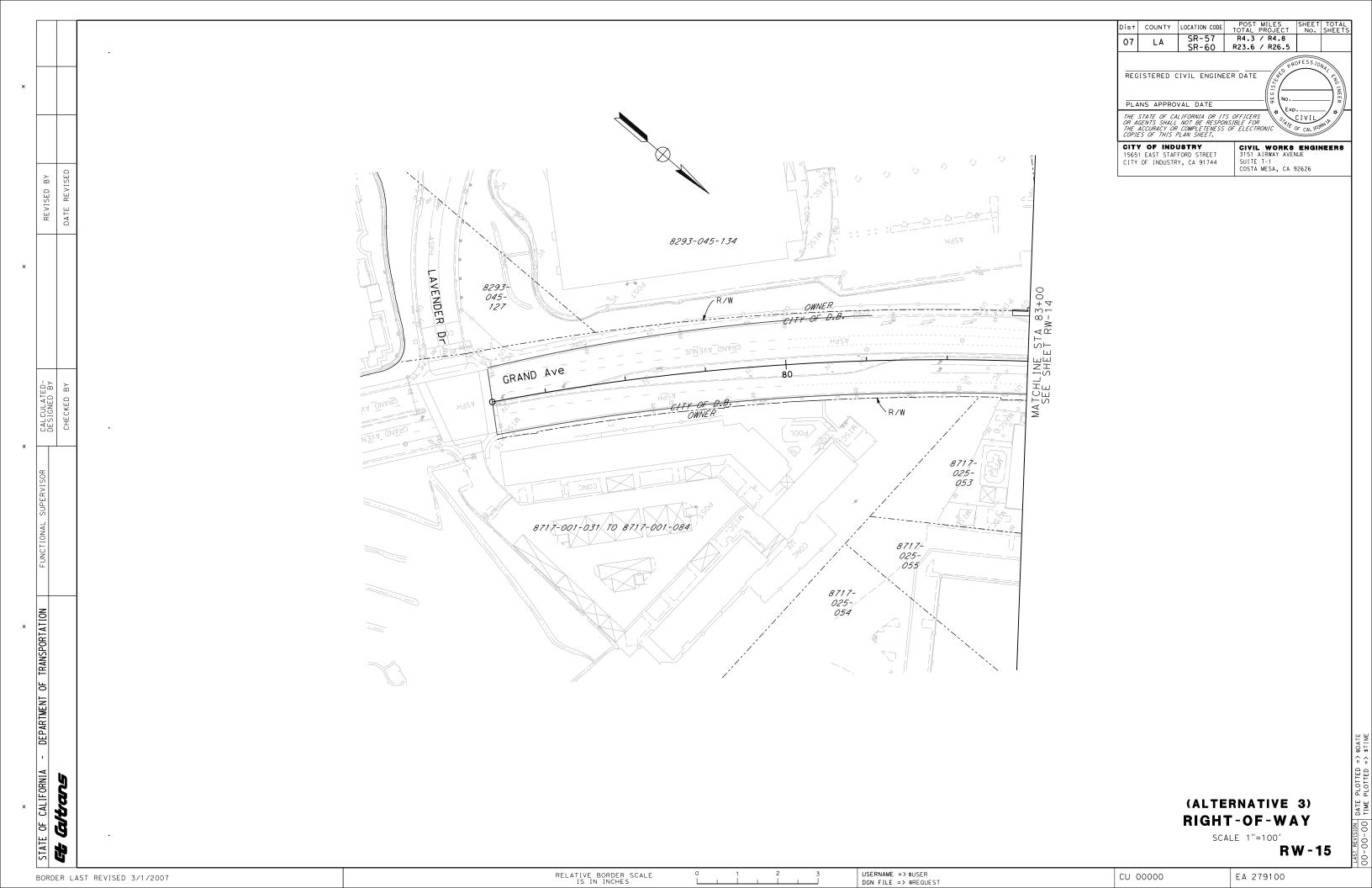
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POST MILES TOTAL PROJECT R4.3 / R4.8 R23.6 / R26.5

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STATE OF CALIFORNIA - [	A - DEPARTMENT OF TRANSPORTATION	FUNCTIONAL SUPERVISOR	CALCULATED-	REVISED BY	
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DIAMOND BAR DEVELOPMENT CORP	?????	1	1-2	16,009	0.37	PARTIAL	CT FEE
OAK CREEK	8293-050-032	2	2	775	0.02	PARTIAL	CT FEE
OAK CREEK	8293-050-003	3	2	1,770	0.04	PARTIAL	CT FEE
OAK CREEK	8293-050-003	4	2	2,830	0.06	PARTIAL	CITY DB F
AYRES HOLDINGS	8717-001-085	5	2-3	56,187	1.29	PARTIAL	CT FEE
AYRES HOLDINGS	8717-001-085	6	2-3	11,808	0.27	PARTIAL	ESMT
LOS ANGELES COUNTY	8717-001-907	7	3-4	47,924	1.10	PARTIAL	CT FEE
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-009-908	8	3	182	0.00	PARTIAL	ESMT
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-009-905	9	3	6,612	0.15	PARTIAL	ESMT
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-921	10	3	4,036	0.09	PARTIAL	ESMT
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-922	11	3-4	17,323	0.40	PARTIAL	ESMT
LOS ANGELES COUNTY	8717-001-908	12	4-5, 13	260,491	5.98	PARTIAL	CT FEE
CITY OF DIAMOND BAR	CITY OF DIAMOND BAR	13	5, 13	34,227	0.79	PARTIAL	CITY TO
LOS ANGELES COUNTY	8717-002-905	14	5, 13	16,619	0.38	PARTIAL	CT FEE
LOS ANGELES COUNTY	8717-002-905	15	5-7	44,077	1.01	PARTIAL	ESMT
LOS ANGELES COUNTY	8717-002-905	16	5-7	71,731	1.65	PARTIAL	CT FEE
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-907	17	6, 12	65,778	1.51	PARTIAL	CT FEE
ali akbar & nida	8717-008-184	18	8-9	12,941	0.30	PARTIAL	ESMT
ALI AKBAR & NIDA	8717-008-184	19	8-9	10,032	0.23	PARTIAL	CT FEE
SONG G & KYOUNG H SHIN	8717-008-039	20	9	2,620	0.06	PARTIAL	ESMT
SONG G & KYOUNG H SHIN	8717-008-039	21	9	755	0.02	PARTIAL	CT FEE
33333	8717-008-038	22	9	2,605	0.06	PARTIAL	CT FEE
AP DIAMOND BAR, LLC	8281-024-053	23	10	719	0.02	PARTIAL	CT FEE
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-922	24	12	1,758	0.04	PARTIAL	CITY IND F
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-917	25	12	33,844	0.78	PARTIAL	CITY IND F
INDUSTRY URBAN DEVELOPMENT AGENCY	8719-007-917	26	12	35,195	0.81	PARTIAL	CT FEE
LOS ANGELES COUNTY	8717-001-908	27	13-14, 16	23,104	0.53	PARTIAL	CITY DB F
LOS ANGELES COUNTY	8717-002-905	28	13-14	17,028	0.39		CITY DB F
33333	8293-045-131	29	14	532	0.01		CITY DB F

REGISTERED CIVIL ENGINEER DATE PLANS APPROVAL DATE THE STATE OF CALIFORNIA OR ITS OFFICERS
OR AGENTS SHALL NOT BE RESPONSIBLE FOR
THE ACCURACY OR COMPLETENESS OF ELECTRONIC
COPIES OF THIS PLAN SHEET, CITY OF INDUSTRY 15651 EAST STAFFORD STREET CITY OF INDUSTRY, CA 91744 CIVIL WORKS ENGINEERS
3151 AIRWAY AVENUE
SUITE T-1
COSTA MESA, CA 92626

> (ALTERNATIVE 3) RIGHT-OF-WAY

> > SCALE 1"=100'

RW-17