



COUNTY OF ORANGE
CEO REAL ESTATE/LAND DEVELOPMENT
333 W. SANTA ANA BLVD., 3RD FLOOR
SANTA ANA, CALIFORNIA 92701

NOTICE OF PREPARATION AND NOTICE OF SCOPING MEETING

DATE: December 19, 2014
SUBJECT: Notice of Preparation of an Environmental Impact Report and Notice of Scoping Meeting
PROJECT TITLE: West Alton Development Plan
APPLICANT: County of Orange

Notice is hereby given pursuant to Section 15082 of the State California Environmental Quality Act (CEQA) Guidelines (*California Code of Regulations*, Title 14, §15000 et seq.) that the County of Orange has determined that an Environmental Impact Report (EIR) is the appropriate environmental document for the West Alton Parkway Parcel Development (Project). The County of Orange (County) will be the Lead Agency for the Project and will be responsible for the EIR preparation pursuant to CEQA and the State CEQA Guidelines. The Project's description, location, and an analysis of probable environmental effects are contained in the attached materials.

As required by Section 15082 of the State CEQA Guidelines, this Notice of Preparation (NOP) has been prepared and distributed to solicit comments from potential Responsible and Trustee Agencies on Project-related concerns relevant to each agency's statutory responsibilities. Given the nature of the Project, it has been determined to meet the definition of a project of regional and areawide significance pursuant to Section 15206 of the State CEQA Guidelines. Comments on the content and scope of the EIR also are solicited from any other interested parties (including other agencies and affected members of the public). The EIR will be the environmental document of reference for Responsible and Trustee Agencies when considering subsequent discretionary approvals.

The County requests that any potential Responsible or Trustee Agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the State CEQA Guidelines, which allows for the submittal of any comments in response to this notice no later than 30 days after receipt of the NOP. The County will accept comments from these Agencies and others regarding this NOP through the close of business on **January 19, 2015**.

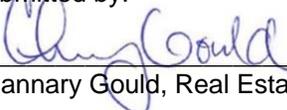
This NOP is available for viewing at http://ocgov.com/gov/ceo/real_estate/currentplans. In addition, a **Scoping Meeting will be held Friday, January 9, 2015 from 1:00 PM to 3:00 PM** at the following location:

Building 317 off Marine Way (see map on reverse side)
Irvine, CA 92618

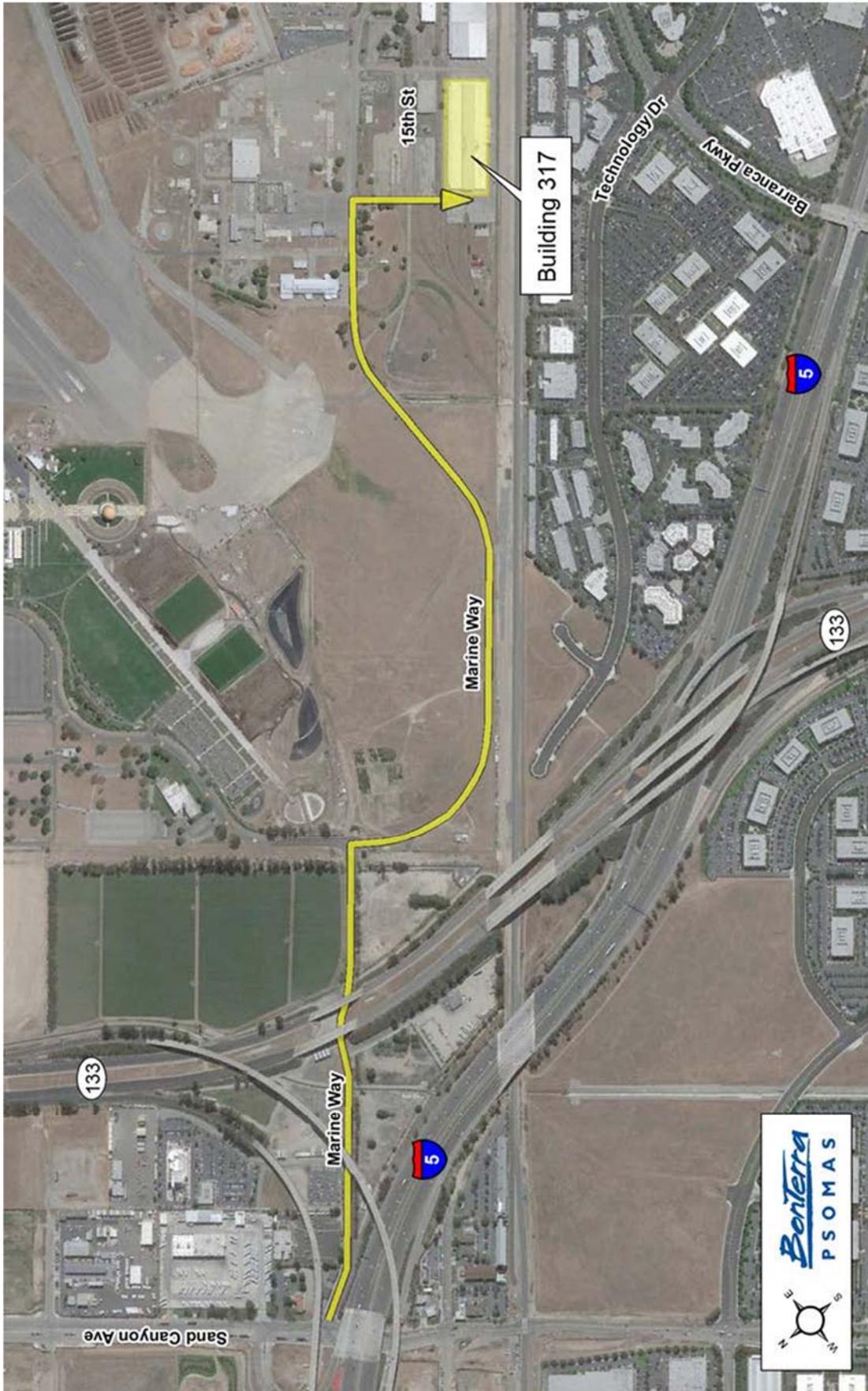
Your agency and other interested parties are invited to attend and submit comments for consideration during preparation of the EIR. All comments and responses to this NOP must be submitted in writing to:

Channary Gould
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701
channary.gould@ocgov.com

Submitted by:


Channary Gould, Real Estate Development Manager

Scoping Meeting Location



West Alton Development Plan

The County of Orange (County) is the Project proponent and will be the Lead Agency under the California Environmental Quality Act (CEQA) for the preparation of an Environmental Impact Report (EIR) for the West Alton development plan (Project). Section 15161 of the State CEQA Guidelines states that an EIR “. . . should focus primarily on the changes in the environment that would result from the development of the project. The EIR shall examine all phases of the project including planning, construction, and operation”.

Project Location

The Project is located on County-owned property within the City of Irvine northwest of the intersection of Alton Parkway and Irvine Boulevard. Magazine Road traverses the site in a west-east direction. The Project is bound by Irvine Boulevard on the southwest; existing business/industrial buildings and Irvine Ranch Water District (IRWD) facilities on the south and southeast; and open space property—which is part of the Reserve Area for the Central-Coastal Subregion Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) and owned by the Federal Aviation Administration (FAA)—to the north. The regional location and local vicinity are shown on Exhibits 1 and 2, respectively.

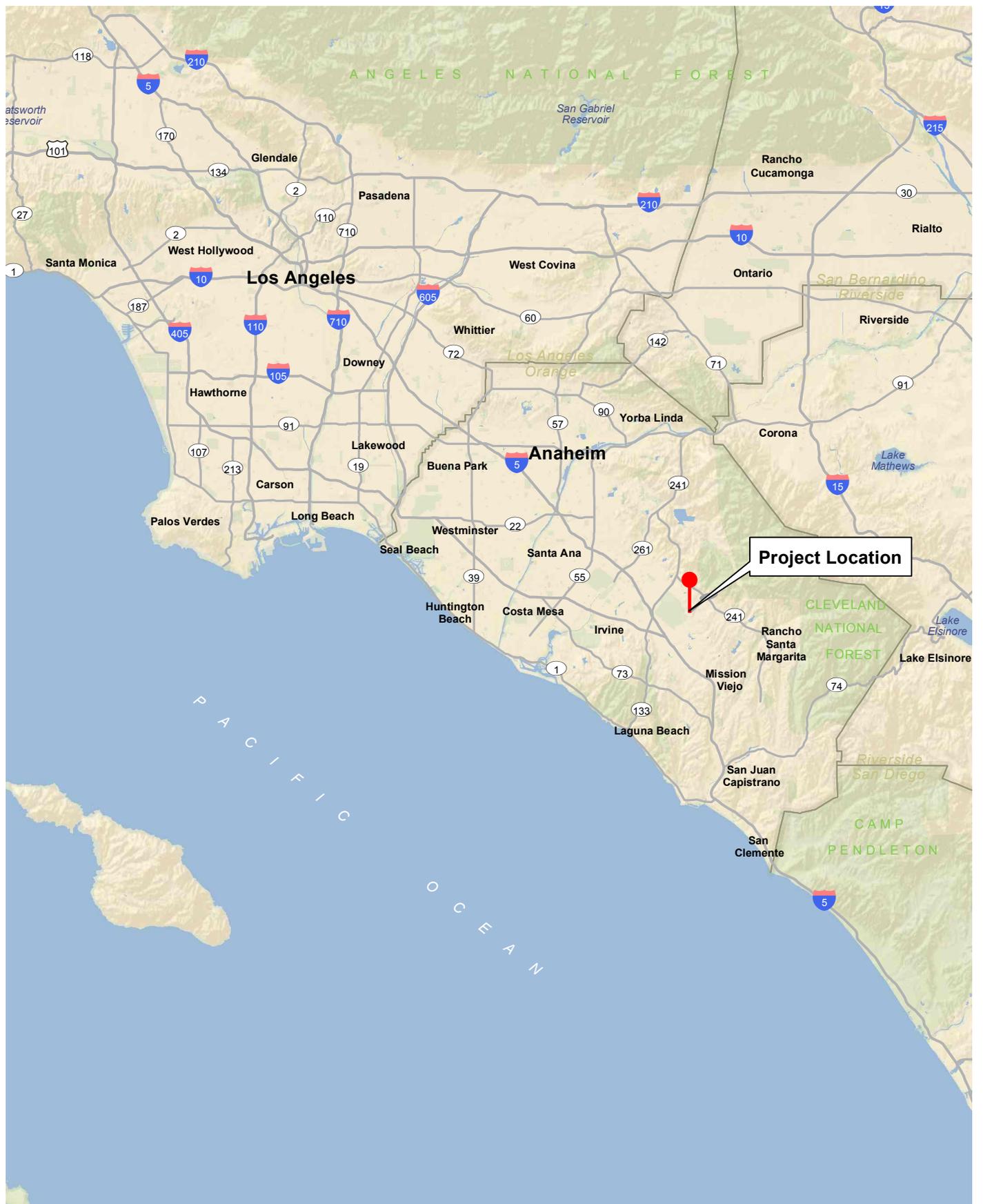
Project Background and Related History

The Department of Navy (DoN) decided to close MCAS El Toro under the Base Realignment and Closure Act in July 1993. Since then, several plans for reuse of the former MCAS El Toro site were considered. The plan for the Orange County Great Park was approved by voters in the March 2002 initiative (Measure W). Measure W amended the County General Plan to designate the unincorporated land for park, open space, and other uses. This removed the former designation for the site as a commercial airport from the County General Plan.

Following closure of the former MCAS El Toro, on March 4, 2003, the County of Orange, the City of Irvine, and the Irvine Redevelopment Agency entered into a three-party, Property Tax Transfer and Pre-Annexation Agreement (Pre-Annexation Agreement) regarding the annexation and reuse of El Toro. As part of the Pre-Annexation Agreement, the City of Irvine agreed to provide certain lands to the County of Orange. The Project site was included in the parcels to be conveyed by the City to the County as part of the Pre-Annexation Agreement over which the County was granted ‘exclusive land use control.’

The parcel, which is approximately 44.16 acres, also includes a wildlife movement corridor that was created as compensatory mitigation for the extension of Alton Parkway. The DoN has released all but approximately 2.45 acres of this property in fee title, with some use restrictions, to the City of Irvine, who in turn conveyed it to the County of Orange as required by the Pre-Annexation Agreement. The 2.45 acres are covered under a lease instrument called a “Lease in Furtherance of Conveyance” or “LIFOC.” Once remediated, the DoN will make a Finding of Suitability to Transfer (FOST) allowing the transfer of the property in fee to Heritage Fields LLC. Subsequently, the property would be transferred to the City of Irvine. The City will then transfer the property to the County of Orange as required by the Pre-Annexation Agreement.

As previously indicated, a portion of the parcel has been designated as a wildlife movement corridor as mitigation for the construction of the extension of Alton Parkway. The majority of

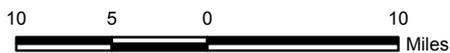


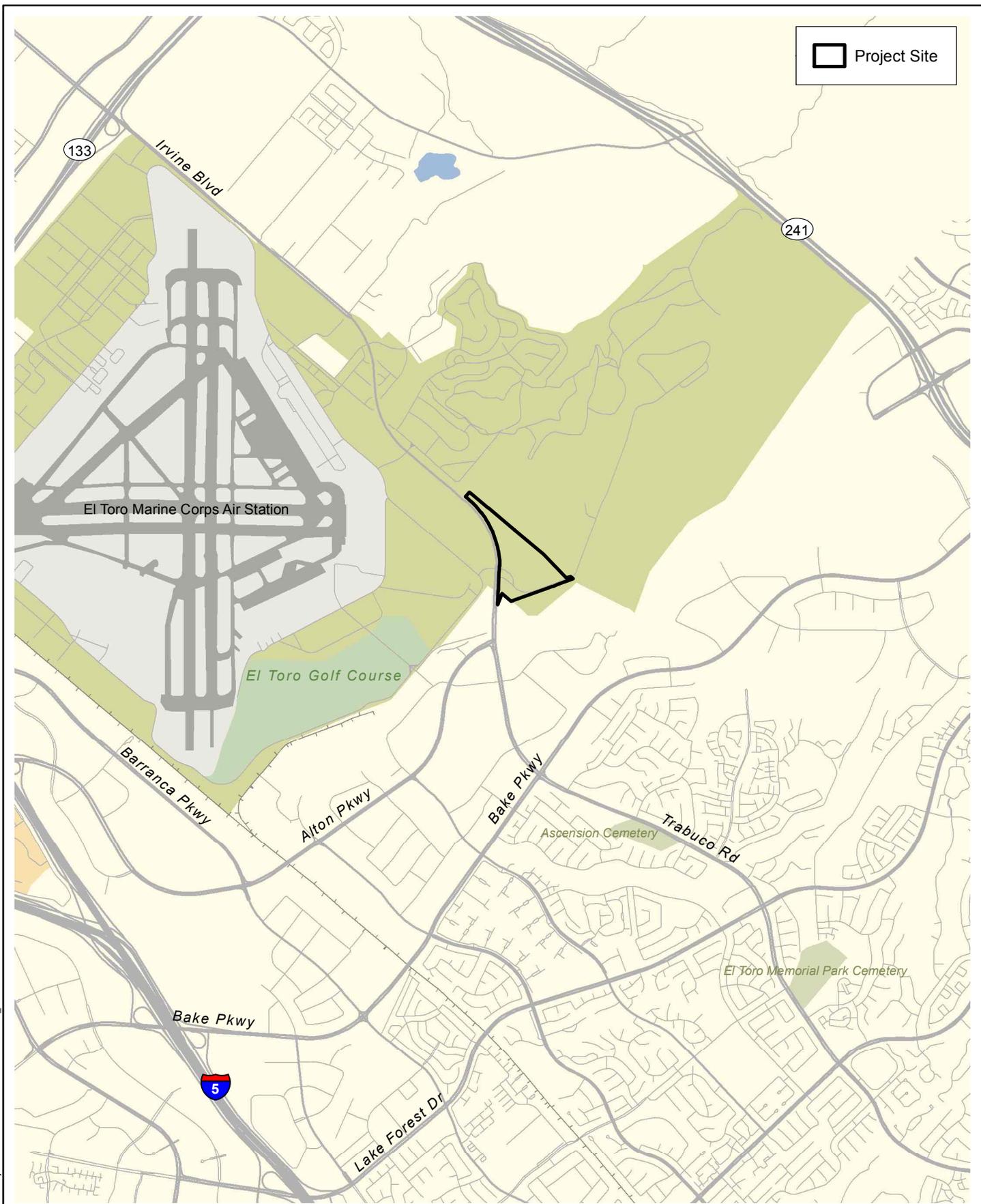
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Regional Location

West Alton Development Plan

Exhibit 1





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Local Vicinity

West Alton Development Plan

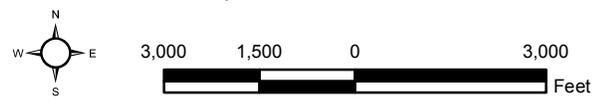


Exhibit 2



Alton Parkway wildlife movement corridor restoration project was completed in 2012 and has recently begun the third year of monitoring consistent with permit requirements. The Alton Parkway wildlife movement corridor, which will ultimately extend under Irvine Boulevard, provides a connection to Borrego Canyon Wash. It is approximately 300 feet in width, with a channel bottom that varies from 200 to 250 feet in width, and approximately 1,600 feet long. Because of the Project site's proximity to the NCCP/HCP, the Alton Parkway wildlife movement corridor will ultimately be part of a wildlife linkage that will connect the Central and Coastal NCCP/HCP Reserve areas.

Project Setting

The Project site is a triangular shaped parcel that is located within Planning Area 51 in the City of Irvine, which encompasses the former MCAS El Toro property. The Project site is designated on the *City of Irvine General Plan* as "Orange County Great Park" (Planning Area 51) (Irvine 2012a). Table A-1 in the General Plan Land Use Element identifies a variety of uses within this designation, including Multi-Use, Institutional, Industrial, and Commercial. The General Plan Land Use Element identifies Zoning Districts 1.1 (Exclusive Agriculture), 1.4 (Preservation Area), 1.9 (Orange County Great Park), 6.1 (Institutional), and 8.1 (Trails and Transit Oriented Development) as being correlated with the Orange County Great Park land use designation. The City of Irvine Zoning Map designates the site as 1.1 along the easterly portion of the site and 1.4 along the westerly portion of the site.

The parcel is 44.16 acres; however, this includes the wildlife movement corridor and an Orange County Flood Control District (OCFCD) drainage outlet structure, which occupy 11.84 acres. The Alton Parkway wildlife movement corridor effectively splits the site into two development areas. The northern development area is about 21.98 acres and the southern development area is 10.34 acres; resulting in 32.32 net development acres.

The Project site is generally disturbed by prior use and undeveloped, with a portion of the site leased to R&S Soils for green waste operations. The Alton Parkway wildlife movement corridor, Magazine Road, and an existing access road serve as the only other improvements on site. Historically, the site has been leased for agricultural uses, which has resulted in the natural vegetation having been removed from the majority of the site. The wildlife movement corridor has been planted with native vegetation. A feature of the wildlife movement corridor is a 72-inch culvert provided under Alton Parkway to allow wildlife to get from the Project site to a different parcel (known as the Eastern Alton Parcel) owned by the County of Orange. Once the mitigation performance standards established as part of the Alton Parkway permitting process, have been achieved (this is generally five years from initial implementation), the wildlife movement corridor will be turned over to the City of Irvine.

Surrounding uses include undeveloped portions of Planning Area 51, which are slated for development of the Orange County Great Park and the Great Park Neighborhoods. Additionally, immediately south of the Project site are business/industrial uses, and IRWD facilities, which includes two large water reservoirs and other facilities. Recreational vehicle (RV) storage is currently located adjacent to the IRWD facilities. Further to the south, across Alton Parkway, is the James A. Musick Jail, a County-run facility. To the northeast, on the FAA property, is a Federal Bureau of Investigation (FBI) shooting range. Access to the shooting range is via Magazine Road (County of Orange 2011). The Irvine Unified School District has approved plans for a new high school located northeast of the Great Park. The school is anticipated to open in fall of 2016.

The Borrego Canyon Wash is located near the Project site. Borrego Canyon Wash is the ephemeral drainage that originates in the foothills of the Santa Ana Mountains just southwest of Santiago Creek. Water only flows within the drainage following rain events. East of the Project site, the Borrego Canyon Wash is a natural sandy bottom channel with riprap on some banks and vegetation on other banks. The portion of the Wash that runs south of the site has been channelized in a box culvert that crosses under Irvine Boulevard. The Borrego Canyon Wash is designated by the OCFCD as Facility No. F20 (County of Orange 2007).

An aerial photograph of the site and surrounding area is provided in Exhibit 3.

Description of the Project

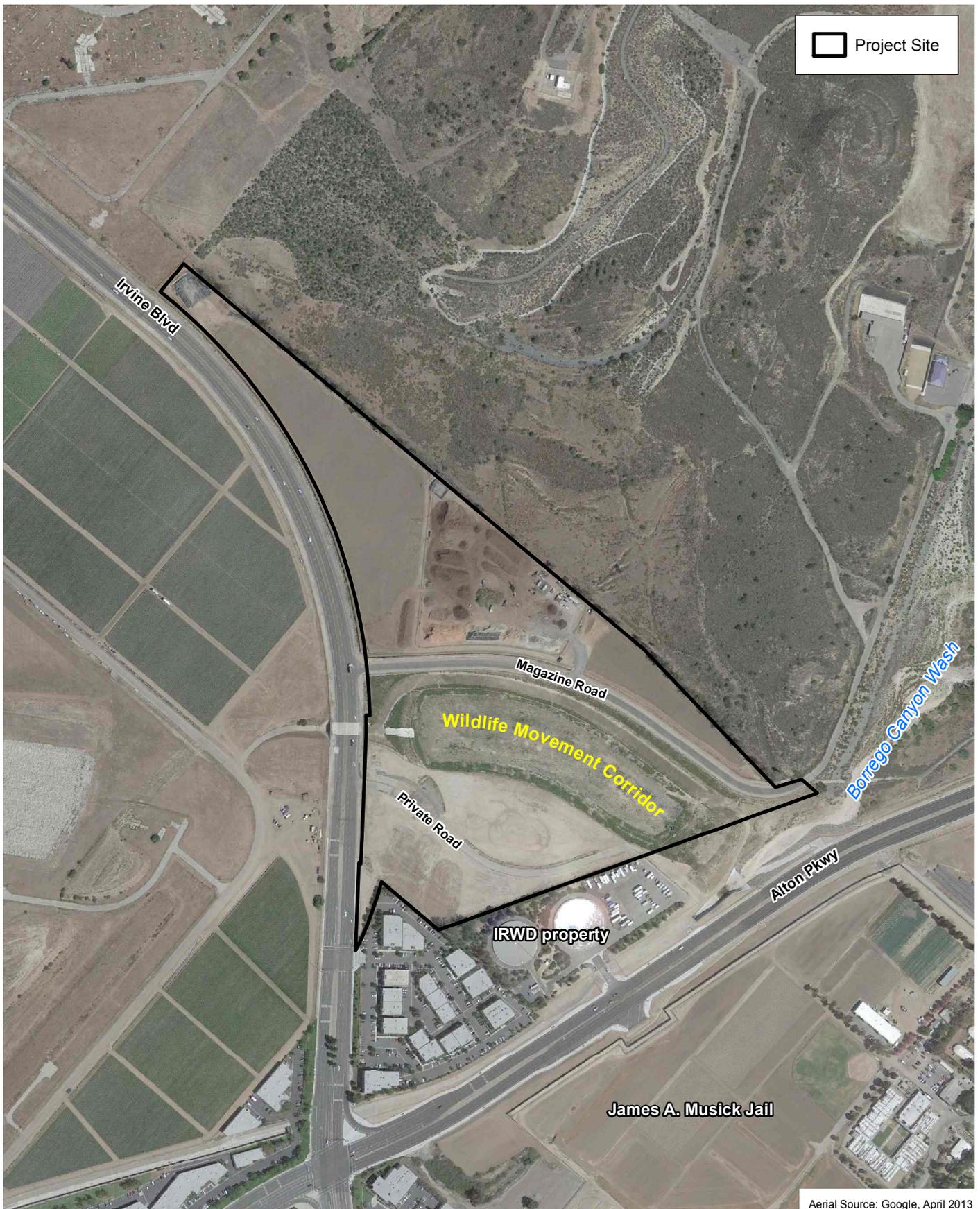
Project Processing

According to Sections 53090–53091 of the California Government Code, counties and cities are exempt from zoning regulations when one entity owns territory within the jurisdiction of another entity. Additionally, according to Section 7-9-20(i) of the Orange County Zoning Code, land owned or leased by the County is not subject to land use regulations of the County, including the Zoning Code, specific plans, and planned communities. Additionally, Section 2.2.4 of the Pre-Annexation Agreement indicates that the “County shall retain exclusive land use control over [its parcels within the Former MCAS EL Toro], and shall be entitled to place any development upon said parcels that County shall determine to be desirable for County’s needs, as though said property remained unincorporated, without the obligations for payment to Irvine of any permit fees or other mitigation/impact fees[.]” That section also states that the City of Irvine is required to “zone County’s parcels and designate them in Irvine’s General Plan in accordance with County’s direction.” Thus the County will be planning and permitting the Project consistent with State law and the consideration given to the County for its assistance and agreement with the annexation of the former MCAS El Toro base property into the City of Irvine.

An amendment to the *City of Irvine General Plan* and Zoning (discussed further below) would be processed by the City as required by Section 2.2.4 of the Pre-Annexation Agreement once the Project is approved by the County of Orange. The proposed land uses, development regulations, circulation, design guidelines, processing requirements and development intensities for the Project site will be identified in a development plan approved by the County. As the County would be providing the necessary approvals for construction, the development plan will serve as the planning document that County staff will use to evaluate the consistency of specific development proposals with the approved Project vision.

The development plan will include development standards and/or design guidelines that will establish parameters for all future development on the subject property. The City of Irvine’s Trails and Transit-Oriented District (TTOD) (8.1) within the City of Irvine’s Zoning Code will serve as the basis on which these development standards and/or design guidelines will be prepared. Generally, the development plan will provide for subsequent approvals by the County of Orange Community Development Director, or his/her designee. Also, findings, procedures and application requirements will be included in the development plan. Should the County of Orange sell a particular development, future entitlements for said development shall be processed through the City of Irvine and per City of Irvine’s application and processing requirements.

Project Site



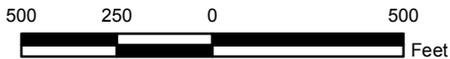
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Aerial Source: Google, April 2013

Aerial Photograph

Exhibit 3

West Alton Development Plan



(Rev: 12-18-2014 JAZ) R:\Projects\LowEnt (LOW)\J0001\Graphics\2 Alton\NOP\ex3_Aerial.pdf

Proposed Land Uses

The Project proposes a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking. The wildlife movement corridor would be protected onsite. Exhibit 4 provides a conceptual site plan.

On-Site Infrastructure Improvements

General infrastructure will be provided on site to support the proposed land uses, including streets; storm drain system improvements (including storm water detention and treatment systems); and utility lines for sewer, domestic water, recycled water, gas, electrical, communication, and closed circuit television services (CCTV). The Project may include a sewer lift station and force main.

Off-Site Improvements

A number of off-site improvements are required to serve the Project and will be provided as part of future development. The following improvements may be implemented, or funded by “fair share” contributions as part of the Project

- Improvements to Irvine Boulevard along the Project frontage (may include minor street pavement widening, signalized intersection[s], curb and gutter, and sidewalk improvements).
- Utility and storm drain system extensions and connections within Irvine Boulevard (includes sewer, water, gas, communication and CCTV services, and storm drain improvements).

Potential City of Irvine Actions

Upon Project approval consistent with the Pre-Annexation Agreement, the Orange County Board of Supervisors will recommend changes to the City of Irvine General Plan and Zoning Ordinance. The following identifies the anticipated modifications to the General Plan and Zoning Ordinance.

General Plan Amendment

The General Plan Amendment would include revisions to Table A-1 in the City of Irvine Land Use Element to allow for the Project within the proposed 8.1D zone. In addition, other minor changes to other sections of the *City of Irvine General Plan* may be required for consistency purposes. The specific modifications would be identified as part of the development plan, and addressed in the preparation of the EIR.

Zoning Ordinance Amendment

Changes to the Irvine Zoning Code would also be needed to implement the densities and character of the Project. Changes to Section 3-37-39, 8.1, Trails and Transit Oriented Development (TTOD), to allow for the Project would include, but would not be limited to:

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Site Plan Summary

- Multi-Family Residential

Source: KTG 2014

Conceptual Site Plan

Exhibit 4

West Alton Development Plan



- Addition of area 8.1D TTOD, County of Orange Great Park Neighborhood West Alton Project and
- Revision to Section 3-37-39.B.1 to allow up to 80 dwelling units per net acre with area 8.1D; and
- Increase the total maximum average daily trips (ADTs) in Planning Area 51.

Changes to Section 9-51, Planning Area 51 (Orange County Great Park), to allow for the Project, including, but not limited to:

- Revisions to the Zoning Ordinance Map for Planning Area 51 to reflect the proposed zoning, indicated in Exhibit 5; and
- Revisions to the 8.1, Trails and Transit Oriented Development Zoning District Intensity, to reflect the Project;

As necessary, changes to other sections of the City of Irvine Zoning Ordinance for consistency purposes would be identified with the development plan and the preparation of the EIR.

Project Alternatives

The County proposes to study four Alternatives including a No Project Alternative. The Proposed Alternatives are as follows:

Alternative 1: Single-Family Homes Alternative. Alternative 1 assumes development of single-family units to the north and south of the Alton Parkway wildlife movement corridor. The precise number of units will be determined once the technical analysis is complete and there is an understanding of the significant impacts.

Alternative 2: Mixed Use Alternative. Alternative 2 assumes that the County would develop the site with mixed use. The portion of the Project site south of the wildlife movement corridor would be developed as office buildings, consistent with the land uses currently existing south of the Project site. A reduce number of multi-family housing units would be constructed north of the wildlife movement corridor. The precise number of units will be determined once the technical analysis is complete and there is an understanding of the Project's potentially significant impacts.

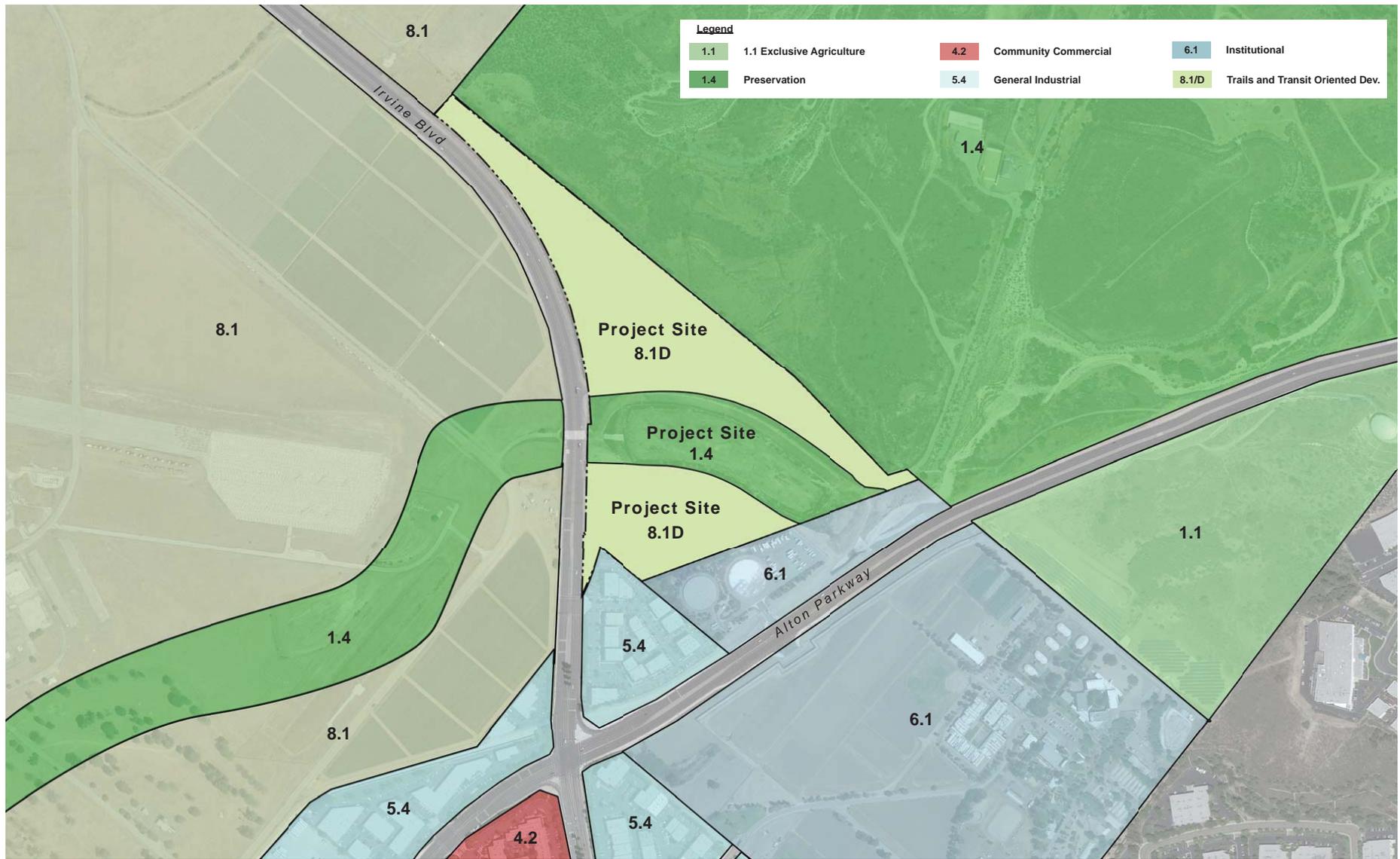
Alternative 3: Age-Qualified Alternative. Alternative 3 assumes that the County would develop all, or a portion, of the residences as age-qualified (over 55 years old). It is anticipated that the total number of units developed would be the same.

Alternative 4: No Project Alternative. The No Project Alternative assumes the existing site would continue the current R&S Soils use for green waste operations or other agricultural-related land uses allowed under existing regulations.

Anticipated Project Approvals

The County of Orange is the lead agency on the Project. Table 1 provides a listing of the anticipated approvals by the County of Orange. Recognizing that Project implementation will require approvals from multiple agencies, a listing of the actions of the Responsible agencies is provided following Table 1.

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Source: KTG 2014

Proposed Land Use Plan

Exhibit 5

West Alton Development Plan



TABLE 1
COUNTY OF ORANGE REQUIRED APPROVALS

Acting Body	Action
County of Orange Planning Commission	<ul style="list-style-type: none"> ▪ Recommendation to Board of Supervisors regarding certification of the Final EIR. ▪ Recommendation to Board of Supervisors regarding the proposed development plan.
County of Orange Board of Supervisors	<ul style="list-style-type: none"> ▪ Certification of the Final EIR and adoption of Findings of Fact and a Statement of Overriding Considerations. ▪ Approval of the proposed development plan. ▪ Approval of the Mitigation Monitoring and Reporting Program. ▪ Recommendation to the City of Irvine for the proposed General Plan Amendments and Zone Change
OC Planning Department (Planning, Building, Grading)	<ul style="list-style-type: none"> ▪ Approval of land use proposals including, but not limited to, Use Permits, Site Development Permits, Special Use Permits and Variances to allow implementation of the development plan. ▪ Approval of a Water Quality Management Plan. ▪ Issuance of grading, building, and occupancy permits. ▪ Implementation of the Mitigation Monitoring and Reporting Plan.

Approvals from other agencies may also be required as necessary. It is anticipated this would include the following:

- **City of Irvine.** The City Council would be requested by the Orange County Board of Supervisors to adopt the County-proposed General Plan Amendment to amend the maximum allowable development intensities allowed on the site and amend the Zoning Ordinance, which would include rezoning the County-owned property to 1.4 Preservation for the wildlife movement corridor and to the Trails and Transit Oriented Development District (8.1D) for the rest of the project site.

City of Irvine Planning and Development Services Department would be requested to issue Encroachment Permits for connections within the public right-of-way

- **Irvine Ranch Water District.** Approval of a Water Supply Assessment and for water and sewer line connections.
- **U.S. Army Corps of Engineers.** Evaluation and permitting pursuant to Section 404 of the Clean Water Act (issuance of a Nationwide Permit), if determined to be necessary.
- **California Department of Fish and Wildlife.** Evaluation and permitting pursuant to Section 1600 (et. seq.) of the *California Fish and Game Code*, if determine to be necessary.
- **Regional Water Quality Control Board.** Issuance of a National Pollutant Discharge Elimination Systems Permit to ensure that construction site drainage velocities are equal

to or less than the pre-construction conditions and that downstream water quality is not worsened.

- **Orange County Fire Authority.** Issuance of a Fire Master Plan.

Anticipated Schedule

The Project schedule, as currently envisioned, contemplates that the draft EIR will be available for public review in late summer or fall of 2015. A 45-day public review period will be provided, after which responses to comments received will be prepared. The Orange County Planning Commission will then hold a public hearing and make a recommendation on certification of the EIR to the Board of Supervisors. Public hearings are anticipated in late 2015 and early 2016.

Project implementation, which may occur in phases, will be based on market demand and may be initiated in 2016.

Probable Environmental Effects of the Project

Until the EIR analysis is completed, it is not possible to identify with precision the potential environmental effects of the Project. However, the County has performed an Initial Study (a copy of which is attached to this notice) to identify the reasonably foreseeable and potentially significant adverse environmental effects of the Project, which the County believes require further and more detailed analysis in the EIR. Additionally, there are several topics where the Initial Study has indicated an anticipated less than significant impact; however, these topics are still identified as being evaluated in the EIR due to anticipated public interest. The County has identified the following specific topics as requiring detailed analysis:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

Based on the Initial Study, the Project would not result in any potentially significant effects with respect to the topical issues listed below. The issues have been scoped out of the EIR because impacts to these resources have been determined negligible.

- Forestry Resources
- Mineral Resources

Conclusion

The County requests the public's careful review and consideration of this notice and it invites any and all input and comments from interested agencies and persons regarding the preparation and scope of the draft EIR.



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Environmental Impact Report 621 West Alton Development Plan

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Agriculture/Forestry Res. | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards/Hazardous Mat. | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings |

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION (ND) will be prepared pursuant to CEQA Guidelines Article 6, 15070 through 15075.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION (MND) will be prepared pursuant to CEQA Guidelines Article 6, Sec. 15070 through 15075.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

I find that although the proposed project could have a significant effect on the environment, because potentially effects 1) have been analyzed adequately in an earlier EIR or ND/MND pursuant to applicable legal standards and 2) have been avoided or mitigated pursuant to that earlier EIR/ND/MND, including revisions or mitigation measures that are imposed upon the project, MINOR ADDITONS AND/OR CLARIFICATIONS are needed to make the previous documentation adequate to cover the project which are documented in this Addendum to the earlier CEQA Document (Sec. 15164)

Signature: Channary Gould

December 19, 2014

Name: Channary Gould, Real Estate Development Manager

Date:



ENVIRONMENTAL ANALYSIS CHECKLIST

ENVIRONMENTAL IMPACT REPORT 621 WEST ALTON WEST DEVELOPMENT PLAN

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
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1. AESTHETICS. Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

2. AGRICULTURE & FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
f. For a project within the vicinity of private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. HYDROLOGY & WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level (e.g., the production rate of the pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. LAND USE & PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
13. POPULATION & HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. PUBLIC SERVICES.				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
b. Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. UTILITIES & SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES AND SUPPORTING DATA SOURCES:	Potential Significant Impact	Less than Significant Impact/MM	Less than Significant Impact	No Impact
18. MANDATORY FINDINGS				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: All referenced and/or incorporated documents may be reviewed by appointment only, at the County of Orange Public Works Department, 300 N. Flower Street, Santa Ana, California, unless otherwise specified. An appointment can be made by contacting the CEQA Contact Person identified above.

CUD: Revised 01/2014

West Alton Development Plan

PROJECT IMPACT ANALYSIS

1. AESTHETICS

- a) Would the project have a substantial adverse effect on a scenic vista?**
- b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

No Impact. The Project is not located within a scenic vista, and there are no scenic resources including trees, rock outcroppings, and historic buildings within or adjacent to the Project limits. In addition, according to the County, City, and Caltrans visual resources maps, there are no designated or eligible State or local scenic highways in the vicinity of the Project site. (Caltrans 2011; County of Orange 2005b; Irvine 2012a). Therefore, the Project would not result in substantial adverse effect on a scenic vista or damage scenic resources. No impacts are expected. Further evaluation of these issues in the EIR is not required, and no mitigation is necessary.

- c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**
- d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?**

Potential Significant Impact. The large portion of the Project site is currently in agricultural production and a portion serves as wildlife corridor, which is mitigation for Alton Parkway Extension Project. The Project would lead to visual changes, including potential changes to the visual character of the site and impacts associated with the introduction of new light and glare. The Draft EIR will include a discussion of the existing and proposed visual character with use of photographs to document views of the Project site. Potential light and glare impacts associated with new sources of light and glazing materials will also be discussed in the Draft EIR.

2. AGRICULTURE AND FORESTRY RESOURCES

- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**
- e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?**

Potential Significant Impacts. According to the California Farmland Mapping Program, the Project site is designated as “Prime Farmland” (FMMP 2011). Therefore, the Project has a potential to convert prime farmland into non-agricultural uses. No lands subject to a Williamson Act Contract are present on the Project site. The EIR will evaluate impacts to farmlands in detail and the potential of conversion of other farmlands to non-agricultural uses. The EIR will also

include an evaluation of the Project's consistency with the -adopted plans and policies regarding agriculture production.

- c) **Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?**
- d) **Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. The Project would not result in pressures to convert forest lands to other uses because no forest uses exist on site. No part of the Project site or adjacent areas is zoned forest land, timberland, or timberland zoned for Timberland Production, nor would the Project result in the loss of forest land or conversion to non-forest use. Further evaluation of this issue in the EIR is not required, and no mitigation is necessary.

3. AIR QUALITY

- a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**
- b) **Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**
- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**
- d) **Would the project expose sensitive receptors to substantial pollutant concentrations?**

Potentially Significant Impact. The Project would generate additional localized air emissions from construction and operation. The Project's compliance with South Coast Air Quality Management District (SCAQMD) standards will be assessed in the EIR. The EIR will include an air quality analysis to evaluate potential emissions from both construction activities and ground transportation. The EIR will provide the summaries of pollutant descriptions; pertinent air quality regulations; local air quality conditions; and Project-generated air pollutant emissions. The EIR will also include an evaluation of the Project's consistency with adopted regional air quality plans and policies. Additionally, the analyses will include a determination of Project conformity with the Air Quality Management Plan for the South Coast Air Basin. If potential significant impacts are identified, appropriate mitigation measures will be recommended.

- e) **Would the project create objectionable odors affecting a substantial number of people?**

No Impact. The Project does not propose any land uses that are identified by the SCAQMD as odor sources of concern (such as wastewater treatment plants, agricultural operations, landfills, composting, food processing plants, chemical plants, or refineries). The Project would increase vehicular trips to and from the site; however, the increase would not result in detectable odors. No impacts are expected. Further evaluation of this issue in the EIR is not required, and no mitigation is necessary.

4. **BIOLOGICAL RESOURCES**

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?**
- b) **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?**
- c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**
- d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**
- e) **Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

Potentially Significant Impact. Other than the Alton Parkway wildlife movement corridor, the site supports limited native vegetation; however, the site is also adjacent to the Reserve Area for the NCCP/HCP (discussed below). There is a potential for indirect impacts to sensitive species. The Draft EIR will summarize the findings of a literature review; general plant/wildlife surveys; a jurisdictional delineation; and an assessment of the site's potential to support special status plant and wildlife species through focused surveys for special status plant species and burrowing owl. Potential impacts to sensitive species, riparian habitat, wetlands, and wildlife movement will be identified in the Draft EIR and mitigation for significant impacts will be provided, as necessary.

- f) **Would the project conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

Less Than Significant Impact. The Orange County Central-Coastal NCCP/HCP covers a 208,000-acre area at the central and coastal portions of Orange County and includes land in the City of Irvine. Though the Project site is not within the Reserve Areas, the area immediately northeast of the site (property owned by the FAA) is within the Reserve Area. The EIR will evaluate the potential indirect impacts on the Reserve Area.

The Orange County Transportation Authority (OCTA) is currently developing an NCCP/HCP as part of the Measure M2 program to mitigate the impacts of proposed freeway projects in Orange County. While this future NCCP/HCP would cover all areas of the County, including the City of Irvine, no conservation areas within OCTA's NCCP/HCP are proposed for areas near the Project site.

5. **CULTURAL/SCIENTIFIC RESOURCES**

a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

No Impact. There are no buildings located on the Project site. The development immediately adjacent to the site consist of water storage facilities and an industrial/office building, which were constructed after 1965 and would not be considered historic. No impacts to historical resources are expected from the Project. Further evaluation of this issue in the EIR is not required, and no mitigation is necessary.

b) **Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

c) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

d) **Would the project disturb any human remains, including those interred outside of formal cemeteries?**

Potentially Significant Impact. The implementation of the Project would result in physical improvements, grading activities, and construction that would result in ground disturbance. As a result, there is a potential to uncover and potentially impact cultural, archaeological, and/or paleontological resources. The EIR will summarize the results of the archeological and paleontological studies that will be prepared for the Project. These studies will include (1) a records search of the Project area, including a one-mile radius buffer around the site, and a Paleontological Resources Literature Review; (2) Native American Scoping through contact with the California Native American Heritage Commission (NAHC) and consultation with local Native American tribes to find out potential for unknown burial sites; and (3) archaeological and paleontological resources field surveys concentrated in undeveloped portions of the Project site. The EIR will summarize the findings of the cultural resources and paleontological resources studies and will include recommendations for mitigating any significant impacts to a level considered less than significant.

6. **GEOLOGY AND SOILS**

a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

iii) **Seismic-related ground failure, including liquefaction?**

c) **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

d) **Would the project be located on expansive soils, as defined in Table 18-1-B of the California Building Code (1994), creating substantial risks to life or property?**

Less Than Significant Impact. The Project is located in the seismic region of Southern California. According to the State of California Department of Conservation Fault Activity Map (CDOC 2014), the nearest known fault is the San Joaquin Hills Blind Thrust located in subsurface 2.3 miles south and southeast of the site. The Newport-Ingelwood Fault (located approximately 12 miles from the Project site) and the Elsinore Fault (located approximately 13 miles northeast of the Project site) are the closest active faults to the site with surface expression. No earthquake faults are identified on the Project site. However, both State of California maps and Irvine General Plan maps indicate that two small inactive faults are identified just north of the Project site. Therefore, the risk of the surface rupture of a known fault is considered low. The Project is underlain by denser soils with a deeper groundwater table defined as SRA-2 Denser Soils/Deeper Ground water on the City of Irvine Seismic Response Areas (Irvine 2012a), which generally would make the site less susceptible to liquefaction and subsidence. However these geological issues need to be investigated further. All structures on the site will have to comply with and will be constructed according to California Building Code seismic safety requirements.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking?

Less Than Significant with Mitigation. As with all of southern California, the Project site is prone to strong seismic ground shaking. All structures on the site will have to comply and will be constructed according to California Building Code seismic safety requirements. The Draft EIR will further evaluate potential for strong seismic shaking and prescribe minimization and mitigation measures as necessary.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv) Landslides?

No Impact. The Project site, and immediately surrounding areas, are relatively flat and not prone to landslides. No further evaluation of impacts associated with landslides will be addressed in the EIR.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project would result in grading and thus would expose soil to erosion. The EIR will further evaluate potential soil erosion impacts from the Project and will prescribe minimization and mitigation measures as necessary.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of waste water?

No Impact. The Project does not propose to be served by septic tanks or alternative wastewater disposal systems. Therefore, no soils impacts related to septic tanks or alternative wastewater disposal systems would occur. Further evaluation of this issue in the EIR is not required, and no mitigation is necessary.

7. GREENHOUSE GAS EMISSIONS

- a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b) **Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Potentially Significant Impact. The Project would generate greenhouse gas (GHG) emissions from the use of fossil fuels, electricity, natural gas, and other indirect sources. The Draft EIR will include a GHG emissions study to determine the existing and future GHG emissions from on-site land uses using the California Emissions Estimator Model (CalEEMod) to calculate construction and operational GHG emissions. The Draft EIR will also include an evaluation of the Project's consistency with applicable State and local plans and policies for reducing GHG emissions.

8. HAZARDS AND HAZARDOUS MATERIALS

- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. Proposed land uses on the site would utilize hazardous materials for construction, operation, and maintenance. However, existing regulations regarding the handling and transport of these materials provide sufficient safeguards to protect against a significant hazard to the community associated with an accidental release of hazardous materials. Less than significant impacts are expected, and no further evaluation of these issues will be provided in the Draft EIR.

- b) **Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**
- d) **Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Potentially Significant Impact. The Project is located on the former MCAS El Toro, which had been known to use and store chemicals and jet fuels. The base is included on the Cortese List compiled pursuant to Section 65962.5 of the *California Government Code*. Due to potential site and groundwater contamination, the DoN has not yet found a small portion of the site to be suitable for transfer to the County. Therefore, this portion of the site is part of a LIFOC. Based on the hazardous material assessment that will be prepared for the Project, the Draft EIR will discuss the presence of soil and groundwater contamination from past land uses on and near the site and the status of existing clean-up and remediation programs as they have potential to affect the Project. Mitigation measures to protect the Project users from these hazards will be identified in the Draft EIR.

- c) **Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less Than Significant Impact. The Project is located in the Irvine Unified School District. According to the Irvine Unified School District Attendance Area Maps for the 2014–2015 school year, no schools are located in the within ¼ mile of the Project site (IUSD 2014a, 2014b, 2014c); however, as previously mentioned the IUSD has approved the construction of a new high school west of Irvine Boulevard. Though the new high school would be within ¼ mile of the Project site, the Project does not propose any activities that would result in the exposure of hazardous materials because no development in the LIFOC area is proposed. Impacts to schools are expected to be less than significant and no further evaluation of these issues will be provided in the EIR.

- e) **Would the project be located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- f) **For a project within the vicinity of private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. There are no airports or private airstrips near the site that may pose safety hazards to the residents, visitors, and employees of future development at the site. The nearest airport, John Wayne Airport, is located over nine miles southwest of the site. No aircraft or airport hazards would affect the Project and no mitigation is required. Further evaluation of this issue in the Draft EIR is not required.

- g) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No Impact. There are no designated emergency evacuation routes on or immediately adjacent to the Project site. There are no unique characteristics about the uses proposed that would impair emergency response or evacuation from the Project site or surrounding areas. Further evaluation of this issue in the Draft EIR is not required.

- h) **Would the project expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

Potential Significant Impact. According to the Orange County Very High Fire Hazard Severity Zones (VHFHSZ) Final Local Responsibility Area (LRA), the majority of the Project site is not located in a VHFHSZ; however, the Project site is bordered to the north by a VHFHSZ (OCFA 2012). Because of this, the Project will be exposed to a potentially higher risk for wildfires. This issue would be further evaluated in the Draft EIR.

9. HYDROLOGY AND WATER QUALITY

- a) **Would the project violate any water quality standards or waste discharge requirements?**

Less Than Significant Impact. Development of the Project site would involve grading of more than one acre; therefore, the Project Proponent would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Permit and comply with permit requirements effective at the time of construction. To address post-construction erosion and discharge impacts, the Project Proponent would be required to prepare a Project-specific Water Quality Management Plan (WQMP). The WQMP will identify measures to treat and/or limit the

entry of contaminants into the storm drain system. Though impacts are expected to be less than significant with implementation of adopted regulatory standards, this issue will be discussed in the forthcoming Draft EIR.

- b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level (e.g., the production rate of the pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Less Than Significant Impact. IRWD provides potable water service to the Project site. As discussed under Utilities and Service Systems (Section 17), there will be an analysis of water usage, and a Water Supply Assessment (WSA) for the Project will be prepared and discussed in the Draft EIR. The Project is not expected to substantially deplete groundwater supplies, and no new water wells are proposed as part of this Project. The Project would increase the amount of impervious surface, which would reduce the area available for groundwater recharge. However, the Project site's only source of water is from direct precipitation, which provides little opportunity to recharge under existing conditions. The Project would not interfere with any flows redirected from Borrego Canyon Wash to the Alton Parkway wildlife movement corridor. Therefore, the Project is not expected to substantially interfere with groundwater recharge. Further evaluation of this issue in the Draft EIR is not required.

- c) Would the project substantially alter the existing drainage pattern of the site or area including the alteration of the course of a stream or river, in manner which would result in substantial erosion or siltation on or off-site?**
- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**
- e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant Impact with Mitigation. The Project does not contain any course of a stream or river that would be altered as a result of the Project construction and operation. Although the Borrego Canyon Wash is located near the Project site, it is not on the Project site and thus the Project would not alter its course. The Project would require grading and thus would result in alteration of existing drainage patterns on site. Design features to reduce erosion, flooding, and polluted runoff will be identified, as necessary, along with any construction and permanent best management practices (BMPs) that will be implemented as part of Project. These issues of alteration of site drainage patterns and potential will be evaluated further in the Draft EIR.

- f) Would the project otherwise substantially degrade water quality?**

Less Than Significant Impact. Storm water discharges from the Project may contain pollutants from short-term demolition and construction activities, as well as from long-term operations and maintenance activities. However, with implementation of BMPs required under existing regulations, impacts would be expected to be less than significant. The Draft EIR will analyze

potential discharges from the Project and will discuss existing regulations and Project design features that would reduce these impacts.

- g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h) Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?**

No Impact. According to the Federal Emergency Management Agency (FEMA), the Project site, including the Alton Parkway wildlife movement corridor, is located outside the Borrego Canyon Wash floodway, the 100-year flood hazard area, and other types of flood areas. Therefore, the Project would not place housing or other structures in areas subject to flood. No impacts are expected and no further discussion would be provided in the Draft EIR regarding these topics.

- i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**
- j) Would the project be subject to inundation by seiche, tsunami, or mudflow?**

No Impact. The Project is located inland on a relatively flat area. Other than Borrego Canyon Wash, no water bodies are located close to the Project site; however the Project site is located outside the Flood Zone for Borrego Canyon Wash. Therefore, the Project would not be subject to seiche, tsunami, or mudflow. According to the County of Orange, General Plan Safety Element (Figure IX-9), the Project site is not located in an inundation area so the Project would not expose people or structures to a significant risk including failure of the dam (County of Orange 2005b). Thus, the Project would not be exposed to inundation by dam failure, seiche, tsunami, or mudflow. No impact would occur, and no mitigation is necessary. Further evaluation of this issue in the Draft EIR is not required.

10. LAND USE AND PLANNING

- a) Would the project physically divide an established community?**

No Impact. The Project is located in a partially urbanized area. The majority of the site has been in agricultural production and the other portions have been used as a wildlife movement corridor. Thus, the Project would not physically divide an established community. Further evaluation of this issue in the EIR is not required.

- b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

Potentially Significant Impact. The Project site is located in the City of Irvine and has a zoning designation of both Exclusive Agriculture (1.1) and Preservation (1.4). Upon approval of the Project, the County Board of Supervisors would recommend to the City of Irvine, a General Plan Amendment and a Zone Ordinance Amendment to reflect the uses and densities ultimately approved for the Project site. The Draft EIR will analyze the Project's compatibility with surrounding land use and zoning designations. In analyzing the proposed land use and zoning changes, the Draft EIR will also evaluate the effects on existing on-site and surrounding land uses.

The Draft EIR will assess the Project's consistency with relevant local planning documents, including the Southern California Association of Governments (SCAG) regional planning documents.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Potentially Significant Impact. See response to Threshold 4(f) Section 4, Biological Resources above.

11. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No impact. The California Department of Mines and Geology (CDMG) designates the site and surrounding area as Mineral Resource Zone (MRZ) 1—areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence (CDMG 1994). Also, the Department of Conservation Division of Oil, Gas and Geothermal Resources (DOGGR) has not identified oil, gas, or geothermal fields on or near the site (DOGGR 2001). There would be no impact to mineral resources from the Project, and no mitigation is necessary. Further evaluation of this issue in the Draft EIR is not required.

12. NOISE

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potential Significant Impact. Implementation of the Project would result in a temporary and permanent increase in ambient noise levels associated with increased traffic on adjacent roadways. The Draft EIR will analyze temporary noise impacts from construction activities on adjacent land uses. Operational noise impacts to existing and planned sensitive receptors from planned uses will be evaluated, including (1) noise from on-site sources; (2) noise increases due to Project-generated traffic on local roads; and (3) traffic noise to planned on-site land uses. The analysis will compare noise impacts with the standards in the County's and City of Irvine's General Plans and in their Noise Ordinances.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**
- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. There are no airports or private airstrips near the site that may expose future residents, visitors, or employees to aircraft or airport noise. The noise contours for the John Wayne Airport do not extend into the site (Irvine 2012a). No impacts would occur, and no mitigation is necessary. Further evaluation of this issue in the Draft EIR is not required.

13. POPULATION AND HOUSING

- a) **Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Potentially Significant Impact. The Project is located on land that was part of MCAS El Toro, that has been put to agricultural and habitat conservation purposes and that is currently designated for agricultural uses. The Project would construct residential uses and thus, in its nature, would increase the population on site. The Draft EIR will evaluate the Project's consistency with local and regional growth assumptions, including the Orange County Preferred (OCP) Socioeconomic Projections. This issue would be further evaluated in the Draft EIR.

- b) **Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c) **Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No impact. There is no housing on the Project site; therefore, the Project would not result in the displacement of people or housing. Further evaluation of these issues in the EIR is not required, and no mitigation is necessary.

14. PUBLIC SERVICES

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**
 - i) **Fire protection?**
 - ii) **Police protection?**
 - iii) **Schools?**
 - iv) **Parks?**

v) Other Public Facilities?

Potential Significant Impact. The Project would introduce new structures, would increase the development intensity, and would increase the number of people at the site, which could create additional demands for public services. The Draft EIR will evaluate the Project's impacts on public services, including fire, police, schools, parks, libraries, and other public facilities. The impact analyses will be based on consultations with the Irvine Police Department, the Orange County Fire Authority (OCFA), the Irvine Unified School District, local libraries, the City of Irvine, and the County of Orange. Potential service impacts associated with Project implementation can be related to provision of adequate service levels; environmental effects associated with the provision of additional services; and the need to upgrade and/or provide additional facilities to serve the Project.

15. RECREATION

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact. The Project's housing units will be occupied by residents that would generate a demand for recreational facilities. The Draft EIR will assess whether construction and operation of the Project would adversely affect existing recreational facilities or require new or expanded facilities whose construction could result in environmental effects.

16. TRANSPORTATION/TRAFFIC

- a) **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**
- b) **Would the project conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Potentially Significant Impact. The Project would increase the number of vehicles going to and coming from the site and may result in traffic congestion and deterioration of level of service on the roadways and freeways surrounding the site. The Draft EIR will summarize the findings of a traffic impact assessment that evaluates the transportation impacts associated with implementing the Project in accordance with City and County guidelines. Impacts on pedestrian and bicycle paths and mass transit services will also be addressed. Project consistency with the Orange County Congestion Management Program and other regional transportation programs will also be discussed.

- c) **Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

No Impact. The Project is a residential development Project and thus would not result in a change in air traffic patterns or increase in traffic levels as a result of that change. This issue will not be further evaluated in the EIR and no mitigation is required.

- d) **Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**
- e) **Would the project result in inadequate emergency access?**

No Impact. Project design, including roadways, would adhere to applicable established design guidelines. No uses are proposed that would result in incompatibility with surrounding areas, thereby resulting in safety hazards. Further evaluation of this issue in the Draft EIR is not required.

- f) **Would the project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

Less Than Significant Impact. The Draft EIR will discuss alternative transportation systems and facilities that are present near the site and any that would be provided by the Project. It will also evaluate the potential demand for these facilities from Project users.

17. UTILITIES AND SERVICE SYSTEMS

- a) **Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b) **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?**
- c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?**

Potentially Significant Impact. The Project would require provision of new utilities and services systems to the currently undeveloped Project site. The Project would implement new storm drain system improvements including storm water detention and treatment systems; new sewer connectors; domestic water connectors; recycled water; and gas, electrical, communication, and CCTV services. In addition the Project may include a potential sewer lift station and force main. Further evaluation of these issues and potential mitigation, if applicable, will be provided in the EIR.

- d) **Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**
- e) **Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Potentially Significant Impact. The Project would generate waste water and would use potable water during the construction and operation. The Project would also implement new water system connectors and wastewater connectors to existing infrastructure. Coordination with the water providers and wastewater treatment provider will be conducted to ensure that the Project would not result in significant impacts. These issues will be further discussed in the Draft EIR, and mitigation measures will be applied as necessary.

- f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

Less Than Significant Impact with Mitigation. The Project would generate solid waste and a demand for solid waste disposal services. The Draft EIR will discuss solid waste collection and disposal services needed by the Project and will evaluate existing landfill capacity to meet the demands of the Project based on consultation with OC Waste & Recycling. Project compliance with the California Integrated Waste Management Act (AB 949), the California Mandatory Commercial Recycling Law (AB 341), the Irvine General Plan Integrated Waste Management Element, and other applicable solid waste regulations will also be evaluated.

18. MANDATORY FINDINGS OF SIGNIFICANCE

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. The Project's impacts on cultural and biological resources will be evaluated in the Draft EIR. The analysis will include potential for degradation of the quality of the environment; potential for substantial reduction in the habitat of a fish or wildlife species; potential for the fish or wildlife population to drop below self-sustaining levels; potential threats to the elimination of a plant or animal community; potential reduction in the number of or restriction in the range of a Rare or Endangered plant or animal; and/or potential elimination of important examples of the major periods of California history or prehistory.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

Potentially Significant Impact. A number of developments and improvements are proposed near the site that may lead to cumulatively significant impacts when considered with the Project. The cumulative impacts of the Project and other related projects will be analyzed in the Draft EIR.

- c) Does project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Potentially Significant Impact. The Project has the potential to degrade the quality of the natural and human environment related to air quality, GHG emissions, noise, traffic, hazards and hazardous materials, and land use. Because of the potential for significant adverse effects, a Draft EIR will be prepared for the Project.

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EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

December 19, 2014

To: Reviewing Agencies
Re: West Alton Development Plan
SCH# 2014121065

Attached for your review and comment is the Notice of Preparation (NOP) for the West Alton Development Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Channary Gould
Orange County CEO Real Estate/Land Development
333 W. Santa Ana Blvd, 3rd Floor
Santa Ana, CA 92701

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014121065
Project Title West Alton Development Plan
Lead Agency Orange County

Type NOP Notice of Preparation

Description The Project proposes a General Plan Amendment and Zone Change that would allow a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking. The wildlife movement corridor would be protected onsite.

Lead Agency Contact

Name Channary Gould
Agency Orange County CEO Real Estate/Land Development
Phone 714 667 4980 **Fax**
email
Address 333 W. Santa Ana Blvd, 3rd Floor
City Santa Ana **State** CA **Zip** 92701

Project Location

County Orange
City Irvine
Region
Cross Streets Irvine Boulevard and Alton Parkway
Lat / Long 33° 40' 15.19" N / 117° 42' 18.06" W
Parcel No. multiple
Township **Range** **Section** **Base**

Proximity to:

Highways SR 241
Airports No
Railways No
Waterways Borrego Canyon Wash
Schools Rancho Canada
Land Use GP: Orange County Great Park and zoning is Institutional

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; California Highway Patrol; Caltrans, District 12; Air Resources Board; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 8

Date Received 12/19/2014 **Start of Review** 12/19/2014 **End of Review** 01/20/2015

Notice of Completion & Environmental Document Transmittal

2014121065

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: West Alton Development Plan

Lead Agency: County of Orange - CEO Real Estate/ Land Development Contact Person: Channary Gould
Mailing Address: 333 W. Santa Ana Blvd, 3rd Floor, Phone: 714 667-4980
City: Santa Ana Zip: 92701 County: Orange

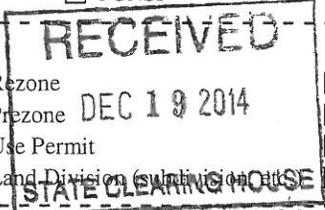
Project Location: County: Orange City/Nearest Community: Irvine
Cross Streets: Irvine Boulevard and Alton Parkway Zip Code: 92618
Longitude/Latitude (degrees, minutes and seconds): 33°40'15.19" N/117°42'18.06" W Total Acres: 44
Assessor's Parcel No.: multiple Section: Twp: Range: Base:
Within 2 Miles: State Hwy. #: SR-241, Waterways: Borrego Canyon Wash
Airports: none Railways: none Schools: Rancho Canada

Document Type:

- CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other: [] FONSI

Local Action Type:

- [] General Plan Update [] Specific Plan [X] Rezone [] Annexation
[X] General Plan Amendment [] Master Plan [] Prezone DEC 19 2014 [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (including MGD) [] Other:



Development Type:

- [X] Residential: Units 970 Acres
[] Office: Sq.ft. Acres Employees [] Transportation: Type
[] Commercial: Sq.ft. Acres Employees [] Mining: Mineral
[] Industrial: Sq.ft. Acres Employees [] Power: Type MW
[] Educational [] Waste Treatment: Type MGD
[] Recreational [] Hazardous Waste: Type
[] Water Facilities: Type MGD [X] Other:

Project Issues Discussed in Document:

- [X] Aesthetics/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archaeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

General Plan is Orange County Great Park and zoning is Institutional (6.1)

Project Description: (please use a separate page if necessary)

The Project proposes a General Plan Amendment and Zone Change that would allow a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking. The wildlife movement corridor would be protected onsite. Exhibit 4 provides a conceptual site plan.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g., Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: Orange

SCH#

2014121065

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
Nicole Wong

California Coastal Commission
Elizabeth A. Fuchs

Colorado River Board
Lisa Johansen

Dept. of Conservation
Elizabeth Carpenter

California Energy Commission
Eric Knight

Cal Fire
Dan Foster

Central Valley Flood Protection Board
James Herota

Office of Historic Preservation
Ron Parsons

Dept of Parks & Recreation Environmental Stewardship Section

California Department of Resources, Recycling & Recovery
Sue O'Leary

S.F. Bay Conservation & Dev't. Comm.
Steve McAdam

Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division

Fish & Wildlife Region 1
Donald Koch

Fish & Wildlife Region 1E
Laurie Harnsberger

Fish & Wildlife Region 2
Jeff Drongesen

Fish & Wildlife Region 3
Charles Armor

Fish & Wildlife Region 4
Julie Vance

Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program

Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program

Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Anna Garbeff
Environmental Services Section

Delta Stewardship Council
Kevan Samsam

Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

Delta Protection Commission
Michael Machado

OES (Office of Emergency Services)
Dennis Castrillo

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Leo Wong

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jenniffer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning HQ LD-IGR
Terri Pencovic

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

Caltrans, District 4
Erik Alm

Caltrans, District 5
Larry Newland

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Dianna Watson

Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

All Other Projects
Cathi Slaminski

Transportation Projects
Nesamani Kalandiyur

Industrial/Energy Projects
Mike Tollstrup

State Water Resources Control Board

Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Jeffery Werth
Division of Drinking Water

State Water Resources Control Board

Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

RWQCB 1

Cathleen Hudson
North Coast Region (1)

RWQCB 2

Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3

Central Coast Region (3)

RWQCB 4

Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S

Central Valley Region (5)

RWQCB 5F

Central Valley Region (5)
Fresno Branch Office

RWQCB 5R

Central Valley Region (5)
Redding Branch Office

RWQCB 6

Lahontan Region (6)

RWQCB 6V

Lahontan Region (6)
Victorville Branch Office

RWQCB 7

Colorado River Basin Region (7)

RWQCB 8

Santa Ana Region (8)

RWQCB 9

San Diego Region (9)

Other

Conservancy



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



January 16, 2015

Ms. Channary Gould
Orange County CEO Real Estate/Land Development
333 W. Santa Ana Blvd., 3rd Floor
Santa Ana, CA 92701
channary.gould@ocgov.com

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the West Alton Development Plan, Irvine, CA (SCH# 2014121065)

Dear Ms. Gould:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the West Alton Development Plan Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The County is a participating landowner in the Central-Coastal NCCP/Habitat Conservation Plan (HCP).

The triangle shaped, 44.16-acre project area is located within the City of Irvine, northwest of the intersection of Alton Parkway and Irvine Boulevard, and is bisected by Magazine Road. The Project is bound by Irvine Boulevard on the southwest; existing business/industrial buildings on the south and southeast; and open space property which is part of the Reserve Area for the Central-Coastal Subregional NCCP/HCP to the north. An 11.64-acre wildlife corridor splits the site into two development areas: the northern development area is 21.98 acres and the southern development area is 10.34 acres, resulting in 32.32 net development acres. The West Alton Development Plan proposes a 970 unit multi-family development, with 660 units in the northern development area and 310 units in the southern development area.

The Department offers the following comments and recommendations to assist the County in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

1. Foremost, the Department is concerned about project-related impacts of the proposed project on the Reserve Area and in particular the Wildlife Corridor. The Wildlife Corridor was compensatory mitigation for impacts to the Borrego Canyon Wash associated with the Alton Parkway extension and was permitted under Department-issued and other Agency permits. The Wildlife Corridor provides a link to foster wildlife species movement between the proposed Orange County Great Park's wildlife corridor to the south of the project site and the Central and Coastal portions of the NCCP/HCP Reserve and Cleveland National Forest

to the north. The Department is concerned that the proposed project would temporarily and permanently impact the Wildlife Corridor from edge effects, such as disturbance by humans and non-native predators (especially domestic pets), trampling, introduction of non-native plants, noise, and lighting. These are documented effects that have negative impacts on sensitive biological resources in southern California. To avoid or minimize project-related edge effects on the Wildlife Corridor, the project should include biological buffers, restrictive lighting (directed away from sensitive habitat or shielded), protective barriers, in-perpetuity monitoring (i.e., regular patrol/enforcement), and public notification (signage) of the sensitivity of the site. The Department believes project-related disturbances to the Wildlife Corridor would remain significant without adequate mitigation.

The Wildlife Corridor was completed in 2012 and is currently in the third year of a five/ten year mitigation maintenance program. The mitigation site will receive Department (and other Agency) mitigation sign-off when it has met all required performance standards and is self-sustainable. Depending on how successful the site is at reaching performance standards, monitoring could extend beyond the anticipated timeframe. The proposed project's activities (temporary and permanent) could negatively affect the mitigation maintenance program and result in the mitigation site failing to meet final performance standards, for example: introduction of non-native plants, project-related activities that reduce the presence of wildlife species, deposition of debris, introduction of pollutants and dust. This issue must be addressed in the DEIR.

2. Alternative 2, the Mixed Use Alternative, would result in a reduction of impacts to biological resources. The Department recommends full consideration of this alternative or any other alternative that would reduce impacts to biological resources.
3. To reduce the potential for the spread of non-native seeds into the Wildlife Corridor and the Reserve, the Department recommends that all heavy equipment proposed for use on the project site be verified as cleaned (including wheels, tracks, undercarriages, and bumpers, as applicable) before delivery to the project site. The County should ensure that all equipment delivered to the initial staging area(s) is documented as being weed free, including: (1) vegetation clearing equipment; (2) earth moving equipment; and (3) all project-associated vehicles (including personal vehicles) that, upon inspection by the monitoring biologist, are deemed to present a risk for spreading weeds. Equipment should be cleaned at existing construction yards or at a wash station.
4. Project development should require the use of native plants in landscaping to avoid the spread of invasive species. This also provides additional benefits such as the attraction of native pollinators and reduced water consumption. The Department recommends that appropriate native plants be used in landscaped areas. The project proponent should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas. Exotic plant species not to be used include those species listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory, which is available online at <http://www.cal-ipc.org>. This list includes (but is not limited to) the following: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping should not contain plants that require extensive irrigation, fertilizers, or pesticides. The DEIR should include a plant palette which does not contain non-native invasive species.

5. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. This should include an in-depth discussion of cumulative impacts with regard to conserved open space and the Wildlife Corridor. General and specific plans, such as the El Toro Development Plan (SCH# 2014111019), as well as past, present, and anticipated future projects, should also be analyzed relative to their impacts on similar plant communities and wildlife habitats.

General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a. The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department¹. Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
 - b. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

commitments for issuance of the LSA².

2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR.
 - a. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
 - b. A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.
 - a. Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region.

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

commitments for issuance of the LSA².

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 - b. A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

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 - a. Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region.

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

Mitigation measures proposed to alleviate such impacts should be included.

- b. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
7. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
8. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

Ms. Channary Gould
Orange County CEO Real Estate/Land Development
January 16, 2015
Page 7 of 7

9. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
10. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Jennifer Edwards at (858-467-2717) or via email at jennifer.edwards@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

cc: Chris Medak, U.S. Fish and Wildlife Service
Scott Morgan, State Clearinghouse



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 ♦ www.aqmd.gov

January 2, 2015

Channary Gould
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701

Notice of Preparation of a CEQA Document for the West Alton Development Plan

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is

recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at jbaker@aqmd.gov or call me at (909) 396-3176.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

San Joaquin Hills
Transportation
Corridor Agency

Chairman:
Scott Schoeffel
Dana Point



Transportation Corridor Agencies™

Foothill/Eastern
Transportation
Corridor Agency

Chairwoman:
Rhonda Reardon
Mission Viejo

January 15, 2015

Via E-mail to: channary.gould@ocgov.com

Channary Gould
Real Estate Development Manager
County of Orange – CEO Real Estate / Land Development
333 W. Santa Ana Blvd, 3rd Floor
Santa Ana, CA 92701

Subject: Notice of Preparation of an Environmental Impact Report for the West Alton Development Plan

Dear Ms. Gould:

The Transportation Corridor Agencies (TCA) has reviewed, and is pleased to submit these comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the West Alton Development Plan (Project). The Project proposes a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed on a 44.16 acre parcel located northwest of the intersection of Alton Parkway and Irvine Boulevard, within Planning Area 51, which encompasses the former MCAS El Toro property, in the City of Irvine. The County of Orange (County) is the Lead Agency for the Project and will be responsible for the EIR preparation pursuant to the California Environmental Quality Act (CEQA) and the State CEQA Guidelines.

The Project is within Zone A of the Foothill/ Eastern Transportation Corridor Agency “Area of Benefit” and will require payment of Development Impact Fees as a condition of issuing building permits pursuant to the Major Thoroughfare and Bridge Fee Program adopted in 1988. As such, TCA requests to be kept on the County’s distribution list and looks forward to receiving all future notices, the EIR, along with any other forthcoming documentation for the Project.

TCA appreciates the opportunity to provide input to your planning process. If you have questions or require additional information, please do not hesitate to contact me at 949.754.3496 or via email (dferemenga@thetollroads.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Feremenga'.

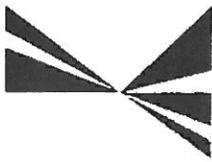
Doug Feremenga, AICP CEP, LEED AP
Principal Environmental Analyst

125 Pacifica, Suite 100, Irvine, CA 92618-3304 • (949) 754-3400 Fax (949) 754-3467

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SOUTHERN CALIFORNIA



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Deborah Robertson, Rialto

Transportation
Alan Wapner, San Bernardino Associated Governments

January 19, 2015

Mr. Channary Gould, Real Estate Development Manager
County of Orange
CEO Real Estate/OC Land Development
333 West Santa Ana Boulevard
Santa Ana, California 92701
Telephone: (714) 834-2166
E-mail: channary.gould@ocgov.com

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the West Alton Development Plan [SCAG NO. IGR8323]

Dear Mr. Gould,

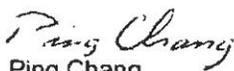
Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the West Alton Development Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the West Alton Development Plan. The proposed project would include the construction and operation of a multi-family development, with an average of 30 units per acre, totaling 970 units on an approximately 44.16-acre site in the eastern portion of the City of Irvine, Orange County, California. To implement the proposed development, the proposed project would require a General Plan Amendment Zoning Ordinance Amendments to change the site's existing land use designations that would increase the residential intensity allowed on-site. Additional off-site improvements are also required to serve the project and will be provided as part of future development.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,



Ping Chang,
Program Manager II, Land Use and Environmental Planning

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE WEST ALTON DEVELOPMENT PLAN [SCAG NO. IGR8323]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS Goals		
Goal		Analysis
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference
etc.		etc.

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscsc.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

Regional Growth Forecasts

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts		Adopted Unincorporated County of Orange Forecasts		Adopted City of Irvine Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	159,100	189,300	265,600	304,200
Households	6,458,000	7,325,000	44,000	57,600	98,000	114,700
Employment	8,414,000	9,441,000	29,700	39,500	242,000	291,800

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscsc.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf



IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Ave., P.O. Box 57000, Irvine, CA 92619-7000 (949) 453-5300

January 15, 2015

Channary Gould
Real Estate Development Manager
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701

Re: Notice of Preparation of Environmental Impact Report – West Alton Development Plan

Dear Ms. Gould:

Irvine Ranch Water District (IRWD) has received and reviewed the Notice of Preparation (NOP) of the Environmental Impact Report (PEIR) for the West Alton Development Plan. IRWD offers the following comments on the NOP.

With regards to Section 17 of the Environmental Checklist as well as the section titled, "Utilities and Service Systems", the proposed project will need to be incorporated into the recently initiated Sub-Area Master Plan (SAMP) update to the "Planning Area 51 SAMP" completed in September 2011. The County and IRWD are coordinating efforts on the SAMP update. This SAMP update will need to be completed prior to plan approvals for the potable, recycled, sewer, or Natural Treatment Systems. Please continue to coordinate with Eric Akiyoshi at (949) 453-5552 for SAMP updates.

IRWD appreciates the opportunity to review and comment on the NOP. If you have any questions or require additional information, please contact the undersigned or Jo Ann Corey, Engineering Technician III, at (949) 453-5326.

Sincerely,

A handwritten signature in blue ink that reads "Fiona Sanchez". The signature is written in a cursive, flowing style.

Fiona Sanchez
Director of Water Resources

cc: Michael Hoolihan, IRWD
Eric Akiyoshi, IRWD
Jo Ann Corey, IRWD



January 16, 2015

channary.gould@ocgov.com

Ms. Channary Gould
County of Orange – CEO Real Estate/Land Development
333. W. Santa Ana Boulevard, 3rd Floor
Santa Ana, CA 92701

RE: Notice of Preparation of a Program Environmental Impact Report – West Alton Development Plan

Dear Ms. Gould:

This letter responds to your December 19, 2014 Notice of Preparation and Notice of Scoping Meeting (NOP) for a project entitled “West Alton Development Plan” (Project).

As an initial matter, we note that the NOP contains several characterizations of existing agreements between the County and the City of Irvine (City), and of the parties’ rights and obligations with regard to entitlement processing for the Project. This letter does *not* respond to those characterizations. Rather, the City has confined its comments to the traditional and typical subject matter of NOP responses; namely, comments on the methodologies, thresholds of significance and other matters related to the preparation of a draft Environmental Impact Report (EIR) for the Project.

Based on its review of the NOP, City staff has the following comments:

General Comments

1. To implement the City of Irvine’s Regional Housing Allocation (RHNA), the City’s General Plan Housing Element calls for and the Zoning Ordinance requires that 15 percent of all new residential units in the City be affordable to very-low, low and moderate income households (5 percent each). Please indicate how and where this requirement will be satisfied through the proposed project.

Project Processing

2. Page 5, fourth paragraph. The penultimate sentence states, "Generally, the development plan will provide for subsequent approvals by the County of Orange Community Development Director..." Please explain what is meant by this sentence, including the types of approvals this would include.

Proposed Land Uses

3. Page 6. The proposed Project would add 970 dwelling units in Planning Area 51 on a parcel of property that is bisected by the Wildlife Corridor. Describe how the proposed Project is appropriate in density and intensity to the remainder of Planning Area 51. Please ensure the Draft EIR adequately analyzes the environmental impacts associated with this proposed increase in density, as well as any potential mitigation measures. Please also analyze in the Draft EIR the suitability and impacts of the proposed 5-story (70 feet maximum height) structures in light of the surrounding proposed land uses and currently permitted maximum structure height of 35 feet.

Off-Site Improvements

4. Page 6. This page references two off-site improvements that are required to serve the Project and will be provided as part of future development either implemented by the Project or funded by "fair share" contributions as part of the Project. The two improvements listed include Irvine Boulevard improvements and utility and storm drain system extensions and connections within Irvine Boulevard. However, there is no discussion of the improvements that may be needed to mitigate potential traffic impacts caused by the Project. Please provide this discussion.
5. Page 6. The improvements off of Irvine Boulevard along the Project frontage shall include landscaped medians to restrict driveway access due to the inherent safety concerns such as sight visibility, curvature of the road, and high vehicular speeds.

Potential City of Irvine Actions – Zoning Ordinance Amendment

6. Page 7, Section 3-37-39, bullet 2. The Project proposes a maximum residential density of 80 dwelling units/acre. The maximum residential density permitted elsewhere in the 8.1 Trails and Transit Oriented Development (TTOD) Zone is 50 dwelling units/acre. Please describe how the proposed ultra-high density is

appropriate given the maximum development intensities for all other properties in the vicinity and TTOD Zone of the Project site.

7. Page 7, Section 3-37-39, bullet 3. Please indicate the number of Average Daily Trips (ADT) proposed to be added to Planning Area 51. Also, clarify if a trip cap is being proposed. If so, indicate the proposed cap.

Project Alternatives

8. Page 7, Project Alternatives. Each alternative should clearly break down the land uses associated with that alternative (i.e., a description of the number of residential dwelling units, type of residential units, and for the Mixed Use Alternative (Alternative 2), the number of units and office square footage). Please clarify if the project traffic analysis will include the analysis of Alternatives 1, 2, and 3.

Anticipated Project Approvals

9. Page 8, Table 1. The second bullet under the County of Orange Board of Supervisors indicates approval of a Statement of Overriding Considerations. Has the County already determined that a Statement of Overriding Considerations is necessary?
10. Page 8, Table 1. The first bullet under the OC Planning Department indicates the department would approve Use Permits, Special Use Permits, and Variances, among others. Please differentiate the terms Use Permit and Special Use Permit and the types of uses they apply to.
11. Page 8, City of Irvine. For your information, approval of general plan amendments and zone changes require prior consideration and recommendation from the City of Irvine Planning Commission and approval by the City Council.
12. Page 8, City of Irvine. Revise the reference from the City of Irvine Planning and Development Services Department to the City of Irvine Community Development Department.
13. Please clarify the current and proposed zoning for the portion of the Project within the wildlife corridor

Environmental Analysis Checklist

14. The County's NOP should discuss the cumulative impacts, as well as applicable mitigation measures, for the identified potentially significant environmental impacts.

15. Pages 13-14, and 23, Biological Resources. The NOP states the Project would lead to potentially significant indirect impacts to sensitive species. Due to the Project's proximity to the Wildlife Corridor and inclusion of a portion of the Wildlife Corridor on the Project site, please explain why potential impacts are limited to only indirect (versus direct) impacts. The NOP also states the Draft EIR will evaluate potential indirect impacts to the Reserve Area. Like the analysis of the potential impacts to sensitive species, the Draft EIR analysis should not be limited to indirect impacts where direct impacts to the Reserve Area may occur due to the Project site's close proximity to the Reserve Area.
16. Pages 15 and 26, Greenhouse Gas Emissions. The NOP states it will evaluate whether the Project is consistent with State and local plans and policies for reducing greenhouse gas (GHG) emissions—while the City agrees this analysis is necessary—compliance with local plans and policies for reducing GHG emissions does not eliminate the need for further mitigation. The scope of the Draft EIR should address the impacts of GHG generated by the Project on nearby land uses including the Orange County Great Park.
17. Pages 15 and 26-27, Hazards and Hazardous Materials, subsection (c). The NOP states the potential Project impact due to hazardous emissions, hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a proposed school is less than significant. In support of this determination, the NOP states the "Project does not propose any activities that would result in the exposure of hazardous materials." However, that statement is directly contradicted by the County's response for Subsection (a) where it states the proposed Project's proposed land uses would utilize hazardous materials for "operation and maintenance." Please clarify that discrepancy to ensure the Draft EIR adequately analyzes the impact of hazards and hazardous materials.
18. Page 30, Land Use and Planning. In subsection (b), please ensure that the Draft EIR will assess the Project's consistency with the City of Irvine General Plan and Zoning Ordinance.
19. Pages 18 and 32, Recreation, subsections a. & b. Both subsections indicate a "Less than Significant Impact." The proposed addition of 970 dwelling units at the Project site will require park facilities. As such, the appropriate response to those subsections should be either "Potential Significant Impact" or "Less than Significant Impact/MM." The City of Irvine requires the provision of parks at a rate of five acres per 1,000 residents (two acres community parks/three acres neighborhood parks). For your information, the proposed Project would require the provision of approximately seven acres of parks as a component of the project per City standards.

20. Page 32, Transportation/Traffic. Separate from the circulated NOP, a copy of the proposed traffic analysis scope of work must be submitted for the City's review and approval prior to commencement of the traffic study. Comments regarding the scope of work will be provided independent of the NOP comments. Generally, the traffic analysis shall follow the methodology, performance and scoping criteria of the North Irvine Transportation Mitigation (NITM) Program since this project resides within the NITM Program area. In addition to the comprehensive traffic analysis, the proposed access points require the review and approval consistent with the City Transportation Design Procedures (February 2007).
21. Page 32, Transportation/Traffic. Since the proposed development is adjacent to a Wildlife Corridor, clarify the County's plans for addressing the concerns over wildlife and human contact, especially with increased traffic volume (vehicles, pedestrian and bicyclists) and the siting of proposed residences directly adjacent to the corridor.
22. The NOP lists various references, yet not all of those references were referred to in the discussion sections of the NOP. The City has not thoroughly reviewed the listed references, but preliminarily notes that the reference to the City's Zoning Ordinance should indicate that it was last updated in December of 2013, not October.

Thank you for the opportunity to review and comment on the NOP. The City is extremely interested in the proposed project and welcomes the opportunity to review future documents as the process progresses. Please feel free to contact me at 949-724-6363 or by email at tgehrich@cityofirvine.org.

Sincerely,



Tim Gehrich
Acting Director of Community Development

cc: City Council
Sean Joyce, City Manager
Sharon Landers, Assistant City Manager
Eric Tolles, Assistant City Manager
Manuel Gomez, Director of Public Works
Barry Curtis, Manager of Planning Services
Bill Jacobs, Principal Planner
David Law, Senior Planner



January 22, 2015

Channary Gould
County of Orange – CEO Real Estate / Land Development
333 W. Santa Ana Blvd, 3rd Floor
Santa Ana, CA 92701

Mayor
Dwight Robinson

Mayor Pro Tem
Adam Nick

Council Members
David A. Bass
Kathryn McCullough
Scott Voigts

City Manager
Robert C. Dunek

Re: Notice of Preparation of a Program Environmental Impact Report for the West Alton Development Plan

Dear Ms. Gould:

The City of Lake Forest has reviewed the Notice of Preparation of an Environmental Impact Report for the West Alton Development Plan, consisting of 44.16 acres located within the City of Irvine northwest of the intersection of Alton Parkway and Irvine Boulevard. The parcel includes a wildlife movement corridor and an Orange County Flood Control District (OCFCD) drainage outlet structure, which occupy 11.84 acres, splitting the developable area to 21.98 acres and 10.34 acres, respectively, and resulting in 32.32 net development acres.

The Project proposes a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking.

To accommodate the proposed development, the County must obtain a General Plan Amendment and Zone Change from the City of Irvine. These changes consist of adding area 8.1D Trails and Transit-Oriented Development, County of Orange Great Park Neighborhood West Alton Project to the General Plan and Zoning Ordinance, as well as a revision to Section 3-37-39.B.1 to allow up to 80 dwelling units per net acre within area 8.1D. This would result in an overall increase the total maximum average daily trips (ADTs) in Planning Area 51.

There would also be changes to Section 9-51 of the Irvine Zoning Ordinance, (Planning Area 51 (Orange County Great Park)), to allow for the proposed Project, including, but not limited to: Revisions to the Zoning Ordinance Map for Planning Area 51, as well as to the 8.1, Trails and Transit Oriented Development Zoning District Intensity to reflect the Project.

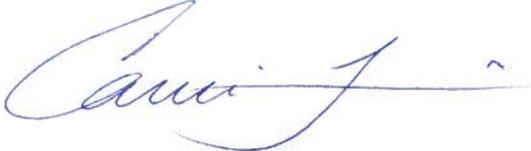
The City of Lake Forest has the following comments:

1. The following the extended study area intersections in the City of Lake Forest should be included in the project build-out year analysis. This analysis will determine if any of the previously identified mitigation measures are needed prior to 2030 as a result of the project. Please verify that the following intersections have been included:
 - a. Bake Parkway / Irvine Blvd – Trabuco Road
 - b. Jeronimo Road / Bake Pkwy.
 - c. Lake Forest Dr / Muirlands Blvd.
 - d. Rockfield Blvd / Lake Forest Dr.

2. This project is within the North Irvine Transportation Mitigation program. The completion of Portola Parkway from State Route 241 to Alton Parkway in the City of Lake Forest is listed on the Master Plan of Arterial Highways in the Circulation Plan of the Irvine General Plan. Please include analysis of this project using the Irvine Transportation Analysis Model with regard to the completion of the segment of Portola Parkway between State Route 241 and Alton Parkway.

If you have any questions, please contact me at (949) 461-3466, or by email by ctai@lakeforestca.gov.

Sincerely,
CITY OF LAKE FOREST

A handwritten signature in blue ink, appearing to read "Carrie Tai", with a long horizontal flourish extending to the right.

Carrie Tai, AICP
Senior Planner

Cc: File



May 8, 2015

Via U.S. Mail and Email

Channary Gould, Real Estate Development Manager
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701
Email: Channary.Gould@ocgov.com

Subject: Notice of Preparation – West Alton Development Plan

Dear Ms. Gould:

On behalf of the City of Laguna Beach (“City”), this letter provides preliminary comments on the County of Orange’s Notice of Preparation (“NOP”) of a draft environmental impact report (“EIR”) for the West Alton Development Plan (“Project”).

The County’s proposed Project is located within the City of Irvine’s jurisdiction, on land formerly within the MCAS El Toro, northwest of the intersection of Alton Parkway and Irvine Boulevard. The Project is bound by Irvine Boulevard on the southwest; existing business/industrial buildings and water district facilities on the south and southeast; and open space property to the north. The Project would encompass approximately 44 acres.

The Project includes the proposed West Alton development plan. According to the NOP,

“The Project proposes a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking. The wildlife movement corridor would be protected onsite.”

According to the NOP, the Project has the potential to cause a number of significant short-term, long-term and cumulative environmental impacts. The County has determined that an EIR is required.

1. Consultation with the City concerning this Project's traffic, recreation, and open space impacts is required, yet the City did not receive timely notice of and an opportunity to comment on the NOP.

On April 27, 2015, the City of Laguna Beach became aware of two projects proposed by the County of Orange, for which Notices of Preparation were distributed on November 7, 2014 and December 19, 2014, respectively. The deadline for written comments on the NOP for the Project was January 19, 2015. The City of Laguna Beach was not provided an opportunity to comment on these NOPs, despite the strong likelihood that these projects will cause significant direct, indirect, and cumulative impacts to City transportation and recreation facilities. In response to a request by Christa Johnson, Assistant City Manager, on April 29, 2015, the County provided the City a web link to obtain copies of the NOP for the Project.

As demonstrated by prior traffic studies and other environmental analyses, the City of Laguna Beach is an affected agency with roadway segments within the impact boundaries of the Project and has an interest in wildlife movement to and from the expansive open space lands surrounding our City. These open spaces areas are precious resources that Laguna Beach residents have generously funded through special taxes. Unfortunately, not only was the City not provided an opportunity to comment on the NOP, the County did not consult with the City to determine information on the Project's effects on the City. In this context, we thank the County for agreeing to accept these comments on the NOP as timely.

Because the County has already correctly determined that the Project is one of regional and areawide significance, a scoping meeting is required pursuant to Public Resources Code, section 21083.9. The scoping meeting that, according to the NOP, was held November 21, 2014 was inadequate because the City and other affected agencies were not provided adequate notice of this meeting or an opportunity to participate in Draft EIR scoping.

Further, because the City exercises authority over resources which may be affected by the Project, including transportation facilities within its jurisdiction which could be affected, the County is required to consult with the City concerning potential effects to those resources. (CEQA Guidelines, § 15086(a).) We hereby request consultation concerning the Project's impacts to SR133 and other potentially impacted transportation facilities within the City and to the area's open space and wildlife habitat resources.

Pursuant to Public Resources Code, section 21092.2, we also request notice of all stages of environmental review for the Project and any and all actions that the County proposes to take on this Project. Please send any and all notices via email to the following persons:

- a) The undersigned, at alarson@lagunabeachcity.net;
- b) Christa Johnson, Assistant City Manager, cjohnson@lagunabeachcity.net; and
- c) Jason Holder, outside legal counsel retained for this matter, jason@holderecolaw.com.

Additionally, please send paper copies of notice documents solely to the undersigned.

2. The Draft EIR must adequately analyze the Project's potentially significant impacts to City transportation and recreation facilities.

The Draft EIR should include an analysis of the following potential environmental impacts that could affect the City:

- 1) Impacts of conversion of non-residential development intensity to residential uses.¹
- 2) Weekend and off-peak traffic impacts on SR133 beyond SR73 into the City of Laguna Beach and impacts on recreation facilities including its parks and beaches as a result of additional residential uses.
- 3) Secondary effects associated with the increase in traffic and recreation impacts to Laguna Beach including but not limited to increased demand for limited parking, increased demand for police, fire and lifeguard services, and the related strains on Laguna Beach's limited facilities and resources.
- 4) Cumulative weekend and off-peak traffic impacts to SR133 past SR73 into Laguna Beach and cumulative secondary impacts to parking, police, fire and lifeguard services as a result of approved uses within the City of Irvine Great Park, the expansion of the Musick Jail facility, and other recently proposed and built projects in the vicinity of these projects.

Additionally, we request that all technical support for the above analyses be included in appendices to the Draft EIR.

If you have any questions, you can reach me at (949) 497-0320 and at alarson@lagunabeachcity.net.

Sincerely,



Ann Larson

Planning Manager

Community Development

cc: John Pietig, City Manager
Christa Johnson, Assistant City Manager
Steve May, Director of Public Works and City Engineer
Greg Pfost, Director of Community Development

¹ Residential uses have different impacts than nonresidential uses. For example, the traffic intensity and patterns differ with residential uses and residential uses increase demand for recreational facilities.



July 10, 2015

Via U.S. Mail and Email

Channary Gould, Real Estate Development Manager
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701
Email: Channary.Gould@ocgov.com

Subject: Additional Comments Concerning Notice of Preparation – West Alton Development Plan

Dear Ms. Gould:

On behalf of the City of Laguna Beach (“City”), this letter provides additional comments on the County of Orange’s Notice of Preparation (“NOP”) of a draft environmental impact report (“EIR”) for the West Alton Development Plan (“Project”). These additional comments follow from and incorporate the City’s preliminary comments on the Project, provided in a letter to you dated May 8, 2015.

In apparent response to the City’s prior letter concerning both this NOP and another NOP for a County-proposed project, the County scheduled a scoping meeting for June 26, 2015. On the morning of the scoping meeting, however, you sent me an email stating that the scoping meeting had been cancelled. The County’s notice attached to your email did not provide any reasons for the cancellation or indicate whether the meeting would be rescheduled. Your email also did not provide these explanations. Because the County cancelled the scoping meeting for this Project’s EIR, and there is no indication that the County will reschedule the scoping meeting, the City is submitting these additional written comments.

Please provide any responses to this letter to the persons identified in the City’s initial NOP letter as well as to Dan Smith, the traffic consultant retained by the City for this matter. Mr. Smith’s contact information is as follows:

Smith Engineering & Management
c/o Dan Smith, Principal
5311 Lowry Road
Union City CA 94587
Tel.: 510 489-9477
Fax: 510 489-9478
Email: Dantsmithj@aol.com

1. The County has not complied with CEQA's mandatory requirements for consulting with responsible agencies and for conducting scoping meetings.

As indicated in our preliminary comments, the scoping meeting that, according to the NOP, was held November 21, 2014 was inadequate because the City and other affected agencies were not provided adequate notice of this meeting or an opportunity to participate in Draft EIR scoping. Subsequently, in mid-June 2015, the City received notice of a second scoping meeting to be held on June 26, 2015. That notice stated that that the County had received a request for additional scoping opportunities and that in response to that request, a scoping meeting would be held to address the EIRs for this Project and another proposed Project in the area. The City was prepared to attend this second scoping meeting to provide additional comments for consideration and inclusion in the draft EIRs. However at 11:59 a.m. on June 26, the day of the scoping meeting, the City received an email from you indicating that the scoping meeting had been cancelled due to unforeseen circumstances, and that additional comments would be accepted by mail.

As indicated in our preliminary comment letter, because the City exercises authority over resources that may be affected by the Project, including transportation facilities within its jurisdiction which could be affected, the County is required to consult with the City concerning potential effects to those resources. (CEQA Guidelines, § 15086(a).) We again request consultation concerning the Project's impacts to SR 133 and other potentially impacted transportation facilities within the City and to the area's open space and wildlife habitat resources. As the City has previously requested, and in accordance with Public Resources Code, sections 21080.4 and 21083.9 and CEQA Guidelines, section 15082(c), this required consultation should be accomplished through one or more additional scoping meetings.

2. The City has several requests for traffic, recreation, open space, and biological resource impact analysis.

As previously requested, the Draft EIR for the Project must include a thorough analysis of four areas of potential environmental impacts that could affect the City. All technical support for these analyses must be included in appendices to the Draft EIR.

In addition to the previous comments, the City requests that the traffic analysis include and consider summer-time traffic counts for the weekend (so called "off-peak" traffic) on SR 133 (Laguna Canyon Road). More specifically, the City requests that traffic counts be conducted at the following intersections, and that the Project's traffic impacts be studied at these locations:

(Going from south to north, all the major intersections and a sampling of the minor ones from the beach to north City limits.)

- (1) Broadway and Pacific Coast Highway;
- (2) Laguna Canyon Road – Broadway – Third Street;

- (3) Laguna Canyon Road – Canyon Acres Drive;
- (4) Laguna Canyon Road – El Toro Road; and
- (5) Laguna Canyon Road – Route 73 ramps (both sides).

The City also requests that the traffic analysis include and consider summer-time traffic counts for the weekend along El Toro Road, north of Laguna Canyon Road, at the following intersections:

- (6) El Toro Road – RT 73 ramps (both sides)
- (7) El Toro Road – The Club Drive – Bells Vireo Lane
- (8) El Toro Road – Canyon Hill Drive
- (9) El Toro Road – Aliso Creek Road
- (10) El Toro Road – Calle Corta

The City also requests that the County conduct traffic counts and impact analysis at several of the small streets that have no other way in or out other than the intersections with Laguna Canyon Road. These small streets include: Castle Rock Road, Stan Oakes Drive, Sun Valley Drive, Stan's Lane, Phillips Street, and Willow Canyon Road. The City requests this analysis as representative of the problems faced by people who have no option for getting in or out except via a minor street intersection with Laguna Canyon Road.

These summer-time traffic counts are essential for the analysis of Project-related direct, indirect, and cumulative traffic impacts because traffic on SR 133 and El Toro Road has become increasingly worse when the City's seasonal art festivals are in session (from July through August) and when the weather is warm (May through October). The City's art festivals and its beaches and parks attract residents from inland areas, including from the former El Toro Marine Base area. The Project, and other similar development projects in the area, will increase the amount of summer weekend traffic in Laguna Beach, causing increased traffic congestion and increased demand for and wear and tear on the City's open space and recreation facilities. Summer traffic counts are critical to analyze the worst case impacts of the Project and other proposed projects on the City's roads and recreation facilities.

Finally, the City is very concerned about potential impacts to the Laguna Greenbelt, a 22,000-acre system of parks and preserves, in and around the City of Laguna Beach. A number of environmental organizations and the City have been working to make sure that there is trail and wildlife connectivity across the Great Park. The County's proposed Project straddles the Alton Parkway wildlife movement corridor, potentially impacting and risking this connectivity between parks and preserves, including those within the City of Laguna Beach. The Draft EIR must analyze impacts from the Project, including, but not limited to, the effects of light, noise, urban runoff, domestic pets and human

activity to the habitats of the wildlife corridor and the animals that might use it. The Draft EIR must also describe all feasible mitigation measures to reduce those impacts to less-than-significant levels. This analysis must be performed by biologists with expertise in wildlife movement and must be substantiated with technical analysis made available for public review.

The City has engaged legal counsel, Jason Holder of Holder Law Group, and a traffic engineering consultant, Dan Smith of Smith Engineering & Management, to assist the City in evaluating the Project's potential impacts that could affect the City and to identify feasible mitigation measures that the County could adopt to reduce or eliminate any and all significant impacts. The City may also retain a biologist or other experts to assist in evaluating the Project's possible impacts to the wildlife, parks, and open space preserves in Laguna Beach.

* * *

If you have any questions, or if you would like to reschedule the scoping meeting for a mutually convenient time, you can reach me at (949) 497-0320 and at alarson@lagunabeachcity.net.

Sincerely,



Ann Larson
Assistant Director
Community Development

Attachment: May 8, 2015 Comment Letter on NOP- West Alton Development Plan

cc: John Pietig, City Manager
Christa Johnson, Assistant City Manager
Steve May, Director of Public Works and City Engineer
Greg Pfof, Director of Community Development
Jason Holder, special outside counsel (via email)
Dan Smith, traffic consultant (via email)

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



January 8, 2015

Channary Gould
Orange County CEO Real Estate/Land Development
333 W. Santa Ana Blvd., 3rd Floor
Santa Ana, CA 92701

RE: SCH # 2014121065 West Alton Development Plan, Orange County.

Dear Mr. Gould,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **USGS 7.5-minute quadrangle name, township, range, and section required**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez
Associate Government Program Analyst

CC: State Clearinghouse

**Native American Contacts
Orange County
January 7, 2015**

Juaneno Band of Mission Indians Acjachemen
David Belardes, Chairperson
32161 Avenida Los Amigos Juaneno
San Juan Capistrano CA 92675
chiefdavidbelardes@yahoo.
(949) 493-4933 Home
(949) 293-8522

Juaneno Band of Mission Indians
Anita Espinoza
639 Holten Road Juaneno
Talent , Or 97540
neta777@sbcglobal.net
(505) 310-5850 Cell

Juaneno Band of Mission Indians Acjachemen
Teresa Romero, Chairwoman
31411-A La Matanza Street Juaneno
San Juan Capistrano CA 92675
(949) 488-3484
(949) 488-3294 Fax
(530) 354-5876 Cell

United Coalition to Protect Panhe (UCPP)
Rebecca Robles
119 Avenida San Fernando Juaneno
San Clemente CA 92672
rebrobles1@gmail.com
(949) 573-3138

Juaneno Band of Mission Indians
Adolph 'Bud' Sepulveda, Vice Chairperson
P.O. Box 25828 Juaneno
Santa Ana , CA 92799
bssepul@yahoo.net
(714) 838-3270
(714) 914-1812 Cell

Juaneno Band of Mission Indians Acjachemen Nation
Joyce Perry, Representing Tribal Chairperson
4955 Paseo Segovia Juaneno
Irvine , CA 92612
kaamalam@gmail.com
(949) 293-8522

Juaneño Band of Mission Indians
Sonia Johnston, Tribal Chairperson
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
sonia.johnston@sbcglobal.
(714) 323-8312
(714) 998-0721

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH #2014121065 West Alton Development Plan, Orange County.



1919 S. State College Blvd.
Anaheim, CA 92806-6114

A  Sempra Energy utility

February 27, 2015

County of Orange Real Estate/Land Development
333 W. Santa Ana Blvd
Santa Ana, CA 92701

Attn: Channary Gould

Subject: Environmental Impact Report Preparation for West Alton Development Plan; Irvine

Thank you for providing the opportunity to respond to this Environmental Document. This letter is not to be interpreted as a contractual commitment to serve the proposed project but only as an information service. Its intent is to notify you that the Southern California Gas Company has facilities in the area where the above named project is proposed. Gas facilities within the service area of the project could be installed, altered or abandoned as necessary without any significant impact on the environment.

The availability of natural gas service is based upon conditions of gas supply and regulatory agencies. As a Public Utility, Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. Our ability to serve can also be affected by actions of federal regulatory agencies. Should these agencies take any action, which affect gas supply or the conditions under which service is available, gas service will be provided in accordance with the revised conditions.

This letter is also provided without considering any conditions or non-utility laws and regulations (such as environmental regulations), which could affect construction of a main and/or service line extension (i.e., if hazardous wastes were encountered in the process of installing the line). The regulations can only be determined around the time contractual arrangements are made and construction has begun.

Information regarding construction particulars and any costs associated with initiating service may be obtained by contacting our area Service Center at 800-427-2200.

Sincerely,

A handwritten signature in black ink, appearing to read "Miguel Calderon".

Miguel Calderon
Technical Services Supervisor
Southeast Region - Anaheim Planning & Engineering



Laguna Greenbelt, Inc.

a non-profit corporation

March 2, 2015

Channary Gould
County of Orange – CEO Real Estate/OC Land Development
333 W. Santa Ana Boulevard
Santa Ana, CA 92701
channary.gould@ocgov.com

RE: West Alton Development Plan NOP

Dear Ms Gould,

Laguna Greenbelt, Inc. is a grassroots organization, dedicated since 1968 to the preservation of natural lands in Orange County, especially the coastal canyons near Laguna Beach. The resulting 22,000-acre system of state and county parks and preserves is known locally and in the Orange County Resources Element as the Laguna Greenbelt. However, urban development has isolated it from habitat lands in the Santa Ana Mtns. foothills and the Cleveland National Forest.

During the last four years, we and a coalition of other environmental organizations (Endangered Habits League, Friends of Harbors, Beaches & Parks, California Native Plants Society- Orange County section, Laguna Canyon Foundation, Natural Resources Defense Council, Sea and Sage Audubon Society) have worked intensively to make sure that the Irvine Wildlife Corridor connection across the closed MCAS El Toro will be built. The proposed intensive West Alton development straddles the Alton Parkway wildlife movement corridor, and is of great concern.

We request that the following issues be covered in the project DEIR:

Alton Wildlife Movement Corridor

Discuss in detail the protective measures to effectively insulate the wildlife corridor from stray light, urban noise, urban runoff, stray pets and human intrusions. The site plan, figure 4, is far too sketchy to even suggest the necessary protection. These measures should be compared to the combination of screening vegetation, high berm and fences that will be employed in the segments of the corridor that abut Heritage Fields Neighborhoods. These were vetted by wildlife movement specialists and adopted in November, 2013, by the Irvine City Council.

Explain how non-flying wildlife in the approved Wildlife Corridor Plan will access the 900-acre FBI property NCCP/HCP natural area across this parcel.

Explain how non-flying wildlife in the Alton wildlife movement corridor moving to the Eastern Alton parcel will access the 900-acre FBI property NCCP/HCP natural area; detailing all wildlife culverts under Alton Blvd and associated protective fencing.

Explain how zoning the Eastern Alton parcel 1.1 (exclusive agriculture) allows for retention of existing habitat for wildlife, including the federally threatened California Gnatcatcher (CAGN).

Describe the biological value of the Eastern Alton parcel, especially the CAGN population. In separating the East Alton parcel from the 1000-acre FBI parcel, the extension of Alton Pkwy split the highest density CAGN population in the entire OC Coastal Central NCCP/HCP.

Explain how zoning the Eastern Alton parcel 1.1 (exclusive agriculture) is consistent with permitted uses in the NCCP/HCP, of which it is a part. Any inconsistency merits changing CEQA checklist items 10(c) and 4(f) to 'Potentially Significant Impact.'

Explain any particular restrictions on property abutting the Alton wildlife corridor, itself a mitigation area; and discuss the consequences of failure of that mitigation.

Our copy of the Central-Coastal NCCP/HCP does not list agriculture (crops) as a permitted use within the reserve system. Assuming there is a desire on the part of the community for continued agricultural fields in the area, and Eastern Alton is not available, we suggest studying an Alternative 5: Intensive Agriculture & Farmer's Market.

Sustainability/Community Structure

Explain how the project would qualify as Transit Oriented Development and what public transit options would be available onsite.

Explain specifically how green infrastructure and low-impact development (LID) principles and approaches will be incorporated into this project to reduce water consumption and stormwater pollution, especially in this period of severe drought.

Explain how the proposed design, scale, and placement of the wildlife corridor and the proposed development, in relation to each other as well as the neighboring parcels and pathways to and from which wildlife is expected to travel, achieves the goal of encouraging and increasing the likelihood of safe transit for wildlife across the property.

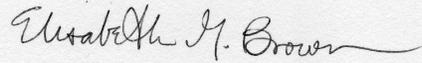
Finally, a few observations:

The NOP refers to the 'FAA' property, but the FBI became the new Custodians in June, 2012.

Also, although the Central/Coastal Orange County Subregion of the Coastal Sage Scrub NCCP area is much larger, the actual NCCP Reserve is about 38,000 acres. The reserve is split almost equally between 20,000 acres in the Central subarea, and 18,000 acres in the Coastal subarea. A functional Irvine Wildlife Corridor will connect the two subareas for the first time.

Thank you for the opportunity to comment on this important project. We learned about the NOP for the first time on February 24.

Sincerely,

A handwritten signature in cursive script that reads "Elisabeth M. Brown". The signature is written in black ink on a light-colored, textured background.

Elisabeth M. Brown, PhD
President
Laguna Greenbelt, Inc.

Damon Nagami
Senior Attorney
Director, Southern California Ecosystems Project
Natural Resources Defense Council

Celia Kutcher
Conservation Chair
California Native Plant Society, Orange County Chapter

Dan Silver
Executive Director
Endangered Habitats League

Susan Sheakley
Conservation Chair
Sea and Sage Audubon Society

Hallie Jones
Executive Director
Laguna Canyon Foundation

Jean Watt
President
Friends of Harbors, Beaches & Parks



November 6, 2015

Eric E. Hull

By email: eric.hull@ocgov.com

West Alton NOP additional comments after Scoping Hearing of 10/23/2015

Thank you for the opportunity to submit these comments.

The range of alternatives in the NOP is too narrow. Besides the No Project alternative, the three other alternatives focus on residential uses, and the NOP ignores a range of other possible uses more suited for this parcel by virtue of its isolated geographic location and adjacent land uses (Musick Jail complex, FBI training and shooting ranges in habitat land, Irvine and Alton Blvds).

The West Alton parcel is a buffer between the future human-intensive uses surrounding the Great Park and the parks of the foothills and Santa Ana mountains/Cleveland National Forest. Alternatives of a wider range of more compatible land uses should be included in the EIR; including continuing agriculture, veterans' cemetery, golf course, industrial park, etc. These seemingly disparate land uses share some common attributes: absence of domestic pets and recreation; little human activity in the evenings and weekends; all leading to quiet and dark conditions that encourage wildlife activity.

The more 'green' alternatives (cemetery, golf course, agriculture) could facilitate wildlife recruitment into the wildlife corridor. This might reduce the amount of wildlife entering residential areas bordering the foothills as they attempt to move coastward.

The defining feature of the parcel is the existing 11.43-acre Wildlife Corridor Link between Borrego Canyon Wash and the Orange County Great Park wildlife corridor (Alton HHMP), mitigation for the extension of Alton Parkway. *Every alternative must explore in depth the impacts of all proposed land uses on the functionality of this wildlife corridor.* 'Protecting it in place' by pretending that a chain link fence will prevent intrusive light, noise, domestic pets and possible human intrusion, is inadequate. *The bottom line for evaluating alternative land uses must be how each one facilitates or hinders the functionality of the wildlife corridor.*

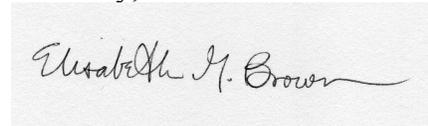
The Coast to Cleveland Wildlife Corridor is a 6-mile wildlife corridor that includes the OC Great Park Corridor (178 acres of habitat) and the narrow Alton Wildlife Corridor Link. The corridor is described at wildlifecorridor.org. It will restore the vital genetic link between Limestone Canyon in the foothills of the Santa Ana mountains and Cleveland National Forest, and 22,000 acres of open space containing two County wilderness parks- Laguna Coast and Aliso and Wood Canyons; Crystal Cove State Park (bought for \$32 million in the early 1980s); City of Irvine's Shady and Bommer Canyons Preserve; and Upper Newport Bay State and County Reserves. About 18,000 acres of this land is the Coastal subarea of the Orange County NCCP (Nature Reserve of Orange County). The 20,000-acre Central subarea is not functionally connected to Coastal for any wildlife except possibly some bird species.

Failure of the Alton Wildlife Corridor Link, through incompatible land uses on the West Alton parcel, will lead to the inevitable destruction by trophic collapse of the ecosystems of the above-mentioned parks and preserves in the Coastal subarea. The first significant signs of this have already been detected. The population of the only two animals whose DNA has been studied- Bobcat and Coastal Cactus Wren- show that they are already isolated and distinct from other populations in Orange and San Diego counties. Furthermore, the population of cactus wrens never recovered from the 1993 Laguna fire, and hovers at 15% of pre-fire levels.

We look forward to an EIR that robustly examines the alternatives we have discussed above.

If there are questions or you would like to discuss these comments, please contact us.

Sincerely,

A rectangular area containing a handwritten signature in black ink. The signature reads "Elisabeth M. Brown" in a cursive script.

Elisabeth M. Brown, Ph.D., President
Laguna Greenbelt, Inc.
lagunagreenbelt@gmail.com



Scoping Meeting

Notice of Preparation of an Environmental Impact Report

Purpose of Today's Meeting

The County of Orange is lead agency for the preparation of an Environmental Impact Report ("EIR") that will address the potential environmental effects of approving the West Alton Development Plan. The EIR is being prepared pursuant to the California Environmental Quality Act ("CEQA"). This scoping meeting provides the opportunity for responsible agencies and the public to learn about the Project and then provide input on the scope of issues that the EIR should analyze.

Project Location

The Project site is located on County owned property within the City of Irvine on the former Marine Corps Air Station (MCAS) El Toro, northwest of the intersection of Alton Parkway and Irvine Boulevard. Magazine Road traverses the site in a west-east direction. The Project is bound by Irvine Boulevard on the southwest; existing business/industrial buildings and Irvine Ranch Water District (IRWD) facilities on the south and southeast; and open space property—which is part of the Reserve Area for the Central-Coastal Subregion Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) and owned by the Federal Aviation Administration (FAA)—to the north.

Project Background

Following closure of the former MCAS El Toro, on March 4, 2003, the County of Orange, the City of Irvine, and the Irvine Redevelopment Agency entered into a three-party, Property Tax Transfer and Pre-Annexation Agreement (Pre-Annexation Agreement) regarding the annexation and reuse of El Toro. As part of the Pre-Annexation Agreement, the City of Irvine agreed to provide certain lands to the County of Orange. The Project site was included in the parcels to be conveyed by the City to the County as part of the Pre-Annexation Agreement. Consistent with the Pre-Annexation Agreement, the "County shall retain exclusive land use control over [its parcels within the Former MCAS EL Toro], and shall be entitled to place any development upon said parcels that County shall determine to be desirable for County's needs, as though said property remained unincorporated...". Upon the County's approval of a Project, the City of Irvine will zone the County's parcels and designate them in Irvine's General Plan in accordance with County's direction.

Description of the Project

The Project proposes a multi-family development, with an average of 30 units per acre. A total of 970 multi-family units are proposed. North of the wildlife movement corridor, approximately 660 units would be constructed, with the remaining 310 units being located south of the wildlife movement corridor. The units would be up to 5 stories (70 feet maximum height) with both surface and garage parking. The wildlife movement corridor would be protected onsite.

General infrastructure will be provided on site to support the proposed Project, including streets; storm drain system improvements (including storm water detention and treatment systems); and utility lines for sewer, domestic water, recycled water, gas, electrical, communication, and closed circuit television services.

Upon Project approval consistent with the Pre-Annexation Agreement, the Orange County Board of Supervisors will recommend changes to the City of Irvine General Plan and Zoning Ordinance. The General Plan Amendment would include revisions to Table A-1 in the City of Irvine Land Use Element to allow for the Project within the proposed 8.1D zone. Changes to the Irvine Zoning Code would also be needed to implement the densities and character of the Project.

Scope of the EIR

The County of Orange prepared a Notice of Preparation (“NOP”) to solicit comments from potential Responsible and Trustee Agencies on Project-related concerns relevant to each agency’s statutory responsibilities. As part of that process the County prepared an Initial Study that identifies that the Project may have potential significant environmental impacts for the following topical areas; therefore, they need to be addressed in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation/Traffic
- Utilities and Service Systems

Additionally, while the Initial Study concludes that there will be no significant Project impacts, the County intends to provide more detailed information on the following topics in the EIR:

- Geology and Soils
- Hydrology and Water Quality
- Recreation

Based on the Initial Study, the Project would not result in any potentially significant effects with respect to the following areas, and they do not require further analysis in the EIR:

- Mineral Resources

For more information on the Project, the Notice of Preparation is posted on the County of Orange website at: http://ocgov.com/gov/ceo/real_estate/currentplans.

Project Schedule

The following are the anticipated key dates for the processing of the Project:

- December 19, 2014 – January 19, 2015 - Public Comment Period on the Notice of Preparation
- Late Summer/Fall 2015 - Public Review of the Draft EIR
- Fall 2015 – Response to Public Comments on the Draft EIR
- Late 2015/Early 2016—Certification of the Final EIR and Action on the Project

Upon certification of the EIR, the Orange County Board of Supervisors would consider whether to approve the Project or a feasible Project alternative. Pursuant to Section 2.2.4 of the Pre-Annexation Agreement, the City Council would be requested by the Orange County Board of Supervisors to adopt the County-proposed General Plan Amendment and amend the Zoning Ordinance.

Opportunities to Provide Input on the Project

In addition to submitting comments at this Scoping Meeting, the public is invited to provide its comments via mail and email during the 30-day public review period noticed in the NOP. The time period for submitting input on the issues that the West Alton Development Plan EIR should analyze is from December 19, 2014 through January 19, 2015. Comments on the NOP can be emailed to channary.gould@ocgov.com or mailed to Ms. Channary Gould, County of Orange - CEO Real Estate/Land Development, 333 W. Santa Ana Blvd, 3rd Floor, Santa Ana, CA 92701. The County will accept comments regarding the NOP through the close of business on January 19, 2015.

There will be additional opportunities to provide input during the EIR public review process. The EIR will be distributed for a 45-day public review, which is expected to occur in late summer or fall of 2015. All comments received during the public review period will be forwarded to the decision-makers and comments on substantive environmental issues will be responded to in writing. The responses to comments become part of the Final EIR. As part of the EIR certification process, you will have an opportunity to provide testimony at the public hearings before the Orange County Planning Commission and the Orange County Board of Supervisors.

Ms. Channary Gould
County of Orange
OC CEO Real Estate/Land Development
333 W. Santa Ana Blvd, 3rd Floor
Santa Ana, CA 92701
