



March 6, 2015

IES PROJECT NO. 15-02-001

Kevin Canning  
**Orange County Public Works/Orange County Planning**  
300 N. Flower St.  
Santa Ana, CA 92702-4048  
Email: kevin.canning@ocpw.ocgov.com  
Subject: **Esperanza Hills**

Steven K. Harris, AICP  
**Director of Community Development**  
**City of Yorba Linda**  
Email: sharris@yorba-linda.org

**Re: Review of the Environmental Documents for the  
Proposed Esperanza Hills Development  
Yorba Linda, Orange County, California**

Dear Mr. Canning and Mr. Harris:

At your request, Innovative Environmental Solutions (IES) has reviewed the Final Environmental Impact Report (FIER) for the proposed Esperanza Hills housing development (Project), located within the Sphere of Influence (SOI) for the City of Yorba Linda (City), with respect to geology related public health hazards. We have identified a number of concerns related to public health impacts and recommend that further studies be conducted as part of the environmental review for the project.

Initially we note that while the FEIR reflects significant efforts to identify fault line and fault trace patterns to avoid building homes on or too near such geological features, no attempts have been made to identify the presence and specific locations of methane and hydrogen sulfide reserves on, under and near the project site. As a general proposition, buildings should not be placed over or too near to such reserves due to expected negative impacts upon human health. Accordingly, the identification of the presence of certain compounds should occur before siting decisions are made for residential structures. The presence of some contaminants can and should lead to decisions to avoid building on portions of any site.

Our firm routinely tests of the presence and concentration of volatile organic compounds as part of Phase II evaluations of project sites. When chemicals of concern are found to be present, on the surface and or subsurface, the exact locations, distributions and concentrations generally need to be determined so that appropriate avoidance and/or mitigation measures can be identified and implemented.