



FINAL | NOVEMBER 2019



Rancho Santa Margarita General Plan Update

ENVIRONMENTAL IMPACT REPORT



FINAL

ENVIRONMENTAL IMPACT REPORT

Rancho Santa Margarita General Plan Update



State Clearinghouse No. 2018041075

LEAD AGENCY:

City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, California 92688
Contacts: Cheryl Kuta, Development Services Director
Wendy Starks, AICP, Principal Planner
949.635.1800

PREPARED BY:

Michael Baker International
5 Hutton Centre Drive, Suite 500
Santa Ana, California 92707
Contact: Mr. Eddie Torres
949.855.3612

November 2019

JN 152779

This document is designed for double-sided printing to conserve natural resources.



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1.0 INTRODUCTION

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Rancho Santa Margarita, as the lead agency, has evaluated the comments received on the Rancho Santa Margarita General Plan Update Public Review Draft EIR (Draft EIR) (State Clearinghouse Number [SCH No.] 2018041075).

The Draft EIR for the proposed Rancho Santa Margarita General Plan Update (General Plan Update or proposed project) was distributed to responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 60 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on April 19, 2019 and concluded on June 20, 2019.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Response to Comments
- Section 3.0 – Errata
- Section 4.0 – Mitigation Monitoring and Reporting Program

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes "significant new information" pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft EIR is not required.



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2.0 RESPONSE TO COMMENTS

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Rancho Santa Margarita, as the lead agency, evaluated the written comments received on the Draft Environmental Impact Report (EIR) (State Clearinghouse No. 2018041075) for the Rancho Santa Margarita General Plan Update (General Plan Update or proposed project) and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

A list of public agencies, organizations, and individuals that provided comments on the Draft EIR is presented below. Each comment has been assigned a number. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Table 2-1
List of Public Agencies, Organizations, and Individuals Commenting on the Draft EIR

Comment Letter No.	Agency, Organization, or Individual	Letter Dated
Public Agencies		
1	Scott Morgan, Director State Clearinghouse and Planning Unit Governor's Office of Planning and Research	June 21, 2019
2	Michael Mirelez, Cultural Resources Coordinator Torres-Martinez Desert Cahuilla Indians	June 11, 2019
3	Scott Shelley, Branch Chief Regional-IGR-Transit Planning California Department of Transportation District 12	June 19, 2019
4	Lijin Sun, J.D., Program Supervisor CEQA IGR South Coast Air Quality Management District	June 20, 2019
5	Virginia Gomez, Environmental Analyst Transportation Corridor Agencies	June 20, 2019
6	Fred W. Gius, CEG, Supervising Engineering Geologist Mineral Resources Program Manager California Geological Survey	June 20, 2019
Organizations and Individuals		
7	Albert Joseph Vacovsky Jr. and Patricia M. Vacovsky ¹	June 18, 2019
8	Bob and Joan Bartlett	June 5, 2019
9	David French	June 5, 2019
10	Kim French	June 5, 2019
11	Otar Bezashvili	June 5, 2019
12	Gary Biehl	June 6, 2019
13	Jim Fricks	June 6, 2019
14	Shawn Gordon	June 6, 2019
15	Gerardo and Julia Sanchez	June 6, 2019
16	Richard McWilliams and Beckie A. McWilliams	June 6, 2019
17	Richard Keenan	June 6, 2019



Table 2-1 (continued)
List of Public Agencies, Organizations, and Individuals Commenting on the Draft EIR

Comment Letter No.	Agency, Organization, or Individual	Letter Dated
18	William and Kathleen Ambrosius	June 9, 2019
19	William and Connie Cole	June 7, 2019
20	Robert M Collins	June 7, 2019
21	Dennis Dwight	June 7, 2019
22	Gary San Filippo	June 7, 2019
23	Jose and Lidia Marquez	June 7, 2019
24	Sandra and Michael Mindt	June 7, 2019
25	John Hall	June 10, 2019
26	Ernest Patrick and Marilyn Lawrence	June 10, 2019
27	Donald Chedwick	June 10, 2019
28	Hector Haget	June 10, 2019
29	Lawrence and Lori Gregson	June 10, 2019
30	Jade Orzol	June 10, 2019
31	Linda and Salim Sioufi	June 10, 2019
32	Chris McGee	June 10, 2019
33	Patricia McGee	June 10, 2019
34	Sharon Smith	June 10, 2019
35	Enrico Santamaria	June 10, 2019
36	Scott and Ann Nelson	June 11, 2019
37	David M Helman	June 11, 2019
38	Brian and Jennifer Slatterly	June 11, 2019
39	Michael Krasowski	June 11, 2019
40	Cheryl P. Evans	June 11, 2019
41	Peter and Jody Schloss	June 11, 2019
42	Bob Bartlett	June 11, 2019
43	Joan Bartlett	June 11, 2019
44	Mahmoud Ghafouri	June 12, 2019
45	David and Susana Castillo	June 12, 2019
46	Kent Hindes and Patti Smith	June 12, 2019
47	Gary Kratochvil	June 12, 2019
48	Julia Arneson	June 12, 2019
49	Greg Nowacki	June 12, 2019
50	Mark Nowacki	June 12, 2019
51	Renee Nowacki	June 12, 2019
52	Edward Stoll	June 12, 2019
53	Teresa Barrett-Bewley	June 13, 2019
54	Dassie Feingold	June 14, 2019
55	Julie and Gary James	June 15, 2019
56	Mark Heard	June 14, 2019
57	Rick M Heard	June 14, 2019
58	Beth Heard	June 14, 2019
59	Mitch and Lisa Gonzales	June 17, 2019
60	Mahmoud Ghafouri	June 17, 2019



Table 2-1 (continued)
List of Public Agencies, Organizations, and Individuals Commenting on the Draft EIR

Comment Letter No.	Agency, Organization, or Individual	Letter Dated
61	Trammell and Janice Hartzog	June 17, 2019
62	Joyce and John Diemer	June 17, 2019
63	David and Leslie Wilson	June 17, 2019
64	Patricia Kilwine Meikle and Ian Meikle	June 17, 2019
65	Keren and Pieter de Zwart	June 17, 2019
66	Natalie Soleno	June 17, 2019
67	Darrell Passwater	June 17, 2019
68	Scott Trafford	June 17, 2019
69	Pattie Gentile	June 17, 2019
70	Jack and Linda Riggs	June 18, 2019
71	Heidi and Mike Newell	June 18, 2019
72	Judi and Doug Leonard	June 18, 2019
73	Julie and Gary James	June 18, 2019
74	Lou Gallipeau	June 19, 2019
75	Brigitte Renee Lown	June 19, 2019
76	John Lown	June 19, 2019
77	Tony Bertocchini	June 19, 2019
78	John and Diana Salverson	June 19, 2019
79	Jamie Calhoun	June 19, 2019
80	Susan A. Piazza	June 19, 2019
81	Cindy Gildersleeve	June 19, 2019
82	Jan Rodick	June 20, 2019
83	Gary Lindquist	June 20, 2019
84	Boris Byk	June 20, 2019
85	Nina Byk	June 20, 2019
86	Neil Philis, Board of Directors Dove Canyon Master Association	June 19, 2019
87	Bobby Cox	June 20, 2019
88	Cesar Covarrubias, Executive Director The Kennedy Commission	June 20, 2019

¹ Note, Comment Letter 7 consists of copies of Comment Letters 73 and 75 and was sent by Albert Joseph Vacovsky Jr. and Patricia M. Vacovsky.



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Gavin Newsom
Governor

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

June 21, 2019

CITYRSM19JUN26PM 1:42

Wendy Starks
Rancho Santa Margarita, City of
22112 El Paseo
Rancho Santa Margarita, CA 92688

Subject: Rancho Santa Margarita General Plan Update
SCH#: 2018041075

Dear Wendy Starks:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 6/20/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

1-1

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet opr.ca.gov/2018041075/2> . Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency



Response No. 1

Scott Morgan, Director
State Clearinghouse and Planning Unit
Governor's Office of Planning and Research
June 21, 2019

1-1 The commenter indicates that the State Clearinghouse submitted the Draft Environmental Impact Report (Draft EIR) to selected State agencies for review, and that the comment period for the Draft EIR concluded on June 20, 2019 for State agencies. The comment indicates that as lead agency, the City of Rancho Santa Margarita complied with the review requirements for draft environmental documents pursuant to CEQA. This letter also refers to the State Clearinghouse CEQA database to retrieve State Agency Comments. Two State Agency letters were retrieved from the State Clearinghouse CEQA database and are included herein as Comment Letters 3 and 6. The comment does not provide specific comments regarding information presented in the Draft EIR and no further response is necessary.

Wendy Starks

From: Michael Mirelez <mmirelez@tmdci.org>
Sent: Tuesday, June 11, 2019 12:54 PM
To: Wendy Starks
Cc: Alberto Ramirez
Subject: Rancho Santa Margarita General Plan Update State Clearing House No. 2018041075
Attachments: Out- Rancho Santa Margarita General Plan Update State Clearing House .pdf

Torres Martinez Desert Cahuilla Indians appreciates your concern for cultural resource preservation in your project. Please consider the attachment file as the Tribe's official response to your project notification letter.

2-1

Respectfully,
Michael Mirelez
Cultural Resource Coordinator
Torres-Martinez DCI
Office: 760-397-0300 Ext:1213
Cell: 760-399-0022
Email:mmirelez@tmdci.org

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If the reader of this message is not the intended recipient, you are hereby notified that you have received this message in error and that any review, dissemination, distribution or copying of this message including any attachments is strictly prohibited. If you received this in error, please contact the sender and delete the material.



TORRES MARTINEZ DESERT CAHUILA INDIANS

P.O. Box 1160
Thermal, CA 92274
(760) 397-0300 – FAX (760) 397-8146

June 3, 2019

Attn: Wendy Starks

Re: Rancho Santa Margarita General Plan Update State Clearing House No. 2018041075

The Torres – Martinez Desert Cahuilla appreciates your response to our AB52 notification request. And in light of said information concerning your agencies location, the Tribe wishes to defer all future project notifications to Tribes that are closer to your area.

Respectfully,

Michael Mirelez
Cultural Resource Coordinator
Torres-Martinez Desert Cahuilla Indians
Office: 760-397-0300 Ext: 1213
Cell: 760-399-0022
Email: mmirelez@tmdci.org

2-2



NOTICE OF AVAILABILITY

Date: April 19, 2019

To: Interested Agencies and Organizations

Subject: Notice of Availability (NOA) of a Draft Environmental Impact Report for the Rancho Santa Margarita General Plan Update

Project Title: Rancho Santa Margarita General Plan Update
State Clearinghouse No. 2018041075

Lead Agency: City of Rancho Santa Margarita
22112 El Paseo, Rancho Santa Margarita, CA 92688
Ms. Wendy Starks, AICP, Principal Planner
Telephone: 949.635.1807 Email: wstarks@cityofrsm.org

Notice is hereby given, pursuant to Public Resources Code Section 21092 and the State CEQA Guidelines (Title 14 of the California Code of Regulations, Section 15087), that the City of Rancho Santa Margarita (City) has completed the Draft Environmental Impact Report (Draft EIR) for the Rancho Santa Margarita General Plan Update (project) described below, and that the Draft EIR is available for public review.

2-3

Project Location: The City is located in eastern Orange County about 10 miles northeast of the Pacific Ocean, in the foothills of the Santa Ana Mountains. The General Plan study area is comprised of 8,607 acres (13 square miles), of which 8,280 acres are located within the City's incorporated limits and 327 acres are located within the City's Sphere of Influence (SOI). The community is bisected by the Foothill Transportation Corridor State Route 241 (SR-241), which extends to the north connecting with North County cities such as Yorba Linda and Anaheim, and to the south terminating at Oso Parkway. Regional access to the City is provided via State Route (SR) 241, SR-133, and Interstate 5.

Project Description: The General Plan Update focuses on five elements: Conservation/Open Space, Economic Development, Land Use, Noise, and Safety. The Circulation and Housing Elements were updated in 2013 and 2014 respectively; thus, no changes are proposed to those two elements. The purpose of the General Plan is to provide the City Council, Planning Commission, Staff, and the entire community with a comprehensive and internally consistent plan to guide the City's decision-making and development processes through the General Plan planning period (2040). The work program includes an update of the General Plan baseline data, goals, and policies.

Based on the proposed land use designations, maximum density, and intensity permitted for each parcel, as well as the historical development patterns in the City with only a limited number of parcels being developed at the maximum density or intensity, the reasonably anticipated development potential of the proposed land use plan would increase development over existing (2016) conditions by 528 additional dwelling units and 3,085,014 additional square feet of non-residential uses.

Significant Environmental Effects: The Draft EIR determined that after implementation of



Response No. 2

Michael Mirelez, Cultural Resources Coordinator
Torres-Martinez Desert Cahuilla Indians
June 11, 2019

2-1 This comment references an email attachment which includes the Torres-Martinez Desert Cahuilla Indian's official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

2-2 The commenter defers all future project notifications to tribes that are closer to the project area. This comment is noted and no further response is warranted.

2-3 This comment attaches the Notice of Availability for the Draft EIR. No further response is required.

Wendy Starks

From: Jamoralin, Joseph@DOT <Joseph.Jamoralin@dot.ca.gov>
Sent: Wednesday, June 19, 2019 3:52 PM
To: Wendy Starks
Cc: state.clearinghouse@OPR.ca.gov; Shelley, Scott@DOT
Subject: Rancho Santa Margarita General Plan Update DEIR Comments
Attachments: 10475.Rancho Santa Margarita General Plan Update DEIR.pdf

Hello Ms. Starks,

Please review the attached comments from Caltrans on the Draft Environmental Impact Report for the Rancho Santa Margarita General Plan Update in the City of Rancho Santa Margarita. Feel free to contact me if you have any questions regarding these comments.

Please confirm receipt of this email by responding.

Thank you,

Joseph Jamoralin
Transportation Planner
Caltrans District 12 | Regional-IGR-Transit Planning
1750 East 4th Street Suite 100
Santa Ana, CA 92705
Office: (657) 328-6276

3-1

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

1750 EAST FOURTH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6267
FAX: (657) 328-6510
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

June 18, 2019

Ms. Wendy Starks
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688

File: IGR/CEQA
SCH#: 2018041075
12-ORA-2018-01110
SR 241, PM 14.5-20.21

Dear Ms. Starks:

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the Rancho Santa Margarita General Plan Update. The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.

The General Plan Update project is focused on updating five elements: Conservation/Open Space, Economic Development, Land Use, Noise, and Safety. The Circulation and Housing Elements were updated in 2014 and 2013. Freeway access to the project site is provided by State Route (SR) 74 (Ortega Highway) and Interstate 5 (I-5) Freeway. Caltrans is a responsible agency on this project and upon review, we have the following comments:

Transportation Planning

1. Please consider encouraging the addition of bicycle elements such as bicycle parking to areas or land uses that may experience higher volumes of bicyclists. These areas may include shopping plazas, schools, parks, and employment centers.

This will encourage people to utilize alternative modes of transportation to access their destinations and may help increase first/last-mile connectivity.

Environmental Analysis

2. Please review the sections referenced from the CEQA Guidelines for accuracy. Sections referenced from Chapter 6.0 Other CEQA Considerations (particularly Sections 6.2, 6.3, and 7.0) in the Rancho Santa Margarita General Plan Update DEIR do not agree with the 2019 edition of the CEQA Statute and Guidelines.
3. Category XX – Wildfire has been added to the January 17, 2019, edition of the CEQA Environmental Checklist. Please include discussion of the project's impacts to wildfires.

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability."*

3-2

3-3

3-4

3-5

Encroachment Permit

4. Please be advised that any project work (e.g. storage of materials, street widening, emergency access improvements, sewer connections, sound walls, storm drain construction, street connections, etc.) proposed in the vicinity of the State Highway System (SHS) will require an Encroachment Permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans' requirements, additional documentation would be required before the approval of the Encroachment Permit. For specific details for Encroachment Permits procedure, please refer to the Caltrans' Encroachment Permits Manual. The latest edition of the Manual is available on the web site:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/> 3-6
5. If the environmental documentation for the project does not meet Caltrans, additional documentation such as a Historic Properties Survey Report (HPSR), or a Natural Environment Study (NES) would be required before approval of the Encroachment Permit. 3-7
6. All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. Any runoff draining into Caltrans Right of Way from construction operations, or from the resulting project, cannot be approved by District 12 Environmental Analysis. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans roadways or facilities. 3-8

Please continue to keep us informed of this project and the associated environmental documents. Please also keep us informed of any future developments which could potentially impact the SHS. If you have any questions, please do not hesitate to contact Joseph Jamoralin, at (657) 328-6276 or Joseph.Jamoralin@dot.ca.gov. 3-9

Sincerely,



Scott Shelley
Branch Chief, Regional-IGR-Transit Planning
District 12



Response No. 3

Scott Shelley, Branch Chief
Regional-IGR-Transit Planning
California Department of Transportation District 12
June 19, 2019

3-1 This comment references an email attachment which includes the California Department of Transportation District 12's official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR nor raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

3-2 This comment provides a general summary of the proposed project. Responses to specific comments are provided below.

3-3 The commenter requests the consideration of adding bicycle elements such as bicycle parking to areas or land uses that may experience higher volumes of bicyclists. These areas may include shopping plazas, schools, parks, and employment centers.

As indicated in Draft EIR Section 5.4, *Traffic and Circulation*, development associated with the General Plan Update would not conflict with or interfere with any adopted policies, plans or programs related to public transit, bicycle, or pedestrian facilities. Instead, goals and policies proposed under the General Plan Update promote and support multimodal opportunities within the City.

Specifically, proposed Land Use Element Goal 4 is aimed towards integrating transportation and land use planning to provide mobility options and comfort for pedestrians, bicyclists, transit users, and personal vehicles. Land Use Element Policy 4.1 encourages establishing appropriately scaled car-free and pedestrian-only zones in high pedestrian demand locations; Land Use Element Policy 4.2 ensures the City's rights-of-way provide adequate infrastructure for the safe and comfortable movement of vehicles, bicyclists, and pedestrians; and Land Use Element Policy 4.3 encourages balancing street space for alternative transportation options with on-street parking. Further, Land Use Element Policy 4.4 supports the creation of multiuse trails within the City and their connection to regional trails; Land Use Element Policy 4.5 supports transit, bicycle, and pedestrian improvements that connect within the City and to neighboring jurisdictions; and Land Use Element Policy 4.6 encourages nodes of interest and activity, public open spaces, and other development areas that are highly accessible by pedestrians, bicyclists, and transit users.

Additionally, proposed Land Use Element Goal 12 is aimed towards, among other things, providing a balance of high-quality active and passive public open spaces, a regional trail system, and recreation facilities based on



community needs. Land Use Element Policy 12.5 encourages coordination with adjacent jurisdictions to facilitate regional trail connections.

Overall, the General Plan Update supports a multi-modal transportation network. Alternative modes of transportation are provided and encouraged through the provision of various pedestrian, bicyclist, and transit user opportunities. The proposed project would not preclude the addition of bicycle elements such as bicycle parking to areas or land uses that may experience higher volumes of bicyclists.

3-4 The commenter requests that the sections referenced from the CEQA Guidelines are reviewed for accuracy and states that Draft EIR Sections 6.2, 6.3, and 7.0 do not agree with the 2019 edition of the CEQA Guidelines. It is noted that CEQA Guidelines Sections 15126.2(c) and (d) have been renumbered to 15126.2(d) and (e), respectively, as part of the 2019 edition of the CEQA Guidelines. The requested clarifications have been made to Section 6.2, 6.3, and 7.0 of the Draft EIR and are reflected below and in Section 3.0, Errata, of this Final EIR.

Page 6-1, Section 6.2, Irreversible Environmental Changes that would be Involved with the Proposed Action Should it be Implemented

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED WITH THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to CEQA Guidelines Sections 15126(c) and 15126.2(e)(d), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(e)(d):

"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."



Page 6-3, Section 6.3, Growth-Inducing Impacts

6.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d)(e) requires that an EIR analyze growth-inducing impacts of a project. Specifically, CEQA Guidelines Section 15126.2(d)(e) requires that an EIR:

"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

Page 7-1, Section 7.0, Significant Unavoidable Environmental Effects if the Proposed Action is Implemented

7.0 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS IF THE PROPOSED ACTION IS IMPLEMENTED

CEQA Guidelines Section 15126.2(f)(c) requires an Environmental Impact Report (EIR) to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

These changes provide a minor update, correction, or clarification and do not represent "significant new information" as defined in CEQA Guidelines Section 15088.5.



3-5 The commenter requests that the Draft EIR include a discussion on the project's impacts to wildfires. Generally, the "project" for CEQA purposes consists of changes in the baseline conditions, if any, that the lead agency's action would cause. A lead agency is not required to identify and analyze impacts that are considered part of the baseline conditions. The baseline typically consists of the physical conditions that exist when the lead agency commences CEQA review. (CEQA Guidelines § 15125(a).) Here, wildfires and their associated risks were part of the existing conditions. The General Plan Update; however, does not involve any changes to the existing land use map or propose site-specific development within very high fire hazard severity zones. Further, there are no State Responsibility Area lands located within the General Plan Update boundaries.

The Draft EIR identifies fire protection services within the Study Area and provides an analysis of potential impacts associated with implementation of the General Plan Update; refer to Draft EIR Section 5.13, *Fire Protection*. The General Plan Safety Element includes policies to reduce the risk of wildfire hazards by working with homeowner and business park associations, property owners, and Orange County Fire Authority (OCFA) to maintain fire retardant landscaping and buffer zones (Safety Element Policy 4.1); identify methods to avoid or minimize wildfire risk and damage associated with new land uses (Safety Element Policy 4.3); ensure compliance with triennial updates to the California Fire Code (Policy 4.5); require new development to be located, designed, and constructed to provide adequate defensibility and fuel modification zones (Safety Element Policy 4.6).

Additionally, Safety Element Policy 4.2 promotes inter-agency coordination to update, monitor, and maintain the most current fire hazard and fire protection information. Safety Element Policy 4.4 requires essential public facilities to be located away from wildfire risks, including high fire hazard severity zones when feasible, and Safety Element Policies 4.7 and 4.8 encourage coordination with OCFA, Santa Margarita Water District, and Trabuco Canyon Water District to ensure new developments have adequate infrastructure for water supply and fire flow, and incorporate fire safe design. Additionally, the General Plan Safety Element was developed in coordination with the California Department of Forestry and Fire Protection and received approval from the California Board of Forestry and Fire Protection.

Per the CEQA Guidelines, an environmental document must meet the content requirements in effect when the document is sent out for public review. (CEQA Guidelines § 15007(c).) CEQA Guidelines amendments include a 120-day grace period. (CEQA Guidelines § 15007(d)(2).) The EIR was sent out for public review on April 19, 2019. As a result, the EIR need only meet the content requirements that were in effect on April 19, 2019. (CEQA Guidelines § 15007(c).) The CEQA Guidelines were amended on December 28, 2018 and the 120-grace period expired on April 27, 2019. Nonetheless, the requested information regarding wildfires has been provided above for informational purposes.



3-6 The commenter notes that any future development occurring within the vicinity of the State Highway System would require a California Department of Transportation (Caltrans) encroachment permit. As the General Plan Update does not propose site-specific development, this comment is noted and will be considered for future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

3-7 The commenter notes that if environmental documentation for future development projects do not meet Caltrans' requirements, additional documentation such as a Historic Properties Survey Report (HPSR) or a Natural Environment Study (NES) would be required before approval of the Encroachment Permit. This comment is noted and will be considered for future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

3-8 The commenter notes that all work within State right-of-way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Plan or Storm Water pollution Prevention Plan. As the General Plan Update does not propose site-specific development, this comment is noted and will be considered for future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

3-9 As requested, Caltrans will continue to be informed of the project and the associated environmental documents.

Wendy Starks

From: Alina Mullins <AMullins@aqmd.gov>
Sent: Thursday, June 20, 2019 12:06 PM
To: Wendy Starks
Cc: Lijin Sun
Subject: South Coast AQMD Staff's Comments on Draft Environmental Impact Report for the Proposed Rancho Santa Margarita General Plan Update (SCH No.: 2018041075)
Attachments: ORC190501-02 DEIR Rancho Santa Margarita General Plan Update_20190620.pdf

Dear Ms. Starks,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed Rancho Santa Margarita General Plan Update (SCH No.: 2018041075) (South Coast AQMD Control Number: ORC190501-02). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. South Coast AQMD staff's comments are meant as guidance for the Lead Agency and should be reviewed for incorporation into the Draft EIR. Please contact me if you have any questions regarding these comments.

Kind regards,

Alina Mullins
Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov

**Please note that South Coast AQMD is closed on Mondays.*

4-1



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

June 20, 2019

Wstarks@cityofrsm.org

Wendy Starks, AICP, Principal Planner
City of Rancho Santa Margarita, Planning Division
22112 El Paseo
Rancho Santa Margarita, CA 92688

Draft Environmental Impact Report (Draft EIR) for the Proposed Rancho Santa Margarita General Plan Update (SCH No.: 2018041075)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to update the City of Rancho Santa Margarita's (City) General Plan conservation and open space, economic development, land use, noise, and safety elements with a planning horizon year of 2040 on 8,607 acres, of which 8,280 acres are located within the City's incorporated limits and 327 acres are located within the City's Sphere of Influence (Proposed Project). The Proposed Project anticipates a net growth of 528 residential units and 3,085,014 square feet of non-residential uses¹ throughout the planning horizon year of 2040.

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South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis, the Lead Agency did not quantify construction emissions because, "construction-related emissions that may occur [...] are speculative and cannot accurately be determined at this stage of the planning process [...]"². Individual development projects would evaluate and determine significant impacts to air quality from construction and appropriate mitigation measures when undergoing project-specific CEQA review; however, because "[t]he General Plan Update would facilitate future development and generate construction emissions that could potentially exceed South Coast AQMD thresholds, impacts would be considered significant and unavoidable"³.

The Lead Agency quantified the Proposed Project's operational emissions based on the expected buildout scenario (year 2040) and compared the incremental increases in emissions at buildout (year 2040) to the existing baseline conditions (year 2016)⁴. The Proposed Project would result in increases in operational PM10 and PM2.5 emissions and decreases in operational ROGs, NOx, CO, and SOx emissions at buildout⁵. "CEQA review of individual development projects would include an evaluation to determine whether potential air pollutant emissions generated from growth could result in a significant impact to air quality [...]. However, due to the magnitude of development [...] [operational] air quality impacts would be significant and unavoidable"⁶. The Lead Agency also found that the Proposed Project would not conflict with South Coast AQMD's 2016 Air Quality Management Plan (AQMP) because,

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¹ Draft EIR. Section 3 Project Description. Table 3-3 General Plan Update Net Growth. Page 3-17.

² Draft EIR. Section 5.5 Air Quality. Pages 5.5-16 through 5.5-17.

³ *Ibid.* Page 5.5-17.

⁴ *Ibid.* Pages 5.5-13 through 5.5-20.

⁵ *Ibid.*

⁶ *Ibid.* Page 5.5-21.

“concentrations of CO, NOx, PM10 and PM2.5 under the General Plan Update would be lower than existing settings”⁷.

South Coast AQMD’s 2016 AQMP

On March 3, 2017, South Coast AQMD’s Governing Board adopted the 2016 AQMP⁸, which was later approved by the California Air Resources Board (CARB) on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

South Coast AQMD Staff’s General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The use of a future baseline to analyze the Proposed Project’s air quality impacts improperly credits the Proposed Project with emission reductions that will occur independent of the Proposed Project. Since the Proposed Project will be implemented over a 20-year period, interim milestone years, in addition to year 2016 and year 2040, should be used to analyze the Proposed Project’s air quality impacts. This will avoid under-estimating the Proposed Project’s peak emissions during earlier years since the air quality is improved over time in later years. While information on the Proposed Project’s development potential at buildout (e.g., 528 residential units and 3,085,014 square feet of non-residential uses) is available⁹, the Lead Agency did not use this information to quantify the Proposed Project’s construction emissions or analyze a scenario where construction activities overlap with operational activities. Additionally, the Lead Agency did not perform a localized air quality impact analysis. South Coast AQMD staff is also concerned about the Lead Agency’s finding that the Proposed Project is consistent with the 2016 AQMP. Please see the attachment for more information

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. To further reduce the Proposed Project’s construction and operational criteria pollutants emissions and to facilitate implementation of General Plan Update Policies 4.1 through 4.6 and the goals of the 2016 AQMP, South Coast AQMD staff recommends revisions to the existing air quality mitigation measure (AQ-3) and additional mitigation measures, including a commitment to periodic technology review, which the Lead Agency should review for incorporation in the Final EIR. Please see the attachment for more information.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended revisions to Mitigation

⁷ *Ibid.* Pages 5.5-25 through 5.5-27.

⁸ South Coast AQMD. March 3, 2017. 2016 Air Quality Management Plan. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

⁹ Draft EIR. Section 3 Project Description. Page 3-6.

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Measure AQ-3 and additional new mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

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Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
ORC190501-02
Control Number

ATTACHMENT**CEQA Baseline**

1. Notwithstanding the general rule that baseline conditions exist at the time of the environmental review is initiated and that a project's environmental impacts are assessed by limiting the examination to changes in the existing physical conditions in the affected area as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP, the use of future baseline is proper in some cases, supported by substantial evidence in the record. Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline, especially when the project has a long-term buildout schedule. “[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects.” (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 454.). “Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal.” (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Proposed Project's operational emissions were estimated for the 2016 CEQA baseline year and the 2040 future buildout year. The 2016 existing conditions were held constant (i.e. using emission rates from year 2016) and compared to the future year (i.e. using emission rates from the future year). The Lead Agency found that overall emissions are anticipated to be lower than existing conditions¹⁰. This approach using a comparison between the Proposed Project's impacts in the future year (using emission rates from year 2040) and the 2016 baseline (using emission rates from year 2016) improperly credits the Project with emission reductions that will occur independent of the Proposed Project due to adopted state and federal rules and regulations and technology advancements, since these rules and regulations and technology are expected to improve air quality over time, even in the absence of the Proposed Project, which the Lead Agency has acknowledged in the Draft EIR¹¹. For example, the California Air Resources Board's (CARB) current regulation for trucks and buses will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 124 tons per day for 2014 and 98 tons per day for 2023¹². This state regulation might have led to the Proposed Project's operational ROGs, NOx, CO, and SOx emission reductions at buildout¹³. Therefore, the methodology used to analyze the Proposed Project's long-term operational impacts in the Draft EIR may have led to an under-estimation of actual emission increases from the Proposed Project.

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The purpose of CEQA is to disclose environmental impacts from the Proposed Project to the public and decision makers in order to provide the public and decision makers with the actual changes to the environment from the activities involved in the Proposed Project. By taking credit for future emission reductions from existing air quality rules, regulations, emissions reductions strategies, and technological advancements that are not contributed by the Proposed Project, the Proposed Project's air quality impacts are likely underestimated. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis to include comparisons between emissions in year

¹⁰ Draft EIR. Section 5.5 Air Quality. Pages 5.5-20, 5.5-24 through 5.5-27.

¹¹ *Ibid.*

¹² California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>, and <https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf>.

¹³ Draft EIR. Pages 5.5-13 through 5.5-20.

2016, year 2020, year 2025, year 2030, year 2035, and year 2040 with the Proposed Project and emissions in the same respective years without the Proposed Project, and use the comparisons to determine the level of significance for the Proposed Project's air quality impacts.

Air Quality Analysis – Interim Milestone Years

2. This Comment is related to Comment No. 1. The Air Quality Analysis in the Draft EIR included only two analysis years: baseline year (2016) and buildup year (2040). By 2040, the Proposed Project is assumed fully built. Although the Proposed Project may not be at peak capacity in earlier years, it is possible that due to higher emission rates of vehicles, trucks, and equipment in earlier years, peak daily emissions may occur in 2017 and beyond. The overall emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. Air quality is improving overtime with substantial emissions reduction occurring in later years. Therefore, South Coast AQMD staff recommends that the Lead Agency include interim milestone years (i.e., year 2020, year 2025, year 2030, year 2035, and year 2040) for analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also demonstrate progress in emission reductions overtime from implementing the air quality-related mitigation measures and General Plan Update policies included in the Draft EIR.

Air Quality Impact Analysis – Construction Impact Analysis

3. The Lead Agency did not quantify the Proposed Project's construction emissions in the Draft EIR. The Lead Agency stated that "[...] construction-related emissions that may occur at any one time are speculative and cannot accurately be determined at this stage of the planning process"¹⁴.

When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Preparing the CEQA analysis "necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can" (CEQA Guideline Section 15144).

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).

When the precise construction schedule or scenario is unknown, the Lead Agency should use its best efforts to identify and quantify a worst-case construction impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared. As discussed in Section 3.5.3 "General Plan Update Growth and Assumptions" in the Draft EIR, the Lead Agency has identified the estimated development potential of the Proposed Project. For example, the Lead Agency discussed that "anticipated growth over existing (2016) conditions is 528 additional dwelling units and 3,085,014 additional square feet of non-residential uses based upon historical development patterns in the City and the reasonably assumed development intensities and densities based on Table 3-2 ["General Plan Update Development Potential"]"¹⁵. Therefore, the Lead Agency can and should use this information

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¹⁴ Draft EIR. Section 5.5 Air Quality. Pages 5.5-16 through 5.5-17.

¹⁵ Draft EIR. Section 3 Project Description. Pages 3-15 through 3-18.

to develop construction scenarios that would be required to implement the full buildout of the Proposed Project, quantify associated construction emissions, including emissions from any demolition activities, and compare the emissions to South Coast AQMD's air quality CEQA significance thresholds to determine the level of significance. The Lead Agency should use the most current version of California Emission Estimator Model (CalEEMod)¹⁶ to quantify construction emissions. While this recommendation may not change the Lead Agency's finding that the Proposed Project's construction air quality impacts would be significant and unavoidable¹⁷, a quantitative analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the kind, size, scope, intensity, duration, density, and location of subsequent project-level development to foster meaningful public participation and informed decision making.

Air Quality Analysis – Overlapping Construction and Operational Impacts

4. When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in a CEQA document. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not analyze a scenario where construction emissions overlap with operational emissions. Since implementation of the Proposed Project is expected to occur over a period of 20 years, an overlapping construction and operation scenario may be reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To conservatively analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions from the overlapping years, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR.

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

5. The Proposed Project has numerous land uses with sensitive receptors, and these land uses are expected to increase with the implementation of the Proposed Project¹⁸. South Coast AQMD staff recommends that the Lead Agency use its best efforts, based on already available Proposed Project development potential information, such as the maximum dwelling units and build-out of nonresidential uses in square feet¹⁹, to quantify and disclose the Proposed Project's localized emissions in the Final EIR. South Coast AQMD guidance for performing a localized air quality analysis is available on South Coast AQMD website²⁰. Alternatively, the Lead Agency should consider to include an additional component on project-level LSTs analysis to the existing Mitigation Measure AQ-3. Please see Comment No. 8 for more information.

Consistency Analysis with South Coast AQMD's 2016 AQMP

6. Section 15125(d) of the CEQA Guidelines requires that EIRs analyze and discuss any inconsistencies between a proposed project and applicable general plans, specific plans, and regional plans. For example, a discussion of consistency between a regionally applicable AQMP and a proposed project helps identify if a proposed project is inconsistent with the assumptions and objectives that were taken into consideration for the development of the AQMP, and thus would interfere with the region's ability to comply with federal and state air quality standards and achieve attainment deadlines. If an

¹⁶ South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: <http://www.aqmd.gov/caleemod/download-model>.

¹⁷ Draft EIR. Section 5.5 Air Quality. Pages 5.5-17 through 5.5-18.

¹⁸ *Ibid.* Page 5.5-15.

¹⁹ Draft EIR. Section 3 Project Description. Pages 3-15 through 3-18.

²⁰ South Coast AQMD. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

inconsistency is found, lead agencies should consider ways to mitigate or eliminate the inconsistency so that there is no interference with regional air quality objectives.

In the Draft EIR, the Lead Agency analyzed the Proposed Project's consistency with the 2016 AQMP and found that, "program-level emissions associated with the future development in the City with the implementation of the General Plan Update would exceed South Coast AQMD thresholds" however the Lead Agency also found that, "South Coast AQMD thresholds are intended to evaluate the air quality impacts from individual development projects and do not apply to the plan-level projects such as the General Plan Update [...][...]. Concentrations of CO, NOx, PM10 and PM2.5 under the General Plan Update would be lower than existing settings [...]; [therefore,] the project would not result in an increase in the frequency or severity of an existing violation or cause or contribute to new violations"²¹.

South Coast AQMD staff is concerned with the Lead Agency's consistency analysis. First, the Proposed Project's operational PM10 and PM2.5 emissions will increase overtime, not decrease²². Second, as discussed in Comment Nos. 1 and 2, the Proposed Project's operational emissions, particularly from NOx, may have been under-estimated. Third, the Proposed Project's air quality impacts from overlapping construction and operational activities were not analyzed and could potentially be significant after comparing the combined emissions from overlapping activities to South Coast AQMD's air quality CEQA significance thresholds for operation. Given these reasons, the Proposed Project may play an important role in contributing additional ROG, NOx, CO, particulate matter emissions to the Basin that could delay the efforts towards achieving attainment deadlines. Therefore, it is recommended that the Lead Agency revise the consistency analysis in the Final EIR.

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Health Risk Assessment (HRA) Analysis and Risk Reduction Strategies

7. To facilitate the implementation of General Plan Update Policy 4.6²³, which requires new development and/or revitalization projects with sensitive uses located within 500 feet of a freeway or an urban road with 100,000 vehicles per day to be designed to lessen potential health risks, the Lead Agency should require subsequent freeway adjacent (e.g., within 500 feet) individual residential projects to conduct project-specific health risk assessment (HRA) analysis²⁴ in the CEQA documents. This requirement will demonstrate that the Lead Agency has adequately addressed the Proposed Project's health risks analysis in this programmatic CEQA document and that a project-level HRA analysis will be completed in a later stage to facilitate the disclosure of health impacts to prospective residents. Further, the Lead Agency should require implementation of measures to reduce exposures, should a project-level HRA analysis show an exceedance of South Coast AQMD CEQA significance threshold for cancer risk²⁵.

Additional Considerations for Implementing General Plan Update Policy 4.6

- a) The Lead Agency should consider the use of high efficiency or enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better in residential units within 500 feet of

²¹ Draft EIR. Section 5.5 Air Quality. Pages 5.5-24 through 5.5-26.

²² *Ibid.* Page 5.5-20

²³ *Ibid.* Pages 5.5-17 through 5.5-18.

²⁴ South Coast AQMD. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

²⁵ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA analysis, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

freeways to ensure the maximum reduction of health risks from exposures to diesel particulate matter (DPM) emissions from vehicles and trucks traveling on the freeway. South Coast AQMD staff recommends that the Lead Agency require subsequent individual residential projects to install enhanced filtration units as a project design feature that must be verified during occupancy inspection prior to the issuance of an occupancy permit.

b) If enhanced filtration systems are installed, it is important to consider limitations. In a study that South Coast AQMD conducted to investigate filters²⁶, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residences prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

c) Because of the limitations, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance of filters in the Final EIR. To facilitate a good faith effort at full disclosure and provide useful information to future residents who will live and/or work in proximity to freeways, the Lead Agency should require subsequent individual residential projects within 500 feet of freeways to include the following information, at a minimum, in the project-level CEQA documents:

- Disclosure potential health impacts to prospective residents from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency, to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents;
- Provide information to residents on where MERV filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;

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²⁶ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

- Identify the responsible entity such as future residents themselves, Homeowner's Association (HOA), or property management for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide or project-specific criteria for assessing progress in installing and replacing the enhanced filtration units.
- Develop a City-wide or project-specific process for evaluating the effectiveness of the enhanced filtration units.

Recommended Revisions to and Considerations for Existing Mitigation Measure AQ-3

8. The Lead Agency included a specific requirement in Mitigation Measure AQ-3 for future, project-specific operational air quality analysis. South Coast AQMD staff recommends that the Lead Agency include more specific details as they relate to both construction and operational air quality analyses in the existing mitigation measure in order to provide useful information to guide subsequent, project-specific air quality analyses and mitigation measures (emphasis added). These details will assist in the Lead Agency's decision making when it reviews and approves subsequent individual projects implementing the Proposed Project. Additionally, the details will provide guidance for project-level air quality analysis and facilitates CEQA streamlining and tiering as an option, where appropriate. Specifically, South Coast AQMD staff recommends that the Lead Agency incorporate the following recommended revisions Mitigation Measure AQ-3 in the Final EIR.

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AQ-3:

To identify potential short-term and long-term construction and operational-related air quality impacts from projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), project-specific air emissions impacts shall be determined in compliance with the latest version of the South Coast AQMD CEQA Guidelines. To address potential regional and localized impacts, the air quality analysis shall be completed pursuant to the latest version of South Coast AQMD's CEQA Handbook and Final Localized Significance Threshold Methodology document, or other appropriate methodology as determined in conjunction with South Coast AQMD. The results of the construction and operational-related and regional and localized air quality impacts analyses shall be included in the development project's CEQA documentation. Construction and operational emissions should be compared to the most recent version of South Coast AQMD's CEQA air quality regional²⁷ and localized²⁸ significance thresholds in order to identify if a Proposed Project will result in significant air quality impacts. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts as required by CEQA Guidelines Section 15126.4.

Additional Considerations for AQ-3 on Localized Significance Thresholds (LSTs) Analysis

²⁷ South Coast AQMD. Regional Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

²⁸ South Coast AQMD. Localized Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

Prior to issuance of a grading permit for new development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily grading activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of South Coast AQMD's significance thresholds for those emissions.

Additional Recommended Mitigation Measures

9. 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. In addition to Mitigation Measures AQ-1 through AQ-3, South Coast AQMD staff recommends that the Lead Agency incorporate the following project-level mitigation measures in the Final EIR. These recommended mitigation measures will further reduce construction and operational emissions from subsequent individual projects implementing the Proposed Project, guide project-level air quality analysis and formulation of mitigation measures, provide CEQA streamlining and tiering benefits, implement the General Plan Update Policies 4.1 through 4.6²⁹, and facilitate the achievement of attainment goals and timelines outlined in the 2016 AQMP. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website³⁰.

Performance Standards-Based Periodic Technology Review

- Since the Proposed Project would be implemented over an estimated period of 20 years, the Lead Agency should take this opportunity to incorporate a periodic, technology review of both off-road construction equipment and on-road haul trucks that will be used during the Proposed Project. South Coast AQMD staff recommends that the Lead Agency develop project-specific or agency-wide strategies to foster and facilitate the deployment of the lowest emissions technologies as they becomes available. This may include incorporating a performance standards-based technology review, or developing other comparable strategies or tools, to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (California Public Resources Code Section 21061.1), such as zero and near-zero emission technologies or best available control technologies (BACTs) that are expected to become more readily available over the life of the Proposed Project. A technology review should also incorporate an appropriate timeline/schedule for the assessment that will also be supportive of emissions reductions goals being implemented at local, regional, state, and federal levels (e.g. South Coast AQMD's AQMPs and other air quality and public health goals). If the technology review identifies that cleaner equipment and fleets have become available, the Lead Agency should commit to incorporating this new technology into the Proposed Project to further reduce the Proposed Project's emissions. South Coast AQMD staff encourages the Lead Agency to involve the public and interested parties, such as the South Coast AQMD and the CARB, in developing an appropriate process and performance standards for technology review.

²⁹ Draft EIR. Section 5.5 Air Quality. Page 5.5-18.

³⁰ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines, or establish a vendor(s)/contractor(s) selection policy that prefers vendor(s)/contractor(s) who can supply 2010 model year trucks, and include the requirement in the Proposed Project's Construction Management Plan. The Lead Agency's commitment to early implementation of the Truck and Bus Regulation at the Proposed Project helps facilitate the Project's transition to 2010 model year trucks in 2023, provides time and opportunities to resolve any implementation challenges ahead of 2023, eases the costs and burden of regulatory compliance, and yields emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

Mitigation Measure for Operational Air Quality Impacts from Mobile Sources

- To facilitate the implementation of General Plan Update Policy 4.3³⁴, which encourages alternative modes of transportation to reduce emissions associated with automobile use, the Lead Agency should provide electric vehicle (EV) charging stations. Require at least 5% of all vehicle parking spaces include EV charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.

³⁴ Draft EIR, Section 5.5 Air Quality, Page 5.5-18.

Mitigation Measures for Construction Air Quality Impacts

- Require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions³¹. A list of CARB verified DPFs are available on the CARB website³².

The Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. The Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. Any approved alternative technologies/strategies for use by the Lead Agency should be included and disclosed in the Air Quality Section of the Final EIR as a project requirement or mitigation measure as a condition of approval.

- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent³³. Since the construction schedule of the Proposed Project extends beyond 2023 to 2040, 2010 model year trucks will be required for the Proposed Project and should become more

4-7
Cont.

³¹ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

³² *Ibid.* Page 18.

³³ California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Compliance with South Coast AQMD Rule 403(e) – Large Operations

10. In the event that a subsequent individual project implementing the Proposed Project is a large operation (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, it will be required to comply with South Coast AQMD Rule 403(e) – Additional Requirements for Large Operations³⁵, which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class³⁶. Therefore, South Coast AQMD recommends that the Lead Agency include a requirement for subsequent individual projects to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final EIR. Compliance with South Coast AQMD Rule 403(e) will further reduce particulate matter from the Proposed Project.

4-7
Cont.

³⁵ South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

³⁶ South Coast AQMD. Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.



Response No. 4

Lijin Sun, J.D., Program Supervisor CEQA IGR
South Coast Air Quality Management District
June 20, 2019

4-1 This comment references an email attachment which includes the South Coast Air Quality Management District's (SCAQMD) official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

4-2 This comment provides a general summary of the proposed project and notes the opportunity to comment on the Draft EIR. This comment does not address the adequacy of the Draft EIR; no further response is required.

4-3 This comment summarizes the analysis and significance findings for Section 5.5, *Air Quality*, of the Draft EIR. This comment does not address the adequacy of the Draft EIR; no further response is required.

4-4 This comment provides a general overview of the SCAQMD's 2016 Air Quality Management Plan for the South Coast Air Basin (AQMP). This comment does not address the adequacy of the Draft EIR; no further response is required.

4-5 The comment states that the Draft EIR should have included: (1) interim long-term air emissions analyses (between 2016 and year 2040); (2) quantified construction emissions, including the potential overlap of construction and operational emissions; and (3) a Localized Significance Thresholds (LST) analysis. The comment also notes concern with the 2016 AQMP analysis and suggests revisions to Mitigation Measure AQ-3 and additional mitigation measures to be incorporated into the Draft EIR to reduce air emissions. Refer to Response 4-7 for responses to each issue raised.

4-6 This comment requests written responses to the SCAQMD comment letter in the Final EIR. All comments are being addressed in this Final EIR, as requested by the commenter.

4-7 The following analysis corresponds to the topical titles provided in the comment letter.

1. CEQA Baseline

Generally, the environmental baseline consists of physical conditions as they exist at the time the Notice of Preparation is published (CEQA Guidelines Section 15125(a)(1)). In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions (CEQA Guidelines Section 15125(a)(1)).



As noted by the commenter, long-term operational emissions from the General Plan Update's reasonably projected development in the year 2040 were modeled in CalEEMod version 2016.3.2 (CalEEMod). Default CalEEMod emissions factors, energy consumption factors, land use data, and other data from CalEEMod were used to calculate existing (2016) and future (2040) emissions based on existing and historical City development patterns, as well as reasonably anticipated development.

The emissions reductions noted by the commenter are embedded into the CalEEMod model and are based on rules, regulations, and improved technology for future years; these model inputs/assumptions were not modified for the year 2040 model run. As discussed in the Draft EIR, long-term year 2040 air emissions would be less than year 2016 emissions primarily due to advances in vehicular technology. The comment suggests the Draft EIR evaluate operational emissions for interim years (years 2025, 2030, and 2035) to compare various future baseline and "with project" scenarios. It is unclear at this time when individual development projects would occur, and thus, modeling interim years would be speculative and would not provide a meaningful analysis in the Draft EIR. Year 2040 was determined to be the worst-case scenario for long-term operational emissions, as this year represents the maximum anticipated development associated with implementation of the General Plan Update. In other words, year 2040 is assumed to have all operational emissions of the anticipated growth (528 additional units and 3,085,014 square feet of non-residential uses) occurring at once, which can be inferred as being more substantial than emissions during interim years when construction and operations of some development would occur at any one time. The uncertainty surrounding when development would occur and to what degree during these interim years between 2016 and 2040 makes interim air emissions analyses speculative. As such, interim air emissions analyses were not conducted in the Draft EIR.

The analysis provided in the Draft EIR provides a good faith effort at full disclosure based on what is reasonably feasible with the CalEEMod modeling for year 2040 per CEQA Guidelines Section 15151. Despite showing a reduction in long-term operational emissions from year 2016 to year 2040 with project implementation, the Draft EIR determined long-term operational air emissions would be significant and unavoidable.

2. Air Quality Analysis – Interim Milestone Years

Refer to Response 4-7 'CEQA Baseline.'

3. Air Quality Impact Analysis – Construction Impact Analysis

As a programmatic EIR, the Draft EIR did not analyze construction-related emissions associated with the General Plan Update. The General Plan Update is a policy document and does not propose specific development projects. Future developments anticipated by the General Plan Update are dependent on the housing market, employment opportunities, provision of services for



housing and supporting commercial uses, decisions of financial institutions related to development projects, and the general economy, among others. Therefore, it would be speculative to quantify construction emissions without knowing accurate phasing, duration, equipment, earthwork quantities, soil import/export information, etc., for potential future development that may occur any time between 2016 and 2040. Speculative construction assumptions would not provide a meaningful analysis in the Draft EIR. As such, an extensive qualitative analysis of construction-related air quality impacts is provided on pages 5.5-16 through 5.5-18 of the Draft EIR.

Construction-related air quality emissions must be addressed on a project-by-project basis. For a programmatic General Plan Update, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of SCAQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory requirements, individual project-specific mitigation may also be included as part of future CEQA review. As such, construction emissions (including a localized construction emissions analysis for LSTs) were not calculated in the Draft EIR.¹ In addition, as noted on page 5.5-17 of the Draft EIR, "Future development projects and plans would continue to define specific phasing at a detailed level and be reviewed by the City to ensure that development occurs in a logical manner consistent with policies in the General Plan Update, and that additional environmental review is conducted under CEQA, as needed." As such, future construction projects would be subject to City/CEQA review to analyze short-term construction emissions impacts when more detailed construction information is available. Further, the Draft EIR concludes that impacts from construction emissions would be significant and unavoidable due to the potential simultaneous construction of several development projects (and concurrent operational emissions).

4. Air Quality Analysis – Overlapping Construction and Operational Impacts

Refer to Response 4-7 'CEQA Baseline' and 'Air Quality Impact Analysis – Construction Impact Analysis.'

5. Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

As stated above, it is speculative to determine where future development projects anticipated by the General Plan Update would occur within the City, which is essential to determine whether a project would expose sensitive receptors to substantial concentrations of criteria air pollutants. For this programmatic policy document, it is not possible to determine whether the scale and phasing of future individual projects would result in the exceedance of localized emissions threshold and therefore contribute to health impacts. As such, the Draft EIR includes Mitigation Measure AQ-3, which requires future development projects subject to CEQA to comply with the latest SCAQMD CEQA Guidelines and address localized emissions impacts in compliance with

¹ *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 373 [CEQA does not require lead agencies to engage in speculation in order to analyze a worst-case scenario].



the SCAQMD LST Methodology Document. SCAQMD's suggested revisions to Mitigation Measure AQ-3 are also included in the Final EIR; refer to Response 4-7 'Recommended Revisions to and Considerations for Existing Mitigation Measure AQ-3' below.

6. Consistency Analysis with South Coast AQMD's 2016 AQMP

As discussed on page 5.5-27 of the Draft EIR, although the project would result in significant and unavoidable short-term construction and long-term operational air emissions impacts, the General Plan Update would be consistent with the SCAQMD and Southern California Association of Government's (SCAG) land use goals and policies. Long-term (2040) operational emissions would be less than 2016 conditions, and less overall growth is anticipated under the proposed project compared to the 2002 General Plan. Therefore, the General Plan Update would be consistent with the 2016 AQMP and would not delay the South Coast Air Basin's efforts toward achieving attainment deadlines. Future development projects anticipated by the General Plan Update would also be required to comply with all SCAQMD rules and regulations to reduce short- and long-term emissions and would require CEQA review (if required) and mitigation measures (if necessary) to reduce air quality impacts. Further, the General Plan Update would be included in the future iteration of the AQMP which would ensure consistency with the most current version of the AQMP.

7. Health Risk Assessment (HRA) Analysis and Risk Reduction Strategies

The commenter requests several additional mitigation measures to be included to in the Draft EIR, including requiring HRA analysis and other project-level mitigation for technology review, purchase of low-emission heavy-duty vehicles, provide electric vehicle (EV) charging stations, installation of solar panels, and requiring the use of Tier 4 off-road construction equipment for development projects, among others. All future development projects subject to CEQA review (meaning, non-exempt projects) would be required to comply with State and Federally-mandated rules and regulations pertaining to energy efficiency and solar requirements (Title 24), vehicle emission standards, off-road construction equipment standards (i.e., the In-Use Off-Road Diesel Vehicle Regulation), EV charging stations, and HRA analysis, etc. A review of project-level air quality impacts and mitigation measures would be required at the time of development/CEQA review for future development projects subject to CEQA review (meaning, non-exempt projects) under the General Plan Update. Accurate and detailed mitigation measures would be better crafted for individual projects based on project-level air quality analysis. As such, the additional mitigation measures requested by the commenter are not appropriate for the proposed project.



8. Recommended Revisions to and Considerations for Existing Mitigation Measure AQ-3

As requested by the commenter, Mitigation Measure AQ-3 has been revised as follows, and is reflected below and in Section 3.0, Errata, of the Final EIR.

Page 5.5-19, Section 5.5.5, Project Impacts and Mitigation Measures, Short-Term Construction Emissions

AQ-3	<p>To identify potential <u>short-term and</u> long-term <u>construction- and</u> operational-related air quality impacts from projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), project-specific air emissions impacts shall be determined in compliance with the latest version of the SCAQMD CEQA Guidelines. To address potential <u>regional and</u> localized impacts, the air quality analysis shall be completed pursuant to the latest version of SCAQMD's <u>CEQA Handbook and Final Localized Significance Threshold Methodology</u> document, or other appropriate <u>methodology methodologies</u> as determined in conjunction with SCAQMD. The results of the <u>construction- and</u> operational-related and <u>regional and</u> localized air quality impacts analyses shall be included in the development project's CEQA documentation. <u>Construction and operational emissions should be compared to the most recent version of SCAQMD's CEQA air quality regional and localized significance thresholds in order to identify if a proposed project will result in significant air quality impacts.</u> If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts as required by CEQA <u>Guidelines Section 15126.4.</u></p> <p><u>Prior to issuance of a grading permit for new development projects that are one acre or larger, the Applicant/Developer shall provide modeling of the localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development. If the modeling shows that emissions would exceed SCAQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of SCAQMD's significance thresholds for those emissions.</u></p>
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These changes provide a minor update, correction, or clarification and do not represent "significant new information" as defined in CEQA Guidelines Section 15088.5.



9. Additional Recommended Mitigation Measures

Refer to Response 4-7 'Health Risk Assessment (HRA) Analysis and Risk Reduction Strategies.'

10. Compliance with South Coast AQMD Rule 403(e) – Large Operations

Future individual projects anticipated under the General Plan Update and identified by the SCAQMD as a large operation (i.e., 50-acre sites or more of disturbed surface area; or requiring daily earth-moving operations of 3,850 cubic yards or more on three days in any year), would be required to comply with SCAQMD Rule 403(e). The comment recommends including this regulatory requirement as a mitigation measure in the Draft EIR. As compliance with SCAQMD Rule 403(e) is a regulatory requirement for all applicable future projects, it does not need to be included in the Draft EIR as a mitigation measure to ensure compliance.

Wendy Starks

From: Gomez, Virginia <vgomez@thetollroads.com>
Sent: Thursday, June 20, 2019 2:30 PM
To: Wendy Starks
Subject: TCA Comments on DEIR for General Plan Update
Attachments: TCA Comments on DEIR General Plan Update.pdf

Letter 5

Dear Ms. Starks,

Attached please find TCA comments on the DEIR for the General Plan update. Should you have any questions, please feel free to give me a call.

Thank you,

Virginia Gomez
Environmental Analyst
Transportation Corridor Agencies
125 Pacifica, Suite 100
Irvine, CA 92618
T: 949-754-3487, F: 949-754-3491
vgomez@thetollroads.com

5-1



June 20, 2019

Via email: wstarks@cityofrsm.org

Ms. Wendy Starks, AICP
Principal Planner
City of Rancho Santa Margarita
22112 El Paseo,
Rancho Santa Margarita, CA 92688

Re: Comments on the Notice of Availability of a Draft Environmental Impact Report for the Rancho Santa Margarita General Plan Update.

Dear Ms. Starks,

The Transportation Corridor Agencies (TCA) has reviewed the Draft Environmental Impact Report (DEIR) for the Rancho Santa Margarita General Plan Update. We understand that the General Plan update will consist of revisions to the following elements: Conservation/Open Space, Economic Development, Land Use, Noise and Safety. Thank you for the opportunity to provide comments on the DEIR. At this time, I would like to once again mention to the City of Rancho Santa Margarita that TCA does have planned widenings along all the toll roads including State Route (SR) 241 through Rancho Santa Margarita. The SR 241 widenings should be reflected in any plans in the General Plan and DEIR as applicable.

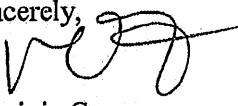
5-2

Additionally, please note that the City is within the Foothill/Eastern Transportation Corridor Agency Fee Program Area Zones A and B and will require payment of Development Impact Fees as a condition of issuing building permits for any future projects pursuant to the Major Thoroughfare and Bridge Fee Program adopted in 1988.

5-3

Thank you again for including the TCA on the City's distribution list. The Agency looks forward to receiving all future notices, the FEIR, along with any other forthcoming documentation for the General Plan Update. 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 949.754.3487 or via email at ygomez@thetollroads.com.

5-4

Sincerely,

Virginia Gomez
Environmental Analyst

cc: Document Control



Response No. 5

Virginia Gomez, Environmental Analyst
Transportation Corridor Agencies
June 20, 2019

5-1 This comment references an email attachment which includes the Transportation Corridor Agencies' (TCA) official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

5-2 This comment provides a general summary of the proposed project and notes that the TCA has planned widenings along all toll roads including State Route (SR) 241 through Rancho Santa Margarita. The commenter requests that the planned SR-241 widenings be reflected in any plans in the General Plan Update and Draft EIR as applicable. As indicated in Draft EIR Section 5.4, *Traffic and Circulation*, SR-241 currently consists of two travel lanes in each direction south of Santa Margarita Parkway. Projects and initiatives identified by TCA acknowledge that TCA is committed to identifying solutions that will relieve traffic congestion through South Orange County; however, there are no lane widening projects currently proposed with project-specific details (e.g., proposed number of lanes, width, and anticipated construction completion). Therefore, the traffic impact analysis accurately analyzes the project's potential impacts on existing and future conditions.

5-3 The commenter notes that the City is within the Foothill/Eastern Transportation Corridor Agency Fee Program Area Zones A and B and will require payment of Development Impact Fees as a condition of issuing building permits for any future projects pursuant to the Major Thoroughfare and Bridge Fee Program adopted in 1988. This comment is noted and will be considered for future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

5-4 As requested by the commenter, TCA will continue to be informed of the project and associated environmental documents.

Wendy Starks

From: Gius, Fred@DOC <fred.gius@conservation.ca.gov>
Sent: Thursday, June 20, 2019 4:04 PM
To: Wendy Starks
Subject: General Plan Update - CGS Comments
Attachments: CGS Comments_General Plan Update June 2019.pdf

Ms. Starks,
Attached are CGS' comments on the proposed General Plan Update.
Thanks for the opportunity.

6-1

Fred W. Gius, CEG
Supervising Engineering Geologist
Mineral Resources Program Manager
California Geological Survey



Department of Conservation
801 K Street, MS 12-31, Sacramento, CA 95814
T: (916) 322-2719
E: fred.gius@conservation.ca.gov



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June 20, 2019

VIA EMAIL: wstarks@cityofrsm.org

Ms. Wendy Starks, AICP, Principal Planner
City of Rancho Santa Margarita, Planning Division
22112 El Paseo
Rancho Santa Margarita, CA 92688

Re: Rancho Santa Margarita General Plan Update – Draft EIR

Dear Ms. Starks:

The California Geological Survey (CGS) has reviewed the Notice of Availability of a Draft Environmental Impact Report for the City of Rancho Santa Margarita General Plan Update. CGS provides objective economic-geologic expertise to assist in the protection and development of mineral resources through the land-use planning process. This effort is mandated by the Surface Mining and Reclamation Act of 1975 (SMARA). The primary products are mineral land classification maps and reports. Local agencies are required to use the classification information when developing land-use plans and making land-use decisions.

The project applicant has deemed impacts to mineral resources as "less than significant."

Evaluation

When determining if a proposed project is within a Mineral Resource Zone (MRZ), CGS refers to its published mineral land classification reports. Lands classified as MRZ-2 indicate a high likelihood that significant mineral deposits (construction aggregate) are present. Areas within a MRZ-2 that have land use(s) considered to be compatible with mining are identified as Sectors. The City of Rancho Santa Margarita is included in Special Report 143, Part III, and Open-File Report 94-15, prepared by CGS in 1981 and 1995, respectively.

In addition to the reports prepared by CGS, the State Mining and Geology Board (SMGB) can designate Sectors it deems as land containing mineral deposits of statewide or regional significance through their Designation Reports. Rancho Santa Margarita is included in the Designation Report No. 3 prepared by the SMGB in 1984.

Section 9 of the EIR states "MRZ-2 areas in the City lie within the general area of O'Neill Park along the Arroyo Trabuco Creek", however it does not mention that the MRZ-2 continues along Trabuco Creek through the Sphere of Influence (SOI), both north and south of Rancho Santa Margarita. Within the lands classified MRZ-2, Sector U and Sector V have been designated by the SMGB (see attached figure). Designated Sector U is

6-2

6-3

Ms. Wendy Starks
June 20, 2019

located along Trabuco Creek extending south from the Tijeras Creek Golf Club passing through and out of the SOI. Designated Sector V runs along Trabuco Creek from the intersection of Trabuco Creek Road and Trabuco Canyon Road. This Sector continues along the northwestern boundary of the northeastern SOI area, which is described by Rancho Santa Margarita as a planned future community (a land-use incompatible with mining).

The referenced Mineral Land Classification reports are available at:

ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/

ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-15/

The SMGB Designation Report and figures are available at:

<https://www.conservation.ca.gov/smgb/reports/Pages/Designation-Reports.aspx>

CGS Comment

CGS recommends that the EIR be revised to accurately reflect the location of all lands classified MRZ-2 within the SOI, and describe the potential impacts, or lack thereof, upon mineral resources.

Section 9 of the EIR states:

Additionally, O'Neill Park and the larger Arroyo Trabuco Creek are not utilized as a mineral resource recovery site.

Although this statement is accurate regarding current recovery operations, it should be revised to reflect the potential for future operations.

Thank you for giving us the opportunity to comments on the Draft EIR. If you have any questions, please contact me at 916-322-2719.

Sincerely,

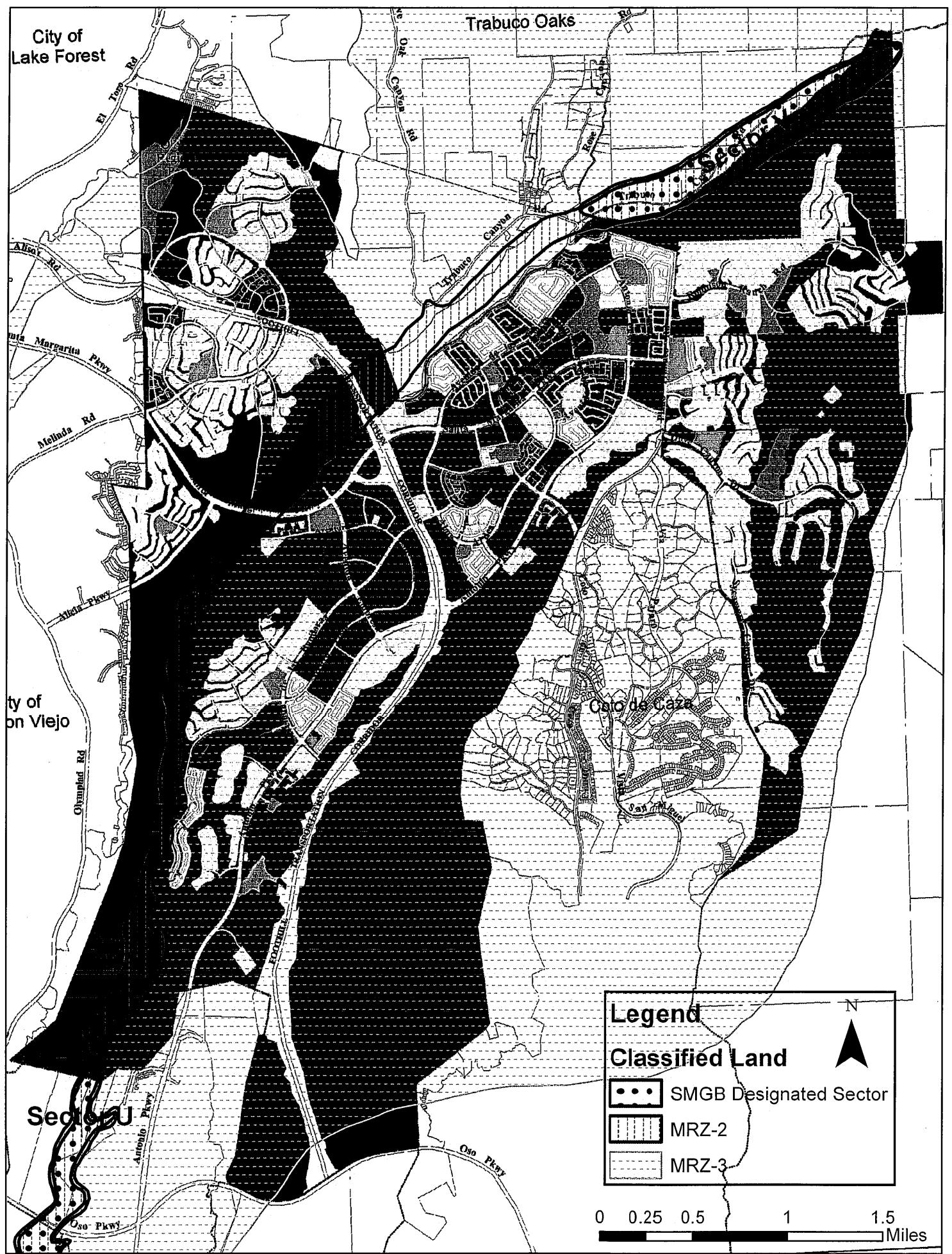


Fred Gius, CEG
Supervising Engineering Geologist
Mineral Resources Program

Cc: State Clearinghouse

6-3
Cont.

6-4





Response No. 6

Fred W. Gius, CEG, Supervising Engineering Geologist
Mineral Resources Program Manager
California Geological Survey
June 20, 2019

6-1 This comment references an email attachment which includes the California Geological Survey's (CGS) official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

6-2 This comment provides a general summary of the CGS' mission. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis.

6-3 The commenter explains that although Draft EIR Section 9.0, *Effects Found Not To Be Significant* notes "MRZ-2 areas in the City lie within the general area of O'Neill Regional Park along the Arroyo Trabuco Creek," it does not mention that MRZ-2 continues along the Trabuco Creek through the Sphere of Influence (SOI), both north and south of Rancho Santa Margarita. Within the lands classified as MRZ-2, Sector U and Sector V have been designated by the State Mining and Geology Board (SMGB). Designated Sector U areas are located along Trabuco Creek extending south from the Tijeras Creek Golf Club passing through and out of the Sphere of Influence. Designated Sector V areas are located along Trabuco Creek from the intersection of Trabuco Creek Road and Trabuco Canyon Road. Sector V continues along the northwestern boundary of the northeastern SOI area, which is identified as "Future Planned Community" on Draft EIR Exhibit 3-3, *General Plan Update Land Use Map*.

The City understands that a portion of the "Future Planned Community" depicted on Draft EIR Exhibit 3-3 would overlap within lands classified as MRZ-2 Sector V. Rancho Santa Margarita is primarily comprised of a series of Planned Communities. At this time, the Planned Communities have been built out and there are no vacant parcels available for development within the City, except for the 92-acre Chiquita Ridge area, leaving little opportunity for significant mineral resources extraction. Based on the developed nature of the City of Rancho Santa Margarita, it is unlikely that suitable mineral resources would be available in areas of adequate size and remoteness to be economically viable for mineral extraction. Further, based on the Surface Mining and Reclamation Act (SMARA) Designation Report No. 3, additional aggregate resources are available in the Orange County-Temescal Canyon Valley P-C Region; refer to SMARA Designation Report No. 3 Table 1, *Regional Aggregate Resources of*



the Orange County-Temescal Canyon Valley P-C Region.² Potential impacts to mineral resources as a result of implementation of the General Plan Update are anticipated to be less than significant due to the unlikelihood of the identified areas to be utilized for mineral extraction and relatively limited footprint of the "Future Planned Community" land use on lands classified as MRZ-2 Sector V. Nevertheless, the requested clarifications have been made to Section 9.0 of the Draft EIR and are reflected below and in Section 3.0, Errata, of this Final EIR.

Page 9-5, Page 9-5, Mineral Resources Response (a)**MINERAL RESOURCES**

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?*

Less Than Significant Impact. The California Department of Conservation, Division of Mines and Geology, designates areas as Mineral Resource Zones (MRZ). MRZ-1 is defined as areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. MRZ-2 is defined as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. MRZ-2 areas are considered significant mineral resource areas. MRZ-3 is defined as areas containing mineral deposits the significance of which cannot be evaluated from available data.

The City of Rancho Santa Margarita includes areas designated as Mineral Resource Zones (MRZs) 1, 2 and 3.³ MRZ-2 areas in the City lie within the general area of O'Neill Park along the Arroyo Trabuco Creek and continue along the Trabuco Creek through the Sphere of Influence (SOI), both north and south of Rancho Santa Margarita. The proposed land use plan does not change the land use designations or allow any development within these areas. Therefore, project development would not result in the loss of availability of a known mineral resource. A portion of the "Future Planned Community" depicted on Exhibit 3-3 would overlap within lands classified as MRZ-2 Sector V. Based on the built-out nature of the City of Rancho Santa Margarita, it is unlikely that suitable mineral resources would be available in areas of adequate size and remoteness to be economically viable for mineral extraction. Further, based on the SMARA Designation Report No. 3, additional aggregate resources are available in the Orange County-Temescal Canyon Valley P-C Region; refer to SMARA Designation Report No. 3 Table 1, Regional Aggregate Resources of the Orange

² California Department of Conservation State Mining and Geology Board, SMARA Designation Report No. 3: Designation of Regionally Significant Construction Aggregate Resource Areas in the Orange County – Temescal Valley and San Gabriel Valley Production-Consumption Regions, August 1984.

³ California Department of Conservation, Mineral Land Classification of the Greater Los Angeles Area Orange County-Temescal Valley Production-Consumption Region, Arroyo Trabuco and San Juan Creek Resource Areas, Aggregate Resource Sectors T-V, 1981, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/Plate_3-6.pdf, accessed May 1, 2018.



County-Temescal Canyon Valley P-C Region.⁴ As a result, potential impacts to mineral resources as a result of implementation of the General Plan Update are anticipated to be less than significant due to the unlikelihood of the identified areas to be utilized for mineral extraction and relatively limited footprint of the "Future Planned Community" land use on lands classified as MRZ-2 Sector V. Additionally, O'Neill Park and the larger Arroyo Trabuco Creek are not utilized as a mineral resource recovery site. Impacts would be less than significant in this regard.

These changes provide a minor update, correction, or clarification and do not represent "significant new information" as defined in CEQA Guidelines Section 15088.5.

6-4 The commenter recommends the Draft EIR be revised to accurately reflect the location of all lands classified MRZ-2 within the SOI, and describe potential impacts, or lack thereof, upon mineral resources. Refer to Response No. 6-3 above.

The commenter also requests that the Draft EIR be revised to reflect the potential for future operations of the O'Neill Regional Park and the larger Arroyo Trabuco Creek as mineral resource recovery sites. As indicated above, based on the built-out nature of the City of Rancho Santa Margarita, it is unlikely that suitable mineral resources would be available in areas of adequate size and remoteness to be economically viable for mineral extraction. No changes are necessary in this regard.

⁴ California Department of Conservation State Mining and Geology Board, SMARA Designation Report No. 3: Designation of Regionally Significant Construction Aggregate Resource Areas in the Orange County – Temescal Valley and San Gabriel Valley Production-Consumption Regions, August 1984.

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, Ca. 92688

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update

Dear Ms. Starks,

As a 30 year resident of RSM and 20 year member of Dove Canyon Association, I am writing today to express my concern for the Draft EIR for the city of RSM.

The proposed RSM General Plan update seems to be in accordance with the past history of our city with limited growth and low density residential housing. What is a concern is the projected net growth of 528 dwelling units by 2040. This amount of growth would dramatically alter RSM's family friendly community and alter our city forever. Safety, quality of life, and traffic would all be impacted by this population increase. Our roads during peak times are already an issue. The potential for a mass evacuations if fire were to break out in our surrounding forests would be a traffic nightmare as was seen in this last years fires in Paradise California.

I am especially concerned that RSM has already permitted more new dwelling units than was projected in the Draft EIR 2020 General Plan. I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Should the update be approved I would sincerely hope RSM to not repeat its past misgivings.

The Update is very important to me as I am a Dove Canyon Association member and RSM resident who is opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive. The owner of this plaza has put forward many projected ideas from 174 senior luxury condos to 392 apartments. All of the ideas the owner has brought forth are high to mid density housing which is incongruent with the low density residential land use designation which surrounds Dove Canyon Plaza. If the owners succeeds in their efforts to build this high to mid density housing it would be incongruent with the Update. It is extremely important to me as a RSM resident for the safety and health of our city that the Update make this a priority and not facilitate further residential development.

Lastly I am pleased that the Update does not show any change to the zoning of the Dove Canyon Plaza. I strongly encourage that this zoning continue as such and that the Update does not support potential residential redevelopment of the Dove Canyon Plaza. I am confident that the lost businesses in the center will return once this developer has lost his bid to dramatically change our environment. The safety, health, noise, pollution, traffic, aesthetics, fire and police would all be impacted by any change to the zoning of the Dove Canyon Plaza.

7-1

Sincerely,

Julie and Gary James
4 Jericho
Dove Canyon, Ca. 92679

June 18, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

7-1
Cont.

I HAVE BEEN A 30 YEAR RESIDENT OF DOVE CANYON AND DO NOT
WANT ANY NEW HOUSES OF ANY KINDS IN THE DOVE CANYON CENTER -
THE REASONS ARE INCLUDED IN THIS 2 PAGE LETTER!

Wendy Starks

City of Rancho Santa Margarita

Page 2

LL

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

7-1
Cont.

Very truly yours,

Lou Gallipen [name]

35 HIGHPOINT [address]

LAKE RIDGE

DOVE CANYON, CA 92679

Wendy Starks

From: Joan Bartlett <bjbart@cox.net>
Sent: Wednesday, June 5, 2019 5:22 PM
To: Wendy Starks
Subject: Dove Canyon Plaza
Attachments: DC Plaza corrected #2.docx

Ms Starks,

Thank you for considering the concern my wife and I have should the change in zoning and the proposed development be build on the Dove Canyon Plaza property.

We are happy to see that the General Plan Update (Draft EIR) has the property remaining as Neighborhood Commercial as it should.

Thank you,

Bob & Joan Bartlett
29 year Dove Canyon Residence

8-1



June 4, 2019

Subject: Dove Canyon Plaza

When you drive around RSM on any street other than Santa Margarita Parkway or Antonio all you see is cars parked in the streets from overflow cars from the condos, apartments and patio homes built in our city. Please do not rezone the DC Plaza and add more unsightly street overflow. We have enough high-density housing.

The proposed project for DC Plaza if rezoning is approved will stick out like a prison in the middle of three single-family home communities and SMCHS on the other side.

A major concern is traffic. With one entrance and one exit for both the DC Plaza and the Dove Canyon Community will create major traffic problems. The added traffic from the SMCHS students parking on Dove Canyon Drive in the morning will create the ultimate traffic jam. A fire or medical emergency in Dove Canyon during this morning traffic would not allow the first responders to get into Dove Canyon in a timely manor and lives could be lost. In the case of a fire multiple homes could be damaged because of no fire equipment available.

DC Plaza could be a successful center if it had the type of tenants the Arbours Office Campus has over next to the old Nissan Dealership. Doctors, dentists, rehab, out patient surgery center, insurance agents, etc. The good news is most of the offices open after people leave for work and the SMCHS students are in classes. Modernize the buildings might be in order. Healthcare is growing and new healthcare professionals are always looking for new office space. People drive all over Orange County for their healthcare needs today and this could end up being a more convenient location.

I realize William Lyon is a very prominent individual in South Orange County and has done a lot of good deeds in our area including helping when SMCHS started but we do not need 150 to 392 condo/apartments at the DC Plaza location.

Thank you for reading my comments. I will be following the process and attending meetings as they unfold once the submission is in for rezoning.

Regards,

Bob Bartlett
29 year Dove Canyon Residence
Mobile: 949-535-6501

8-1
Cont.

Wendy Starks

From: David French <dfrench@planethomeliving.com>
Sent: Wednesday, June 5, 2019 4:28 PM
To: Wendy Starks
Subject: Dove Canyon Plaza Opposition - David & Kim French 3 Morningstar, Dove Canyon, CA 92679
Attachments: SKM_C30819060515251.pdf; SKM_C30819060515250.pdf

David French
COO, President



planet home living™

1451 Quail Street, Suite #204 Newport Beach, CA 92660

O: 949.208.7248

C: 949.300.4804

F: 949.387.8990

www.planethomeliving.com

dfrench@planethomeliving.com



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Wendy Starks, Principal Planner City of Rancho Santa Margarita

22112 El Paseo
Rancho Santa Margarita, CA 92688

Email: wstarks@cityofrsm.org

June 5, 2019

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Very truly yours,



David French
3 Morningstar
Dove Canyon, CA 92679

9-1
Cont.

Wendy Starks, Principal Planner City of Rancho Santa Margarita

22112 El Paseo
Rancho Santa Margarita, CA 92688

Email: wstarks@cityofrsm.org

June 5, 2019

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

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10-1

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Very truly yours,



Kim French
3 Morningstar
Dove Canyon, CA 92679

10-1
Cont.

Wendy Starks

From: Otar Bezashvili <otar@ecomstor.com>
Sent: Wednesday, June 5, 2019 4:31 PM
To: Wendy Starks
Subject: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

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Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

11-1

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential development projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

11-1
Cont.

Thank you,

Otar Bezhashvili

15 Glen Echo

Dove Canyon, CA 92679

June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

12-1

Wendy Starks
City of Rancho Santa Margarita
Page 2

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 138 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

12-1
Cont.

Very truly yours,

Gary Biehl [name]
04/26/08 [address]
DOVE CANYON 92670

Wendy Starks

From: Fricks, Jim <Jim.M.Fricks@saint-gobain.com>
Sent: Thursday, June 6, 2019 9:31 AM
To: Wendy Starks
Cc: terrifricks@gmail.com
Subject: Dove Canyon Rezoning Concerns
Attachments: 20190606094120282.pdf

Dear Ms. Starks,

Please find attached our Letter of Concerns in regard to the proposed rezoning of the Dove Canyon Plaza Retail Center. I would appreciate you taking the time to seriously review these concerns and take them into consideration prior to any final decisions being made about the proposed rezoning.

Best regards,

Jim Fricks

Jim.m.fricks@saint-gobain.com
Direct: 714-694-7521
Cell: 714-394-6360

13-1

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita

General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential

13-1
Cont.

projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

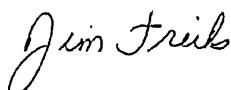
The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected

number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development. I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents of Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Very truly yours,

Jim & Terri Fricks

50 Hillrise Dove Canyon, CA 92679



Wendy Starks

From: Shawn Gordon <smga3000@gmail.com>
Sent: Thursday, June 6, 2019 9:33 AM
To: Wendy Starks
Subject: General plan update comments

Dear Ms. Starks:

As a 21 year resident of RSM, I wanted to provide feedback on the proposed General Plan Update. I believe what you currently have appropriately reflects that minimal to zero residential growth should be permitted in RSM, and any growth that might be allowed, be of the low density variety, unlike the last 2 rezones of property that allowed for high density housing where the builders also mislead the homeowners into thinking they would have access to SAMLARC facilities.

We are currently well past what was allowed for in the current General Plan, and the target of 528 dwelling units by 2040 is unrealistic, there is nowhere for them to go without tearing down tax generating commercial centers and replacing them with negative revenue (for the city) high density housing units. Our city has extremely limited arteries in and out, and as the Holy Fire just last year showed us, we could get stuck very easily. Traffic is already pretty bad in town, adding hundreds of houses with thousands of people is a disaster waiting to happen.

14-1

I am also opposed to mixed-use land use, which we see a lot in Anaheim now, basically you have overpriced condos on top of a Subway sandwich. it just isn't feasible in our town with the height restrictions. All of these things have a negative impact on the tax base, the aesthetic, traffic, crime, schools of the city in addition to environmental impacts.

This also dovetails (if you will) into the proposed re-zone of Dove Canyon Plaza into residential from commercial, I believe that proposal is coming in July. There is nothing about the idea that is positive for our city and I hope our General Plan update will shut down the notion of that re-zone being considered.

Thank You,
Shawn Gordon
5 Coluso
RSM, CA 92688

--
Best Regards,
Shawn Gordon

Wendy Starks

From: Jerry Sanchez <gsanchez200@gmail.com>
Sent: Thursday, June 6, 2019 11:45 AM
To: Wendy Starks
Subject: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update
Attachments: June 6 2019 letter of concern to RSM.pdf

June 6, 2019
 Wendy Starks, Principal Planner
 City of Rancho Santa Margarita
 22112 El Paseo
 Rancho Santa Margarita, CA 92688
 Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

My wife and I are due-paying members of the Dove Canyon Master Association (“DCMA”) and tax-contributing residents in the City of Rancho Santa Margarita (“RSM”). Because of the potential changes to the landmark Dove Canyon Plaza to residential apartments we write to you to offer our public comments concerning this change. It seems clear to us that the potential change will harm the character of the RSM community, its safety, and the well-being of the RMS residents, you represent.

As you prepare to evaluate the General Plan for updates please remember that the goals and policies that govern our RSM community and should not take a back seat to the profit desires of a developer who wishes to change our community for the sake of a few shareholders.

15-1

Please continue planning the growth of RSM so that we do not get our public safety to be threatened by the intermittent forest wildfires that occur in our area. It is intuitively clear that as the number of residents and cars increase, that will make more dangerous and more difficult to plan for evacuations and control. No potential harm must come to any RSM resident, especially in our Dove Canyon area, due to the clear danger the proposed changes to the Dove Canyon Plaza will bring.

Moreover, there will undoubtedly be harmful environmental impacts (traffic, pollution, noise, etc.) that we will suffer as a result of the changes to Dove Canyon Plaza desired by the developer. We should not suffer these impacts because of an unwelcome desire by the developer that brings no commensurate benefit to the RSM community. Therefore, we ask and implore that you and RSM protect my wife and me, as well your other constituents and neighbors, by not supporting or accepting a General Plan Update that includes the potential residential redevelopment of the Dove Canyon Plaza.

Very truly yours,

Gerardo & Julia Sanchez

Castle Point, Dove Canyon, CA 92679-3509
 949-616-0724 gsanchez200@gmail.com

Wendy Starks

From: Rich McWilliams <konamac@comcast.net>
sent: Thursday, June 6, 2019 3:33 PM
To: Wendy Starks
Cc: Beckie McWilliams
Subject: SUBMITTAL OF PUBLIC COMMENTS ON DRAFT EIR FOR RANCHO SANTA MARGARITA GENERAL PLAN UPDATE
Attachments: RICHARD AND BECKIE MCWILLIAMS COMMENTS ON GENERAL PLAN UPDATE JUNE 2019.docx

Dear Ms. Starks,

Please find attached our submittal of public comments on the city's Draft EIR for the General Plan Update.

Thank you for incorporating our comments into the file on this matter. If you for any reason need verification of our submittal, please do not hesitate to call.

Thank you,

Richard McWilliams
6 Aspen Leaf
RSM
25-337-5346 cell

16-1

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

We are members of the Dove Canyon Master Association and reside in the City of Rancho Santa Margarita ("RSM"). We would like to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") in our opinion properly reflects that minimal, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with RSM's existing land uses. RSM is a community of largely single family homes and it is critically important that continue for the maintenance of RSM residents' health, safety, and well-being. That principal of maintaining community integrity is recognized in the General Plan Update Goals and Policies and is appreciated.

We chose to move here in May, 2018. We relocated from northern California and could have moved anywhere. We chose RSM because it has been thoughtfully-planned, has been recognized as one of the safest communities we could choose in California, and because it has a sense of community. It has not succumbed to the crowded, urbanized, high-rise residential trends and accompanying negative impacts on the community that we escaped in our former city and that we have seen in some neighboring cities.

We are concerned that the City-wide projected net growth of 528 dwelling units by 2040 appears over-ambitious. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of the community.

The incidence of significant and deadly wildfires over the last several years in Orange County and across the State of California, combined with the vast open space forest and park land next to and interwoven in RSM, tells us that permitting appreciable further residential development, and particularly medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure and the greater surrounding transportation infrastructure. They were not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic movement and parking are already significant concerns throughout RSM, particularly around peak transportation hours, and adding additional cars to the existing street system risks lives in the event of a natural disaster such as a wildfire. Driving the length of Santa Margarita Parkway from Alicia Parkway to Plano Trabuco can easily take 20 minutes during commute hours. And exiting driveways from adjacent commercial properties at those times is a challenge.

16-1
Cont.

Wendy Starks
City of Rancho Santa Margarita
From McWilliams
Page 2

The number of motor vehicles sitting queued at traffic signals, repeatedly accelerating and decelerating, wastes natural resources and contributes to toxic emissions in our air. Traffic collisions are frequent occurrences on the downtown streets. Curb parking along Alma Aldea between La Promesa and Avenida De Las Banderas is at a premium due to the presence of high-density residential apartments adjacent to the shopping centers.

For these same reasons we are opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM (mentioned previously) and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

We are particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. **Since RSM has already exceeded the projected number of new dwelling units in the existing General Plan and RSM is considering the much needed Update, we strongly urge RSM not to consider any further applications to add any more new dwelling units before the Update has been approved and adopted.** Should the Update be approved, we urge RSM to not continue excessive permitting of residential units as a matter of policy.

The Update is particularly important to us as we are among the large number of Dove Canyon Master Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. We have attended multiple public meetings regarding Dove Canyon Plaza and have yet to meet a resident or a Dove Canyon Plaza business owner who favors redevelopment.

The owner and owner-representative of Dove Canyon Plaza have publicly presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. It is our understanding that each of those options would constitute either a high-density or a medium-density residential land use designation, which is completely incompatible with the low-density residential land use designation that surrounds the Dove Canyon Plaza. Since the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, **any of the options being considered by Dove Canyon Plaza's owners would either use up every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of such units.** Either way, the residential redevelopment of Dove Canyon Plaza would completely controvert the Update, which is why it is critically important to us that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

16-1
Cont.

Wendy Starks
City of Rancho Santa Margarita
From McWilliams
Page 3

We also note, support, and appreciate that the Dove Canyon Plaza's "neighborhood commercial" zoning will remain unchanged under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update.

The Dove Canyon Plaza is zoned as "neighborhood commercial" primarily because it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and surrounding neighborhoods in addition to the students and employees of Santa Margarita Catholic High School. We support the businesses at this center and utilize their services regularly.

We looked at the commercial center as one of the positive factors that influenced our decision to move here. Our insurance representation was transferred from our former northern California agent to the local agent at Dove Canyon Plaza. We lost our homeowner insurance after the Holy Fire and our local agent was the only one able to find a suitable replacement policy for us. We count on that kind of service from a local agent who understands the community. A thriving, popular restaurant at the center has plans to open in another city. This is solely in response to the center's owners' stated proposed actions and will mean a loss for its patrons and a loss for the community. With no other nearby commercial centers, everyone will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts.

We do not want to suffer from significant, avoidable environmental impacts and thus urge RSM to protect us and our fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Sincerely,

Richard A. McWilliams
Beckie A. McWilliams
6 Aspen Leaf, Dove Canyon
Rancho Santa Margarita, CA 92679

submitted by email

16-1
Cont.

Wendy Starks

From: RICHARD KEENAN <rmkeenan@cox.net>
sent: Thursday, June 6, 2019 4:15 PM
To: Wendy Starks
Subject: Dove Canyon Plaza

Dear Ms. Stark

I am a resident of the Dove Canyon community. I understand that a Proposed Santa Margarita General Plan Update and Draft EIR are presently open for comment. My brief comments follow.

I moved to southern California in 1986 and have been blessed to raise my 4 children in nearby Mission Viejo for 23 years. In May, 2019 I relocated to Dove Canyon after selling my Mission Viejo home to my daughter who is now raising 3 of my 8 grandchildren in that very same home.

After 10 years in Dove Canyon, I was recently dropped by my home insurer of 33 years, Liberty Mutual, due to evaluation of the fire hazards Dove Canyon represents. I am scrambling to find another cost effective policy and deeply disappointed by this action. Unfortunately, I somewhat understand their position having recently watched flames on the other side of the mountain in clear view from my homes windows while firefighters in places and helicopters battled these fires for days on end in Lake Elsinore. Clearly, the Dove Canyon community is at risk for a major fire emergency of its own. Most insurers I have approached agree with Liberty Mutual and won't even give me a quote.

17-1

Emergency access and egress for Dove Canyon is limited to Dove Canyon Drive. If you have ever seen nonresidents trying to access the community on a major holiday or say for a Super Bowl party to gather with Dove Canyon friends, you saw cars backed up to and onto Plano Trabuco Road. Now imagine an emergency evacuation involving 1250 Dove Canyon residences plus residences from nearby Coto de Caza and Rancho Cielo plus Robinson Ranch all trying to simultaneously funnel onto Santa Margarita Parkway to escape. Our situation is already precarious. I pray this fact is properly considered in the current EIR update.

The possibility that a developer is exploring the idea of adding high density housing in the location currently called Dove Canyon Plaza is nothing short of terrifying. This absolutely cannot be allowed.

Thank you for the opportunity to highlight this issue of critical importance.

Sincerely,

Richard Keenan

17 Golf Ridge Drive

Dove Canyon, CA 92679

Mobile: 949-365-6184

Wendy Starks

From: Bill Ambrosius <whambro@gmail.com>
Sent: Sunday, June 9, 2019 11:52 AM
To: Wendy Starks
Subject: Dove Canyon Plaza and General Plan EIR
Attachments: General Plan EIR Letter.docx

Hi Wendy,

Please consider our comments on the Dove Canyon Plaza and General Plan EIR attached.

Thank you,

William and Kathleen Ambrosius

18-1



June ___, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

We are resident owners in Dove Canyon. It is important to us that the Dove Canyon Plaza (DCP) remains zoned as neighborhood commercial and that the City Council ensures that RSM maintains our current culture of low-density residential and family friendly neighborhoods.

Dove Canyon Plaza should remain neighborhood commercial for these considerations:

- Emergency Evacuation – there is only a single viable ingress/egress for all of Dove Canyon residents and that is via Dove Canyon Drive. Residents of Dove Canyon, Coto de Caza and Santa Margarita Catholic High School egress onto Plan Trabuco Road which creates a serious bottleneck. Adding apartments or other residences in DCP will greatly increase risk to our lives in a fire or other emergency evacuation event, especially during non-daytime hours when virtually all residents will need to egress simultaneously. The local infrastructure is clearly not designed to support this additional traffic.
- Safety – access by first responders into Dove Canyon will be hampered by additional traffic and parking density along Dove Canyon Drive. Additional traffic and auto density will also negatively impact the pedestrian and driving safety of Santa Margarita Catholic High School students.
- Traffic – rush hour traffic, especially for Dove Canyon residents, will be significantly adversely affected by the addition of any residences in DCP. This will cause back-ups not only on Dove Canyon Drive, but also on Plan Trabuco Road. Rush hour traffic impact relative to the current commercial use of DCP is negligible.
- Quality of Life – current residents of RSM have moved here specifically for the quality of life that RSM has been able to establish based on its current General Plan including low-density residential areas with green belts, limited high-rise apartments, light traffic, air quality, noise quality, general cleanliness, and excellent infrastructure. Adding residences to DCP will affect all these qualities negatively, especially for residents of Dove Canyon and neighboring areas.

We implore RSM to not consider adding any new dwellings, either before or after approval of the pending General Plan Update.

RSM should prioritize the safety and well-being of RSM residents over additional residential development.

Very truly yours,

William and Kathleen Ambrosius

77 Bell Canyon Drive

Dove Canyon, CA 92679

18-1
Cont.

CITYRSM19JUN 7pm 1e52

June 5, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a resident at 22 Wakonda in Dove Canyon. I am writing to you to provide public comment concerning the Draft EIR for the RSM general plan update.

The proposed RSM General Plan Update properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should be of a low-density residential land use designation to be consistent with the of RSM's existing land uses. RSM is a community of largely single family homes and it is important that it continues for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

I am concerned the City-wide projected growth of dwelling units by 2040 appears overreaching. That amount or a greater amount of projected growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city. By adding more people and more cars to RSM's transportation infrastructure, will create more traffic that is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system.

My wife and I are opposed to the mixed-use land use alternative that would permit additional dwelling units and convert existing commercial uses to mixed-uses at Dove Canyon Plaza, 31931 Dove Canyon Dr. This would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic, noise, police protection, school facilities, parks and recreation, water supply, and ect.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the RSM Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods.

Thank you



William & Connie Cole

19-1

CITYRSM/19JUN 7PM 1:53

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

20-1

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Very truly yours,

Robert M Collins

Robert M. Collins

17 Inverary, Dove Canyon CA 92679

20-1
Cont.

June 05, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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21-1

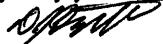
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21-1
Cont.

Very truly yours,



Dennis Duight [name]

26 Golf View Dr. [address]

Dove Canyon, CA. 92679

June 5, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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22-1



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Very truly yours,

Wendy Starks [name]
15 Promontory [address]
Dove Canyon

22-1
Cont.

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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23-1

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23-1
Cont.

Very truly yours,

Jose and Lidia Mague [name]
14 Promontory [address]
Dove Canyon, CA 92679

June 5, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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24-1

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Very truly yours,

Sandra Mindt
Michael Mindt
8 Coachmen

Dove Canyon, Ca 92679

24-1
Cont.

June 10, 2019

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City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
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25-1



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25-1
Cont.

Very truly yours,

John Hall

3 Foxhollow, Dove Canyon

John W. Hall

Wendy Starks

From: mrjohnwhall@aol.com
Sent: Monday, June 10, 2019 11:55 AM
To: Wendy Starks
Subject: Proposed RSM Zoning Changes
Attachments: RSM Proposed Zoning Update.pdf

Dear Wendy, please find attached my shared concerns regarding the EIR for the Rancho Santa Margarita General Plan update.

Thank you,
John Hall

25-1
Cont.

June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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26-1

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Very truly yours,

Ernest Patrick and Marilyn Lawrence

61 Bell Canyon Drive, Dove Canyon, CA 92679

Wendy Starks

From: Don Chedwick <dchedwick@sullicurt.com>
Sent: Monday, June 10, 2019 2:18 PM
To: Wendy Starks
Subject: Dove Canyon Plaza
Attachments: 20190610132540209.pdf

27-1

Please see attached



Donald G. Chedwick, CIC | Vice President
SullivanCurtisMonroe | 1920 Main Street, Suite 600, Irvine, CA 92614
Direct (949) 852-4811 | Fax (949) 852-9762



CA Insurance License 0E83670

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Thank You

Please consider the environment before printing this e-mail.

June 18 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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27-1
Cont.

Very truly yours,

Sandy Chaffick [name]
35 MULFIELD [address]
Dove Canyon CA

Wendy Starks

From: HECTOR HAGET <hhaget@cox.net>
Sent: Monday, June 10, 2019 4:10 PM
To: Wendy Starks
Subject: Comments to Draft EIR RSM Update
Attachments: Dove RSM General Plan Update Comments Letter.pdf

Please see attached letter that outline my specific concerns for the proposed development outside The Dove Canyon community.

Sincerely

Hector Haget

9 Brighton

Trabuco Canyon Ca 92679

28-1



June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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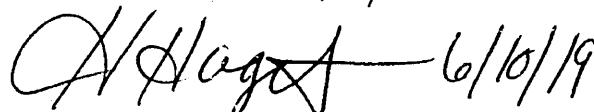
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Very truly yours,

Hector Hager [name]

9 Brighton [address]

DOVE CANYON

 6/10/19

28-1
Cont.

Wendy Starks

From: Larry Gregson <larrygregson@me.com>
Sent: Monday, June 10, 2019 7:21 PM
To: Wendy Starks
Subject: General Plan
Attachments: Letter to Wendy Starks re RSM General Update.docx; ATT00001.txt

Dear Ms Stark:

Please carefully read the attached letter regarding the public comments concerning the draft EIR for Rancho Santa Margarita General plan update. Thank you for your consideration.

Best regards,

Larry W. Gregson

29-1



June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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Very truly yours,

Lawrence and Lori Gregson

85 Bell Canyon Drive, Dove Canyon, CA 92679

CITYRSM/19JUN10PM 3#03

June 5, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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30-1
Cont.

Very truly yours,

Jade Orzol

37 Summitcrest

Dove Canyon CA 92679

CITYRSM719JUN18PM 3#81

June 7, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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31-1

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31-1
Cont.

Very truly yours,
Linda and Salim
Sionfi [name]
11 Villamoura [address]
Dove Canyon, CA 92679
(949) 285-4782

We have lived here for 10 years, please do not
ruin the Plaza and our quality of life here.

CITYRSM13JUN10pm 3:00

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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32-1

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32-1
Cont.

Very truly yours,

CHRIS McGEE [name]

26 GREENSPRING [address]

DOVE CANYON CA. 92679

CITYRSM 10 JUN 10 PM 3:00

June 6th, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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33-1
Cont.

Very truly yours,

Patricia McGee [name]

26 Greenspring [address]

Dove Canyon, CA 92679

CITYRSM19JUN10PM 2:53

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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34-1

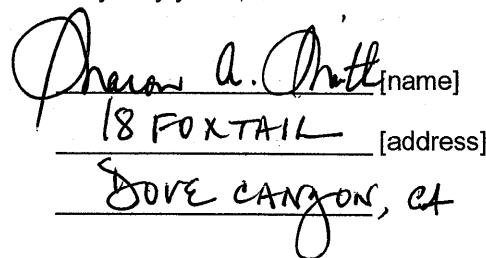
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34-1
Cont.

Very truly yours,


Wendy A. Starks [name]
18 FOXTAIL [address]
DOVE CANYON, CA

CITYRSM 19 JUN 10 PM 2:57

June 6, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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35-1
Cont.

Very truly yours,

Enrico Santamaria [name]

12 Club Vista [address]

Dove Canyon, CA 92679

P.S. I know this is a form letter, but it is the
most expeditious way to make my views known.
I do pay attention to ~~our~~ events around our city.

June 9, 2019

ATTURCHIN 9 JUN 11 PM 4-12

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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36-1

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36-1
Cont.

Very truly yours,

Scott & Ann Nelson [name]
53 Foxtail Lane [address]
Dove Canyon CA

CITYRSM19JUN11PM 1a12

June 9, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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37-1
Cont.

Very truly yours,



David M. Helmick [name]

67 Hillside [address]

Dove Canyon, Ca.

92679

CITYRSM19JUN11PM 1:15

June 9, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

**Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update**

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38-1
Cont.

Very truly yours,

Brian & Jennifer Slattery
[name]
2 Rocky Pt. [address]
Dove Canyon, CA

CITYRSM714.JUN11PM 1#15

June 9, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
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Rancho Santa Margarita, CA 92688
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39-1
Cont.

Very truly yours,

Michael Krusawski [name]

54 Foxhill Ln [address]

Dove Canyon CA 92679



CITYRSM/19.JUN11PM 1:15

June 9, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
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40-1
Cont.

Very truly yours,

Cheryl P Evans [name]
11 Saint Elias [address]
Dove Cyn, CA 92679

CITYRSM19JUN11PM 1118

June 5, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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For these reasons, I oppose the proposed General Plan Update and the Draft EIR. I request that the City of Rancho Santa Margarita consider the concerns expressed in this letter and make the necessary changes to the proposed General Plan Update and the Draft EIR to reflect the concerns of the Dove Canyon Association and the residents of RSM.

41-1

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41-1
Cont.

Very truly yours,

PETER & JODY SULLOSS [name]

28 THORN OAK [address]

RSM 92679

June 11, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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42-1



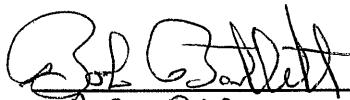
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42-1
Cont.

Very truly yours,


Bob Bartlett [name]
37 MUIRFIELD [address]

Dove Canyon, CA

92679

June 11, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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43-1
Cont.

Very truly yours,

Span L. Barefoot [name]

37 Muirfield [address]

Dove Canyon, Ca 92679

Wendy Starks

From: Ghafouri, Mahmoud@DOT <mahmoud.ghafouri@dot.ca.gov>
Sent: Wednesday, June 12, 2019 9:47 AM
To: Wendy Starks
Cc: 'mgmails@yahoo.com'; Ghafouri, Mahmoud@DOT
Subject: Draft EIR for RSM
Attachments: Dove Canyon Plaza Mahmoud Leter.pdf

Hi Ms. Starks,

Pls. see my letter above. Thanks.

Mahmoud Ghafouri
3 Midlothian, Dove Canyon CA 92679

44-1



June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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Very truly yours,

Mahmood Ghafouri [name]

3 Midlothian [address]

Dove Canyon, CA 92679

44-1
Cont.

Wendy Starks

From: David Castillo <ddcast2000@gmail.com>
Sent: Wednesday, June 12, 2019 11:00 AM
To: Wendy Starks
Subject: Dove Canyon Plaza Rezoning
Attachments: DCMA - Letter RSM General Plan Update.docx

Dear Wendy Starks, please read my letter regarding this issue.
Thank you for your help and have a great day!

David Castillo

45-1



June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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45-1
Cont.

Very truly yours,

David and Susana Castillo

2 Villamoura,
Trabuco Canyon, CA 92679

Wendy Starks

From: Patti Smith <smittibear@gmail.com>
Sent: Wednesday, June 12, 2019 11:12 AM
To: Wendy Starks
Subject: General Plan Update Comment Letter
Attachments: Letter to RSM re Dove Canyon Plaza.docx

Dear Ms. Starks:

Please see attached letter with our comments concerning the General Plan Update.

Kind regards,

Patti Smith

46-1



June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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46-1
Cont.

Very truly yours,

Kent Hindes and Patti Smith
15 Inverary
Dove Canyon, CA 92679

June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

CITYRSM19JUN12PM 12:51

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Dear Ms. Starks:

I am a resident of Rancho Santa Margarita (RSM) and a member of the Dove Canyon Master Association (DCMA). I write to you to provide comments concerning the Draft EIR for the RSM General Plan Update (Draft EIR).

First, I would like to thank you and your staff very much for your work in preparing the Draft EIR. And, based on my review of the document, additional thanks are due for your recognition of the importance in preserving the look and feel of RSM.

As shown in Table 3-1 "Existing Land Use Summary" in the Draft EIR, Low Density Residential development comprises 895.5 acres of the total 1,638.4 total RSM residential acreage. Therefore, the City's residential development is dominantly (54.7%) characterized by low-density, single-family dwellings. Coupled with total residential development comprising less than 20% of the City's 8,279.9 acreage and "open spaces," & parks comprising nearly 60% of the City's acreage, the General Plan Update effectively preserves Mr. Richard Reese's vision of RSM as "Our Village Home".

The City projects modest net growth of 528 dwelling units by 2040. With regret, I think growth may turn out to be substantially greater – much as we have seen with the exceedance of the current Plan. However, Exhibit 5.1-1 (General Plan Land Use Map) illustrates that there is minimal, if any, real estate available for residential development unless the City accepts the unfortunate prospect of rezoning existing non-residential parcels. The City should consider a more attractive option in moving forward by incorporating the area to the northeast of the City designated as "Future Planned Community". The extended timelines for increased growth in the number of dwelling unit (out to 2040) are consistent with that strategy.

Looking forward to the near-term, the City will soon be faced with considering an application from Raintree/Lyon to re-zone the Dove Canyon Plaza from "Neighborhood Commercial" to "Medium" or "High Density Residential". Approval

47-1

of such an application will have multiple negative effects, some of great consequence including:

- Erosion of the vision of RSM as "Our Village Home";
- Increased burden on RSMs fire and police services; and
- Adverse impact to the residents of Dove Canyon (traffic, fire evacuation safety, loss of local retail and service amenities, street parking concerns, added congestion at the single entry/exit gates to Dove, construction noise, etc).

Perhaps more important, given current California politics, homeless problems, and lack of affordable homes, I see significant risk of State intervention to capitalize on any City parcel that is re-zoned as "Residential". Such an attractive political target provides the State irresistible opportunity to require development as "Low- to Very Low- Income Housing" with attendant adverse impact to RSM for all the above listed reasons and including diminished local property values.

I understand such a strategy by the State goes well beyond the scope of the ill-fated proposed SB-50, but our problem of homelessness and availability of low-income housing is only growing more critical day-by-day. Those problems are going to get solved one way or another. The City may have options should housing mandates come our way.

In the near-term, the City, and specifically Dove Canyon residents, would be far better served by a concerted effort to focus on "Our Village Home" by retaining the "Neighborhood Commercial" zoning of Dove Canyon Plaza and enticing exciting new retail and service enterprises to better serve our residents and reinvigorate the Plaza.

I urge adoption of the Draft General Plan Update and urge the City to oppose any proposed change to zoning established in the Plan to allow development of Dove Canyon Plaza as "Residential" in any form.

Sincerely,



Gary Kratovich

6 Club Vista

Dove Canyon, CA 2679

Email: garyk2000@cox.net

Phone: 714-345-3755

47-1
Cont.


A

Julia Arneson
3 Hillrise
Dove Canyon, CA 92679

Letter 48

June 11, 2019

CITYRSM'19JUN12PM 1:58

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions; geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

48-1

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48-1
Cont.

Very truly yours,

Julie Arneron [name]
3 Hillside [address]
Dove Canyon, CA 92679

June 10, 2019

CITYRSM/19JUN12PM 1:49

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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49-1
Cont.

Very truly yours,

Greg Novak [name]

8 Jericho [address]

Trabuco Canyon CA

June 10, 2019

DRAFT/UNREFERENCED

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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Very truly yours,

Maril Nakazki [name]
8 Tercero [address]
Dove Canyon CA

June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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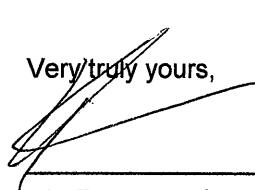
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51-1
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Very truly yours,

Renee Nowack
[name]
870440 [address]
Date: August 10, 2026
[Signature]

CITYRSM/19JUN12PM 1:49

June 11, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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Wendy Starks
City of Rancho Santa Margarita
Page 2

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Very truly yours,

Edward M. Sull [name]

1 DEER RUN [address]

DOVE CANYON CA. 92679

Ed Sull

Wendy Starks

From: Barrett-Bewley, Teresa <tbarrett@uci.edu>
Sent: Thursday, June 13, 2019 11:54 AM
To: Wendy Starks
Subject: Dove Canyon Redevelopment

Good morning Ms. Starks,

I am writing to you as a 20 year resident of Dove Canyon who greatly opposes the redevelopment of the Dove Canyon commercial center into a high density housing. I realize this is all about money and how much profit these developers can make in building high density housing in its place. The city should be more concerned about those who live in RSM and the surrounding areas and their quality of life. I have concerns about safety in case of an evacuation due to a fire or earthquake in addition to the increase in traffic on Dove Canyon drive and Plano Trabuco. With the high school located at that corner and the number of students crossing the street, there will no doubt be an increase in accidents in that area. There is also the park area just outside of the gate that we as Dove Canyon residents pay to maintain. What will happen to that once these high density houses are dropped in on top of it?

RSM has been one of the top cities in the U.S. and if you want to maintain that you must not allow more of this type of development. I know there have many rumors on social media that the developers have you and others in their back pocket and that there has been collusion between the city and the developer. I'd like to believe that the city has our back in this and I hope this to be true. I was particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering.

Thank you for your serious consideration of this upcoming decision.

Teresa Barrett-Bewley
33 Summitcrest

Teresa Barrett-Bewley
UC Irvine Blood Donor Center

949.824-2662

tbarrett@uci.edu



This message may contain confidential information and is for the sole use of the intended recipient(s). If you are not the intended recipient, do not use, distribute, or copy this e-mail. Please notify the UC Irvine Health – Compliance and Privacy Office via email at hacompliance@uci.edu or by phone 888-456-7006 immediately if you have received this e-mail in error. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission.

Wendy Starks

From: Dassie Feingold <dassie.feingold@gmail.com>
Sent: Friday, June 14, 2019 11:25 AM
To: Wendy Starks
Subject: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update
Attachments: Letter to RSM City Planner.pdf

Dear Ms. Starks,
Please see attached my comments regarding the Dove Canyon Plaza project.

Respectfully,
Dassie Feingold
Dassie.feingold@gmail.com
Tel: 949-872-5444

54-1



June 14, 2019
Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR"). The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

54-1
Cont.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development. I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods,

in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Very truly yours,
Hadassah Feingold
6 Woodbridge Court
Dove Canyon, CA 92679
949-872-5444
Dassie.feingold@gmail.com

54-1
Cont.

Wendy Starks

From: Julie James <julieraejames@gmail.com>
Sent: Saturday, June 15, 2019 3:12 PM
To: Wendy Starks
Subject: Public Comments concerning Draft EIR
Attachments: Blank.docx; ATT00001.txt

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, Ca. 92688

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update

Dear Ms. Starks,

As a 30 year resident of RSM and 20 year member of Dove Canyon Association, I am writing today to express my concern for the Draft EIR for the city of RSM.

The proposed RSM General Plan update seems to be in accordance with the past history of our city with limited growth and low density residential housing. What is a concern is the projected net growth of 528 dwelling units by 2040. This amount of growth would dramatically alter RSM's family friendly community and alter our city forever. Safety, quality of life, and traffic would all be impacted by this population increase. Our roads during peak times are already an issue. The potential for a mass evacuations if fire were to break out in our surrounding forests would be a traffic nightmare as was seen in this last years fires in Paradise California.

I am especially concerned that RSM has already permitted more new dwelling units than was projected in the Draft EIR 2020 General Plan. I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Should the update be approved I would sincerely hope RSM to not repeat its past misgivings.

The Update is very important to me as I am a Dove Canyon Association member and RSM resident who is opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive. The owner of this plaza has put forward many projected ideas from 174 senior luxury condos to 392 apartments. All of the ideas the owner has brought forth are high to mid density housing which is incongruent with the low density residential land use designation which surrounds Dove Canyon Plaza. If the owners succeeds in their efforts to build this high to mid density housing it would be incongruent with the Update. It is extremely important to me as a RSM resident for the safety and health of our city that the Update make this a priority and not facilitate further residential development.

Lastly I am pleased that the Update does not show any change to the zoning of the Dove Canyon Plaza. I strongly encourage that this zoning continue as such and that the Update does not support potential residential redevelopment of the Dove Canyon Plaza. I am confident that the lost businesses in the center will return once this developer has lost his bid to dramatically change our environment. The safety, health, noise, pollution, traffic, aesthetics, fire and police would all be impacted by any change to the zoning of the Dove Canyon Plaza.

55-1

Sincerely,

Julie and Gary James
4 Jericho
Dove Canyon, Ca. 92679

June 14, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

56-1

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I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

56-1
Cont.

Very truly yours,

Mark Heard [name]
4 Foxtail Lane [address]
Dove Canyon CA 92679

June 14, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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57-1

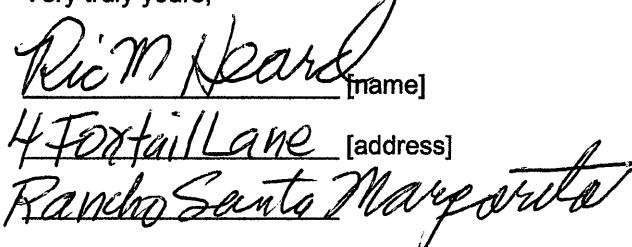
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57-1
Cont.

Very truly yours,


[name]
4 Foxtail Lane [address]
Rancho Santa Margarita

June 14, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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58-1

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58-1
Cont.

Very truly yours,

Beth Heard [name]
4 Foxtail Lane [address]
RSM, CA 92679

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

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The proposed Rancho Santa Margarita General Plan Update (“Update”) properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM’s existing land uses. RSM is a community of largely single family homes and it is critically important that continue for the maintenance of RSM resident’s health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

59-1

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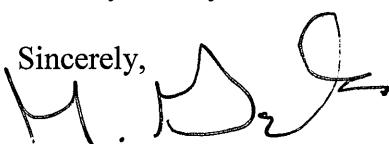
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We also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides real commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. We do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect us and fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Thank you for your time and consideration.

Sincerely,



Mitch and Lisa Gonzales
8 Greenspring
Dove Canyon, CA 92679
(949) 264-6191

June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

60-1

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Very truly yours,

Mahmood Ghafouri [name]

3 Midlothian [address]

Dove Canyon, CA 92679

60-1
Cont.

June 10, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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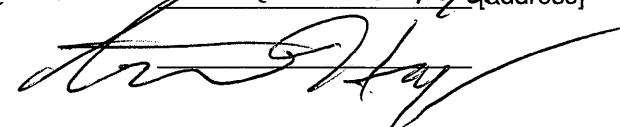
61-1

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Very truly yours,

TRAMMELL & JANCE HARTZOG
[name]
11 FIELD POINT, DOVE CANYON, CA. 92679
[address]


61-1
Cont.

June 11, 2019

Letter 62

Wendy Starks,
Principal Planner
City of RSM

We are residents of Dove Canyon writing to express our interest as you update the General Plan for RSM.

When we came to live in Dove Canyon 22+ years ago it was because of the openness and beauty of this area. We voted to be part of RSM when that was proposed. All of this area was open and "uncluttered". Everyone moved to the city to enjoy the beautified fresh air and the family friendly atmosphere RSM provided. Over the years that aura that makes RSM so desirable has been sustained and, hopefully, will be considered as the Draft EIR plans and goals are updated.

Our concerns are for the future of RSM and, of course, Dove Canyon. Overbuilding is our #1 concern... a disaster for the quality of life that we now enjoy. The dangers that we may face as the wildfire season approaches could be devastating due to our close proximity.

62-1

to the National Forest. And this is
our fear as we hear about the
proposed high density development
of Dove Canyon Plaza.

Dove Canyon has exactly ONE practical
exit for over 1250+ homes in an
emergency evacuation. That one exit
intersects with the Plaza exit, and
presently is not a problem. However,
any additional cars leaving a high
density apartment/condo complex
would create a serious evacuation
disaster. The limitations on our agreed
from DoveCanyon are an ongoing
concern as wildfires become so prevalent.

May we say how convenient Dove
Canyon, ^{PLAZA} small businesses have been.
We have patronized so many of them
over the years, and feel badly for
those who have been displaced by
reason of rent/lease increases. We can
feel why people choose to "retire" and
close (San Giovanni's?) rather than
fight the big money. SO sad!

Please, all who have a stake in
planning for the future of RSM, look
at what we have here, take sometime
to enjoy the beauty around us, then
begin your planning.

George Deemer
John Deemer

24 Club Vista Dr Dove Canyon,

Wendy Starks

From: David and Leslie Wilson <katyamw@cox.net>
Sent: Monday, June 17, 2019 8:28 AM
To: Wendy Starks
Subject: Public Comments Concerning Draft EIR for the RSM General Plan Update
Attachments: Letter to Wendy Starks, City of RSM.docx

Importance: High

June 17, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

63-1

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The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

63-1
Cont.

Very truly yours,

David and Leslie Wilson
33 Foxtail Lane
Dove Canyon, CA 92679

Wendy Starks

From: PAT KILWINE <p.kilwine@comcast.net>
Sent: Monday, June 17, 2019 4:49 PM
To: Wendy Starks; Ian Meikle; Pat Kilwine
Subject: Public Comments: Draft EIR for RSM General Plan Update
Attachments: City of RSM.docx

Dear Ms. Starks:

Please find attached our comment letter regarding the draft EIR for the City of Rancho Santa Margarita's General Plan Update.

64-1

In summary, we are concerned about the proposed rezoning of Dove Canyon Plaza without development of the infrastructure required to support additional growth along Plano Trabuco Road. Traffic and safety are high concerns for us, together with the lack of sufficient ingress and egress to residents in case of wildfire and/or other natural disaster.

Thank you in advance for your consideration of our concerns.

Patricia Kilwine Meikle

Ian Meikle

12 Promontory

Dove Canyon, CA

Ian and Patricia Meikle
12 Promontory
Trabuco Canyon, CA

June 17, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA; 92688
Email: wstarks@cityofrsm.org

RE: Public Comments Concerning Draft EIR for the RSM General Plan Update

Dear Ms. Starks:

My husband and I are members of the Dove Canyon Master Association ("Dove Canyon Master Association") and residents of the City of Rancho Santa Margarita. The purpose of our letter is to comment on the Draft EIR for Rancho Santa Margarita General Plan Update ("Draft EIR").

It's our understanding that the present update minimizes further, if any, residential growth in RSM and that the limited permitted growth should predominantly be of a low-density residential land use designation consistent with RSM's existing land uses. We support that plan for continued low-density single-family homes, together with Dove Canyon Plaza NOT being rezoned from its present "neighborhood commercial use."

We are opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Mixed-uses which would entail density and building heights and massing is inconsistent with RSM as a family-friendly, community-based city and would degrade the quality of life for RSM residents.

Given the current residential development in this area without concurrent improvements in infrastructure – largely roads, parking and safety – to protect EXISTING residents in this area, it seems egregious to allow further development proposed for the Dove Canyon Plaza.

I am concerned to read that that the Draft EIR has already permitted more new dwelling units than projected in in the 2002 General Plan. RSM should NOT be prioritizing residential development over the health, safety and well-being of RSM's existing residents.

Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering a needed Update, I strongly urge RSM not to consider any further application to add more new dwelling units before the Update is approved and adopted.

Moreover, further development should not be considered before development of roads providing ingress and egress to existing communities. Fire hazard is a real risk in throughout all of California and Orange County. Residents of not only Dove Canyon but Robinson Ranch and Cielo Ranch experienced firsthand

64-1
Cont.

the Holy Jim fire in late 2018. There's NO WAY 1,250 households in Dove Canyon, together with residents of Robinson and Cielo Ranch sub-divisions could have been safely evacuated. Luck is NOT a plan.

Given the startling number of significant and deadly fires in Orange County and RSM, permitting appreciable further residential development along Plano Trabuco Road and in particular Dove Canyon Plaza with its medium to high-density project impact threatens public safety by adding more people and cars to RSM's transportation infrastructure which was not and is not designed to accommodate meaningful further development.

Traffic is already a significant concern and parking on streets on Alas de Paz at night and weekday parking by students of RSM High School. Adding additional people and cars to a troubling and underperforming street system coupled with lack of ingress and egress for EXISTING communities' risks lives in the event of a natural disaster such as wildfire.

We respectfully request that rezoning of Dove Canyon Plaza NOT be permitted to proceed WITHOUT considerable improvements to streets and existing ingress and egress for peoples already living along Plano Trabuco Road. William Lyons and Raintree Developers are profit-driven, not community-driven citizens. We must rely on you, our elected representatives to protect our interests and maintain our safety. That presently means NOT supporting the potential residential redevelopment of Dove Canyon Plaza without the underlying infrastructure upgrades to roads, ingress-egress and natural-disaster planning required to keep RSM residents safe.

Regards,



The image shows two handwritten signatures. The top signature is "Ian J. M. Meikle" and the bottom signature is "Patricia G. Kilwine-Meikle". Both signatures are in cursive and appear to be on a single sheet of paper. There are some small black dots and a line near the signatures, possibly from a previous page or a scanning artifact.

Ian J. M. Meikle
Patricia G. Kilwine-Meikle

Wendy Starks

From: Keren de Zwart <kerendezwart@gmail.com>
Sent: Monday, June 17, 2019 1:41 PM
To: Wendy Starks
Subject: Public Comments re: Draft EIR
Attachments: RSM Public Comment Letter.pdf

Hi Wendy,

65-1

Please see attached letter in response to the Draft EIR.

Respectfully,

--
Keren de Zwart

kerendezwart@gmail.com

(949) 584-9148



June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am writing today as a member of the Dove Canyon Master Association and a longtime resident of the City of Rancho Santa Margarita. I moved here with my parents and siblings in 1996 as a child, and save for a few years for college and law school, I have lived here since and am now raising my own children here. I am writing to you today to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update.

I know you'll receive a lot of form letters from residents here, and probably many angry letters, emails, and calls that although properly reflective of the opinions of the residents, certainly don't ingratiate themselves with you. So I'm going to try another way.

I certainly have a unique perspective as both a resident of Dove Canyon since 1996, from tween, through high school and on to raising my own preschooler and first grader right here in Dove Canyon, but also as a lawyer who has an extensive background in commercial real estate, having worked for two of the largest landlord-developers in Southern California. At both companies, I was part of teams that developed new retail, office, and industrial properties, so I understand both the needs of developers and the residents affected by the developments.

As I'm sure you know, part of what makes Rancho Santa Margarita so wonderful is its unique smaller town charm. Indeed, it has grown exponentially from when I first moved here and they still held rodeos on empty dirt lots where mega centers now operate with Target, Lowe's and the various restaurants and shops that have landed here. What initially took no more than 5 minutes from my parents' home in Dove Canyon near the gate to the toll road now takes 10 or even 15 minutes. With only two main arteries in and out of the city, it is of deep concern that the City is considering updating the General Plan to include high density housing at all. This City was built, as recognized in the General Plan Update Goals and Policies, to be a low-density city. It operates as a low-density City. It can only accommodate low-density on its street system.

65-1
Cont.

For these reasons, my husband and I, together with the overwhelming majority of residents in Dove Canyon and Rancho Santa Margarita, oppose any update that would approve additional high- and medium-density dwellings, including mixed-used developments. In fact, it is already concerning to have learned from the Draft EIR that the City has already permitted more new dwelling units than projected in the 2020 General Plan. Accordingly, I would urge you not to approve any additional applications before the General Plan Update has even been approved and adopted.

It goes without saying, of course, that my biggest interest related to this issue is Dove Canyon Plaza. I'm not sure if you've attended any of the so-called town halls that the owner-representative has held, but they have intentionally misleading, indirect, and mostly just fluff. One of my favorite responses was when the representative said that based on "similar" centers, the building of 400 apartment units would actually lower ingress and egress compared to the center. Not only is that patently absurd, but one simply has to stand for an hour to know that hundreds of apartment units would easily add hundreds or even thousands of occasions of vehicle ingress and egress daily.

Moreover, there are several hundred students parking on Dove Canyon Drive, Plano Trabuco, and Alas de Paz daily. Now I'm sure a developer's answer would be subterranean parking, but that looks nice on paper, and is utilized much less frequently in reality. Just take one look at the apartment buildings locally and you'll see that people either don't have sufficient parking spaces per unit or prefer to park on the street for easier getaways in morning traffic.

On a personal note, I also have a concern for the safety of my own family, as we live at the back of Sycamore Canyon in Dove Canyon, and with one way out in an emergency, the last thing this community needs is thousands more residents clogging up the exit to safety. After watching last year's Holy Fire at the top of the hill from my front yard and seeing many insurance companies drop Dove Canyon and Coto de Caza residents due to fire risk, it is not wholly unreasonable to take a moment to consider the potentially catastrophic affects of a high-density addition to the only way out in a future emergency.

The General Plan Update has Dove Canyon Plaza in its current neighborhood commercial zoning, and I firmly believe it should stay that way. This developer took a gamble when it paid a huge sum of money for Dove Canyon Plaza in hopes of a big financial gain. I hope that you and the rest of your team will consider the overall aesthetic, traffic and circulation, safety of and environmental impact to the residents of Rancho Santa Margarita over the financial gamble of a few corporate developers.

Respectfully submitted,

Keren de Zwart

Keren and Pieter de Zwart
7 Saratoga, Dove Canyon

June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

66-1

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

66-1
Cont.

Very truly yours,

Natalie Solano [name]
21 Inverary [address]
Trabuco Canyon,
Ca 92679.

Resident / Homeowner
Darc Carlson.

June 15, 2019

Dear Ms. Starks,

For the past 15 years I have been a RSM resident in Dove Canyon. I understand that a local Real Estate developer desires to build high-density residences in what is now called the Dove Canyon Plaza/Center. While I have little understanding of City Master Planning (forgive me for not investigating this issue) but I do understand congestion and safety. By reengineering that plot of ground to be high-density housing, I believe will likely create a significant number of new cars that will want to park on Dove Canyon Drive. For the past many years scores of students from Santa Margarita Catholic High School use both sides of the street for parking, and if this project creates a similar number of cars from residents who live in the apartments on Alas De Paz does, there will be an overwhelming number of students and apartment residents vying for a limited number of spots for street parking on Dove Canyon and the result would be challenging.

67-1

In addition, the residents of Dove Canyon have but one entrance and exit and the entrance to the Dove Canyon Plaza and that entrance is within a very short distance from the entrance to Dove Canyon. As such, with the addition of high-density housing that geographic area could become a traffic nightmare just getting into Dove Canyon for those who live there. Not to mention that if there were a fire requiring everyone to evacuate, (and that has happened three times during my tenure in Dove) the ensuing congestion could clearly be a safety hazard.

In short, I am opposed to the rezoning of this project for high-density housing. I would, however welcome a housing project that placed the same number of homes per acre as Dove Canyon residence have. That seems sensible and a reasonable compromise.

Please feel free to contact me if you have any questions.

Sincerely,



Darrell Passwater
2 Foxtail Lane
Dove Canyon, CA 92679

CITYRSM\19JUN17AM 9:20

June 12, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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68-1

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68-1
Cont.

Very truly yours,

Scott Trafford [name]
33 MURFIELD [address]
DOVE CANYON, CA

June 17, 2019

JUN 17 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

BUILDING DEPT.

TS
12-5-19

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

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69-1

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Respectfully submitted,



Patti Gentile
12 Field Pt.
Dove Canyon, CA 92679

Wendy Starks

From: lindajriggs lindajriggs <lindajriggs@cox.net>
Sent: Tuesday, June 18, 2019 4:28 PM
To: Wendy Starks
Subject: City of Rancho Santa Margarita General Plan comments

Dear Ms Starks,

We are members of the Dove Canyon Master Association and residents in the City of Rancho Santa Margarita. We write to you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update.

In the General Plan Update Goals and Policies it properly recognizes that the limited permitted growth should be consistent with RSM's existing land uses and continue for the maintenance of RSM residents' health, safety and well being.

We are opposed to any prospective mixed use land use alternatives that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant increases in traffic, evacuation issues during any natural disasters and needs for increased fire and police protection and school facilities.

We strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Please do not repeat the misgivings of permitting more new dwelling units than projected in the 2002 General Plan.

We also note that the Dove Canyon Plaza's 'neighborhood commercial' zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed use land use designations to be included in the Update. We do not want to suffer from increased environmental impacts that would be created if the zoning on the Plaza was changed.

We urge the City of Rancho Santa Margarita to protect us and our fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Dove Canyon Plaza is completely surrounded by Dove Canyon property. The proposed construction of high density condos and/or senior housing is inconsistent with the architecture of Dove Canyon, Rancho Cielo and Coto de Caza and should not be built.

Thank you for your consideration of the best interests of the residents of Dove Canyon and residents of all of Rancho Santa Margarita in preserving the quality of life that we presently enjoy. We should not have that quality of life disturbed to allow RainTree Investments to profit from a zoning change.

Jack and Linda Riggs

5 Ravensridge

Dove Canyon, CA

70-1

Wendy Starks

From: heidi newell <heidinewell@me.com>
Sent: Tuesday, June 18, 2019 9:26 PM
To: Wendy Starks
Subject: Comments concerning Draft EIR for RSM General Plan Update

Wendy Starks, Principal Planner
 City of Rancho Santa Margarita
 22112 El Paseo
 Rancho Santa Margarita, CA 92688
 Email: wstarks@cityofrsm.org

June 18 2019

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

My husband Mike and I have been Dove Canyon residents for over two years, and have fallen in love with the neighborhood and surrounding community. It is a joy to drive up Dove Canyon Drive at night after a hard day's work, it is peaceful and welcoming and calm and we really begin to unwind from the stressful traffic and commotion in Orange County! We are writing concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

In our own words, we love the peace and tranquility of RSM and believe the initial planning proposals should be kept as is and not further changed to include more development. We believe that the streets will no longer be safe for our neighborhood residents as well as the students at Santa Margarita that park and walk along Dove Canyon Drive. We walk our dogs, bike and hike almost everyday along the drive as well as shop and use the services provided by the local merchants at Dove Canyon Plaza. Our favorite restaurant, our dentist, our dry cleaner, our florist as well as our pet's groomer and doggie day care are located in the plaza. It is so convenient for us as well as the other Dove Canyon, Coto and Rancho Cielo residents. It is a way of life that we believed was planned by the city and we have grown to adore it!

The following portion of this letter remains intact due to the tremendous amount of valuable input. It is a template that others in Dove Canyon may use, but we felt it important to cite all of the important facts to back up our plea to keep the zoning as is.

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

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Thank you for taking our opinions seriously.
 Very truly yours,

Heidi and Mike Newell (Dove Canyon Residents)
10 Woodbridge Court
Rancho Santa Margarita, CA. 92679
678-457-2626

From: dougleonard@netzero.net
Sent: Tuesday, June 18, 2019 7:27 PM
To: Wendy Starks
Subject: Dove Canyon Plaza

June 18, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work town homes, and 135 town homes.

72-1

Having such dense population in that parcel of land would create unsafe and unnecessary traffic, parking issues, noise and other environmental impacts which are often associated with dense housing.

72-1
Cont.

Y truly yours,

Judi and Doug Leonard
1 Springside
Dove Canyon, CA 92679

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, Ca. 92688

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update

Dear Ms. Starks,

As a 30 year resident of RSM and 20 year member of Dove Canyon Association, I am writing today to express my concern for the Draft EIR for the city of RSM.

The proposed RSM General Plan update seems to be in accordance with the past history of our city with limited growth and low density residential housing. What is a concern is the projected net growth of 528 dwelling units by 2040. This amount of growth would dramatically alter RSM's family friendly community and alter our city forever. Safety, quality of life, and traffic would all be impacted by this population increase. Our roads during peak times are already an issue. The potential for a mass evacuations if fire were to break out in our surrounding forests would be a traffic nightmare as was seen in this last years fires in Paradise California.

I am especially concerned that RSM has already permitted more new dwelling units than was projected in the Draft EIR 2020 General Plan. I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Should the update be approved I would sincerely hope RSM to not repeat its past misgivings.

The Update is very important to me as I am a Dove Canyon Association member and RSM resident who is opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive. The owner of this plaza has put forward many projected ideas from 174 senior luxury condos to 392 apartments. All of the ideas the owner has brought forth are high to mid density housing which is incongruent with the low density residential land use designation which surrounds Dove Canyon Plaza. If the owners succeeds in their efforts to build this high to mid density housing it would be incongruent with the Update. It is extremely important to me as a RSM resident for the safety and health of our city that the Update make this a priority and not facilitate further residential development.

Lastly I am pleased that the Update does not show any change to the zoning of the Dove Canyon Plaza. I strongly encourage that this zoning continue as such and that the Update does not support potential residential redevelopment of the Dove Canyon Plaza. I am confident that the lost businesses in the center will return once this developer has lost his bid to dramatically change our environment. The safety, health, noise, pollution, traffic, aesthetics, fire and police would all be impacted by any change to the zoning of the Dove Canyon Plaza.

73-1

Sincerely,

Julie and Gary James
4 Jericho
Dove Canyon, Ca. 92679

CITYRSM19.JUN18am11:04

June 18, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

74-1

I HAVE BEEN A 30 YEAR RESIDENT OF DOVE CANYON AND DO NOT
WANT ANY NEW HOUSES OF ANY KINDS IN THE DOVE CANYON CENTER -
THE REASONS ARE INCLUDED IN THIS 2 PAGE LETTER!

Wendy Starks

City of Rancho Santa Margarita

Page 2

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I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

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74-1
Cont.

Very truly yours,

Lou Gallipen [name]

35 HIGHPOINT [address]

LAKE RINCE

DOVE CANYON, CA 92679

June 17, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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75-1

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Wendy Starks
City of Rancho Santa Margarita
Page 2

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Very truly yours,

Brigitte Renee Lowen
[name]

13 Mariposa [address]

Dove Cyn. 92679

Brigitte Renee Lowen

CITYRSM19JUN19PM 1:00

June 17, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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76-1

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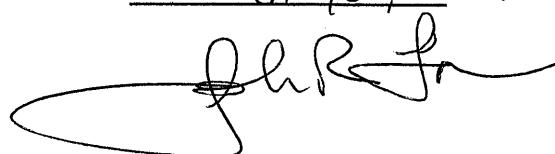
76-1
Cont.

Very truly yours,

John Low, N [name]

13 MARIPOSA [address]

Dove Canyon, CA 92679



June 6, 2019

CITYRSM19.JUN19PM

Letter 77

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

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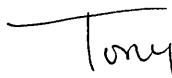
77-1

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Very truly yours,



Tony Bertocchini
23 Saratoga
Rancho Santa Margarita, CA 92679

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

CITYRSM/19 JUN 19 PM 1:07

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association and a resident of the City of Rancho Santa Margarita. I write you to provide public comments concerning the redevelopment of the Dove Canyon Plaza.

I am among the many Dove Canyon residents who are opposed to this project. Primarily because of environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza.

78-1

This would greatly impact the traffic and parking congestion currently present on Dove Canyon Drive, negatively impacting the safety of Dove Canyon residents, as well as the students at Santa Margarita High School. As you know, all of the traffic exiting Dove Canyon is funneled through Dove Canyon Drive and the transformation of Dove Canyon Plaza into a residential area would greatly exacerbate the traffic congestion there. Not to mention the potential disaster it would create in the event of an evacuation.

The Dove Canyon Plaza is zoned as “neighborhood commercial” for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods. When I moved to Dove Canyon 23 years ago it was with the firm understanding that Dove Canyon Plaza would remain a neighborhood commercial zone, not a residential zone.

Please consider the concerns of RSM residents over the profits of wealthy non-resident corporations.

Very truly yours,
John & Diana Salverson
6 Indian Pipe
Dove Canyon, CA 92679

Wendy Starks

From: Jamie Calhoun <jamiecalhoun@gmail.com>
Sent: Wednesday, June 19, 2019 11:47 AM
To: Wendy Starks
Subject: Fwd: Updated City Plan

Dear Ms. Starks,

I am a resident of Dove Canyon in the City of Rancho Santa Margarita. I am writing to provide public comments concerning the Rancho Santa Margarita General Plan Update. I am pleased to see the proposed Rancho Santa Margarita General Plan Update reflects that minimal, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses.

As a parent of young children, I moved to RSM 2.5 years ago specifically for the community of largely single family homes, good schools, and reputation for safety, plus its proximity to beautiful open areas. It is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. I am concerned that medium and high density housing development is inconsistent with the RSM plan, and will negatively impact our safety, schools, and ability to handle potential disasters such as earthquakes and wild fires. The City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount of projected growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects.

There is one way in and out of Dove Canyon. Imagine the strain on our streets in an emergency at our current level of development, then imagine adding hundreds of units more. This could be deadly to me and my family.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development. I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. I urge RSM to protect me, my children, and fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

79-1

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Jamie Calhoun
8 Foxtail Ln.
Dove Canyon, CA 92679

Wendy Starks

From: Susan Piazza <suepiazza@cox.net>
Sent: Wednesday, June 19, 2019 3:47 PM
To: Wendy Starks
Subject: Public Comments Draft EIR for RSM General Plan Update
Attachments: RSM General Plan Update Comments SP 2019-06-19.pdf; ATT00001.htm

Please see attached comments on the above subject.

80-1



June 19, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
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The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood, commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

80-1
Cont.

Very truly yours,

Susan A. Piazza

Susan A. Piazza
23 Field Point
Dove Canyon, CA 92679

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

As a member of the Dove Canyon Master Association and a resident in the City of Rancho Santa Margarita, I would like to express my concerns about the Draft EIR for the Rancho Santa Margarita General Plan Update:

The proposed Rancho Santa Margarita General Plan Update reflects that any minimal further residential growth should be permitted in RSM, and that any limited permitted growth should predominantly be of a low-density residential land use designation, to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. This is recognized in the General Plan Update Goals and Policies.

However, I am concerned that the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city; would degrade the quality of life for RSM's residents; would diminish community satisfaction; and most importantly, would compromise the safety of RSM's residents. Of concern is the startling number of significant, deadly wildfires over the last several years in Orange County and in the state of California: any further residential development, especially medium-density and high-density residential projects, will jeopardize public safety with the addition of more people and cars to RSM's and the greater surroundings' transportation infrastructures. Traffic is already a significant concern throughout RSM, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

81-1

For the same reasons, I am opposed to the mixed-use land use alternative that would permit additional dwelling units and allow for the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted.

I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is not compatible with the low-density residential land use designation that surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM

for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial," primarily to provide vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, including students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts. Thus, I urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Respectfully,

Cindy Gildersleeve
59 Bell Canyon Dr
Dove Canyon, CA 92679
cindyjoegildersleeve@gmail.com

Wendy Starks

From: Jan 92679 <jmr92679@gmail.com>
Sent: Thursday, June 20, 2019 12:39 PM
To: Wendy Starks
Subject: Public Comment regarding RSM General Plan Update

June 20, 2019

To: Wendy Starks, Principal Planner, City of Rancho Santa Margarita, 22112 El Paseo, Rancho Santa Margarita, CA 92688 sent by Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

As a resident and Homeowner in Dove Canyon in the City of Rancho Santa Margarita ("RSM"), I am writing to comment concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

I agree with the proposed Rancho Santa Margarita General Plan Update ("Update") which reflects that minimal further, if any, residential growth should be permitted in RSM, and that any permitted growth be very limited and consist of predominantly low-density residential land use, designed to be consistent with the characteristics of RSM's existing land uses.

It is critically important that the City continue to consist of largely single family residential homes for the maintenance of RSM atmosphere, and the health, safety, and well-being of its residents. I agree with this being properly recognized in the General Plan Update Goals and Policies.

Permitting appreciable further residential development, and particularly medium to high density residential projects, will threaten public safety by adding too many more people and more cars to RSM's roads and infrastructure, which was not designed to accommodate much more further residential development, let alone medium-density or high-density residential projects.

For the reasons of traffic congestion and safe evacuation in the event of emergency such as wildfires, I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM environmental planning, and subject RSM's residents to significant changes in population, quality of housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than was projected in the 2002 General Plan. My hope and desire is that RSM will not prioritize residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the

82-1

projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add more new dwelling units.

The Update is particularly important to me as I am among the Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and/or owner's representatives of Dove Canyon Plaza have publicly presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, that would have a direct daily bearing on the lives of Dove Canyon residents, students of the Santa Margarita High School, and other residential land use designation which currently surrounds the Dove Canyon Plaza.

In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number for the next 20 years. The overwhelming consensus of Dove Canyon residents want the commercial area, which lies between land owned by DCMA, to remain commercial. It is noted and I AGREE

that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, and pray that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update.

The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive further for basic needs, and not without affecting RSM's traffic, air quality, noise, and other environmental impacts.

I do not want to suffer from those unavoidable environmental impacts that would be caused by rezoning the Dove Canyon Plaza to allow residential development, and I urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Sincerely yours,

Jan Rodick
18 Lawnridge
Dove Canyon, CA 92679

82-1
Cont.

Wendy Starks

From: Gary D Lindquist <glindquist54@gmail.com>
Sent: Thursday, June 20, 2019 1:58 PM
To: Wendy Starks
Subject: Comments on General Plan Update
Attachments: Comments RSM General Plan.pdf

Dear Ms. Starks,

I just became aware of the invitation to comment on the General Plan Update today.

I've attached a pdf file to register my support of retaining the Dove Canyon Plaza in it's current zoning configuration.

Regards,
Gary Lindquist
18 Lawnridge
Dove Canyon, CA 92679

83-1

June 20, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita
General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association (“Dove Canyon Association”) and a resident in the City of Rancho Santa Margarita (“RSM”). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update (“Draft EIR”).

The proposed Rancho Santa Margarita General Plan Update (“Update”) properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM’s existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident’s health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM’s residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM’s residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM’s transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and under performing street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM’s residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM’s residents. Since RSM has already

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Cont.

exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

83-1
Cont.

Very truly yours,
Gary D. Lindquist
18 Lawnridge
Dove Canyon, CA 92679

Wendy Starks

From: Boris Byk <boris.byk@gmail.com>
Sent: Thursday, June 20, 2019 2:39 PM
To: Wendy Starks
Subject: Regarding Draft EIR for the Rancho Santa Margarita General Plan Update
Attachments: borisbykdcp.pdf

Hello, Mrs. Starks

I live at 4 Villamoura, Dove Canyon, CA 92679 and I am writing in regards to the General Plan Update for RSM. Please find attached my letter.

Have a good day.

--

Best,
Boris

84-1



June 20, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

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Cont.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

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Cont.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

Very truly yours,

Boris Byk [name]

4 Villamoura [address]

Dove Canyon

Wendy Starks

From: Nina Byk <ninochka.byk@gmail.com>
Sent: Thursday, June 20, 2019 2:45 PM
To: Wendy Starks
Subject: Regarding the draft EIR for the Rancho Santa Margarita General Plan Update
Attachments: ninabykdcp.pdf

Hello, Mrs. Starks

My husband, my children and I live at 4 Villamoura, Dove Canyon and I am concerned with the proposed update to the General Plan for RSM. Please find attached my letter.

--
Best,
Nina

85-1



June 20, 2019

Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Public Comments Concerning Draft EIR for the Rancho Santa Margarita General Plan Update

Dear Ms. Starks:

I am a member of the Dove Canyon Master Association ("Dove Canyon Association") and a resident in the City of Rancho Santa Margarita ("RSM"). I write you to provide public comments concerning the Draft EIR for the Rancho Santa Margarita General Plan Update ("Draft EIR").

The proposed Rancho Santa Margarita General Plan Update ("Update") properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the General Plan Update Goals and Policies.

Of concern though, the City-wide projected net growth of 528 dwelling units by 2040 appears overreaching. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, would degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, would compromise the safety of RSM's residents. Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

For the same reasons I am opposed to the mixed-use land use alternative that would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

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Cont.

I am particularly concerned to read in the Draft EIR that RSM has already permitted more new dwelling units than projected in the 2002 General Plan. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2020 General Plan and RSM is considering the much needed Update, I strongly urge RSM not to consider any further applications to add even more new dwelling units before the Update has been approved and adopted. Moreover, should the Update be approved, I implore RSM to not repeat its past misgivings.

The Update is particularly important to me as I am among the masses of Dove Canyon Association members and RSM residents who are opposed to the potential residential redevelopment of the Dove Canyon Plaza, located at 31931 Dove Canyon Drive, due to environmental impacts and health, safety, and well-being concerns. The owner and owner-representative of Dove Canyon Plaza have publicly-presented residential redevelopment projects they are considering, including: 392 market rate apartments, 174 senior luxury condos, 134 live/work townhomes, and 135 townhomes. Each of those options would constitute either a high-density or a medium-density residential land use designation, which is wholly incongruent with the low-density residential land use designation which surrounds the Dove Canyon Plaza. In that the Update contemplates a net growth of only 136 high-density and 133 medium-density dwelling units by 2040, any of the options supposedly being considered by Dove Canyon Plaza owners would either subsume every single high-density or medium-density dwelling unit projected in RSM for the next 20 years or greatly exceed the projected number of high-density or medium-density residential dwelling units projected in RSM for the next 20 years. Either way, the residential redevelopment of Dove Canyon Plaza would be wholly incongruent with the Update, which is why it is critically important to me that the Update prioritize the preservation of the health, safety, and well-being of RSM's residents by not facilitating further residential development.

I also note that the Dove Canyon Plaza's "neighborhood commercial" zoning would remain the same under the Update, as it should, and that Dove Canyon Plaza is not among either the future planned community or mixed-use land use designations to be included in the Update. The Dove Canyon Plaza is zoned as "neighborhood commercial" for a reason and that is primarily that it provides vital commercial support for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School. With no other nearby commercial centers, all the foregoing will be forced to drive more and further for basic needs, thereby creating even greater aesthetic/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, fire protection, and police protection environmental impacts. I do not want to suffer from those unavoidable environmental impacts and thus urge RSM to protect me and my fellow RSM residents by ensuring that the Update does not support the potential residential redevelopment of the Dove Canyon Plaza.

85-1
Cont.

Very truly yours,

Nina Byk [name]

4 Villamoura [address]

Dove Canyon



Response Nos. 7 through 85

Refer to Table 2-1, List of Public Agencies, Organizations, and Individuals Commenting on the Draft EIR, for a listing of these author names and applicable dates.

7-1 through 85-1 Comment Letters 7 through 85 were primarily based on a form letter with minor variations among the letters; however, the same general environmental concerns were raised. As such, the following master response is provided to respond to Comment Letters 7 through 85.

The form letter from Dove Canyon Association members and Rancho Santa Margarita residents raises several concerns related to: 1) the anticipated residential growth under the General Plan Update; 2) the mixed-use land use alternative; 3) existing residential development exceeding the 2020 General Plan buildout; and 4) future potential redevelopment of the Dove Canyon Plaza.

Residential Growth Anticipated By the General Plan Update

The comments generally state that the anticipated net growth of 528 dwelling units by 2040 would degrade the City's quality of life and result in environmental impacts related to public safety (specifically fire services), wildfire, and transportation. The General Plan Update is not authorizing this level of development; rather, this level of growth is anticipated, and the goal of the General Plan Update is to accommodate the anticipated growth that would occur with or without the project. Nevertheless, as detailed in Draft EIR Section 5.13, *Fire Protection*, the Orange County Fire Authority (OCFA) is currently under its response time goal of seven minutes 20 seconds for urban/suburban communities with an average response time of six minutes and 34 seconds within the City.

It should be noted that not all 528 dwelling units would be constructed at once. Future development anticipated with the General Plan Update is projected to occur over a span of approximately 20 years, during which, the OCFA would continue to regularly monitor resources and services to ensure adequate facilities, staffing, and equipment are available to serve existing and future development and residents.

Additionally, any future development of single-family or multi-family homes in the City would be required to comply with all applicable California Fire Code requirements for construction, emergency access, fire flows, and hydrants, among others. Further, areas posing a significant wildfire risk to the City (e.g., the eastern, southern, and western portions of the City in very high fire hazard severity zones) are subject to Public Resources Code Sections 4291-4299, which require property owners to conduct maintenance to reduce fire hazards. Required fire maintenance includes, but is not limited to, maintaining 100 feet of defensible space along all sides of a structure or up to property line; removing dead or dying vegetative materials, trees, and/or



shrubs; constructing fire breaks or other appropriate vegetation management techniques around fire-sensitive land uses; and maintaining vegetative clearings near electrical transmission or distribution lines. The OCFA has responsibility for wildfire suppression on all private land in the City and any proposed development plans are reviewed by the OCFA to determine if fuel modification plans or other preventative measures are required.

The letter also states that the increase in residential development would adversely impact the City's transportation infrastructure, and could exacerbate emergency conditions during natural disasters, such as wildfires. As stated above, the General Plan Update is not authorizing this level of development; instead, it is accommodating anticipated growth that would occur with or without the project. As detailed in Draft EIR Section 5.4, *Traffic and Circulation*, the General Plan Update does not propose any site-specific development. Specifically, the General Plan Update, as a policy plan, does not propose any site-specific development and thus, would not result in changes to the City's circulation patterns or emergency access routes. Therefore, it is uncertain when forecast traffic volumes could impact study area intersections and roadway segments as the exact location and nature of future development is currently unknown. Given this unknown, mitigation is included in the Draft EIR that requires future projects subject to CEQA that would generate 50 or more peak hour trips to prepare a Traffic Impact Analysis to assess project-specific impacts and mitigate such impacts as needed.

Nonetheless, the City has an Emergency Operations Plan (EOP) that details planned responses to emergency situations, such as natural disasters. The EOP establishes policies and procedures for emergency response, identifies authorities, and assigns responsibilities for response activities. Development is also reviewed by the OCFA to ensure adequate emergency access and ingress/egress would be provided. In addition, the City is in the process of preparing a Local Hazard Mitigation Plan (LHMP), which presents a strategy for reducing the City's vulnerability to the impacts of natural hazards, such as earthquakes, droughts, and fires. Under the Federal Disaster Mitigation Act of 2000 and upon adoption of a Federal Emergency Management Agency (FEMA) approved LHMP, the City would become eligible for FEMA hazard mitigation funds to implement mitigation actions to reduce the impact of natural hazards, such as wildfires. The City also intends to update the LHMP on a five-year cycle to ensure the LHMP addresses current and high-priority hazards as the natural environment changes and to maintain grant funding eligibility. Together, the EOP and LHMP provide a mitigation and response strategy to hazard events. As such, the City is actively addressing present and future wildfire hazards.

Mixed-Use Land Use Alternative

The comments generally opposes the Mixed-Use Land Use Alternative and states that future mixed-use developments would be inconsistent with the



City's density, building heights, and massing, resulting in significant environmental impacts without reference to any further facts or other substantial evidence.

As detailed in Draft EIR Section 8.3, *Mixed-Use Land Use Alternative*, mixed-use development would be designated within the City's commercial core where there are already existing commercial uses and nearby multi-family residences. The intent of this designation is to encourage more flexible, compact, and diverse uses by providing the ability for development projects to combine compatible uses in a variety of ways. Mixed-use development encourages property owners to make efficient use of their land and propose unique mixes of development designed to meet the demands of the surrounding area. Optimal site conditions and characteristics for the Mixed-Use designation include areas with close proximity to major employment areas, and areas near the City center or existing commercial centers with enough surrounding density to support retail and promote walkability. As such, the City's commercial core was identified as the area that would most reasonably complement mixed-use developments. Similar to the General Plan Update, the Mixed-Use Land Use designation would provide guidance as to the intensity and density of development, including limiting the scale and height to ensure any mixed-use development is compatible with the surrounding area. Future mixed-use projects would also be subject to applicable Municipal Code requirements and be guided by relevant General Plan Update policies.

Additionally, as detailed in the Draft EIR, the Mixed-Use Land Use Alternative would actually have similar or reduced environmental impacts in all environmental topical areas when compared to the General Plan Update with the exception of an increase in impacts to public services and utilities. Further, because mixed-use developments reduce the need for vehicles, encourage pedestrian and transit activity, and reduce overall vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions, this alternative would eliminate the project's significant and unavoidable GHG impacts.

It should be noted that the General Plan Update's proposed land use plan does not designate any parcel within the City as Mixed-Use. Future mixed-use developments would require a General Plan Amendment to change a site's existing land use designation to MU. The City would review any request for mixed-use development to ensure the location meets the optimal site conditions and characteristics for a mixed-use development and the development is compatible with the surrounding area and designed to enhance the community's character.

Existing Residential Development Exceeding 2020 General Plan Buildout

The comments note that existing dwelling units within the City (17,766 units) currently exceed the residential development anticipated by the 2002 General Plan (16,996 units) and that the General Plan Update projects



additional residential growth. Note, the General Plan Update does not authorize additional growth; rather, it is accommodating future development anticipated to occur with or without the General Plan Update.

During preparation of the General Plan Update, City staff and the City's consultant conducted a thorough review of the existing land uses within the City. This review included the use of parcel-level data to ensure an accurate count of existing dwelling units and non-residential square footage. As a result, corrections were made to the land use data, which noted a greater number of existing dwelling units than were included in the 2002 General Plan; refer to Draft EIR Table 3-1, *Existing Land Use Summary*. Since adoption of the 2002 General Plan, three infill residential projects were reviewed and approved by the City, totaling 110 units. Accordingly, the majority of the difference between the 2002 General Plan dwelling unit capacity (16,996 units) and the General Plan Update existing dwelling units (17,766 units) is attributed to greater accuracy in the inventory of existing land uses; refer to Draft EIR Table 3-3, *General Plan Update Net Growth (increase over existing conditions)*.

The Land Use Element identifies a variety of future land use opportunities that could result in new development or redevelopment within the community. These opportunity areas consist of the Northeast Future Planned Community, Chiquita Ridge, Mixed Use, and Reuse and Revitalization. The development of up to 528 units among these opportunity areas would result in an approximately three percent increase in the number of dwellings. In general, it is anticipated that new development will occur in a similar manner to historical development patterns in the City with only a limited number of parcels being developed at the maximum density or intensity. Further, the development assumptions for the 2002 General Plan and proposed General Plan Update, did not assume development would occur to the maximum densities or intensities allowed for every parcel within the City. The maximum density or intensity permitted for an individual parcel is controlled by the land use designation, unless a density bonus pursuant to Rancho Santa Margarita Zoning Code Section 9.08.120 applies. In addition to the land use designation, development of a parcel is influenced by a variety of factors including the physical characteristics of a parcel, compatibility with nearby uses, access and infrastructure limitations, market factors, and previous development trends. Within Rancho Santa Margarita, many of the parcels are not developed to their maximum density or intensity.

The projected future development intensity and density identified in the General Plan Update is based upon existing and historical development, as well as reasonably anticipated development associated with the future land use opportunities. As stated above, extensive review of existing land uses within the City were conducted by City staff and the City's consultant, which identified a more accurate count of existing dwelling units (17,766 units), which was utilized for baseline conditions. The General Plan Update focuses growth assumptions to reflect accurate and reasonable development assumptions based on existing on-the-ground conditions and historical



development, including infill development and opportunities for redevelopment of existing developed sites.

Additionally, General Plans are updated to plan for the future by addressing key issues in the City and responding to the dynamics of anticipated population growth, economic development, natural resource preservation, and land use. Almost 20 years have passed since the 2002 General Plan was prepared. The proposed project is updating the General Plan to reflect existing conditions and project future anticipated development patterns.

Redevelopment of Dove Canyon Plaza

The comments are concerned about the potential redevelopment of the Dove Canyon Plaza into a multi-family residential development. The current land use designation of Dove Canyon Plaza would remain Neighborhood Commercial under the General Plan Update. The General Plan Update does not propose any change in the current use of this site. The owners of Dove Canyon Plaza with their consultant, William Lyon Homes, submitted a proposal to the City for a change in use from commercial to residential on July 24, 2019. This development application was initiated by the property owner. It is not part of the City-initiated General Plan Update and is subject to a separate review process. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

Wendy Starks

From: Aaron J. Ehrlich <aehrlich@berdingweil.com>
Sent: Wednesday, June 19, 2019 12:09 PM
To: Wendy Starks
Cc: Sunna V. Smith
Subject: Public Comment Letter re RSM General Plan Update and Draft EIR
Attachments: Dove Canyon Master Association - RSM General Plan Update Comment Letter.pdf

Dear Ms. Starks,

Our law firm is land use and environmental legal counsel for the Dove Canyon Master Association. Please find attached an electronic version of Dove Canyon Master Association's public comment letter concerning the City of Rancho Santa Margarita's proposed General Plan Update and Draft EIR. The same letter has also been mailed to you.

Best,

Aaron J. Ehrlich | Partner
aehrlich@berdingweil.com | [Profile](#) | [vCard](#)



WALNUT CREEK COSTA MESA SAN DIEGO

2175 N California Blvd. Suite 500 Walnut Creek CA 94596	575 Anton Blvd. Suite 1080 Costa Mesa CA 92626	1660 Hotel Circle North Suite 701 San Diego CA 92108
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P 925.838.2090 F 925.820.5592	P 714.429.0600 F 714.429.0699	P 858.625.3900 F 858.625.3901
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86-1

June 19, 2019

VIA U.S. MAIL AND EMAIL

Ms. Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688
Email: wstarks@cityofrsm.org

Re: Dove Canyon Master Association's Public Comments Concerning the Proposed Rancho Santa Margarita General Plan Update and Draft Environmental Impact Report

Dear Ms. Starks:

The purpose of this letter is to submit the public comments of the Dove Canyon Master Association regarding the proposed Rancho Santa Margarita General Plan Update ("GPU") and Draft Environmental Impact Report ("Draft EIR").

The Dove Canyon Master Association contains 1,252 single family detached homes in which well over four thousand six hundred (4,600) people reside, in addition to significant open and common area, located within the Dove Canyon Planned Community area of Rancho Santa Margarita ("RSM"). The information we are providing in this public comment letter represents the overwhelming opinion of our members and the Dove Canyon Master Association's Board of Directors ("Board") concerning the GPU and Draft EIR. The Board was assisted in drafting this public comment letter by its retained land use and environmental attorney and California Environmental Quality Act ("CEQA") consultant.

Following in this letter are comments on the proposed GPU and the Draft EIR.

GENERAL PLAN UPDATE

Land Use Element

The proposed GPU properly reflects that minimal further, if any, residential growth should be permitted in RSM and that the limited permitted growth, if any, should predominantly be of a low-density residential land use designation to be consistent with the characteristics of RSM's existing land uses. RSM is a community of largely single-family homes and it is critically important that continue for the maintenance of RSM resident's health, safety, and well-being. That is properly recognized in the proposed Land Use Element Goals and Policies.

No Land Use Designation Change for Dove Canyon Plaza

The Dove Canyon Master Association supports that the GPU proposes no land use changes to the Dove Canyon Plaza located at 31931 Dove Canyon Drive and maintains the Neighborhood Commercial land use designation. The Dove Canyon Plaza has been operating since 1991 and is one of 11 retail commercial centers in RSM. Maintaining the Neighborhood Commercial designation ensures vital and

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convenient access to shopping and services for the residents in Dove Canyon, Coto de Caza, and other surrounding neighborhoods, in addition to the students and employees of Santa Margarita Catholic High School.

In addition, the Dove Canyon Plaza is not among either the future Planned Community or Mixed-Use Land Use designations in the proposed GPU Land Use Element.

Potential for Increased Intensity within Dove Canyon Plaza

The Neighborhood Commercial designation allows for a maximum intensity of development is 0.6:1 Floor Area Ratio (FAR), with an average intensity is 0.3:1 FAR. The Dove Canyon Plaza consists of approximately 99,000 square feet of gross leasable commercial/retail space, which equates to a 0.25 FAR.

Potential shopping center growth under the GPU is discussed on proposed Land Use Element page LU-27:

"Table LU-3 assumes additional development within the shopping centers resulting in an average FAR of 0.20 in the NC district and 0.25 in the GC district. Development at this level would result in approximately 462,000 square feet of new commercial development over the life of the plan. However, additional development up to the maximum allowable FAR is possible. All new development will be dependent upon site- and project-specific characteristics and compliance with the Zoning Code."

The Dove Canyon Master Association supports incentives to make Dove Canyon Plaza an economic success with services and amenities that are beneficial to nearby residential neighborhoods, employers, and schools. And as noted above, the Dove Canyon Master Association expects to fully participate in the planning, entitlement, and environmental processes if plans are submitted to intensify the Dove Canyon Plaza.

Future Land Use Opportunity for Mixed-Use

The Dove Canyon Master Association does not support the potential for future mixed-use development within the Dove Canyon Plaza as the mixed-use development would not be compatible with the surrounding area or community character.

Economic Development Element

As stated on GPU page ED-1, "(t)he purpose of the Economic Development Element is to maintain and improve the economic sustainability of Rancho Santa Margarita by addressing:

- 1) Economic growth and development;
- 2) Business attraction and retention; and
- 3) Fiscal strength and stability."

Per RSM's Economic Development Office, approximately 9,635 square feet of commercial space or 10% percent of Dove Canyon Plaza is available. The Dove Canyon Master Association welcomes and

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Cont.

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encourages incentives to make Dove Canyon Plaza an economic success through any and all of the strategies, goals, and policies identified in the proposed Economic Development Element.

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Cont.

Safety Element

Wildland Fires and Evacuation Routes

The homes and residents within the Dove Canyon Master Association have the potential to be impacted by wildland fires given their proximity to and recent fires within the Cleveland National Forest, as well as fires within the urbanized areas of RSM or neighboring communities. Weather conditions, such as high heat or winds, can accelerate the spread of fires to natural and urbanized areas, including within the Dove Canyon Planned Community area. Thus, implementation of proposed Safety Element Goal 4 and Policies 4.1 through 4.6 is imperative to minimize wildland fires within RSM, but also aid residents to install ember-resistant building materials and defensible space to protect their home, such as those identified on the CAL FIRE website www.readyforwildfire.org.

86-8

Dove Canyon residents want to ensure RSM has an adequate emergency response and evacuation plan is place should a fire occur within or adjacent to their homes. The 2002 General Plan Safety Element included Figure S-5, Emergency Response Locations and Evacuation Routes. This figure was not included in the April 2018 draft of the proposed Safety Element. Given the increasing potential for wildfire hazards or other natural or man-made hazards, this figure should be revised as necessary and included in the updated Safety Element. It is a helpful figure for residents and employers within RSM to know the identified routes in advance of an emergency.

DRAFT ENVIRONMENTAL IMPACT REPORT

Proposed Growth Under General Plan Update

The Dove Canyon Master Association supports no new residential or commercial growth within the Dove Canyon Planned Community area.

The projected growth under the proposed GPU includes a net growth of 528 dwelling units and 3,085,014 square feet of non-residential uses. The city-wide projected net growth of 528 dwelling units by 2040 appears overreaching to the Dove Canyon Master Association. That amount or a greater amount of projected net growth of dwelling units would materially impair the maintenance of RSM as a family-friendly, community-based city, degrade the quality of life for RSM's residents, would diminish community satisfaction, and most importantly, compromise the safety of RSM's residents.

86-9

Given the startling number of significant and deadly wildfires over the last several years in Orange County and across the State of California, coupled with the vast open space forest and park land next to and interwoven in RSM, permitting appreciable further residential development, and particularly, medium-density and high-density residential projects, will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects.

Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to an underperforming street system risks lives in the event of a natural disaster, such as a wildfire. Refer to additional comments under Section 5.4, Traffic and Circulation and Section 5.10, Hazards and Hazardous Materials.

86-9
Cont.

Section 5.4, Traffic and Circulation

Table 5.4-5, Future Average Daily Traffic Volumes accounts for growth through 2040 under the GPU. The table identifies existing (2016) average daily trips, future (2040) average daily trips, and the growth or change in trips between the two. The following roadway segments are in close proximity to the Dove Canyon Planned Community area:

86-10

ID	Street Name	Segment	Existing (2016) ADT	Future (2040) ADT	Growth
1	Alas De Paz	Antonio Parkway to Plano Trabuco Road	8,900	8,900	0
13	Antonio Parkway	La Promesa/Coto de Caza Drive to Alas De Paz	20,600	23,300	2,700
14	Antonio Parkway	Alas De Paz to Santa Margarita Parkway	13,300	13,500	200
33	Dove Canyon Drive	Plano Trabuco Road to Entry Gate	15,100	15,300	200
39	Plano Trabuco Road	Dove Canyon to Alas De Paz	15,800	15,800	0
40	Plano Trabuco Road	Alas De Paz to Santa Margarita Parkway	12,200	12,200	0

As shown above, an increase of 200 or less average daily trips is anticipated on Dove Canyon Drive or Plano Trabuco Road, which are the only roads that provide direct access to the Dove Canyon Planned Community area. These traffic growth numbers reflect that very little or no residential or commercial growth is anticipated in this area of RSM, and the Dove Canyon Master Association assumes this infers that no new or significant traffic impacts are anticipated on the roadway segments noted in the above table.

Given that there is only a single entry and exit location for the Dove Canyon Planned Community area, the Dove Canyon Master Association wants to ensure that the GPU does not add traffic trips that would worsen the existing capacity of the roadway segments or intersections that serve this community.

Section 5.10, Hazards and Hazardous Materials

Wildland Fires

In recent years, the number of significant and deadly wildfires in Orange County and across the State of California over the last several years have increased. Vast open space forest and park land are next to and interwoven within RSM. Permitting appreciable further medium-density and high-density residential development under the proposed GPU will threaten public safety by adding more people and more cars to RSM's transportation infrastructure, and the greater surrounding transportation infrastructure, which was not designed to accommodate meaningful further residential development, let alone medium-density or high-density residential projects. Traffic is already a significant concern throughout RSM, particularly around peak transportation hours, and adding additional cars to a troubling and underperforming street system risks lives in the event of a natural disaster, such as a wildfire.

86-11

There is no map within the proposed Safety Element (previous noted in this comment letter) or this Draft EIR section that shows the emergency response locations and/or evacuation routes. An Emergency Response Location and Evacuation Routes Exhibit should be added to the Draft EIR to illustrate the key pathways to safely evacuate RSM in emergency situations, including wildfire.

86-11
Cont.

Section 8.0, Alternatives to the Proposed Action

Section 8.0 identifies and evaluates two alternatives to the proposed GPU: 1) No Project/Existing General Plan Alternative and 2) Mixed-Use Land Use Alternative. The two alternatives are analyzed in Section 8.2 and 8.3, respectively.

Section 8.3, Mixed-Use Land Use Alternative

Development of this Alternative assumes all new residential growth (552 dwelling units) and approximately 323,374 square feet of new non-residential development, primarily general commercial uses, would occur within these mixed-use areas. Compared to the proposed project, this Alternative assumes a slight increase in residential development (552 dwelling units) compared to the proposed project (528 dwelling units) and a slight reduction in net non-residential development (2,961,562 square feet) compared to the proposed project (3,085,014 square feet).

86-12

The mixed-use land use alternative would permit additional dwelling units and facilitate the conversion of existing commercial uses to mixed-uses. Such mixed-uses would entail density and building heights and massing inconsistent with RSM and subject RSM's residents to significant land use and planning, population and housing, aesthetics/light and glare, traffic and circulation, air quality, noise, greenhouse gas emissions, geology and soils, hydrology and water quality, fire protection, police protection, school facilities, parks and recreation, water supply, wastewater, and solid waste environmental impacts.

The Dove Canyon Master Association supports no new residential or commercial growth within the Dove Canyon Plaza or within the Dove Canyon Planned Community area.

Section 9.0, Effects Found Not To Be Significant

Section 9.1 summarizes the Initial Study/Environmental Checklist conclusions. Under the Hazards and Hazardous Materials subheading, the analysis concludes less than significant impacts relative to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The analysis notes that there would not be changes to the circulation patterns or emergency access routes. However, there is no map within the proposed Safety Element (previous noted in this comment letter) or the Draft EIR that shows the emergency response locations and/or evacuation routes. See previous comment under Section 5.10, Hazards and Hazards Materials to add an exhibit to the Draft EIR to show evacuation routes.

86-13

COMBINED GENERAL PLAN UPDATE AND DRAFT ENVIRONMENTAL IMPACT REPORT ISSUES

The Draft EIR indicates that RSM has already permitted more new dwelling units than projected in the 2002 General Plan being replaced. RSM should not be prioritizing residential development over the health, safety, and well-being of RSM's residents. Since RSM has already exceeded the projected number of new dwelling units in the 2002 General Plan and RSM is considering the much needed GPU,

86-14

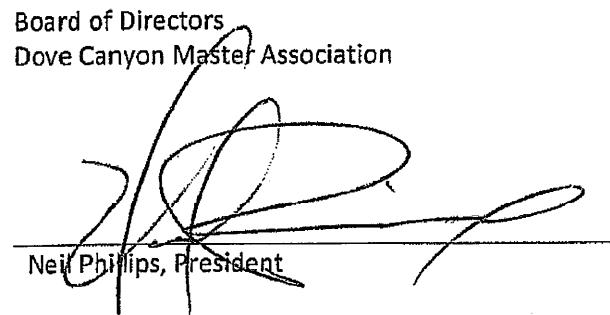
RSM should not consider any further applications to add even more new dwelling units before the GPU has been approved and adopted. The potential approval of any such application would materially change the existing conditions that have been used as the baseline conditions for assessing the environmental impacts of the GPU in the Draft EIR, thereby needlessly necessitating the recirculation of the Draft EIR, delaying the adoption of the GPU, and increasing RSM's cost to adopt the GPU and perform the required environmental review. Further, the GPU's content, including the tables, calculations, and assumptions therein, would be inaccurate as well, again requiring wasteful revisions, and thereby delaying the GPU's adoption and increasing costs. More fundamentally, RSM should not make a bad situation even worse by exceeding the 2002 General Plan new dwelling units projection by an even greater amount and considering further applications under an admittedly outdated and obsolete General Plan.

CONCLUSION

Thank you for the opportunity to comment on the proposed General Plan Update and Draft EIR. The comments offered in the letter outline the Dove Canyon Master Association's concerns relative to protecting the health, safety, and well-being of its members, residents, and guests today and in the future.

Respectfully submitted,

Board of Directors
Dove Canyon Master Association


Neil Phillips, President

86-14
Cont.

86-15



Response No. 86

Neil Philis, Board of Directors
Dove Canyon Master Association
June 19, 2019

86-1 This comment references an email attachment which includes the Dove Canyon Master Association's official comments on to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

86-2 This comment provides a general summary of the Dove Canyon Master Association. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

86-3 The commenter notes that the General Plan Update properly reflects that minimal additional residential growth should be permitted in the City and that the limited permitted growth, if any, should predominately be of a low-density residential land uses. This comment is noted and will be considered during future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

86-4 The commenter expresses support that the General Plan Update would not change the existing land use designation for Dove Canyon Plaza. This comment is noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

86-5 The commenter supports economic incentives to strengthen Dove Canyon Plaza and intends to fully participate in the planning, entitlement, and environmental processes if plans are submitted to intensify Dove Canyon Plaza. This comment is noted and will be considered during future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)



86-6 The commenter indicates that the Dove Canyon Master Association does not support the potential for future mixed-use development within the Dove Canyon Plaza. Refer to Response Nos. 7 through 85.

86-7 The commenter expresses that the Dove Canyon Master Association welcomes and encourages incentives to make Dove Canyon Plaza an economic success through any and all of the strategies, goals, and policies identified in the proposed Economic Development Element. Refer to Response Nos. 7 through 85.

86-8 The commenter would like to ensure the City has an adequate emergency response and evacuation plan in place should a wildfire occur near Dove Canyon. The City of Rancho Santa Margarita has an Emergency Operations Plan, which guides City personnel on responding to and recovering from a disaster. City personnel work out of the City's Emergency Operations Center (EOC) as a central point of coordination. The EOC supports responders in the field by providing needed resources and works closely with the County level EOC.

The City is also currently preparing a Local Hazard Mitigation Plan (LHMP). The purpose of the LHMP is to provide the City with clear direction for hazard mitigation action planning. The LHMP identifies natural and human-induced hazards that threaten the community and provides resources, information, and strategies to reduce these threats, resulting in overall risk reduction. The Draft LHMP and appendices were available for public review and comment on the City's website or at City Hall from July 9, 2019 to August 7, 2019. After FEMA approval and formal adoption by the City, the LHMP will be another tool to address emergency preparedness and response and will work in conjunction with other plans, including the City's General Plan and Emergency Operations Plan. Refer also to Response No. 3-5, for a discussion concerning the project's impacts to wildfires.

86-9 The commenter expresses several concerns related to the anticipated residential growth under the General Plan Update. Refer to Response Nos. 7 through 85.

86-10 The commenter would like to ensure that the General Plan Update would not add traffic trips that would worsen the existing capacity of the roadway segments or intersections that serve the Dove Canyon community. The roadway segment analysis for future development conditions anticipated by the General Plan Update indicates that the roadway network would provide adequate capacity to accommodate projected future traffic demands on all the Study Area roadway segments, with two segments approaching capacity and two segments potentially exceeding the theoretical daily capacity. As indicated in Draft EIR Table 5.4-6, *Future Roadway Segment Capacity Analysis*, none of the roadway segments identified by the commenter are expected to approach or potentially exceed the average daily vehicle capacity thresholds and would operate at acceptable levels. It should also be noted that the only roadway segment identified by the commenter that is adjacent to the Dove Canyon community is Dove Canyon Drive from Plano Trabuco Road to Entry Gate (ID 33), which would have an anticipated growth of 200 average daily trips and operate at acceptable levels by year 2040.



86-11 The commenter requests that an Emergency Response Location and Evacuation Routes exhibit be added to the Draft EIR to illustrate the key pathways to safely evacuate the City in emergency situations, including wildfire. The General Plan Safety Element notes that major arterials serve as the primary routes for evacuation; however, evacuation routes depend upon the emergency event and area affected. During such an event, law enforcement would identify the appropriate routes and assist residents leaving the City in the event that an evacuation of all or part of the City is required. Similarly, depending upon the emergency and area(s) affected, law enforcement, in coordination with the City and partner agencies, would identify appropriate locations for shelters and gathering areas.

The General Plan Update is a policy plan to guide future development in the City and does not propose any site-specific land use changes. Therefore, the project would not result in changes to existing circulation patterns or emergency access routes. In addition, the General Plan Update includes several policies intended to assist in the implementation and maintenance of the City's Emergency Operations Plan (Safety Element Policies 1.1 and 1.2). Refer also to Response No. 3-5, for a discussion concerning the project's impacts to wildfires, and Response No. 86-8, for a discussion concerning the City's Emergency Operations Plan and LHMP.

86-12 The commenter indicates that the Dove Canyon Master Association supports no new residential or commercial growth within the Dove Canyon Plaza or within the Dove Canyon Planned Community Area. Refer to Response Nos. 7 through 85.

86-13 The commenter requests a map within the proposed Safety Element or the Draft EIR which shows the emergency response locations and/or evacuation routes for the City. Refer to Response No. 86-11.

86-14 The commenter expresses concerns related to the anticipated residential growth under the General Plan Update. Refer to Response Nos. 7 through 85.

86-15 This comment serves as the conclusion to the comment letter. Responses to specific comments are provided above; no further response is required.

Wendy Starks

n: Bobby Cox <bobbyhwy1@icloud.com>
Sent: Thursday, June 20, 2019 1:28 PM
To: Wendy Starks
Subject: General Plan Update

The General Plan Update (GPU) goes out of its way to equate the 2002 GPU and today's as somehow being connected; in other words the 2019 GPU is just a furtherance of 2002 except with modifications.
Nothing could be further from the truth.

The 2019 Update is a plan to stop the effects of Global Warming and Sea Level Rise.
With th

Sent from my iPhone

87-1



Wendy Starks

From: Bob <Bobhcox@cox.net>
Sent: Thursday, June 20, 2019 1:30 PM
To: Wendy Starks
Subject: Fwd: General Plan Update

Sent from my iPhone

Begin forwarded message:

From: Bob <Bobhcox@cox.net>
Date: June 13, 2019 at 11:49:57 AM PDT
To: Warren R Daniels <wdaniels@ocsd.org>, Tennille Langille <langille@cityofrsm.org>, Rachel Puckett <rpuckett@ocsd.org>, Jennifer Cervantes <jcervantez@cityofrsm.org>, graths@cityofmissionviejo.org, GARY KRATOCHVIL <garyk2000@cox.net>, bjmjbm@aol.com, tbeall@cityofrsm.org, jholloway@cityofrsm.org
Subject: General Plan Update

On September 30, 2008, California passed the Sustainable Communities and Climate Protection Act, or SB 375. The legislation was the first in the country to link land use, transportation, and housing planning to mitigate Global Warming (ab32).

“SB 375 requires that planning for transportation and housing occur together in order to reflect the necessary balance between jobs and housing within a region..”

87-1
Cont.

Any urbanized area with a population greater than **50,000** is mandated to create a General Plan with a comprehensive planning process all in the name of defeating global warming.
NOTE: Rancho Santa Margarita should require the CA Census people - who recently appeared before the City - to inquire about a U.S. Citizenship. As a city (urban area) we are not yet a population of 50,000.

The California Air Resources Board (CARB) is responsible for implementing this regional plan for every city.

It is called the Sustainable Communities Strategy or SCS.

But how does CARB determine when an SCS is “feasible?”

CARB’s “determination of ‘feasibility’ is a quasi-legislative act that is reviewable under the ‘arbitrary and capricious’ standard instead of the ‘substantial evidence’ standard.”

CARB's finding of feasibility is thus granted substantial judicial deference. In addition, the SCS gains a higher level of deference in the CA courts, which employ the "arbitrary and capricious" - and not a "fair argument standard" during review.

Dove Canyon Plaza Residential or "Mixed-Use Projects" that are consistent with SCS: In its Environmental Impact Report (EIR), a residential or mixed-use project that is consistent with the SCS is not required to discuss "growth-inducing impacts".

SB 375 requires that planning for transportation and housing occur together. To accomplish this goal, these historically separate planning areas are assessed together.

The bill extends the General Plan Housing Element Update period from five to eight years, synchronizing it with the eight-year Regional Housing Needs.

Once the housing element has been submitted - which RSM has and is currently under public comment period(?) - local governments have three years to rezone parcels to demonstrate consistency with the SCS.

If they fail to rezone within the three-year period, SB 375 provides two remedies:

- 1) a private right of action to require rezoning within sixty days or to force the local government to overturn the denial of a consistent project.
- 2) the local government is simply not allowed to disapprove a housing development project (or impose other discretionary measures to make the project infeasible) if the project has at least 10 to 30 percent affordable housing.

Not only may any interested person (such as Raintree/William Lyon) bring an action to require a city to complete its rezoning within sixty days, the court may also impose sanctions on the local government.

This alignment of housing allocation and transportation planning, and the degree to which they come together is the most extraordinary aspects of SB 375.

The presence of an approved and adopted SCS incorporated into the RTP is central to the success of SB 375.

Rancho Santa Margarita HAS incorporated The Sustainable City Strategy into Our Regional Transportation Plan or RTP.

(In my opinion, the City relies on the hope that no one will read city documents and it is why Sustainable City Strategy is neither spoken to or promoted - people would freak out if they knew!)

This document is the keystone to administrative "reconstruction and the harmonization" it hopes to achieve.

Note: when removed the entire structure quickly falls apart.

87-1
Cont.

Also! If man made Global Warming is not real - everything under the SCS sun falls apart. It's why there is a bs "scientific consensus" with no debate.

Science with no debate: The first time in human history.

The city has refused to meet with me and I find this frustrating, but at times, being honest with myself, self inflicted.

The City, according to its Dove Canyon Plaza Q & A on the Rancho Santa Margarita website, answers "yes" regarding if they have ever met with the property owner of the Plaza: "Property owners may request to meet with City staff to discuss potential applications for changes in use." Dear City Staff. I am a property owner and property tax paying citizen (One Hundred and Twenty-four thousand dollars over 15 years- never once delinquent) and request to meet with City and Staff. For a constructive and meaningful purpose. I want to help the City.

I can only hope that my understanding of decorum - instead of previous ranker within City Council - might be followed with an invitation to speak in a Meeting with City Council and staff.

I've come to understand that the people within our City Government to be very admirable, professional and really do want what is best for Rancho Santa Margarita.

87-1
Cont.

Bobby Cox

(October 8, 2019 City Council Meeting Agenda/Minutes

"Mayor Blaise asks the City Attorney for a report regarding AB32/SB375 which transfers all Land Use Authority away from the Municipality to a local Regional Board and other entities".)

Sent from my iPhone

Wendy Starks

n: Bob <Bobhcox@cox.net>
Sent: Thursday, June 20, 2019 1:47 PM
To: Wendy Starks
Subject: General Plan Update

Dear Wendy,

Can anyone explain to me how it is fair, no matter what I write, that my remarks would be 'duly noted' but have zero impact on the City's Plan to implement the new Update.

The people of Rancho Santa Margarita need to know is that the Environmental Impact General Plan Update is a Plan to combat Global Warming and Sea Level rise.

There is zero connection between the 2002 and 2019 General Plan, no matter how difficult a try City Council tries to combine the two.

It has been very frustrating to me, driving me mentally ill, the lack of transparency and Orchestrated Plan to n

Sent from my iPhone

87-1
Cont.

Wendy Starks

From: Bob <Bobhcox@cox.net>
Sent: Thursday, June 20, 2019 1:57 PM
To: Wendy Starks
Subject: Re: General Plan Update

..not to speak with me.

Imagine being a homeowner for over 15 years, paying over \$124,000 in property tax and the City will not talk with me.

‘Ya got three minutes, ya can’t address anyone by name and further more- we don’t and won’t offer a reply.’ It’s the ultimate “screw you” without any regard for the consequences.

“Just let him get angrier and angrier”.

That’s exactly what’s happening and I’m losing it over here!

The Sustainable Community Strategy, and you can check my emails and recorded statements- is EXACTLY what I have been warning the City about and now WE have it.

↑
Sent from my iPhone

On Jun 20, 2019, at 1:30 PM, Bob <Bobhcox@cox.net> wrote:

87-1
Cont.

↓
Sent from my iPhone

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87-1
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Bobby Cox

(October 8, 2019 City Council Meeting Agenda/Minutes
“Mayor Blaise asks the City Attorney for a report regarding AB32/SB375 which transfers all Land Use Authority away from the Municipality to a local Regional Board and other entities”.)

Sent from my iPhone



Response No. 87

Bobby Cox
June 20, 2019

87-1 The commenter provides information regarding the existing regulatory framework in place to mitigate the effects of climate change and raises several concerns regarding the future potential redevelopment of the Dove Canyon Plaza. Refer to Response Nos. 7 through 85. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

Wendy Starks

From: Linda T <lindat@kennedycommission.org>
Sent: Thursday, June 20, 2019 3:26 PM
To: Wendy Starks
Cc: Cesar C
Subject: RE: Comments on DEIR for Rancho Santa Margarita's General Plan Update
Attachments: Ltr_RSM DEIR GP Update_19.6.20.pdf

Dear Ms. Starks,

Please find attached the Kennedy Commission's comments regarding the DEIR for Rancho Santa Margarita's General Plan Update. 88-1

Please reply to confirm receipt of this email and let us know if you have any questions.

Thank you.

Sincerely,

Linda

June 20, 2019



www.kennedycommission.org
17701 Cowan Ave., Suite 200
Irvine, CA 92614
949 250 0909

Ms. Wendy Starks, Principal Planner
City of Rancho Santa Margarita
22112 El Paseo
Rancho Santa Margarita, CA 92688

RE: Notice of Availability of a Draft Environmental Impact Report for the Rancho Santa Margarita General Plan Update – April 2019

Dear Ms. Starks:

The Kennedy Commission (the Commission) is a broad based coalition of residents and community organizations that advocates for the production of homes affordable for families earning less than \$30,000 annually in Orange County. Formed in 2001, the Commission has been successful in partnering and working with jurisdictions in Orange County to create effective policies that has led to the new construction of homes affordable to lower income working households.

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the Rancho Santa Margarita General Plan Update. As the City moves forward with the proposed General Plan Update, the Commission urges the City to support and prioritize the development of homes affordable to lower income families by implementing effective affordable housing policies and programs in the City.

While the City anticipates the proposed General Plan Update will result in 6,439 new jobs (41 percent increase), the update would only increase the City's existing housing inventory by only 528 residential units (3 percent increase).¹ To accommodate the large growth in the labor market, the City will need to provide and increase housing opportunities for all economic segments of the community. The City should not rely on neighboring cities' vacancy rates and available housing opportunities to meet the residual demand for housing created by the General Plan Update.² The draft EIR indicates that within the City, "many parcels are not developed to their maximum density or intensity. There are future land use opportunities that could result in new development or redevelopment."³ With this in mind, the City should identify potential properties that would allow maximum density or intensity to facilitate the development of new affordable homes for lower income working households in the City. Identifying these sites will also help plan and address housing growth for the upcoming 2021-2028 Housing Element cycle.

As the City moves forward with the Draft EIR for the City's General Plan Update, the Commission urges the City to consider the following recommendations. These

88-2

¹ Draft Environmental Impact Report Rancho Santa Margarita General Plan Update, April 2019, p. 5.2-7.

² Draft Environmental Impact Report Rancho Santa Margarita General Plan Update, April 2019, p. 5.2-7 – 5.2-8.

³ Draft Environmental Impact Report Rancho Santa Margarita General Plan Update, April 2019, p. 3-15.

actions are important in planning new residential development since zero units have built in the City since 2013.

1. Identify available and realistic opportunity sites for the development of affordable homes for lower income households to help meet the City's current Housing Element Regional Housing Needs Assessment goals and for the upcoming 2021-2028 Housing Element cycle.
2. Include a General Plan Update goal that prioritizes the development of affordable homes for lower income households. A policy should be included that specifically allows new proposed residential development under the City's residential land use designations at High Density Residential (25 du/acre) and the proposed Mixed Use designation (25 du/acre) to set-aside at least 15 percent of the units to be affordable to seniors, veterans and lower income working households. In addition, the City should consider prioritizing and streamlining (i.e., by-right) proposed developments that are 100% affordable to lower income households.
3. Develop effective land use alternatives (i.e., affordable residential incentive overlays) for balanced growth that will increase affordable home opportunities for seniors, veterans and lower income working households.
4. Create an affordable housing strategic plan, where the City commits to constructing a specific number of multi-family rental homes that will be affordable to lower income working households.

The Need for Affordable Homes in Rancho Santa Margarita

Ranked among the top ten least affordable metropolitan areas in the country⁴, Orange County is suffering from an affordable housing crisis. A resident must earn at least \$39.17 per hour to afford a two-bedroom apartment at a fair market rent of \$2,037 a month.⁵ Over the past seven years, Orange County renters have paid an average of \$355 more a month and rents are projected to continually rise.⁶ During 2000 to 2015, Orange County's inflation-adjusted median rent increased by 28 percent while the median renter income decreased by 9 percent.⁷ With the serious lack of affordable home and with wages that are not keeping up with rising rent, many working families, especially those who earn lower wages, struggle financially to work *and* live in Rancho Santa Margarita.

⁴ 2019 Out of Reach, National Low Income Housing Coalition, p.15, June 2019.

⁵ 2019 Out of Reach, National Low Income Housing Coalition, p.39, June 2019.

⁶ Southern Californians Scrimp to Get By As Average Rents Hit \$1,900, Orange County Register, February 15, 2018.

⁷ California Rents Have Risen to Some of the Nation's Highest. Here's How that Impacts Residents, Orange County Register, February 15, 2018.

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Cont.

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The impact of this crisis is dire. Many Orange County renters are rent burdened where they spend more than 30% of their income towards housing costs. Struggling to make ends meet, many households take on more jobs or live in overcrowded substandard households. With high rents, low vacancy rates and an increasing number of residents needing affordable homes, the supply of affordable homes being built for lower income households has also not kept up with the demand. An additional 111,996 affordable rental homes are needed to address Orange County's housing needs for lower income renters.⁸

While Orange County is experiencing a shortage of quality housing opportunities at all levels of affordability, the barriers to finding affordable rental homes are greatest for the County's working poor families earning minimum wages. Categorized as extremely low-income for a family of four, these households earn less than \$35,600 a year, which is 30 percent of Orange County's Area Median Income of \$97,900.⁹ Many factors contributing to the affordable housing crisis include: limited housing options, high cost of living and a growing low-wage job sector in Orange County. These issues are all placing a huge burden on the quality of life for lower income working families.

Affordable Homes Decreases Environmental Impacts

With high housing costs and significant lack of affordable homes, many workers and families, especially those who earn lower wages, struggle financially to live in the city they work in. These impacts not only hurt workers and families but may also impact the city's economic competitiveness and attractiveness to major employers to provide jobs. Locating homes, specifically affordable homes, near transit, job centers and neighborhood services will decrease travel costs and allow individuals to save money and spend it elsewhere in the City. In particular, the environmental impacts of a development are especially less drastic when a person can afford to live and spend their money in the same community in which they work in.

In 2018, the average commute time to work for Orange County residents was approximately 27 minutes and approximately 79% of commuters drove alone.¹⁰ Improving location accessibility and connectivity reduces the dependency for residents, especially for lower income households and workers, to drive their automobiles. This will lead to decreased environmental impacts, such as vehicles miles traveled (VMT) and greenhouse gas emissions, which will contribute to the project's overall purpose and intent to create a sustainable transit oriented neighborhood. The project will also align with the Sustainable Communities and Climate Protection Act of 2008 (SB 375) and help the City implement and comply with the Sustainable Communities Strategy (SCS) goals of reducing VMT and greenhouse gas emissions by 19% by 2035.

⁸ Orange County's Housing Emergency Update, California Housing Partnership, p. 1, May 2019.

⁹ State Income Limits for 2019, Department of Housing and Community Development, May 6, 2019.

¹⁰ Profile of Orange County, Southern California Association of Governments, p. 18, May 2019.

88-7
Cont.

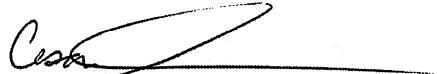
88-8

Ms. Wendy Starks
June 20, 2019
Page 4 of 4

Please keep us informed of any updates to the City's General Plan Update and if you have any questions, please feel free to contact Cesar Covarrubias at (949) 250-0909 or cesarc@kennedycommission.org.

88-9

Sincerely,



Cesar Covarrubias
Executive Director



Response No. 88

Cesar Covarrubias, Executive Director
The Kennedy Commission
June 20, 2019

88-1 This comment references an email attachment which includes the Kennedy Commission's official response to the Draft EIR. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

88-2 This comment provides a general summary of the Kennedy Commission and provides a summary of the proposed General Plan Update. This comment urges the City to prioritize the development of homes affordable to lower income families by implementing effective affordable housing policies and programs in the City. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

This commenter also opines that the City should not rely on neighboring cities' vacancy rates and available housing opportunities to meet the residual demand for housing caused by the General Plan Update. Implementation of the General Plan Update anticipates the development of 528 additional dwelling units, which would directly increase the City's population by approximately 3.4 percent or 1,692 persons; refer to Draft EIR Table 5.2-14, *General Plan Update Compared to Existing Conditions*. The non-residential development anticipated under the General Plan Update could increase the City's employment base by approximately 41.2 percent or 6,439 jobs. Employment opportunities accommodated through implementation of the General Plan Update could directly increase the City's population, as employees and their families may choose to relocate to the City. It should be noted that the General Plan Update does not authorize additional growth; rather, it is accommodating future development anticipated to occur with or without the General Plan Update; refer to Response Nos. 7-1 through 85-1. As discussed in Draft EIR Section 6.3, *Growth-Inducing Impacts*, estimating the number of employees who would relocate to the City would be highly speculative, as many personal factors influence personal housing decisions (i.e., family income levels and the cost and availability of suitable housing in the local area). There is also the potential that existing residents may fill some of the new positions. Thus, the number of new employees who would relocate to the City because of future employment opportunities is unknown. Further, the 528 dwelling units anticipated by the General Plan Update could be occupied by new employees who could relocate to the City. Additional housing opportunities are available in surrounding cities (Mission Viejo, Lake Forest, Laguna Niguel, Aliso Viejo, and Laguna Woods). As a result, it is anticipated that adequate



housing would be available to satisfy the housing demand created by new employment opportunities and the construction of more housing would not be warranted.

88-3 The commenter requests that available and realistic opportunity sites be identified for the development of affordable housing to help meet the City's Housing Element Regional Housing Needs Assessment (RHNA) goals and for the upcoming 2021-2028 Housing Element cycle. As indicated in Draft EIR Section 3.5.1, *General Plan Update Components*, the General Plan Update is a strategic update focused on five elements: Conservation/Open Space, Economic Development, Land Use, Noise, and Safety. The Circulation and Housing Elements were updated in 2014 and 2013, respectively; thus, no changes are proposed to those two elements. However, as noted, the Housing Element will be updated in the future as part of the upcoming 2021-2028 Housing Element cycle. Although no changes are proposed to the Housing Element at this time, the General Plan Update anticipates a net growth in the City's housing inventory by approximately 528 dwellings. As indicated in Draft EIR Section 3.0, *Project Description*, the growth assumptions under the General Plan Update account for the potential development of housing to accommodate the City's RHNA requirements and current Housing Element. Specifically, the City's RHNA requirement could be fulfilled by accessory dwelling units assumed in the General Plan Update. This anticipated growth is evaluated in the Draft EIR.

88-4 The commenter requests the General Plan Update include a goal that prioritizes the development of affordable homes for lower income households. The commenter also requests that a policy be included that specifically allows new proposed residential development under the City's residential land use designations at High Density Residential (25 du/acre) and the proposed Mixed-Use designation (25 du/acre) to set aside at least 15 percent of the units to be affordable to seniors, veterans, and lower income working households. The commenter also requests the City prioritize and streamline by-right developments that are 100 percent affordable to lower income households. Refer to Response No. 88-3. This comment is noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

88-5 The commenter requests effective land use alternatives be developed (i.e., affordable residential incentive overlays) to increase affordable home opportunities for seniors, veterans, and lower income working households. This comment is noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)



88-6 The commenter suggests the City create an affordable housing strategic plan, where the City commits to constructing a specific number of multi-family rental homes that will be affordable to lower income working households. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

88-7 The commenter provides information related to the need for affordable homes in Rancho Santa Margarita. This comment is noted and will be considered during future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

88-8 The commenter provides information related to the potential for affordable homes to decrease environmental impacts. This comment is noted and will be considered during future project-specific deliberations. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (CEQA Guidelines Section 15088(a) requires that a lead agency only evaluate and respond to comments raised on significant environmental issues.)

88-9 As requested by the commenter, the Kennedy Commission will continue to be notified on the project and its associated environmental documents.



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3.0 ERRATA

Changes to the Draft Environmental Impact Report (EIR) are noted below. A double-underline indicates additions to the text; strikethrough indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, Response to Comments, of this Final EIR. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

These errata address the technical comments on the Draft EIR, which circulated from April 19, 2019 through June 20, 2019. These clarifications and modifications are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft EIR. Any changes referenced to mitigation measures contained in the Draft EIR text also apply to Draft EIR Section 1.0, *Executive Summary*, of the Draft EIR. All mitigation measure modifications have been reflected in Section 4.0, Mitigation Monitoring and Reporting Program, of this Final EIR.

GLOBAL EDITS

Global errata apply to the entirety of the Draft EIR. These clarifications or modifications are not considered significant new information and would not result in new or substantially greater significant impacts as compared to those analyzed in the Draft EIR.

GENERAL PLAN SAFETY ELEMENT POLICY 1.3

General Plan Safety Element Policy 1.3 has been modified to incorporate the *Rancho Santa Margarita Local Hazard Mitigation Plan* by reference. This policy has been modified as follows throughout the Draft EIR:

Policy 1.3: Update the City's Local Hazard Mitigation Plan in conjunction with the General Plan Safety Element every five years, to ensure consistency and relevancy of hazards and issues within the City, and to maintain consistency with Assembly Bill 2140, Senate Bill 379, and applicable subsequent State and/or Federal legislation. The Rancho Santa Margarita Local Hazard Mitigation Plan is incorporated by reference as part of this Safety Element and should be consulted when addressing hazards in order to ensure the general health and safety of the community.

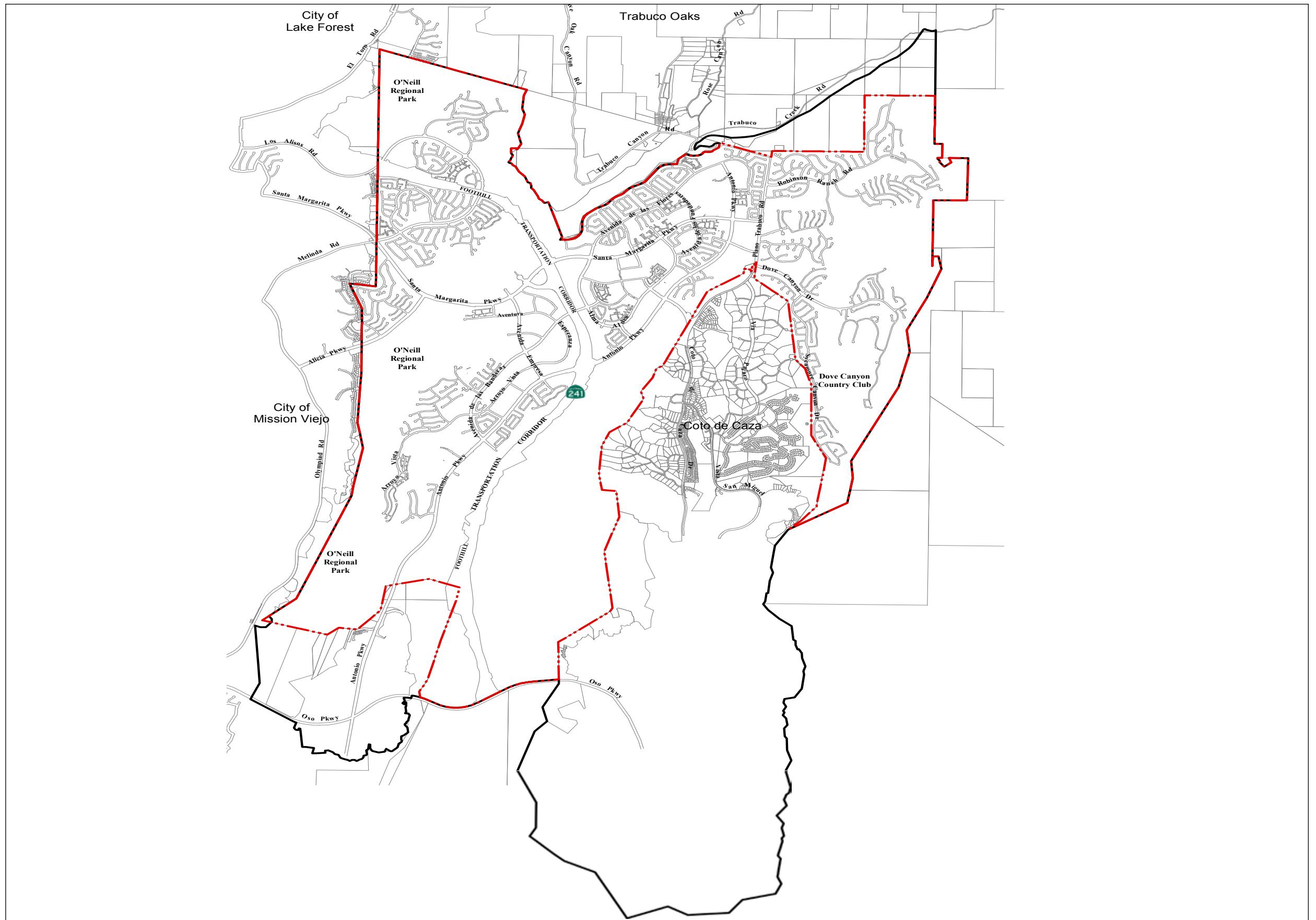
EXHIBIT EDITS

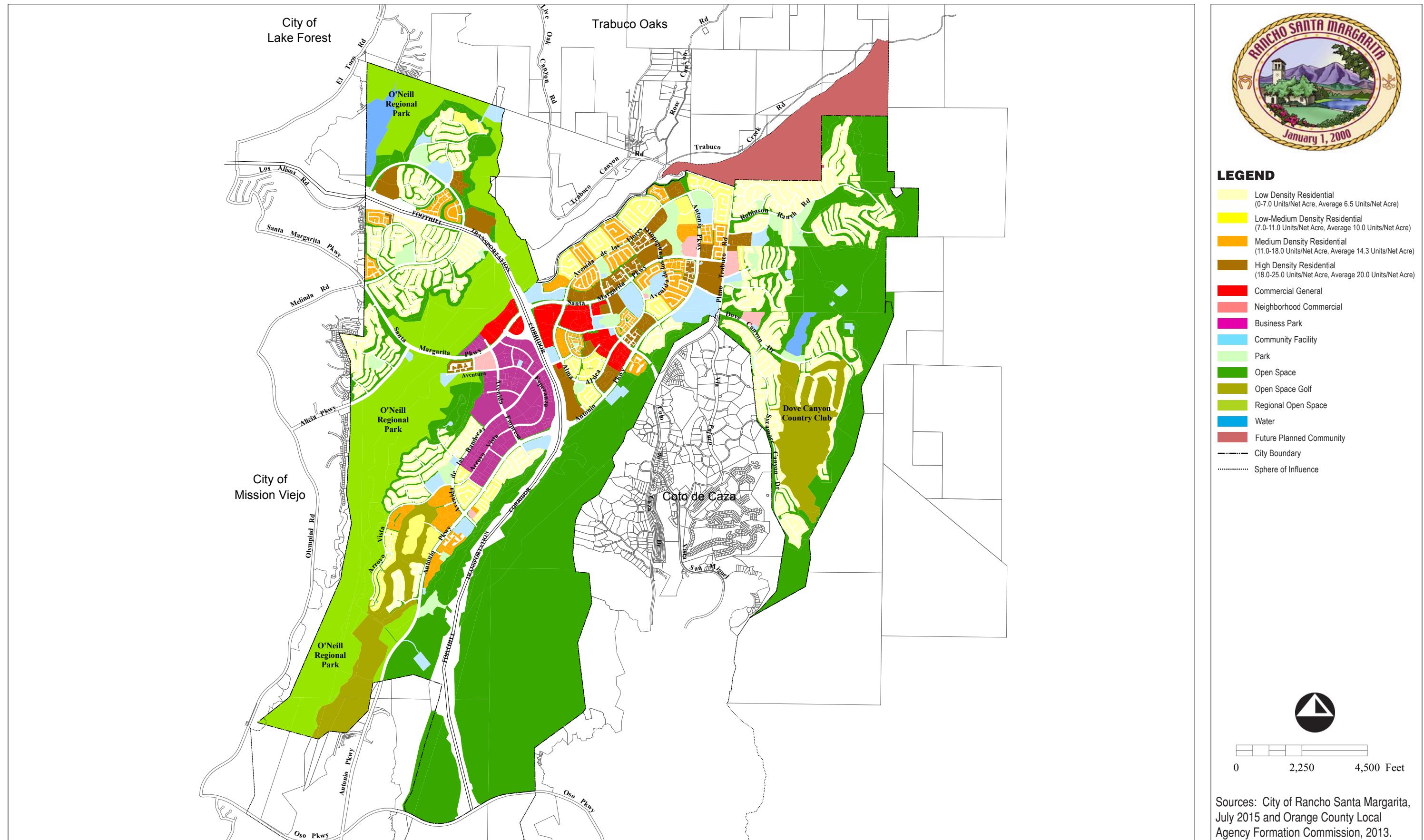
The City boundary depicted on all Draft EIR exhibits has been updated to reflect the addition of Assessor's Parcel Number (APN) 814-041-39, which was annexed to the City in October 2016. APN 814-041-39 encompasses 1.22 acres and is generally located west of Plano Trabuco Road and Dove Canyon Drive. This parcel is designated Community Facility and was considered as part of the Draft EIR's environmental analysis.

In addition, "Orange County Local Area Formation Commission, 2013" has been revised to "Orange County Local Agency Formation Commission" on the following Exhibits:



- Exhibit 3-2, General Plan Study Area;
- Exhibit 3-3, General Plan Update Land Use Map;
- Exhibit 5.1-1, 2002 General Plan Land Use Map;
- Exhibit 5.1-2, Rancho Santa Margarita Zoning Map;
- Exhibit 5.3-1, Scenic Highways;
- Exhibit 5.3-2, Surface Water Sources;
- Exhibit 5.6-2, Existing Roadway Noise Contours;
- Exhibit 5.6-3, Noise Measurement Locations;
- Exhibit 5.6-4, General Plan Year 2040 Noise Contours;
- Exhibit 5.8-1, Liquefaction/Landslide Potential;
- Exhibit 5.9-1, Flood Hazard Map;
- Exhibit 5.10-1, Wildfire Hazard Areas;
- Exhibit 5.12-1, Soils;
- Exhibit 5.12-2, Vegetation Communities;
- Exhibit 5.12-3, Jurisdictional Areas and Reservoirs;
- Exhibit 5.12-4, Critical Habitat;
- Exhibit 5.12-5, Designated Reserve Lands;
- Exhibit 5.16-1, Park Sites;
- Exhibit 5.17-1, Water District Service Areas; and
- Exhibit 8-1, Mixed-Use Land Use Alternative.

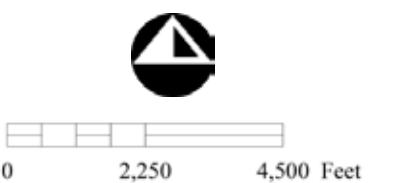




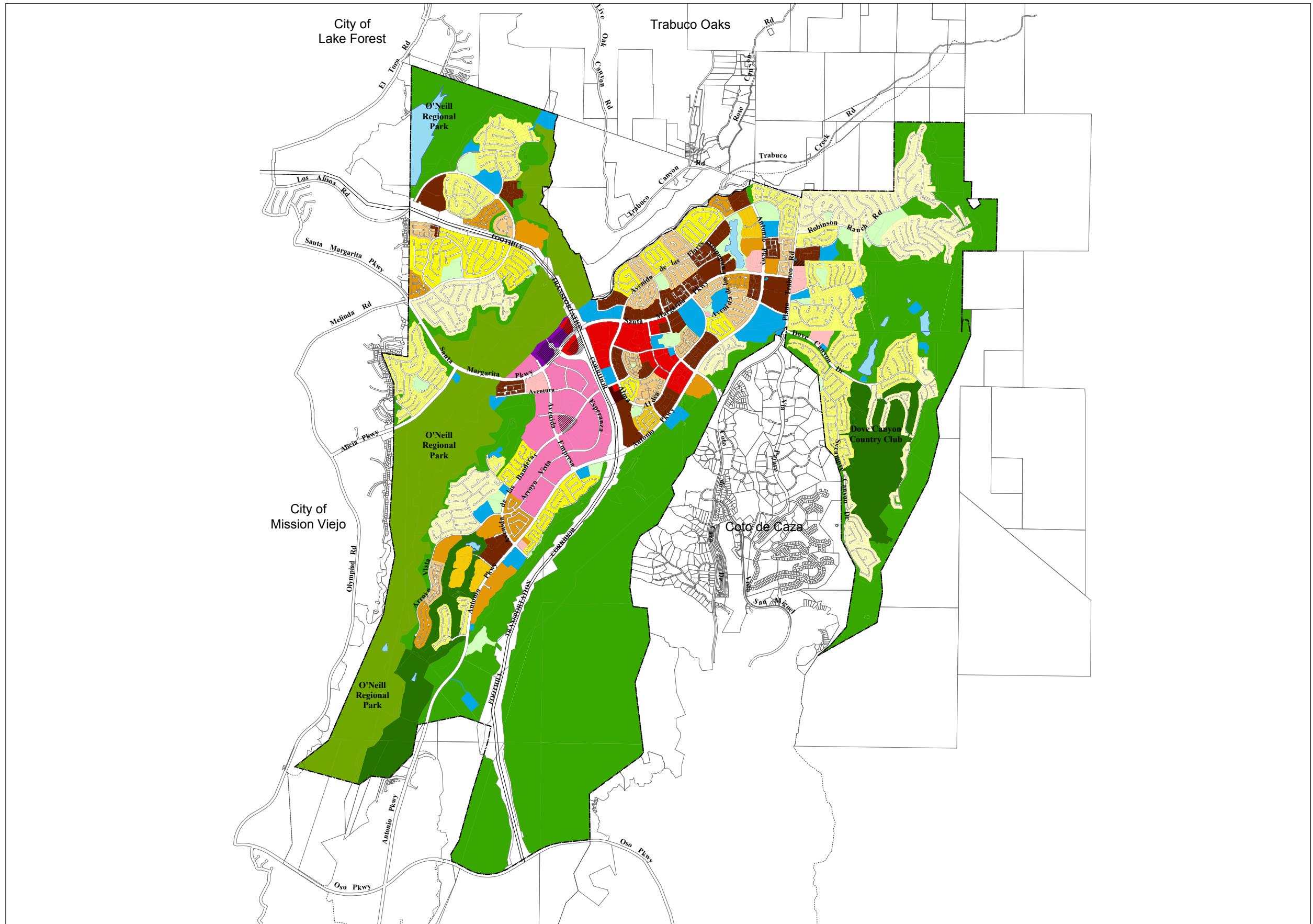


LEGEND

- Low Density Residential (0-7.0 Units/Net Acre, Average 6.5 Units/Net Acre)
- Low-Medium Density Residential (7.0-11.0 Units/Net Acre, Average 10.0 Units/Net Acre)
- Medium Density Residential (11.0-18.0 Units/Net Acre, Average 14.3 Units/Net Acre)
- High Density Residential (18.0-25.0 Units/Net Acre, Average 20.0 Units/Net Acre)
- Commercial General
- Neighborhood Commercial
- Business Park
- Community Facility
- Park
- Open Space
- Open Space Golf
- Regional Open Space
- Water
- Future Planned Community
- City Boundary
- Sphere of Influence



Sources: City of Rancho Santa Margarita, July 2015 and Orange County Local Agency Formation Commission, 2013.

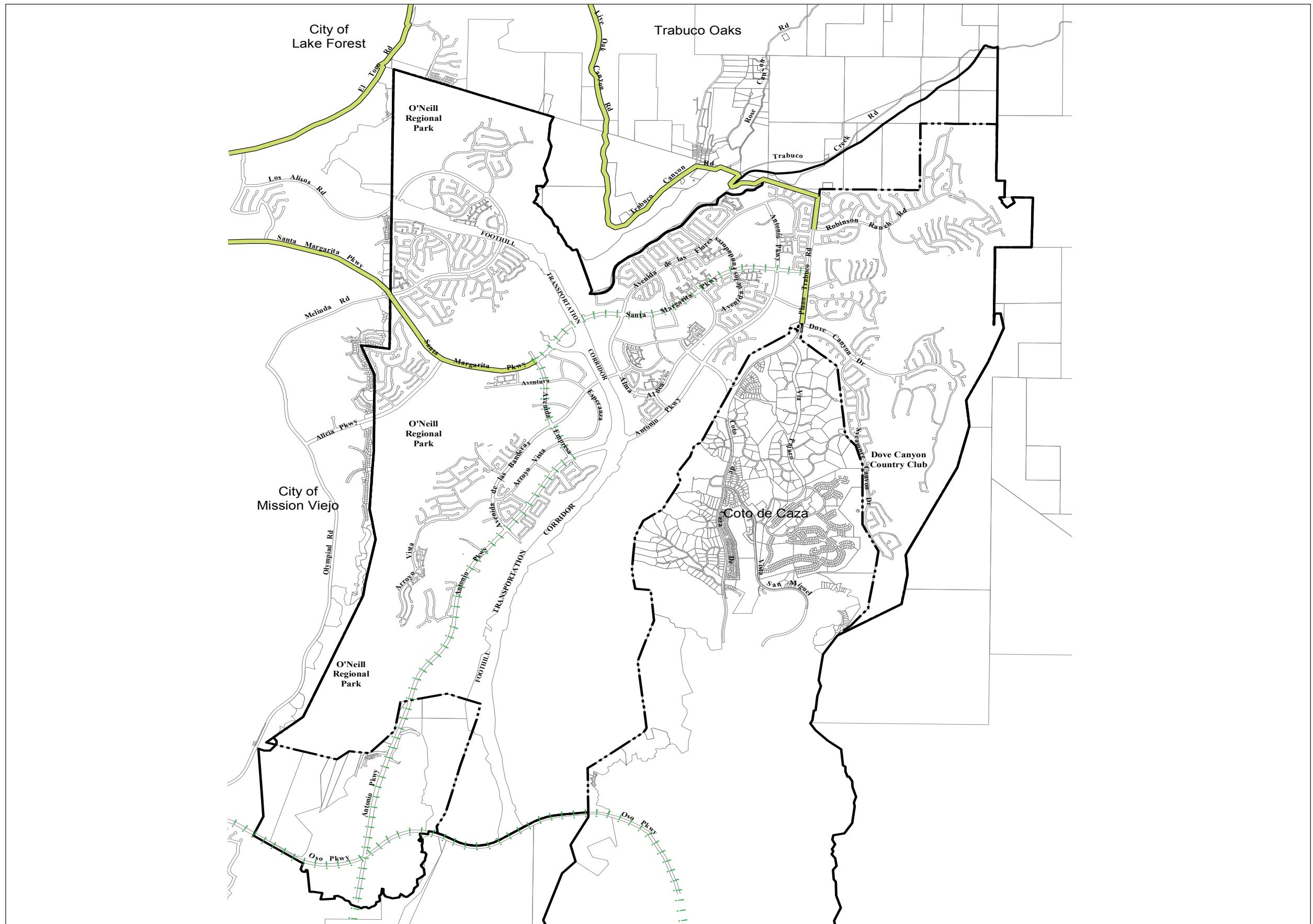


LEGEND

- Residential - Low Density (RL)
 - RL-6000
 - RL-5000
- Residential - Low-Medium Density (RLM)
 - RLM-4000-A
 - RLM-4000-D
- Residential - Medium Density (RM)
 - RM-3000-D
 - RM-2000-A
 - Residential - High Density (RH)
 - Residential - High Density Specific Plan (RH-SP)
 - Commercial - General (CG)
 - Commercial - Neighborhood (CN)
 - Auto Center (AC)
 - Auto Center - Overlay (AC-O)
 - Business Park (BP)
 - Public/Quasi-Public (PQ)
- Park (P)
- Open Space (OS)
- Open Space - Golf (OSG)
- O'Neill Regional Park (ONP)
- Water (W)
- City Boundary
- Sphere of Influence

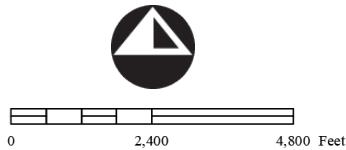


Source: City of Rancho Santa Margarita, June 2015 and Orange County Local Agency Formation Commission, 2013.

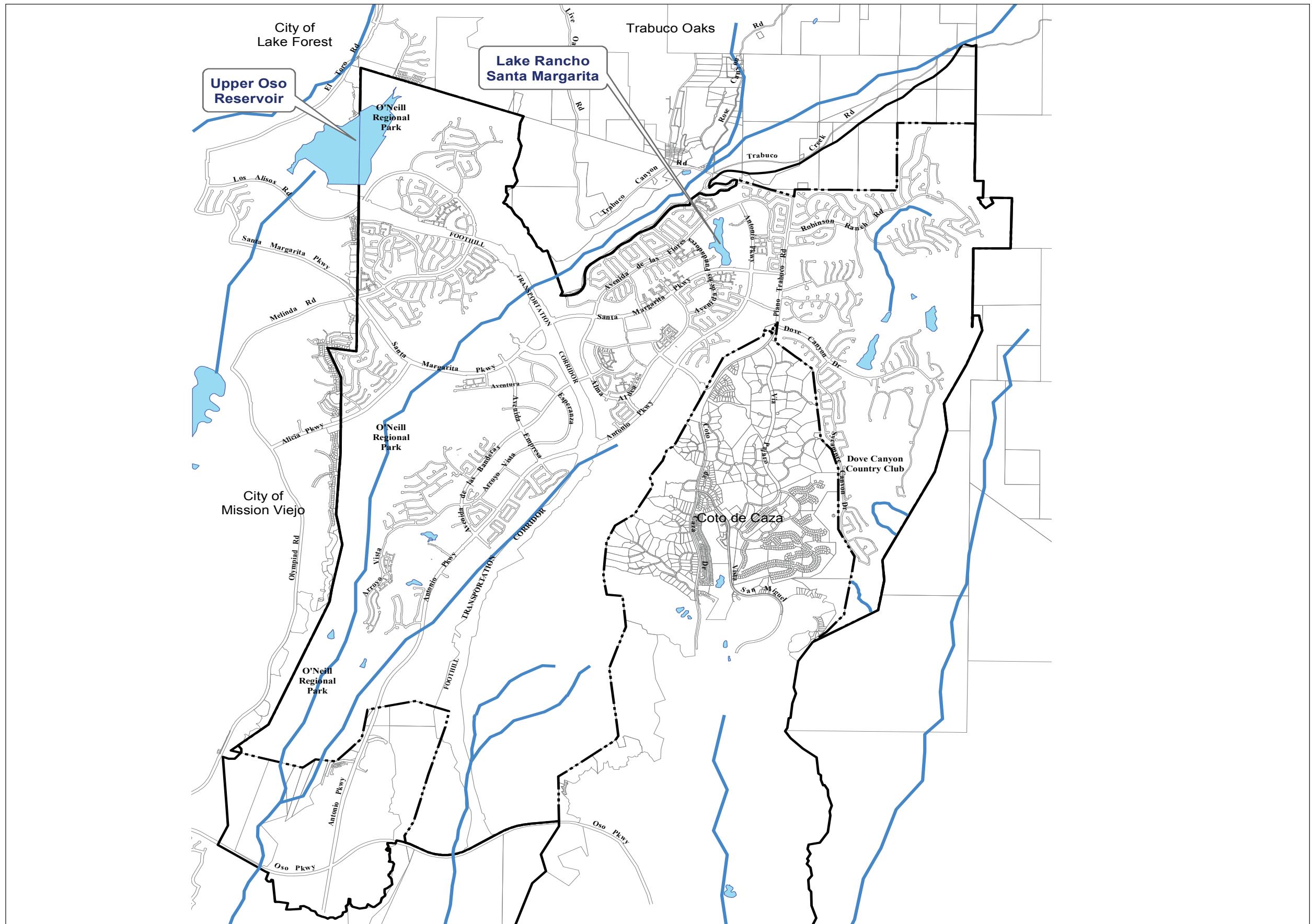


LEGEND

- Viewscape Corridor
- Landscape Corridor
- City Boundary
- Sphere of Influence



Sources: County of Orange Scenic Highway Plan, April 2005 and Orange County Local Agency Formation Commission, 2013.

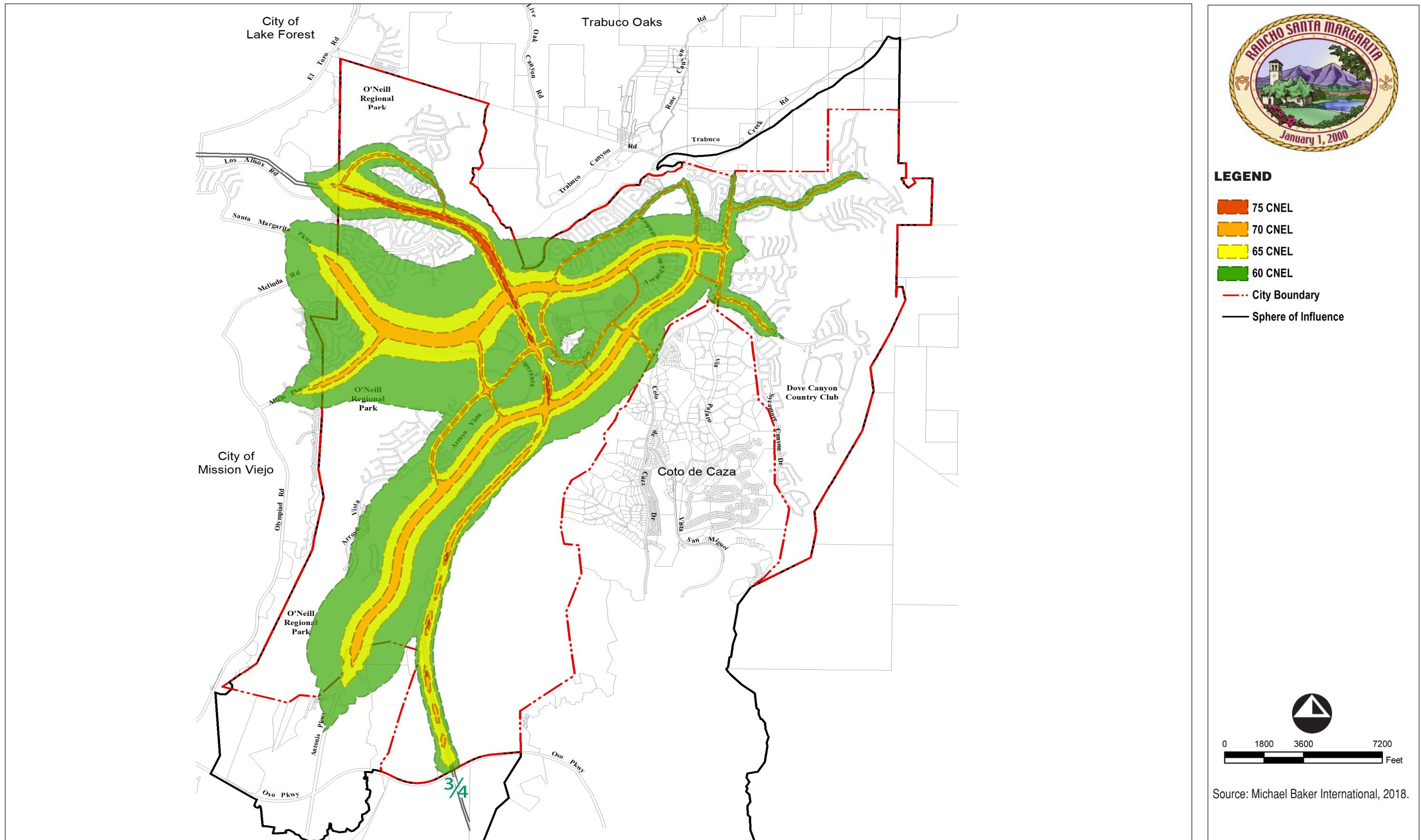


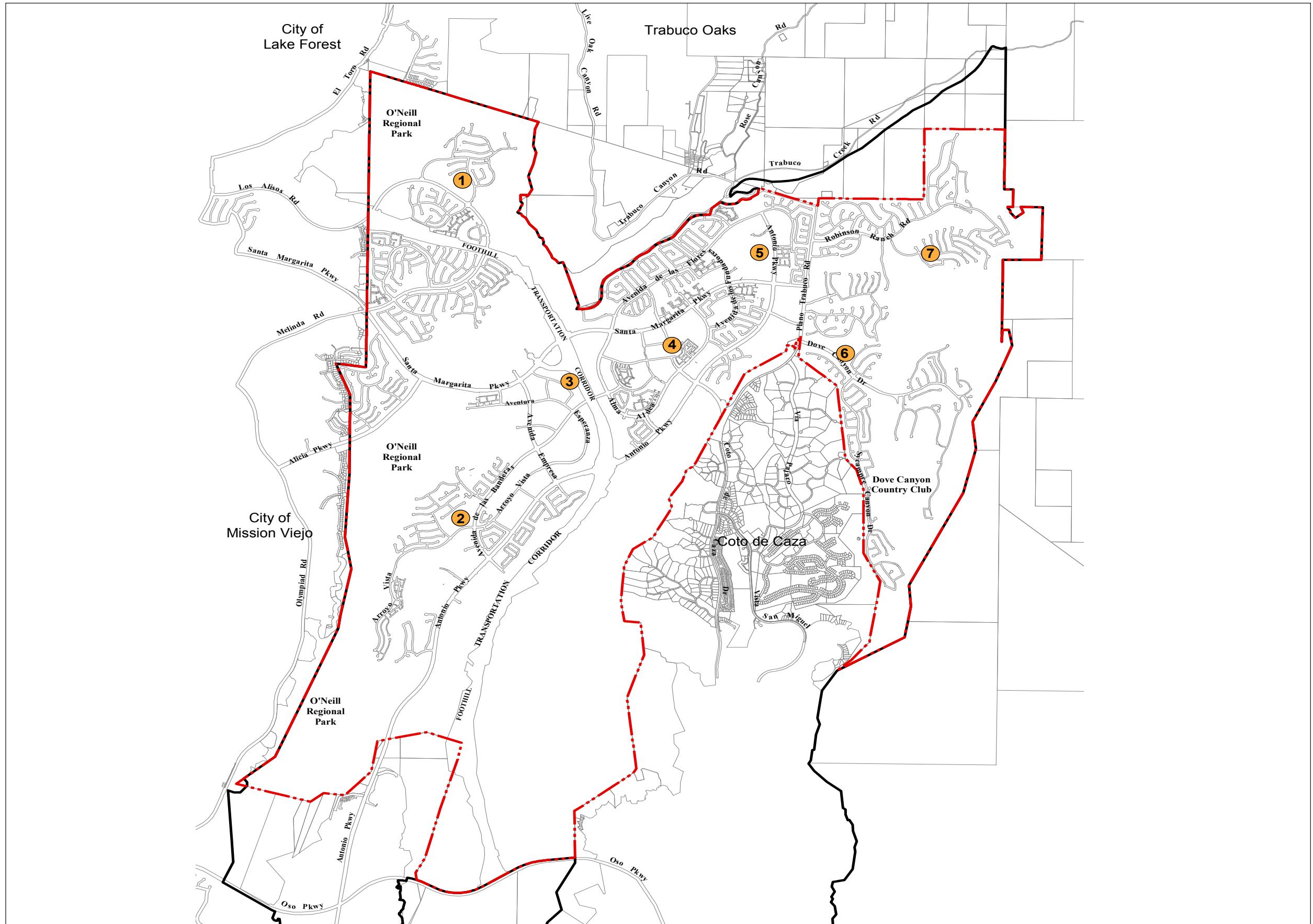
LEGEND

-  Water Features
- Streams
-  City Boundary
- Sphere of Influence



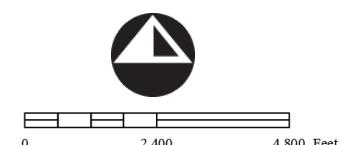
Sources: Orange County Local Agency Formation Commission, 2013 and City of Rancho Santa Margarita, 2016.



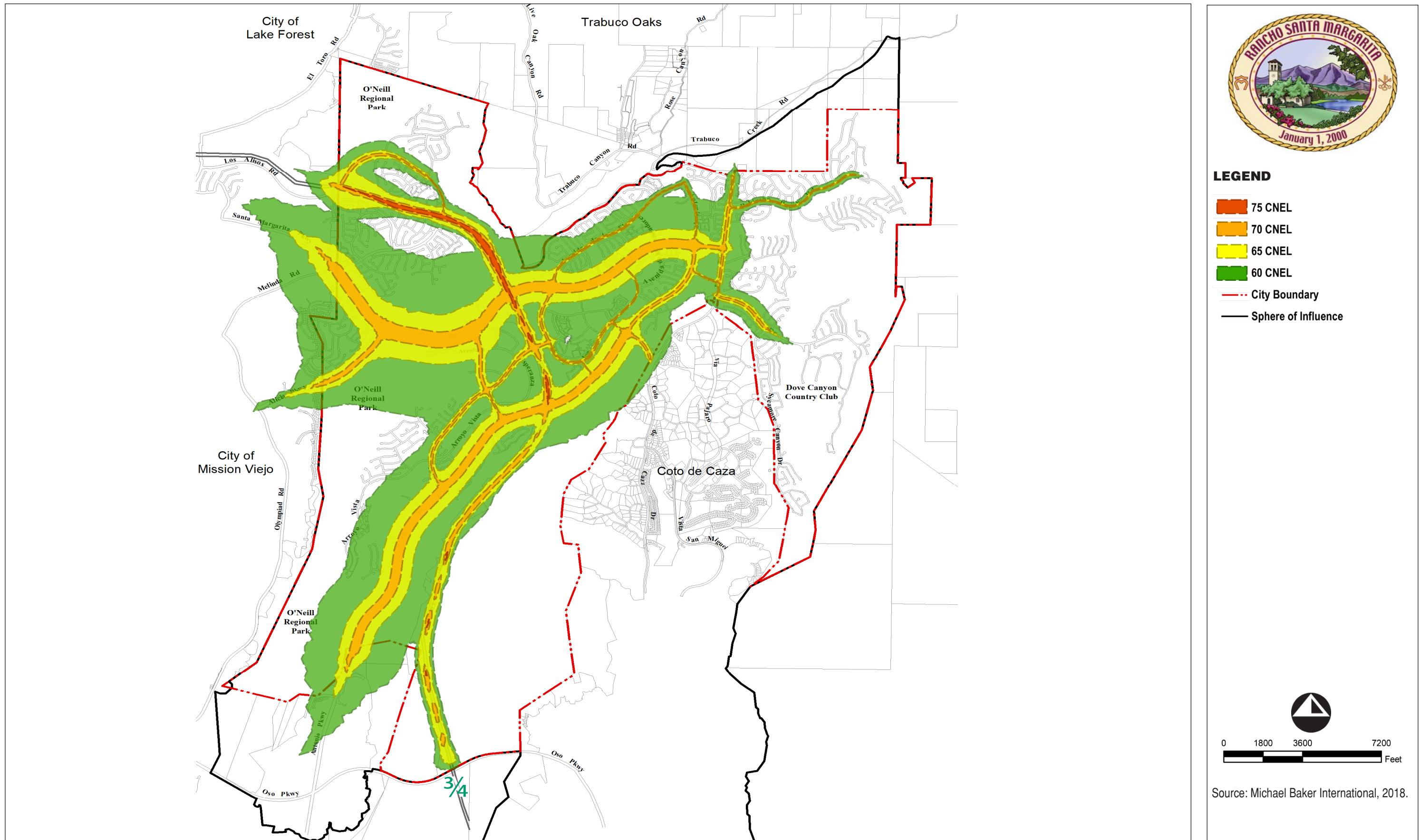


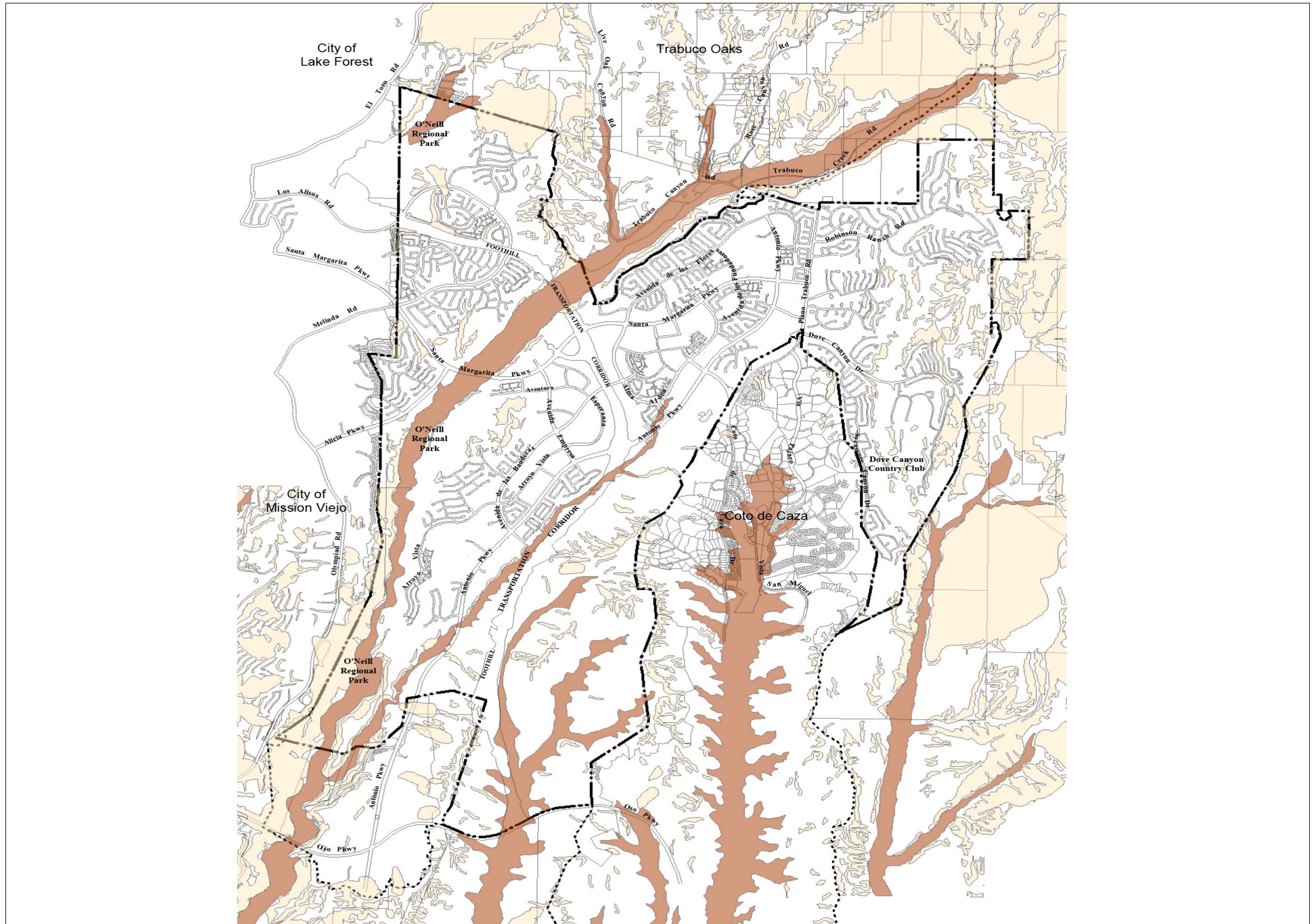
LEGEND

- ① Noise Measurement Location
- City Boundary
- Sphere of Influence



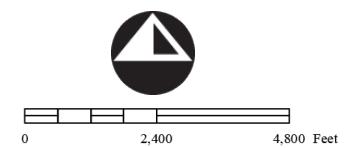
Sources: Orange County Local Agency Formation Commission, 2013 and Michael Baker International, 2016.



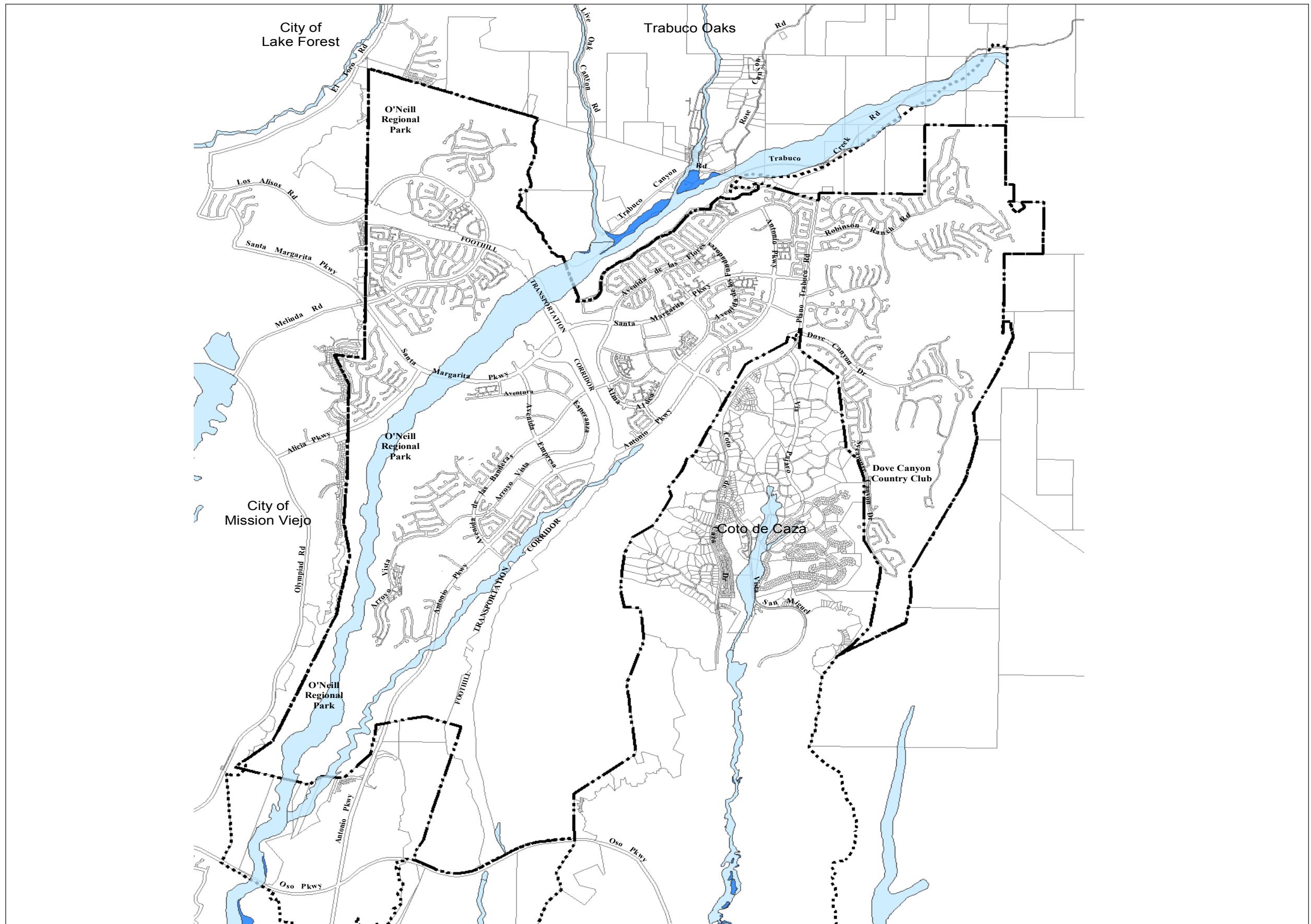


LEGEND

- Landslide (tan)
- Liquefaction (brown)
- City Boundary (solid line)
- Sphere of Influence (dashed line)

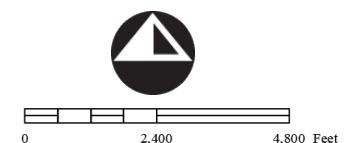


Source: Orange County Local Agency Formation Commission, 2013 and California Geological Survey, 2002.

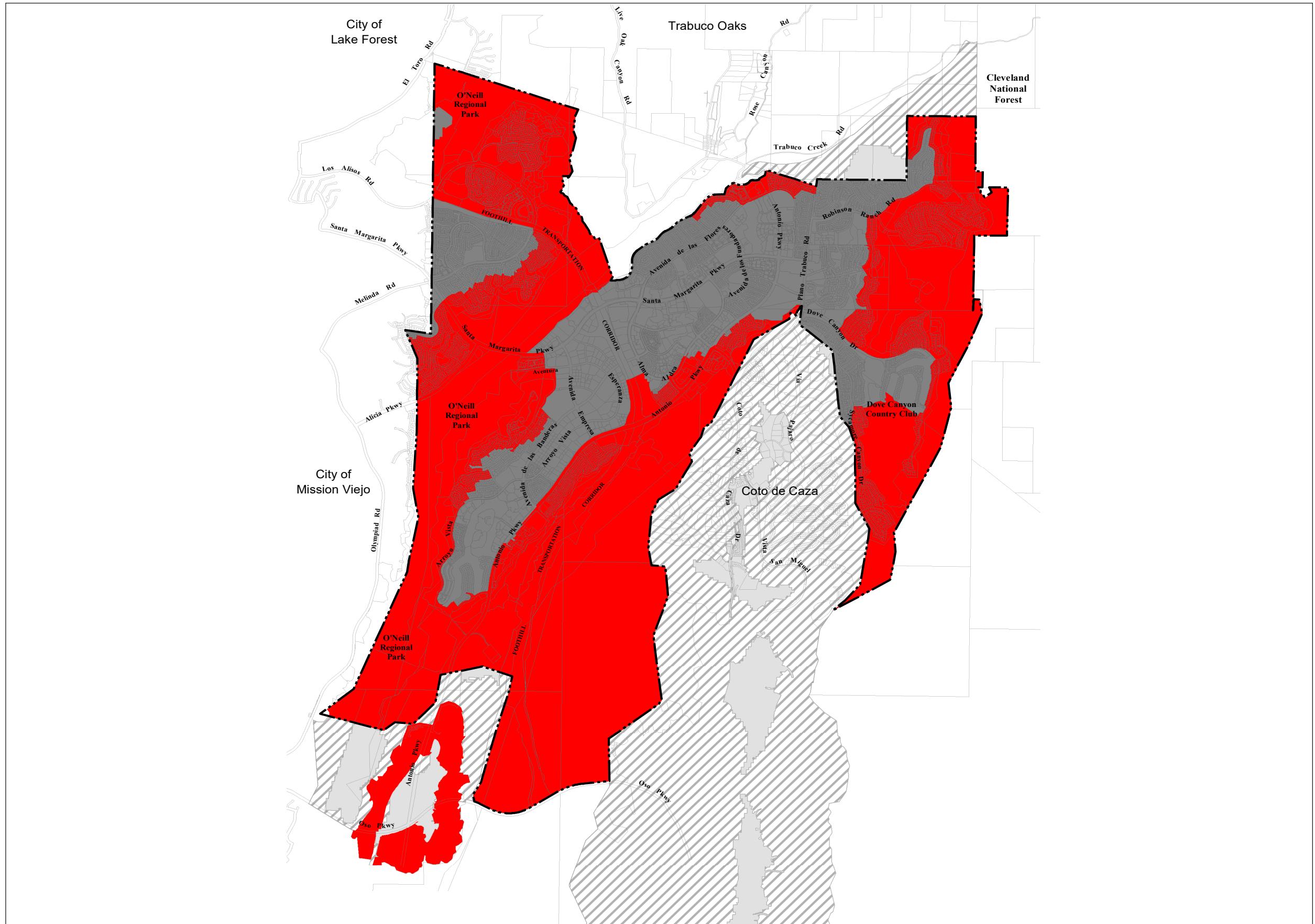


LEGEND

- 100-Year Flood
- 500-Year Flood
- City Boundary
- Sphere of Influence



Source: Orange County Local Agency Formation Commission, 2013 and Federal Emergency Management Agency, Flood Insurance Rate Maps, December 2009.



LEGEND

Local Responsibility Area

- VHFHSZ
- Non-VHFHSZ

State and Federal Responsibility Area

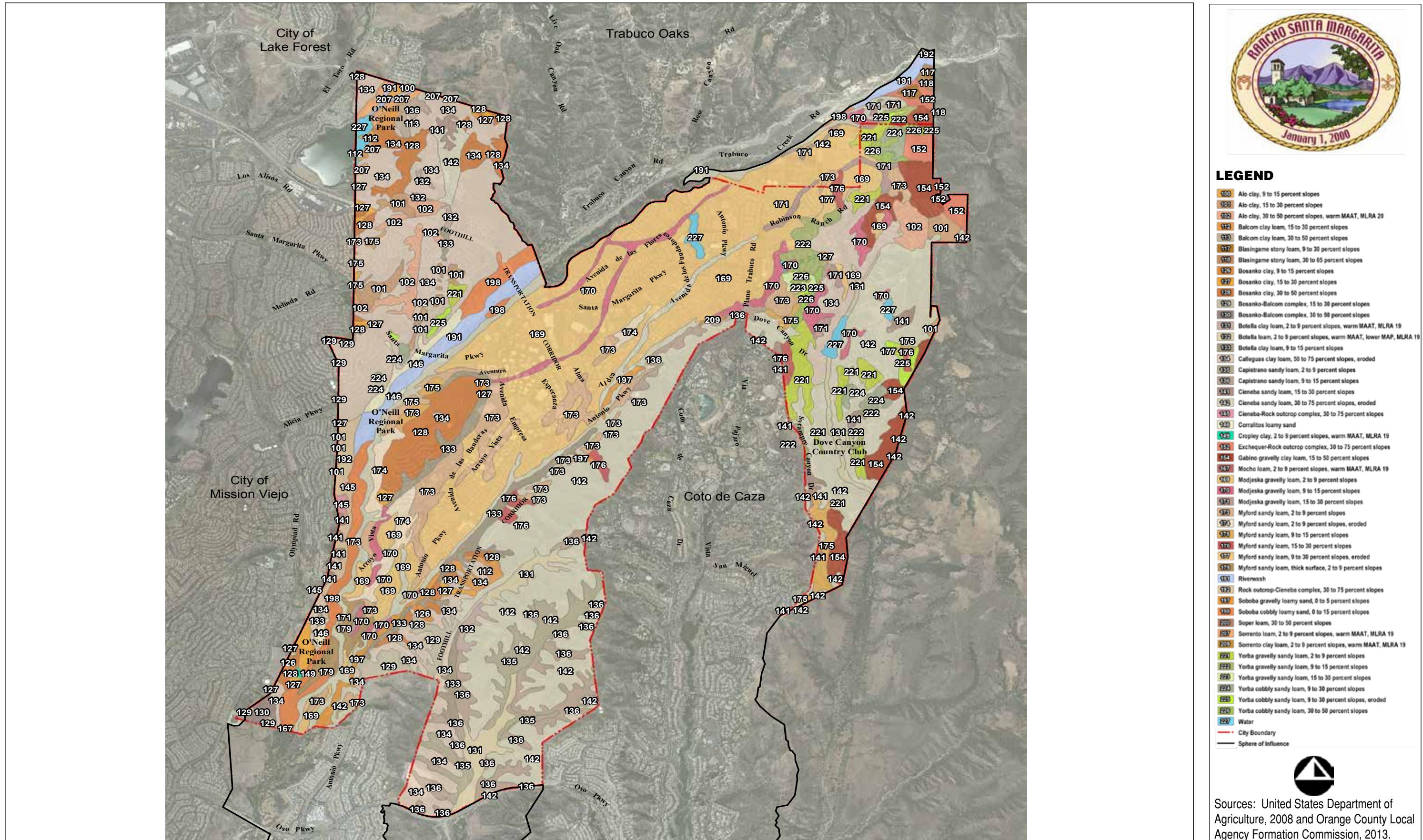
- VHFHSZ
- Non-VHFHSZ
- City Boundary
- Sphere of Influence

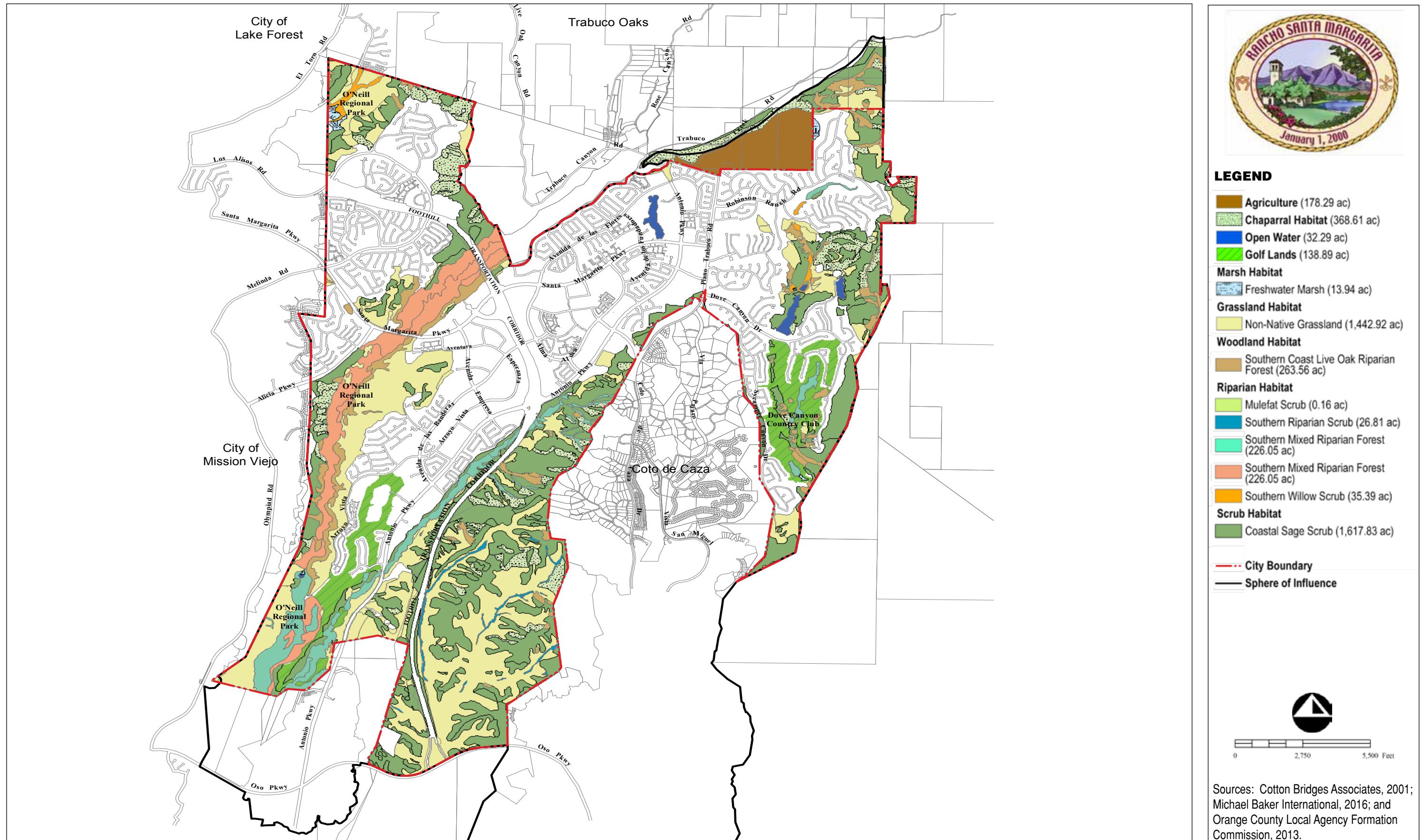
VHFHSZ - Very High Fire Hazard Severity Zone

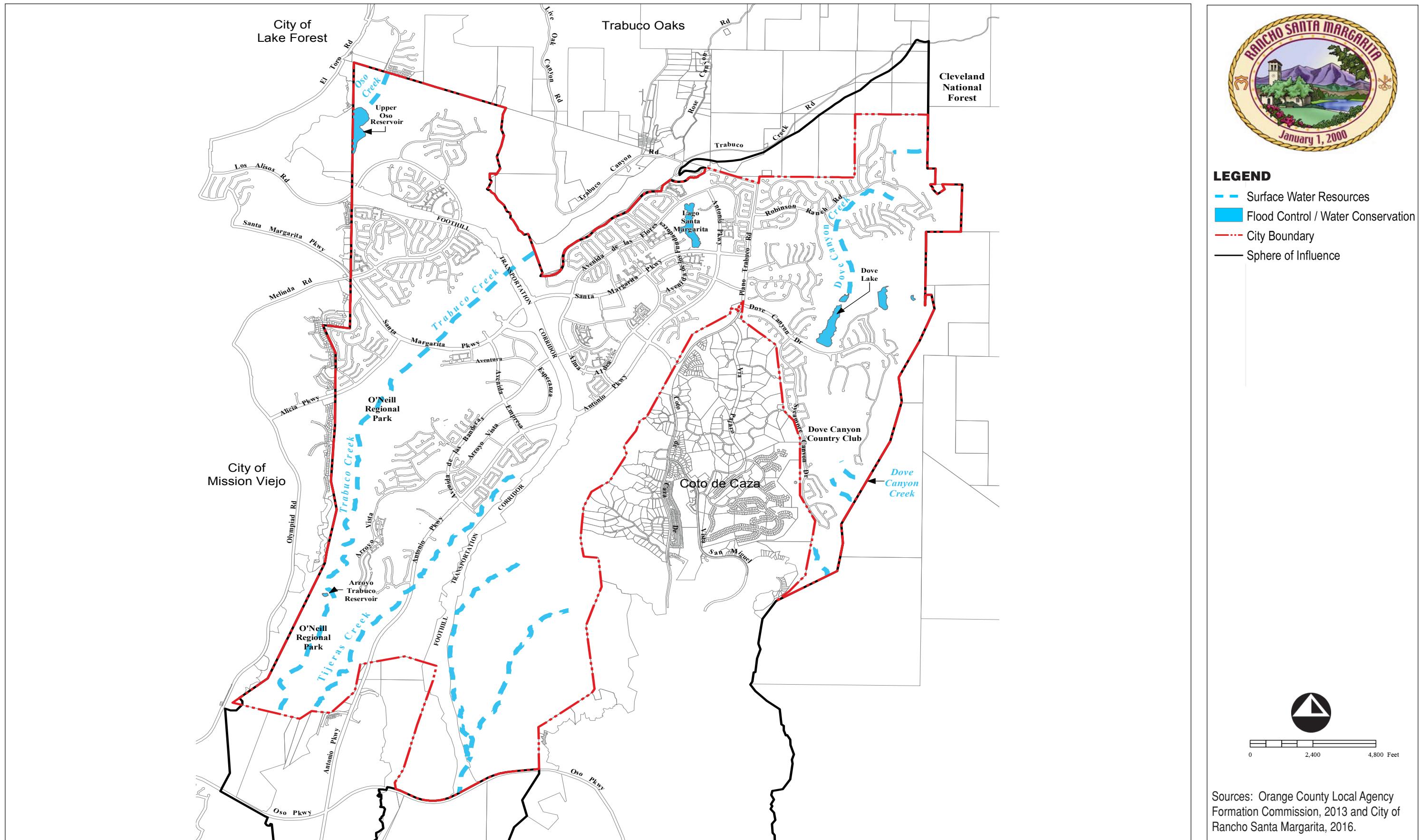


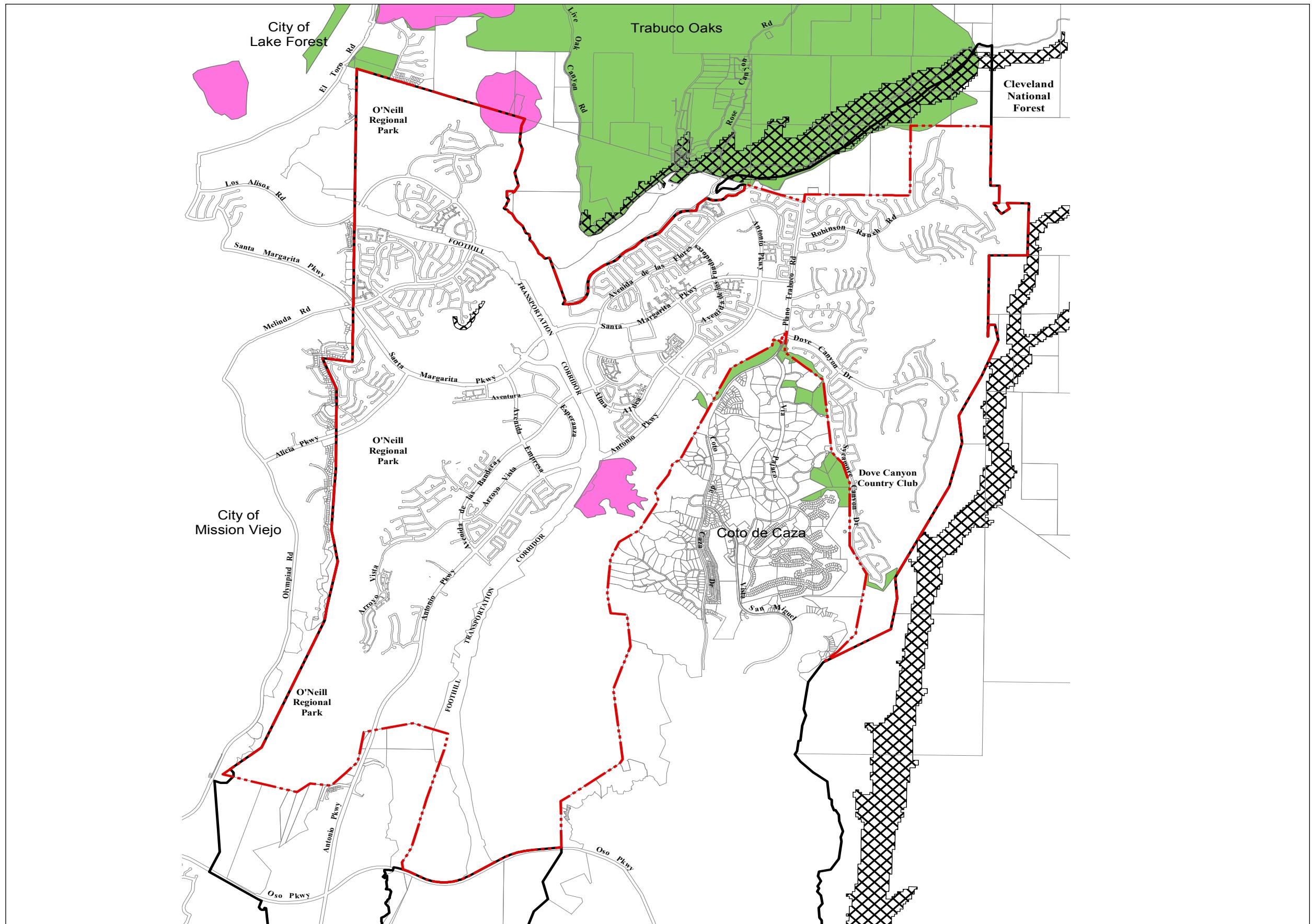
0 2,400 4,800 Feet

Sources: CALFire Fire Resource and Assessment Program (FRAP), October 2011 and Orange County Local Agency Formation Commission, 2013.









LEGEND

Critical Habitat

 Arroyo Toad

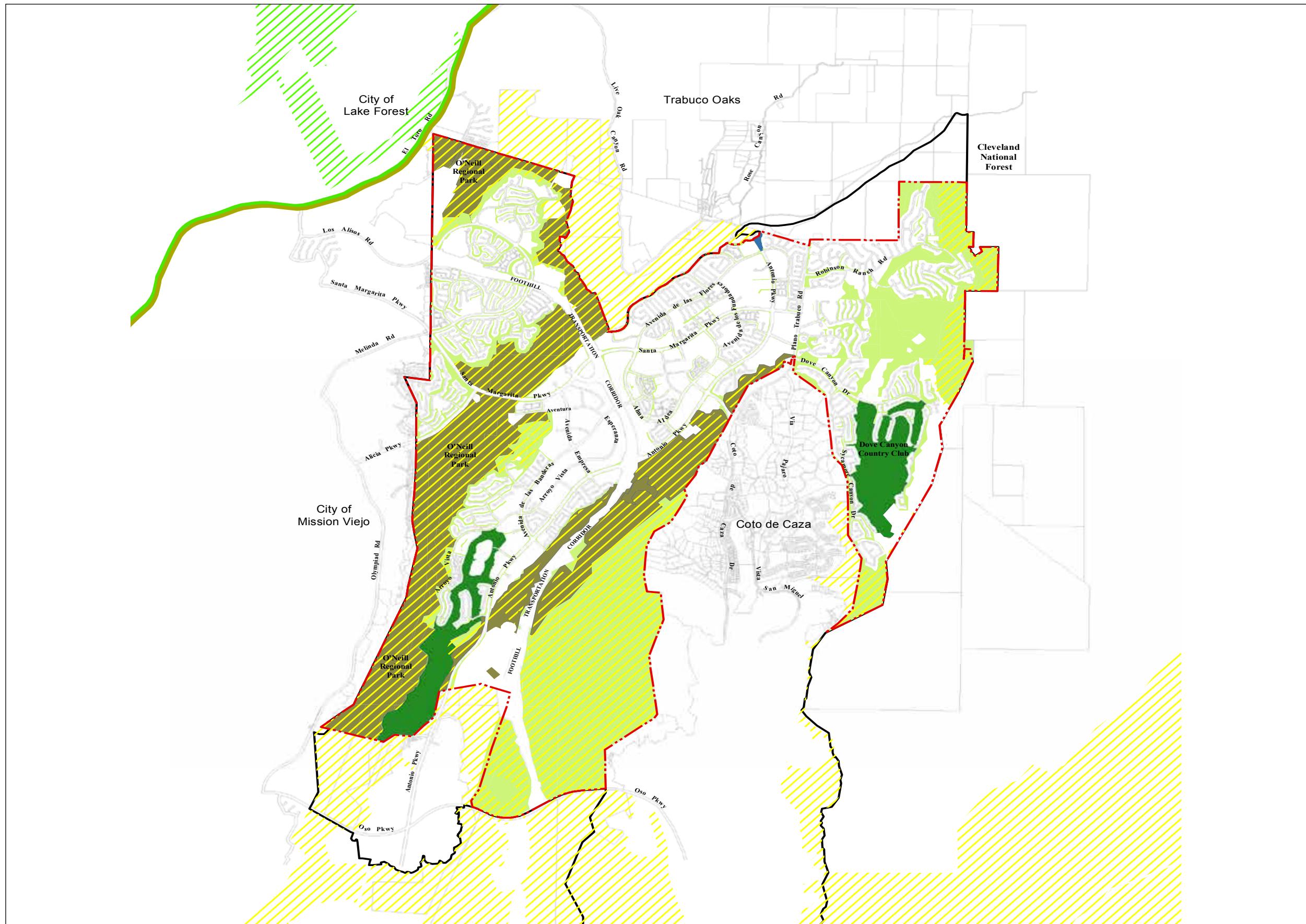
Riverside Fairy Shrimp

Riverside Fairy Sl
Coastal California

Coastal California G...

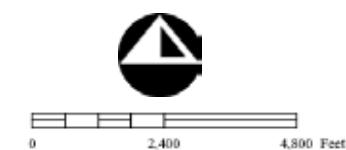


Sources: United States Fish and Wildlife Service, Critical Habitat, 2017 and Orange County Local Agency Formation Commission, 2013.

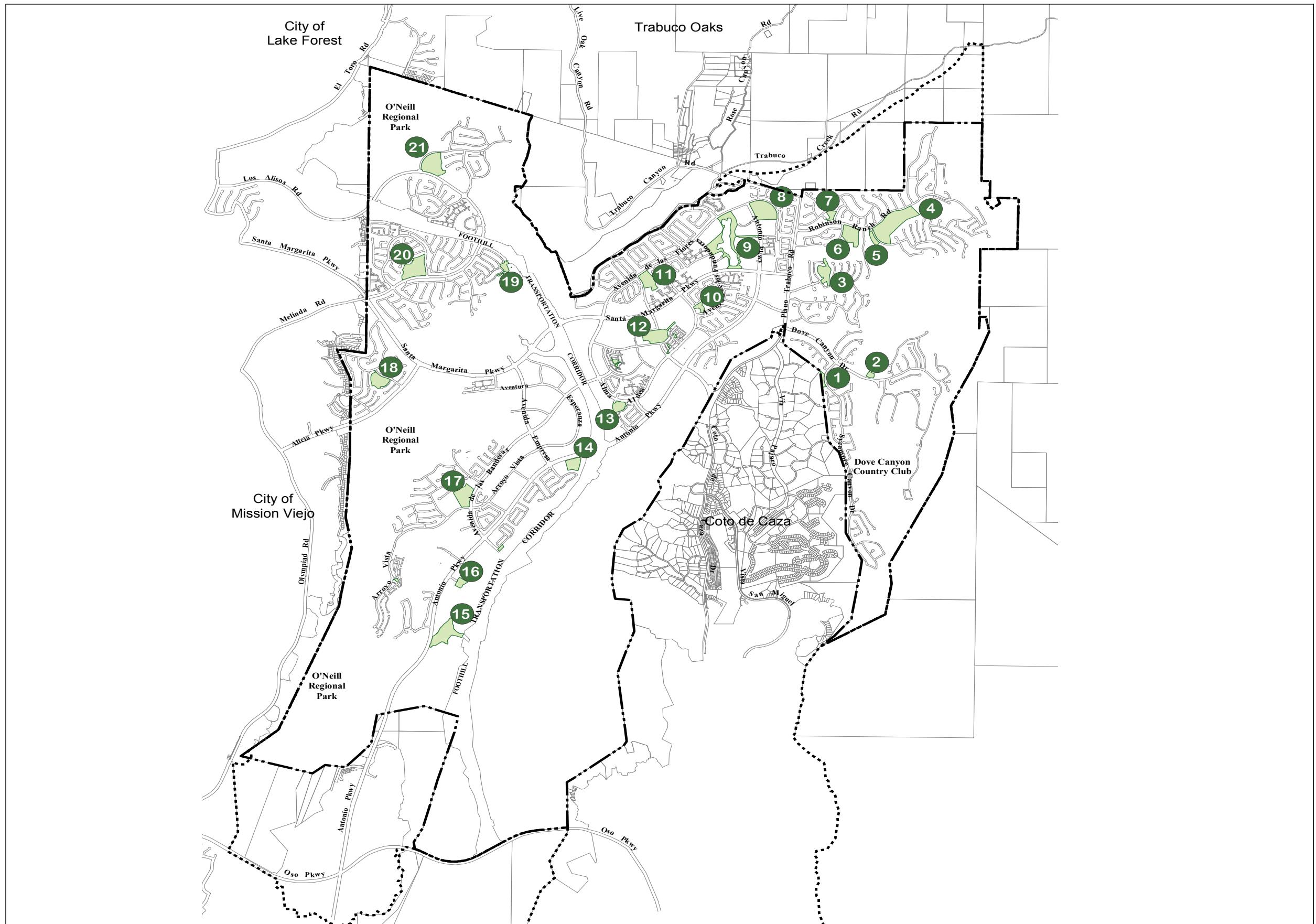


LEGEND

Conservation Plan Boundaries	
Central-Coastal NCCP/HCP Boundary	(Green)
Central-Coastal Reserve	(Green Hatching)
Southern HCP Boundary	(Yellow)
Southern Reserve	(Yellow Hatching)
Undeveloped Areas	
Dove Canyon Preservation Easement	(Purple)
Rose Canyon Area	(Blue)
Regional Park	
O'Neill Regional Park	(Dark Green)
Open Space	
Open Space	(Light Green)
Open Space Golf	(Dark Green)
City Boundary	
Planning Area Boundary	(Black Line)



Sources: City of Rancho Santa Margarita, 2016 and California Department of Fish and Wildlife, 2010.



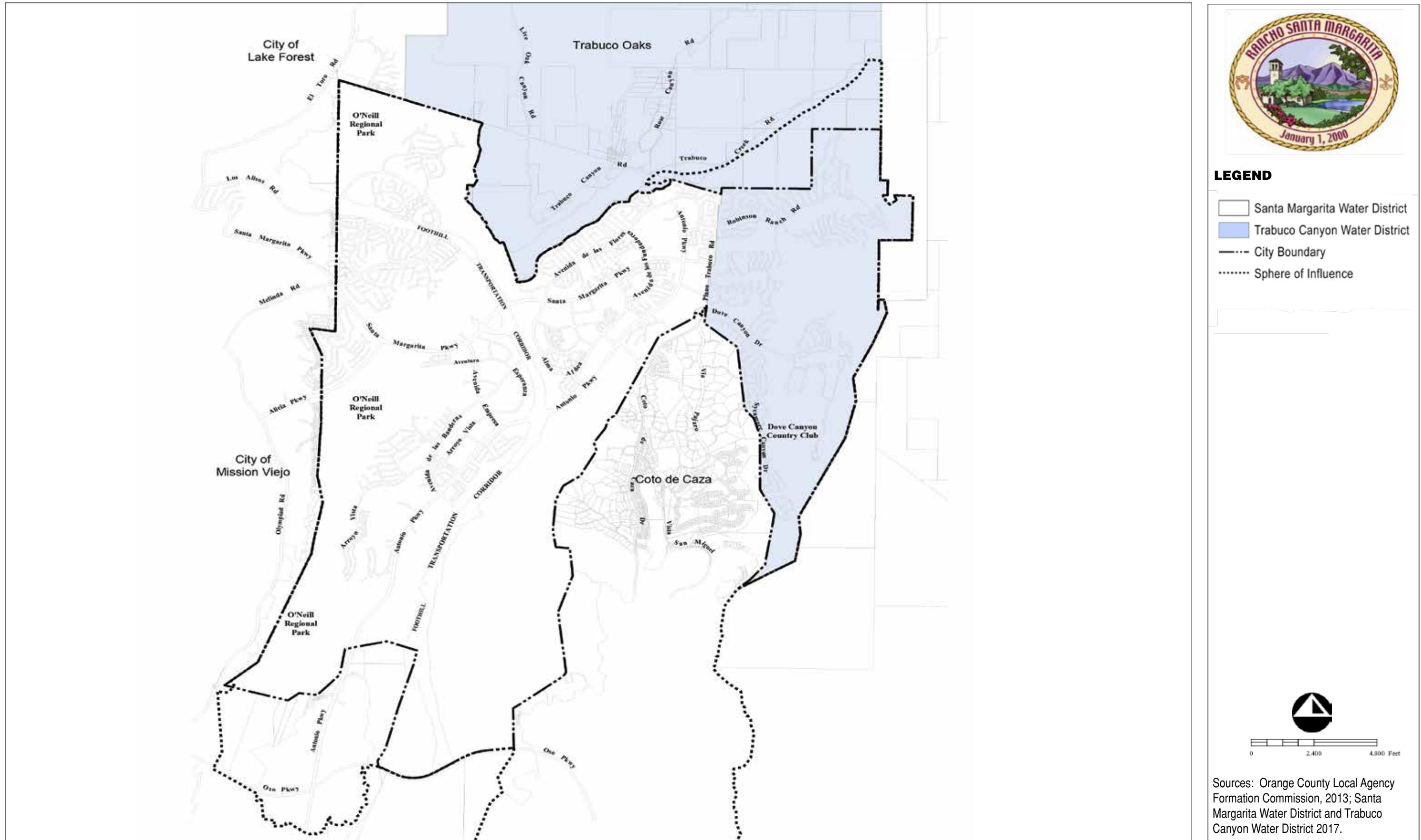
LEGEND

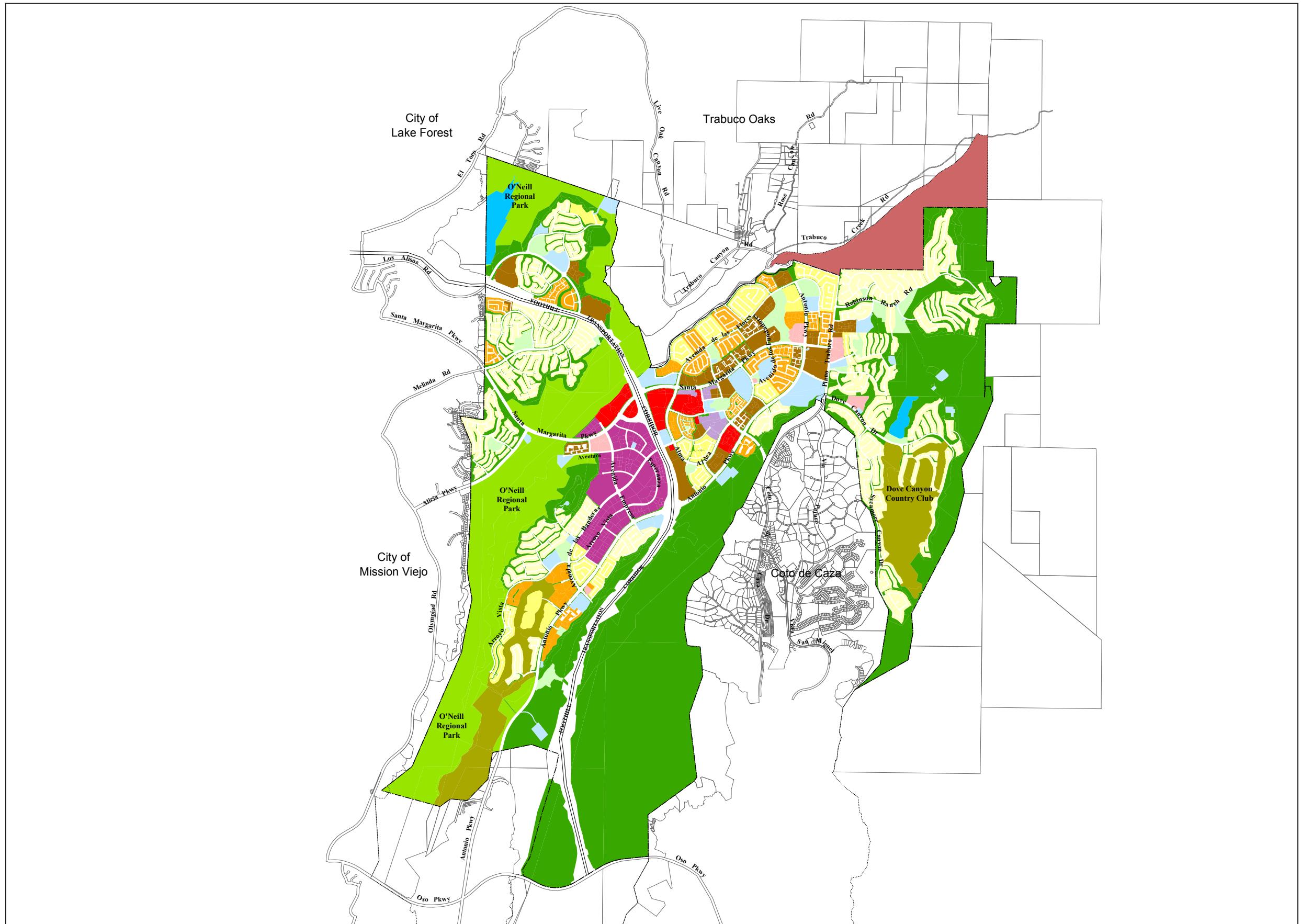
- Parks
- 1. Sycamore Canyon Drive
- 2. Swim & Racquet Complex
- 3. Walden Park
- 4. Central Park (TH)
- 5. Heritage Drive Trailhead
- 6. Ike Arnold Park
- 7. Country Hollow Lane Park
- 8. Trabuco Mesa Park
- 9. Lago Santa Margarita
- 10. Cielo Vista Park
- 11. Monte Vista Park
- 12. RSM Central Park
- 13. Vista Verde Park
- 14. Tijeras Creek Park
- 15. Canada Vista Park
 - Dog Park
 - Skate Park
- 16. Mesa Linda Park
- 17. Arroyo Vista Park
- 18. San Benito Park
- 19. Estrella Vista Park
- 20. Solana Park
- 21. Altisima Park

— City Boundary
- - - Sphere of Influence

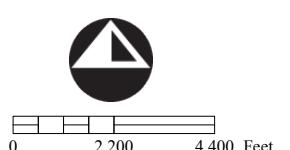


Sources: City of Rancho Santa Margarita, 2017 and Orange County Local Agency Formation Commission, 2013.





Source: City of Rancho Santa Margarita, July 2015





SECTION 3.0, PROJECT DESCRIPTION

Page 3-14, Section 3.5.2, General Plan Update Elements

The intent of this designation is to ~~encourage more flexible, compact, and diverse uses by providing~~ the ability for development projects to combine compatible uses in ~~a variety of ways which offer a balance of land uses where people can live, work, shop and dine on a neighborhood scale, and which remain consistent with the City's Master Plan and the goals and policies of the General Plan.~~ Mixed-use development encourages property owners to make efficient use of their land and propose unique mixes of development designed to meet the demands of the surrounding area. ~~The maximum density and building height for this designation are specified to ensure compatibility with the existing form and character of the master planned community. Mandatory Optimal~~ site conditions and characteristics for the Mixed-Use Residential/Commercial designation would ~~be at least ten acres in size, be proximate to major employment areas; be located near the City center or existing commercial centers with enough surrounding density to support retail; and promote walkability. Sites should be located adjacent to major arterials to capture commuter traffic, but the focus of the internal circulation system should be limited to one or two lanes of traffic (preferably with diagonal parking in each direction) to make for safe and comfortable pedestrian movement.~~

SECTION 5.3, AESTHETICS

Page 5.3-12, Section 5.3.5, Project Impacts and Mitigation Measures, Scenic Vistas

The City would also review any request for Mixed-Use development to ensure the location meets the ~~mandatory minimum optimal~~ site conditions and characteristics for a Mixed-Use development and the development would not have a substantial adverse effect on a scenic vista.

Page 5.3-16, Section 5.3.5, Project Impacts and Mitigation Measures, Visual Character – Long-Term

The General Plan Update would also introduce a new Mixed-Use designation that could be applied to individual development sites subject to approval of a General Plan Amendment. The City would review any request for mixed-use development to ensure the development is ~~compatible with the surrounding area and is designed to enhance the community's character, and honors the City's Master Plan.~~

SECTION 5.4, TRAFFIC AND CIRCULATION

Page 5.4-28, Section 5.4.5, Project Impacts and Mitigation Measures, Traffic Operations

The intent of the MU designation is to ~~encourage more flexible, compact, and diverse uses by providing~~ the ability for development projects to combine compatible uses in ~~a variety of ways which offer a balance of land uses where people can live, work, shop and dine on a neighborhood scale, and which remain consistent with the City's Master Plan and the goals and policies of the General Plan.~~



SECTION 5.5, AIR QUALITY

Page 5.5-19, Section 5.5.5, Project Impacts and Mitigation Measures, Short-Term Construction Emissions

AQ-3 To identify potential short-term and long-term construction and operational-related air quality impacts from projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), project-specific air emissions impacts shall be determined in compliance with the latest version of the SCAQMD CEQA Guidelines. To address potential regional and localized impacts, the air quality analysis shall be completed pursuant to the latest version of SCAQMD's CEQA Handbook and Final Localized Significance Threshold Methodology document, or other appropriate methodology methodologies as determined in conjunction with SCAQMD. The results of the construction- and operational-related and regional and localized air quality impacts analyses shall be included in the development project's CEQA documentation. Construction and operational emissions shall be compared to the most recent version of SCAQMD's CEQA air quality regional and localized significance thresholds in order to identify if a proposed project will result in significant air quality impacts. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts as required by CEQA Guidelines Section 15126.4.

Prior to issuance of a grading permit for new development projects that are one acre or larger, the Applicant/Developer shall provide modeling of the localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily grading activities for the proposed development. If the modeling shows that emissions would exceed SCAQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of SCAQMD's significance thresholds for those emissions.

SECTION 5.7, GREENHOUSE GAS EMISSIONS

Page 5.7-27, Section 5.7.5, Project Impacts and Mitigation Measures, Consistency with Applicable GHG Plans, Policies, or Regulations, Table 5.7-4

The General Plan Update would support these strategies by introducing a new Mixed-Use land use designation intended to provide the ability for development projects to combine compatible uses in ways which offer a balance of land uses where people can live, work, shop, and dine on a neighborhood scale, and which remain consistent with the City's Master Plan and the goals and policies of the General Plan encourage more flexible, compact, and diverse uses.



SECTION 5.10, HAZARDS AND HAZARDOUS MATERIALS

Page 5.10-11, Section 5.10.3, Existing Environmental Setting, Reported Regulatory Properties, GeoTracker

Leaking Underground Storage Tank (LUST) Cleanup Sites. There is a total of three LUST Cleanup Sites in the City: 1) OCFA Fire Station #45 (T0605991308), located at 30131 Aventura; 2) Mobil Gas Station (T0605966905), located at 31421 Santa Margarita Parkway; and 3) ~~the Plano Lift Station Force Main Sewage Spill (T10000002278), located along Antonio Parkway~~ Shell Oil Gas Station (T0605933373), located at 21712 Plano Trabuco. All LUST Cleanup Sites in the City have received a Case Closed status.

Other Cleanup Sites. ~~There are no Other Cleanup Sites in Rancho Santa Margarita~~ One Cleanup Site program closed in 2012 occurred at the Plano Lift Station due to a sewage spill on Antonio Parkway.

Land Disposal Sites. There are no Land Disposal Sites in Rancho Santa Margarita.

Military Sites. ~~There are no Military Sites in Rancho Santa Margarita~~ The former Trabuco Bombing Range is designated as a military Cleanup Site.

Page 5.10-23, Section 5.10.5, Project Impacts and Mitigation Measures, Hazardous Materials in Proximity To A School

- **FUTURE DEVELOPMENT WITHIN THE CITY COULD EMIT OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL.**

Impact Analysis: The City of Rancho Santa Margarita is served by a variety of public and private schools; refer to Section 5.15, School Facilities. As noted above, construction activities associated with future development could expose the public to hazardous materials such as ACMs, LBPs, or other hazardous materials. Excavation and grading activities associated with future development could expose the public to unknown hazardous materials present in soil or groundwater, which would require remediation activities. Remediation, if any, would include potential transport of hazardous materials to an approved landfill facility. As a result, construction activities could emit or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Compliance with Mitigation Measures HAZ-1 ~~through HAZ-3~~ and the established regulatory framework would reduce impacts related to the accidental release of hazardous materials during construction to a less than significant level.



Page 5.10-24, Section 5.10.5, Project Impacts and Mitigation Measures, Hazardous Materials Sites

HAZARDOUS MATERIAL SITES

- **FUTURE DEVELOPMENT WITHIN THE CITY COULD BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITE COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT.**

Impact Analysis: GeoTracker search results indicate that there are the following eight hazardous materials sites within the City.¹

- LUST Cleanup Sites
 - OCFA Fire Station #45 (T0605991308) at 30131 Aventura;
 - Mobil Gas Station (T0605966905) at 31421 Santa Margarita Parkway;
 - ~~Plano Lift Station Force Main Sewage Spill (T10000002278) located along Antonio Parkway~~ Shell Oil Gas Station (T0605933373) at 21712 Plano Trabuco;

Page 5.10-28, Section 5.10.6, Cumulative Impacts

- **FUTURE DEVELOPMENT RESULTING FROM IMPLEMENTATION OF THE GENERAL PLAN UPDATE COULD RESULT IN CUMULATIVE IMPACTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS.**

Impact Analysis: Future development accommodated through implementation of the General Plan Update would result in an increase in risk of exposure to hazardous materials, including through excavation, spills, or releases. The land uses allowed under the General Plan could also involve the routine use, storage, transport, or disposal of hazardous materials. In addition, new development may be located within areas classified as VHFHSZs. Potential short-term construction related impacts associated with future development involving accidental release of hazardous materials would be less than significant following compliance with Mitigation Measures HAZ-1 through HAZ-3, as well as SCAQMD Rule 1403. All future development activities requiring the routine use, storage, transport, or disposal of hazardous materials would be subject to all applicable Federal, State, and local standards in place for hazardous materials. Project implementation would not expose people or structures to a significant risk involving wildland fires following conformance with the Rancho Santa Margarita Fire Code.

¹ State of California Water Resources Control Board, GeoTracker Database – Orange County, <http://geotracker.waterboards.ca.gov/search?cmd=search&hidept=True&status=&reporttitle=Orange+County&county=Orange>, accessed on April 26, 2018.



SECTION 6.0, OTHER CEQA CONSIDERATIONS

Page 6-1, Section 6.2, Irreversible Environmental Changes that would be Involved with the Proposed Action Should it be Implemented

6.2 IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED WITH THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to CEQA Guidelines Sections 15126(c) and 15126.2(e)(d), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(e)(d):

"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

Page 6-3, Section 6.3, Growth-Inducing Impacts

6.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d)(e) requires that an EIR analyze growth-inducing impacts of a project. Specifically, CEQA Guidelines Section 15126.2(d)(e) requires that an EIR:

"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."



SECTION 7.0, SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS IF THE PROPOSED ACTION IS IMPLEMENTED

Page 7-1, Section 7.0, Significant Unavoidable Environmental Effects if the Proposed Action is Implemented

7.0 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS IF THE PROPOSED ACTION IS IMPLEMENTED

CEQA Guidelines Section 15126.2(b)(c) requires an Environmental Impact Report (EIR) to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

SECTION 9.0, EFFECTS FOUND NOT TO BE SIGNIFICANT

Page 9-5, Mineral Resources Response (a)

MINERAL RESOURCES

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?*

Less Than Significant Impact. The California Department of Conservation, Division of Mines and Geology, designates areas as Mineral Resource Zones (MRZ). MRZ-1 is defined as areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. MRZ-2 is defined as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence. MRZ-3 is defined as areas containing mineral deposits the significance of which cannot be evaluated from available data.

The City of Rancho Santa Margarita includes areas designated as Mineral Resource Zones (MRZs) 1, 2 and 3.2 MRZ-2 areas in the City lie within the general area of O'Neill Park along the Arroyo Trabuco Creek and continue along the Trabuco Creek through the Sphere of Influence (SOI), both north and south of Rancho Santa Margarita. The proposed land use plan does not change the land use designations or allow any

² California Department of Conservation, Mineral Land Classification of the Greater Los Angeles Area Orange County-Temescal Valley Production-Consumption Region, Arroyo Trabuco and San Juan Creek Resource Areas, Aggregate Resource Sectors T-V, 1981, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/Plate_3-6.pdf, accessed May 1, 2018.



development within these areas. Therefore, project development would not result in the loss of availability of a known mineral resource. A portion of the "Future Planned Community" depicted on Exhibit 3-3 would overlap within lands classified as MRZ-2 Sector V. Based on the developed nature of the City of Rancho Santa Margarita, it is unlikely that suitable mineral resources would be available in areas of adequate size and remoteness to be economically viable for mineral extraction. Further, based on the SMARA Designation Report No. 3, additional aggregate resources are available in the Orange County-Temescal Canyon Valley P-C Region; refer to SMARA Designation Report No. 3 Table 1, Regional Aggregate Resources of the Orange County-Temescal Canyon Valley P-C Region.³ Potential impacts to mineral resources as a result of implementation of the General Plan Update are anticipated to be less than significant due to the unlikelihood of the identified areas to be utilized for mineral extraction and relatively limited footprint of the "Future Planned Community" land use on lands classified as MRZ-2 Sector V. Additionally, O'Neill Park and the larger Arroyo Trabuco Creek are not utilized as a mineral resource recovery site. Impacts would be less than significant in this regard.

³ California Department of Conservation State Mining and Geology Board, SMARA Designation Report No. 3: Designation of Regionally Significant Construction Aggregate Resource Areas in the Orange County – Temescal Valley and San Gabriel Valley Production-Consumption Regions, August 1984.



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4.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 1, Mitigation Monitoring and Reporting Checklist, has been prepared for the proposed Rancho Santa Margarita General Plan Update (General Plan Update or proposed project). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the Rancho Santa Margarita General Plan Update file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 1). If an adopted mitigation measure is not properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the EIR, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.



- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.
- The City prepares a reporting form periodically during project-specific review and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures are included as conditions of permits/approvals for future project-specific review.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.

Based on the Draft EIR, no significant impacts would occur in regard to the following environmental issue areas, which are addressed in Draft EIR Section 9.0, *Effects Found Not To Be Significant*:

- Agriculture and Forest Resources; and
- Mineral Resources.

In accordance with Appendix G of the CEQA Guidelines, the following environmental issue areas were determined in the Draft EIR to have a potentially significant impact, and were included in the Draft EIR for further analysis:

- Land Use and Planning;
- Population, Housing, and Employment;
- Aesthetics and Light/Glare;
- Traffic and Circulation;
- Air Quality;
- Noise;
- Greenhouse Gas Emissions;
- Geology and Soils;
- Hydrology and Water Quality;
- Hazards and Hazardous Materials;
- Tribal and Cultural Resources;
- Biological Resources;



- Fire Protection;
- Police Protection;
- School Facilities;
- Parks and Recreation;
- Water Supply;
- Wastewater; and
- Solid Waste.

For the purposes of the environmental analysis in the Draft EIR, impacts were analyzed in each environmental issue area for the proposed project. Consideration of mitigation measures that apply to each respective topical area was considered, particularly if that impact would be reduced.



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Table 1
Mitigation Monitoring and Reporting Checklist

Mitigation Number	Mitigation Measure	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
AESTHETICS								
AES-1	Prior to issuance of a grading permit for a project subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), and located on or immediately adjacent to a residentially zoned property, a Construction Management Plan shall be prepared for review and approval by the City of Rancho Santa Margarita City Engineer and/or Development Services Director. At a minimum, the Construction Management Plan shall indicate equipment and vehicle staging areas, materials stockpiling areas, fencing types, and construction worker vehicle parking. All equipment and vehicle staging areas shall be sited and/or screened to minimize public views to the maximum extent reasonably possible.	Project Applicant/Construction Contractor	Prior to Issuance of Grading Permits	City Engineer and/or Development Services Director	During Plan Review/Prior to Issuance of Grading Permits; During Construction			
TRAFFIC AND CIRCULATION								
T-1	As determined by the City Traffic Engineer, projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and generate 50 or more peak hour trips shall be required to prepare a Traffic Impact Analysis to assess potential project-specific impacts in accordance with CEQA.	Project Applicant	Prior to Project Approval	City Traffic Engineer	During Plan Review/Prior to Project Approval			



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AIR QUALITY								
AQ-1	Prior to issuance of any grading permit for a project subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), the City Planning Division shall confirm that the Grading Plan, Building Plans, and specifications require that ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications. The equipment maintenance records and equipment design specifications data sheets shall be submitted to the City and verified by the City Planning Division, and shall be kept on site by the project contractor during construction activities.	Project Applicant/Construction Contractor	Prior to Issuance of Grading Permits	City Planning Division	During Plan Review/Prior to Issuance of Grading Permits; During Construction			
AQ-2	Each development project subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) shall submit a traffic control plan to the City Engineer prior to the issuance of a grading permit. To reduce traffic congestion during temporary construction activities, the plan shall include, as deemed necessary by the City Engineer, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of	Project Applicant/Construction Contractor	Prior to Issuance of Grading Permits	City Engineer	During Plan Review/Prior to Issuance of Grading Permits; During Construction			



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	construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow. Traffic control devices included in the traffic control plan shall be developed in compliance with the requirements of the California Manual on Uniform Control Devices.							
AQ-3	To identify potential short-term and long-term construction and operational-related air quality impacts from projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), project-specific air emissions impacts shall be determined in compliance with the latest version of the SCAQMD CEQA Guidelines. To address potential regional and localized impacts, the air quality analysis shall be completed pursuant to the latest version of SCAQMD's CEQA Handbook and <i>Final Localized Significance Threshold Methodology</i> document, or other appropriate methodologies as determined in conjunction with SCAQMD. The results of the construction- and operational-related and regional and localized air quality impacts analyses shall be included in the development project's CEQA documentation. Construction and operational emissions shall be compared to the most recent version of SCAQMD's CEQA air quality regional and localized significance thresholds in order to identify if a proposed project will result in significant air quality impacts. If such analyses identify potentially significant regional or local air quality impacts, the City	Project Applicant	Prior to Project Approval	City Planning Division	During Plan Review/Prior to Project Approval			



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	<p>shall require the incorporation of appropriate mitigation to reduce such impacts as required by CEQA Guidelines Section 15126.4.</p> <p>Prior to issuance of a grading permit for new development projects that are one acre or larger, the Applicant/Developer shall provide modeling of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily grading activities for the proposed development. If the modeling shows that emissions would exceed SCAQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of SCAQMD's significance thresholds for those emissions.</p>							
NOISE								
NOI-1	For projects that are subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects), project applicants shall ensure through contract specifications that construction best management practices (BMPs) will be implemented by all project contractors to reduce construction noise levels. Contract specifications shall be included in construction documents, which shall be reviewed and approved by the City Development Services Department prior to issuance of a grading or building permit (whichever is issued first). BMPs to reduce construction noise levels may include, but are not limited to, the following:	Project Applicant/Construction Contractor	Prior to Issuance of Grading or Building Permits	City Development Services Department	During Plan Review/Prior to Issuance of Grading or Building Permits; During Construction			



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	<ul style="list-style-type: none">Ensure that construction equipment is properly muffled according to industry standards and is in good working condition.Place noise-generating construction equipment and construction staging areas away from sensitive uses.Construction activities shall occur between the hours of 7:00 a.m. and 8:00 p.m. Monday through Saturday, pursuant to Section 5.04.070(5) of the Rancho Santa Margarita Noise Ordinance.Implement noise attenuation measures, as needed, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.Use electric air compressors and similar power tools rather than diesel equipment, where feasible.Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than five minutes.Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly							



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	posted at all construction entrances to allow surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party and the Development Services Department.							
NOI-2	Projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) with construction activities within 25 feet of an occupied sensitive use (i.e., historical buildings, residential, senior care facilities, hospitals, and schools/day care centers) shall be required to prepare a project-specific vibration impact analysis to evaluate potential construction vibration impacts associated with the project, and to determine any specific vibration control mechanisms that shall be incorporated into the project's construction bid documents to reduce such impacts. Contract specifications shall be included in construction documents, which shall be reviewed and approved by the City Engineer prior to issuance of a grading permit.	Project Applicant	Prior to Issuance of Grading Permits	City Engineer	During Plan Review/Prior to Issuance of Grading Permits			
NOI-3	Projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) within 100 feet of a historic structure(s) shall implement the following measures to reduce the potential for architectural/structural damage	Project Applicant/Construction Contractor	Prior to and During Construction	City Development Services Department	Prior to and During Construction			



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	<p>resulting from elevated groundborne noise and vibration levels:</p> <ul style="list-style-type: none">• Pile driving within 50 feet of any historic structure(s) shall utilize alternative installation methods, such as pile cushioning, jetting, predrilling, cast-in-place systems, and resonance-free vibratory pile drivers.• As accessible, a preconstruction survey of all eligible for listing or listed historic buildings under the National Register of Historic Places, California Register of Historic Resources, and/or local historic database(s) within 50 feet of proposed construction activities shall be conducted. Fixtures and finishes within 50 feet of construction activities susceptible to damage shall be documented photographically and in writing. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating any damage caused by construction activities. Construction vibration monitoring shall be conducted at the edges of these historic properties and construction activities shall be reduced, as needed, to ensure no damage occurs.• Vibration monitoring shall be conducted prior to and during pile							



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	driving operations occurring within 100 feet of the historic structure(s). Contractors shall limit construction vibration levels during pile driving and impact activities in the vicinity of the historic structure(s) in accordance with the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual, dated September 2013.							
NOI-4	Prior to issuance of any building permits for projects that are subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) adjacent to sensitive uses (i.e., residential, senior care facilities, hospitals, and schools/day care centers), the applicant shall submit plans for review and approval by the City Engineer that demonstrate all noise from HVAC equipment will be shielded from sensitive uses such that stationary noise associated with the HVAC equipment is 65 dBA or less when measured 50 feet from the noise source.	Project Applicant	Prior to Issuance of Building Permits	City Engineer	During Plan Review/Prior to Issuance of Building Permits			
GREENHOUSE GAS EMISSIONS								
GHG-1	Within 24 months of adoption of the proposed General Plan, the City of Rancho Santa Margarita shall implement an Energy Action Plan (EAP). The EAP shall: <ul style="list-style-type: none"> Evaluate the City's current green building requirements every three years, consistent with Building Code updates, to consider additional requirements for new residential and 	City Development Services Department	Within 24 Months of Adoption of the General Plan Update	City Development Services Department; EAP Implementation Coordinator	Within 24 Months of Adoption of the General Plan Update; Ongoing			



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	<p>nonresidential development to ensure that new development meets or exceeds adopted green building measures in the state.</p> <ul style="list-style-type: none">• Establish a program to encourage and incentivize existing development to install solar panels.• Encourage the use of electric equipment for City construction contracts.• When feasible, the City shall offer incentives for use of energy reduction measures such as expedited permit processing and reduced fees.• Coordinate periodic community outreach to leverage community involvement, interest, and perspectives in implementing energy reduction measures.• Review feasibility of Community Choice Energy to increase availability of renewable energy sources to consumers within Rancho Santa Margarita.• Encourage the business community to reduce energy consumption through innovative technologies such as the use of cogeneration facilities.							



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	<ul style="list-style-type: none"> Work with large employers and retail shopping centers to ensure access to EV charging stations. <p>In addition, to implement the EAP, the City shall appoint an Implementation Coordinator to oversee the successful implementation of all selected EAP strategies. The primary function of the Implementation Coordinator will be to create a streamlined approach to manage implementation of the EAP.</p>							
HAZARDS AND HAZARDOUS MATERIALS								
HAZ-1	Prior to issuance of any grading or building permit (whichever occurs first) for a project subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) on a site identified on any list of hazardous materials compiled pursuant to Government Code Section 65962.5, a formal Phase I Environmental Site Assessment (ESA) shall be prepared in accordance with ASTM Standard Practice E 1527-05 or the Standards and Practices for All Appropriate Inquiry (AAI). The Phase I ESA shall identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified Hazardous Materials Specialist with Phase II/site characterization experience prior to demolition, and/or construction. The Hazardous Materials Specialist shall identify proper remedial activities appropriate to the hazardous material(s) found (e.g., removal and disposal; bio-remediation; pump and	Project Applicant	Prior to Issuance of Grading or Building Permits	City Development Services Department	During Plan Review/ Prior to Issuance of Grading or Building Permits			



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	treat; soil vapor extraction, and in situ oxidation), as necessary.							
TRIBAL AND CULTURAL RESOURCES								
CUL-1	To ensure identification and preservation of potentially historic resources (as defined by CEQA § 15064.5 a resource listed in, eligible for listing in, or listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register), projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) shall be conditioned as follows: prior to any construction activities that could impact potential or previously identified historical resources, the project proponent shall provide a historical resources assessment performed by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history or history (as defined in 48 Code of Federal Regulations 44716) to the City of Rancho Santa Margarita Planning Division for review and approval. The historical resources assessment shall include a records search at the South Central Coastal Information Center (SCCIC) and a survey in accordance with the California Office of Historic Preservation (OHP) guidelines to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project.	Project Applicant; Qualified Architectural Historian	Prior to Construction	City Planning Division	During Plan Review			
CUL-2	If a project subject to California Environmental Quality Act (CEQA) review	Project Applicant;	Prior to Construction	City Planning Division	During Plan Review/Prior to			

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	(meaning, non-exempt projects) requires the relocation, rehabilitation, or alteration of a historical resource (defined above), the project proponent shall utilize the Secretary of the Interior's Standards for the Treatment of Historic Properties to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualification Standards. Prior to any construction activities that may affect the historical resource (defined above), a report, meeting industry standards, shall identify and specify the treatment of character-defining features and construction activities and be provided to the City of Rancho Santa Margarita Planning Division for review and approval. A project proponent, its construction personnel, and all subcontractors shall comply with the procedures outlined in the resulting report.	Qualified Architectural Historian			Construction; During Construction			
CUL-3	If a project subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) would result in the demolition or significant alteration of a historical resource previously recorded, evaluated, and/or designated in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation shall take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic	Project Applicant; Qualified Architectural Historian	Prior to Issuance of Demolition, Building, or Grading Permits	City Planning Division	During Plan Review/Prior to Issuance of Demolition, Building, or Grading Permits			



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	American Landscape Survey (HALS) documentation, and shall be performed by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards. Recordation shall meet the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation shall be developed at the project level in coordination with the City of Rancho Santa Margarita Planning Division and performed prior to the first issuance of any demolition, building, or grading permits.							
CUL-4	To ensure identification and preservation of archaeological resources and avoid significant impacts to those resources within the City of Rancho Santa Margarita, all projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) shall be screened by the City to determine whether an Archaeological Resources Assessment study is required. Screening shall consider the type of project and whether ground disturbances will occur. Ground disturbances include activities such as grading, excavation, trenching, boring, or demolition that extend below the current grade. If there will be no ground disturbance, then an Archaeological Resources Assessment shall not be required. If there will be ground disturbances, prior to issuance of any permits required to conduct ground	Project Applicant; Qualified Archaeologist	Prior to Issuance of Grading Permits	City of Planning Division	During Plan Review/Prior to Issuance of Grading Permits			



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	<p>disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards in either prehistoric or historic archaeology.</p> <p>All Archaeological Resources Assessments shall include records searches conducted through of the following databases through the respective repositories: California Historical Resources Information System (CHRIS) records search conducted through the South Central Coastal Information Center (SCCIC); Sacred Land Files (SLF) search through the Native American Heritage Commission (NAHC). The records searches shall be conducted for the proposed project site and a radius of no less than 0.5 miles. The results shall be documented in the Archaeological Resources Assessment and shall state if the project site has been adequately assessed for archaeological resources and whether archaeological resources are present within the project site or radius. Determining the adequacy of previous studies shall consider the methods utilized in the study and whether an intensive pedestrian survey and/or subsurface archaeological excavation was conducted, and the date of the study. The Archaeological Resources Assessment shall summarize the type of resource and whether it has been evaluated for significance at the Federal, State, or local level. For resources identified</p>							



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	<p>directly within the project site, any details concerning the integrity of the resource, if available, shall be included in the results. If the area in which ground disturbances are proposed, including the horizontal and vertical extent, have been adequately assessed for the presence of archaeological resources and no archaeological resources are present, then the results shall be presented in a report or memo, submitted to the Rancho Santa Margarita Planning Division for approval, and no further work shall be required to avoid impacts to archaeological resources.</p> <p>If the area of proposed ground disturbances has not been adequately assessed, additional background research shall be conducted to assess the likelihood that unidentified archaeological resources may be present on the surface and below ground. The assessment shall be based on substantial information. If undeveloped surfaces are present and the project area has not been surveyed within the past 10 years, a Phase I (intensive) pedestrian survey shall be undertaken. Pedestrian surveys shall include an assessment of the likelihood for buried archaeological resources to occur. If the surface has been developed, the assessment shall consider the likelihood of buried archaeological resources to be present below or intermixed with existing disturbances. If the results of the Phase I survey are negative and the likelihood of</p>							



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	<p>buried archaeological resources is found to be low, the results shall be documented in a report or memo, submitted to the Rancho Santa Margarita Planning Division for approval, and no further work shall be required to avoid impacts to archaeological resources.</p> <p>If the likelihood of buried archaeological resources being present is assessed as medium or high, the assessment shall consider whether subsurface exploration is feasible and necessary to avoid potential impacts to as yet unidentified archaeological resources, and make recommendations for completing the Phase I investigation. If subsurface exploration is recommended, the methods shall conform to those used for Phase II investigations and include specific information about what information is required to complete an adequate Phase I assessment.</p> <p>By performing a records search, consulting with the NAHC, and conducting background research and, if needed, a Phase I survey, the archaeologist shall classify the project site as having high, medium, or low sensitivity for unidentified archaeological resources. The results of the Archaeological Resources Assessment shall be summarized in a report or memo and submitted to the City of Rancho Santa Margarita Planning Division for review and approval. The Archaeological Resources Assessment shall meet or exceed standards</p>							



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	in the Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format (1990) and Guidelines for Archaeological Research Designs (1991).							
CUL-5	For projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and subject to the requirement for an Archaeological Resources Assessment (Mitigation Measure CUL-4). If the required Assessment identifies potentially significant archaeological resources (defined as resources that have not been evaluated for listing to the NRHP, CRHR, or local register), a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior's Professionally Qualified Standards prior to any construction-related ground-disturbing activities to determine the significance of the identified archaeological resources. If the resources are determined to be significant through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be developed and implemented by the project proponent in coordination with an archaeologist meeting the Secretary of the Interior's Professionally Qualified Standards. These might include a Phase III data recovery program that would be implemented by the archaeologist and shall be performed in accordance with the Office of Historic Preservation's Archaeological Resource Management	Project Applicant; Qualified Archaeologist	Prior to Issuance of Grading Permits	City Planning Division	During Plan Review/Prior to Issuance of Grading Permits			

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	Reports (ARMR): Recommended Contents and Format (1990) and Guidelines for Archaeological Research Designs (1991). Additional options can include 1) interpretative signage 2) educational outreach that helps inform the public of the past activities that occurred in this area, or 3) funding a Phase III data recovery of a similar site outside of the proposed project that would allow the project to continue on an unimpeded timeline, but would still contribute to the public knowledge of past human activity.							
CUL-6	For projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and subject to the requirement for an Archaeological Resources Assessment (Mitigation Measure CUL-4). If potentially significant archaeological resources are not identified through an Archaeological Resources Assessment, but a project site is identified as being highly sensitive for archaeological resources (Mitigation Measure CUL-4), an archaeologist, supervised by an archaeologist meeting the Secretary of the Interior's Professionally Qualified Standards, shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil within depths that archaeological resources can occur. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The	Project Applicant; Qualified Archaeologist	Prior to and During Construction	City Planning Division	During Construction			



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	pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity (defined as within a 30-meter radius) of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary of the Interior's Professionally Qualified Standards. If the discovery proves to be significant, it shall be curated with a recognized scientific or educational repository.							
CUL-7	For projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and subject to the requirement for an Archaeological Resources Assessment (Mitigation Measure CUL-4). If potentially significant archaeological resources are not identified through an Archaeological Resources Assessment but a project site is identified as having medium sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary of the Interior's Professionally Qualified Standards shall be retained on an on-call basis. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-	Project Applicant; Qualified Archaeologist	Prior to and During Construction	City Planning Division	During Construction			

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	construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. If the on-call archaeologist determines that the discovery is significant, it shall be curated with a recognized scientific or educational repository.							
CUL-8	Projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) a site containing or adjacent to a cultural resource that is unevaluated for listing to, recommended eligible for listing to, listed as eligible for listing to, or already listed on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, shall be conditioned as follows: Prior to issuance of a grading or building permit, the construction limits shall be clearly flagged prior to commencement of any pre-construction or construction activities to assure impacts to eligible cultural resources are avoided or minimized to the extent feasible. Prior to construction activities, an archaeologist, supervised by an archaeologist meeting the Secretary of the Interior's Professionally Qualified Standards, shall verify that the flagging clearly delineates the construction	Project Applicant/ Construction Contractor; Qualified Archaeologist	Prior to Issuance of Grading or Building Permits; During Construction	City Planning Division	During Construction			



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	limits and eligible resources to be avoided. Since the location of some eligible cultural resources is confidential, these resources will be flagged as environmentally sensitive areas (ESA).							
CUL-9	Projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and subject to the requirement for an Archaeological Resources Assessment (Mitigation Measure CUL-4) shall be conditioned as follows: In the event of any archaeological discovery regardless of if an archaeological monitor is present, construction work shall halt within a 30-meter radius of the find until its eligibility can be determined by an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards. Any artifact or feature shall be recovered, prepared to the point of curation, identified by an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards, listed in a database to facilitate analysis, and deposited in a designated archaeological curation facility.	Project Applicant/ Construction Contractor; Qualified Archaeologist	During Construction	City Planning Division	During Construction			
CUL-10	Projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and subject to the requirement for an Archaeological Resources Assessment (Mitigation Measure CUL-4) shall be conditioned as follows: In the event of a human burial recovery, all construction work shall halt within a 30-meter radius of the find. The Orange County Coroner shall be contacted immediately. If the Coroner and	Project Applicant/ Construction Contractor; Qualified Archaeologist	During Construction	City Planning Division	During Construction			



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	archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards agree that the human remains are prehistoric, the Native American Heritage Commission (NAHC) shall be contacted to determine the Most Likely Descendant (MLD). The MLD will make recommendations for the treatment and potential repatriation of the remains. The recommendations shall be followed, as deemed appropriate by a qualified archaeologist.							
CUL-11	Projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects) and that involve ground-disturbing activities shall implement the following: <ul style="list-style-type: none"> • A paleontological resources mitigation and monitoring plan (PRMMP) tailored to the proposed development project shall be prepared by a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for a Principal Investigator or Project Paleontologist. The qualified paleontologist shall submit a letter of retention to the project proponent no fewer than 15 days before any grading or excavation activities commence. The letter shall include a resume for the qualified paleontologist that demonstrates fulfillment of the SVP standards. The PRMMP shall be prepared before any 	Project Applicant; Qualified Paleontologist	Prior to Issuance of Grading Permits; Prior to and During Construction	City Planning Division	During Plan Review; During Construction			



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	<p>grading activities begin. The PRMMP shall address mitigation and monitoring specific to the project area and construction plan, which may include one or more of the following: construction worker training, monitoring protocols, protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate, fossil salvage and data collection protocols in the event of an unanticipated discovery, curation facilities for any significant fossils that may be salvaged, and a final report summarizing the results of the program. The PRMMP shall take into account updated geologic mapping, geotechnical data, updated paleontological records searches, and any changes to the regulatory framework. The PRMMP shall adhere to and incorporate the performance standards and practices from the current SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. The qualified paleontologist shall submit the final PRMMP to the City of Rancho Santa Margarita Planning Division for review and approval before issuance of a grading permit.</p> <ul style="list-style-type: none">• All projects involving ground disturbances in areas mapped as							



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	<p>having high potential paleontological sensitivity (refer to Exhibit 5.11-1, Paleontological Sensitivity of Geologic Units) shall be monitored by a qualified paleontological monitor, as defined above, on a full-time basis. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined to be significant, shall professionally and efficiently recover the fossil specimens and collect associated data for curation as detailed below. Qualified paleontological monitors shall use field data forms to record pertinent geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.</p> <ul style="list-style-type: none"> • All projects involving ground disturbance in areas mapped with low-high potential paleontological sensitivity (refer to Exhibit 5.11-1) shall only require paleontological monitoring if construction activity exceeds the depth of the low sensitivity surficial sediments as determined by a qualified paleontologist, as defined above, on a site-specific basis. The underlying 							



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	<p>sediments may have high paleontological sensitivity, and therefore work in those units may require paleontological monitoring.</p> <ul style="list-style-type: none">• All projects involving ground disturbance in areas mapped as the Trabuco Formation (Ktr) with low paleontological sensitivity (refer to Exhibit 5.11-1) shall incorporate worker training prior to any ground-disturbing activity to ensure construction workers are aware that while paleontological sensitivity is low, fossils may still be encountered. A qualified paleontologist, as defined above, shall be appointed to oversee the training, remain on-call in the event fossils are found, and have the authority to divert activity should fossils be found on-site.• If found, recovered fossils shall be prepared to the point of curation, identified by a qualified paleontologist, as defined above, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.							
BIOLOGICAL RESOURCES								
BIO-1	Projects subject to California Environmental Quality Act (CEQA) review (meaning, non-exempt projects), and with the potential to reduce or eliminate habitat for native plant and wildlife species or sensitive habitats, as determined by the City of Rancho Santa	Project Applicant; Qualified Biologist	Prior to Project Approval	City Development Services Department	During Plan Review/ Prior to Project Approval			

Mitigation Monitoring and Reporting Program



Mitigation Number	Mitigation Measure	Implementation Responsibility	Implementation Timing	Monitoring Responsibility	Monitoring Timing	VERIFICATION OF COMPLIANCE		
						Initials	Date	Remarks
	Margarita's Development Services Department, shall provide a Biological Resources Assessment prepared by a City-approved qualified biologist for review and approval by the Development Services Department. The assessment shall include biological field survey(s) of the project site to characterize the extent and quality of habitat that would be impacted by development. Surveys shall be conducted by qualified biologists and/or botanists in accordance with California Department of Fish and Wildlife and/or United States Fish and Wildlife Services survey protocols for target species. If no sensitive species are observed during the field survey and the regulatory agencies agree with those findings, then no further mitigation will be required. If sensitive species or habitats are documented on the project site, the project applicant shall comply with the applicable requirements of the regulatory agencies and shall apply mitigation determined through the agency permitting process.							