

**FINAL**

**SHEA/BAKER RANCH  
SUPPLEMENTAL  
ENVIRONMENTAL  
IMPACT REPORT**

**SCH NO. 2004071039**



*prepared for:*

**CITY OF LAKE FOREST**

Contact:  
Carrie Tai, AICP  
Senior Planner

*prepared by:*

**THE PLANNING  
CENTER | DC&E**

Contact:  
Konstanza Dobрева  
Senior Planner

**MAY 2012**

**FINAL**

**SHEA/BAKER RANCH**

**SUPPLEMENTAL**

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**IMPACT REPORT**

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*prepared for:*

**CITY OF LAKE FOREST**

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**COLF-03.0E**

**MAY 2012**

<b>Section</b>	<b>Page</b>
<b>1. INTRODUCTION.....</b>	<b>1-1</b>
1.1 INTRODUCTION .....	1-1
1.2 FORMAT OF THE FSEIR.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES .....	1-2
<b>2. RESPONSE TO COMMENTS.....</b>	<b>2-1</b>
<b>3. REVISIONS TO THE DRAFT SEIR.....</b>	<b>3-1</b>
3.1 INTRODUCTION .....	3-1
3.2 DSEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS.....	3-1

**APPENDICES**

- A. Revised Table 1
- B. Austin-Foust Associates, Inc. Report dated March 2, 2011



# *Table of Contents*

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# 1. *Introduction*

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## 1.1 **INTRODUCTION**

This Final Supplemental Environmental Impact Report (FSEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Pub. Res. Code § 21000 et seq.) and CEQA Guidelines (Cal.Code Regs., tit. 14, § 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FSEIR shall consist of:

- (a) The Draft Supplemental Environmental Impact Report (DSEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DSEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DSEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DSEIR for the Shea/Baker Ranch project during the public review period, which began February 24, 2012, and closed April 10, 2012. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DSEIR, along with all of its technical studies and appendices, comprise the FSEIR, in accordance with CEQA Guidelines, Section 15132.

## 1.2 **FORMAT OF THE FSEIR**

This document is organized as follows:

**Section 1, Introduction.** This section describes CEQA requirements and content of this FSEIR.

**Section 2, Response to Comments.** This section provides a list of agencies and interested persons commenting on the DSEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter and a number (“A” for letters received from agencies and “O” for letters received from organizations or residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

**Section 3. Revisions to the Draft EIR.** This section contains revisions to the DSEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2, and/or errors and omissions discovered subsequent to release of the DSEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FSEIR. The City of Lake Forest staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the DSEIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the

# 1. Introduction

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project will result in a significant new environmental impact not previously disclosed in the DSEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

## 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DSEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FSEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DSEIRs.



## 2. *Response to Comments*

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Section 15088 of the CEQA Guidelines requires the Lead Agency (City of Lake Forest) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DSEIR and prepare written responses.

This section provides all written responses received on the DSEIR and the City's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DSEIR are excerpted in this document, the sections are shown indented. Changes to the DSEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DSEIR during the public review period.

<b><i>Number Reference</i></b>	<b><i>Commenting Person/Agency</i></b>	<b><i>Date of Comment</i></b>	<b><i>Page No.</i></b>
<b>Agencies</b>			
A1	City of Irvine	March 14, 2012	2-3
A2	Department of Toxic Substances Control	March 26, 2012	2-9
A3	Department of Transportation	March 19, 2012	2-17
A4	Orange County Public Works	April 23, 2012	2-23
<b>Organizations</b>			
01	California Cultural Resource Preservation Alliance, Inc.	April 3, 2012	2-27



## *2. Response to Comments*

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## 2. Response to Comments

LETTER A1 – David R. Law, AICP, City of Irvine (3 pages)

	www.ci.irvine.ca.us
City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 (949) 724-6000	
March 14, 2012	<b>RECEIVED</b>
Ms. Carrie Tai, AICP Senior Planner City of Lake Forest Development Services Department 25550 Commercentre Drive, Suite 100 Lake Forest, CA 92630	MAR 19 2012 CITY OF LAKE FOREST DEVELOPMENT SERVICES DEPT
<b>Subject: Draft Supplemental Environmental Impact Report (DSEIR) for Shea/Baker Ranch Area Plan (AP-2-11-1732) and Tentative Tract Map No. 16466</b>	
Dear Ms. Tai:	
Thank you for the opportunity to comment on the DSEIR for the Shea/Baker Ranch Area Plan (AP-2-11-1732) and Tentative Tract Map No. 16466. City of Irvine staff has reviewed the submittal and has the following comments:	
<b>Initial Study</b>	
1. Consistent with the previously approved Vacant Land Opportunities Study (OSA), the extended study area intersections in the City of Irvine should be included in the project build-out year analysis (2015). This analysis will determine if any of the previously identified mitigation measures are needed prior to 2030, the OSA Study scenario year. The referenced memorandum by Austin Foust Associates (AFA) only evaluates Post 2030. A similar analysis provided in the memo for Post 2030 can also be provided which analyzes the proposed project impacts in 2015 with the proposed project land use assumptions.	A1-1
2. Page 161: The Future Plus Project section identifies that the project would create impacts at two intersections, Bake Parkway/Irvine Boulevard/Trabuco Road and Bake Parkway/Jeronimo Road which were both identified in the OSA Study and have previously identified Lake Forest Transportation Mitigation (LFTM) mitigation measures. The OSA study analyzed year 2030; however, this project analysis shows an impact in 2015. These mitigation	A1-2
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## 2. Response to Comments

Ms. Carrie Tai  
March 14, 2012  
Page 2 of 3

measures should be advanced to 2015 to mitigate the project. The advancement of these improvements should be discussed in this section of the study.

A1-2  
cont'd.

3. Page 166: The first sentence references Table E of the Traffic Study. Revise this statement to reference the **Construction and Development Phase** Traffic Study to clarify for the reader.

A1-3

### Traffic Study

4. Page 6: In the first paragraph, the first sentence states the study area is consistent with the original study area. The original study area was expanded as part of the analysis process; therefore, this analysis should also include the expanded study area in the 2015 scenario or provide information that justifies the exclusion of the expanded study area.

A1-4

5. Page 6: In the first paragraph the process describing how the intersections in the City of Irvine were analyzed is inconsistent with the Memorandum referenced. There was not an addition of the project delta to Irvine Transportation Analysis Model (ITAM), as explained in the memo. Please clarify this inconsistency.

A1-5

6. Page 6: The AFA memorandum referenced here and attached as Appendix B contains several errors, as mentioned in the comments previously and repeated below. Therefore, provide the data in the traffic study instead of referencing this memo.

A1-6

7. The extended study area intersections in the City of Irvine should be analyzed for project build-out year (2015) to verify the phasing of improvements as they are within the City of Lake Forest. Post 2030 assumes a different roadway network than 2015 and 2030 that is analyzed for the Lake Forest intersections.

A1-7

### March 24, 2011 Memorandum – Appendix B

8. The second paragraph references a report dated March 2, 2011. This report should be included for reference for the reader or excluded from discussion.

A1-8

9. It is unclear what data is being summarized in Table 1. Clarify if this is a prior version of ITAM and clarify how this table is reflected in the project.

A1-9

10. Table 1: Correct the Level of Service (LOS) values shown for both ITAM 8.4-10 AM and PM Peak hours. Several locations have incorrect LOS.

A1-10



## 2. Response to Comments

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Ms. Carrie Tai  
March 14, 2012  
Page 3 of 3

If you have any questions, please contact me at (949) 724-6314, or by email at [dlaw@cityofirvine.org](mailto:dlaw@cityofirvine.org).

Sincerely,



David R. Law, AICP  
Senior Planner

cc: Barry Curtis, Manager of Planning Services  
Bill Jacobs, Principal Planner  
Kerwin Lau, Project Development Administrator  
Karen Urman, Senior Transportation Analyst

## *2. Response to Comments*

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## 2. Response to Comments

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### A1. Response to Comments from David R. Law, AICP, City of Irvine, dated March 14, 2012.

A1-1 The traffic analysis for the OSA PEIR included an extended study area that encompassed intersections in Irvine. The March 24, 2011 Memo (Appendix B of the Traffic Study, which is Appendix H of the Modified Initial Study) summarizes the manner in which the most recent data for the OSA, per the approved Alternative 7 conditions (including the Shea/Baker Ranch project information) and Irvine locations in the extended study area, were verified with the Irvine Transportation Analysis Model (ITAM), Version 8.4-10. The purpose of this was to identify whether there were significant changes between the latest Irvine ITAM traffic model and the latest OSA information (based on Alternative 7). The conclusion was that impacts to Irvine are no worse than previously reported. As a result, the study area for the 2015 analysis was reduced to focus on intersections within the City of Lake Forest that are adjacent to the project site, per the guidelines set forth in the LFTM Ordinance.

A1-2 As indicated on Page 5 of the Traffic Study (Appendix H of the Modified Initial Study), the project buildout year is 2015. The timing of intersection improvements is commensurate with the timing of the development. However, because the timing of the development depends on many factors, the completion of the intersection improvements can only occur from funding from the development. The results of the traffic study show that two intersections require improvements in 2015, should the SBRA project be fully built out in that year. Project mitigation measures would require timely payment of LFTM fees that is commensurate with the development, ensuring that if the project is fully built out in 2015, the improvements to the intersections will also be required by 2015.

As stated on 162 of the Modified Initial Study (DSEIR Appendix A), the proposed project is not forecast to have any significant impact on non-LFTM intersections. As such, intersections within the City of Irvine (which are not within the LFTM area) have not been included in Table 3.16-4. While the intersections mentioned (Bake/Trabuco and Bake/Jeronimo) are both NITM and LFTM intersections, the full cost for the improvements is listed in the City's LFTM Ordinance and required to be funded by project developers. Reimbursements for fair share, or future cost adjustments due to availability of funds from other sources, may be pursued separately, but will otherwise not impede the intersection improvements.

A1-3 Any reference to "Traffic Study Addendum" is hereby globally revised and understood to refer to "Construction and Development Phase Addendum Traffic Study" contained in DSEIR Appendix H. This clarification, does not affect the conclusions of the traffic study and Supplemental EIR.

A1-4 See Response to Comment A1-1.

A1-5 The methodology described in the AFA Memorandum (March 24, 2011) is correct. Page 6 of the Traffic Study incorrectly described the modeling process to forecast traffic volumes within the City of Irvine using the ITAM model. Rather, it should state that "The most recent data for the OSA per the approved Alternative 7 conditions presented for Irvine locations in the extended study area were verified with the most recent Irvine Transportation Analysis Model (ITAM), Version 8.4-10." This correction

## 2. Response to Comments

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- has been included in the Errata to the DSEIR. This inconsistency, however, does not affect the conclusions of the traffic study and Supplemental EIR.
- A1-6 See Response to Comments A1-9 through A1-11 below, which explain why the AFA Memorandum is correct.
- A1-7 See Response to Comment A1-1.
- A1-8 The Austin-Foust Associates, Inc. report dated March 2, 2011 that is described in Appendix B of the Traffic Study is provided for reference as Appendix A of this FSEIR. It should be noted that adding this memorandum is editorial only and does not affect the conclusions of the traffic study and Supplemental EIR.
- A1-9 As described in the memo provided in Appendix B of the Traffic Study, Table 1 provides a comparison of Post 2030 intersection levels of service for the extended study area (including Irvine locations) between the version of ITAM used in the OSA PEIR and Alternative 7, and the latest version of ITAM (version 8.4-10). Each version of ITAM includes a more intense project on the SBRA site than currently proposed. The result of this information concluded that impacts to Irvine locations are no worse using the latest version of ITAM than previously reported in the OSA Alternative 7. Based on this, the study area for the 2015 analysis was reduced to focus on intersections within the City of Lake Forest and adjacent to the project site, per the guidelines set forth in the LFTM Ordinance.
- A1-10 Table 1 of Appendix B of the Traffic Study has been revised to correct the Levels of Service. It should be noted that these changes were editorial only and do not affect the conclusions of the traffic study and Supplemental EIR. Revised Table 1 is included as Appendix B of this FSEIR.



## 2. Response to Comments

LETTER A2 – Greg Holms, Unit Chief, DTSC (6 pages)

		
<p><b>Matthew Rodriguez</b> Secretary for Environmental Protection</p>	<p><b>Department of Toxic Substances Control</b></p>	<p><b>Edmund G. Brown Jr.</b> Governor</p>
	<p><b>Deborah O. Raphael, Director</b> 5796 Corporate Avenue Cypress, California 90630</p>	<p><b>RECEIVED</b> MAR 27 2012 CITY OF LAKE FOREST DEVELOPMENT SERVICES DEPT</p>
<p>March 26, 2012</p>		
<p>Ms. Carrie Tai, Senior Planner City of Lake Forest 25550 Commercentre Drive Lake Forest, California 92630 ctai@lakeforestca.gov</p>		
<p><b>NOTICE OF AVAILABILITY OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE SHEA/BAKER RANCH AREA PLAN PROJECT, (SCH #2004071039), ORANGE COUNTY</b></p>		
<p>Dear Ms. Tai:</p>		
<p>The Department of Toxic Substances Control (DTSC) has received your submitted Draft Supplemental Environmental Impact Report (SEIR) for the above-mentioned project. The following project description is stated in your document: "Shea/Baker Ranch Associates, LLC (SBRA) seeks City approval of an Area Plan (AP2-11-1732) and Tentative Tract Map 16466 for a residential and mixed-use development consisting of 2,379 residential units and 25,000 square feet of commercial uses (herein referred to as the "SBRA Project") within the City of Lake Forest, Orange County, California. The SBRA Project Site is a 386.8-acre proposed master-planned community located in the northwestern portion of the City of Lake Forest. The SBRA Project is bounded by Borrego Canyon Wash on the northwest, Bake Parkway and existing business park development on the south, the State Route 241 (241 Toll Road) to the northeast, and an Irvine Ranch Water District reservoir site on the east. The site was partially graded in conjunction with an entitled business park development, but is otherwise undeveloped except for a number of small structures related to a nursery that occupies the northwestern portion of the overall property. Because of the property's proximity to the then-operating Marine Corps Air Station (MCAS) El Toro, Land uses on the property were limited to non-residential uses. The site's existing General Plan land use designations consist of Mixed-Use, Low Density Residential (LDR), Low-Medium Density Residential (L-MDR), Medium Density Residential (MDR), and Open Space (OS)".</p>		
<p>Based on the review of the submitted document DTSC has the following comments:</p>		
<p>1) DTSC provided comments on the project original Notice of Preparation (NOP) on February 7, 2012; those comments have not been addressed in the Notice of</p>	<p>A2-1</p>	
<p><small>♻️ Printed on Recycled Paper</small></p>		

## 2. Response to Comments

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Ms. Carrie Tai  
March 26, 2012  
Page 2

Availability of the Draft SEIR. Please ensure that all those comments will be addressed in the final Environmental Impact Report for the project.

- 2) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

A2-2

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at [rahmed@dtsc.ca.gov](mailto:rahmed@dtsc.ca.gov), or by phone at (714) 484-5491.

Sincerely,



Greg Holmes  
Unit Chief  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
Attn: Nancy Ritter  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3484





Matthew Rodriguez  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



Edmund G. Brown Jr.  
Governor

February 7, 2012

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FEB 08 2012

CITY OF LAKE FOREST  
DEVELOPMENT SERVICES DEPT

Ms. Carrie Tai, Senior Planner  
City of Lake Forest  
25550 Commercecenter Drive  
Lake Forest, California 92630  
ctai@lakeforestca.gov

NOTICE PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL REPORT FOR  
THE SHEA / BAKER RANCH PROJECT, (SCH#2004071039), ORANGE COUNTY

Dear Ms. Tai:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation for a Supplemental Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "Shea/Baker Ranch Associate, LLC (SBRA) seeks City approval for an Area Plan (AP 2-11-1732) and Tentative Tract Map 16466 for a residential and mixed-use development on a 386.7 acre site within the City of Lake Forest, Orange County, California. Development would include up to 1,638 for-sale homes (on approximately 308 acres with a density range from 2-7 dwelling units per acre to 25 dwelling units per acres) and mixed-use commercial/residential land uses (on approximately 50 acres with up to 25,000 square feet of commercial and 741 low medium to high density residential units, including some affordable housing units). The project would also include up to 100 acres of open space, of which 40 acres would be parks and recreational areas, and the improvement and vegetation of the Borrego Canyon Wash. The project is bounded by Borrego Canyon Wash on the northwest, Bake Parkway and existing business park development on the south, State Route 241 (241 Toll Road to the northeast, and an Irvine Ranch Water District reservoir site on the east".

Based on the review of the submitted document DTSC has the following comments:

- 1) The EIR should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

A2-3

## 2. Response to Comments

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Ms. Carrie Tai  
February 7, 2012  
Page 2

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
  - EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations. A2-3
  - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. A2-4
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR. A2-5



## 2. Response to Comments

Ms. Carrie Tai  
 February 7, 2012  
 Page 3

- |    |   |       |
|----|---|-------|
| 4) | If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.   | A2-6  |
| 5) | Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.   | A2-7  |
| 6) | Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.  | A2-8  |
| 7) | If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.  | A2-9  |
| 8) | If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. | A2-10 |
| 9) | DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see  | A2-11 |

## 2. Response to Comments

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Ms. Carrie Tai  
February 7, 2012  
Page 4

[www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at [rahmed@dtsc.ca.gov](mailto:rahmed@dtsc.ca.gov), or by phone at (714) 484-5491.

Sincerely,



Greg Holmes  
Unit Chief  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
Attn: Nancy Ritter  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3457



## 2. Response to Comments

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### A2. Response to Comments Greg Holms, Unit Chief, DTSC, dated March 26, 2012.

- A2-1 DTSC's comments were addressed generally in Chapter 2, Table 2-1, *NOP Responses*, of the DSEIR. Table 2-1 states that the Modified Initial Study (DSEIR Appendix A) determined that impacts related to hazards and hazardous materials were sufficiently analyzed in the OSA PEIR and Addendum. No new impacts related to hazards and hazardous materials would result from implementation of the SBRA Project. However, more detailed responses are provided below.
- A2-2 Comment noted. This comment does not raise specific environmental concerns about the proposed Project or the SEIR; therefore, no further response necessary.
- A2-3 As stated in the Modified Initial Study and on page 18 of the Phase I Site Assessment (Modified Initial Study Appendix E), Regulatory agency database information was obtained from a standard radius Site Assessment (ASTM) report by Environmental Data Resources, Inc. The database search included over 94 federal, state, local, and proprietary records. No Recognized Environmental Conditions were identified by review of the agency database report other than the former diesel underground storage tank at the project site. A copy of the EDR report and a discussion of selected findings of the report are presented in the Phase I. The Modified Initial Study includes environmental analysis that evaluates whether the conditions of the project site and surrounding area would cause harm to humans. DSEIR, Appendix E, *Modified Initial Study*, pp. 97-102. A Phase I hazards assessment was completed for the proposed project. As explained in the Modified Initial Study, with mitigation, all impacts would be less than significant. (*Id.*)
- A2-4 See Response to Comment A2-1. The Phase I assessment found that human health impacts from hazardous substances would be less than significant. PPP HAZ-1 and HAZ-2 require compliance with all federal and state regulations for handling of hazardous materials. Mitigation measure HAZ MM-1 ensures that if remediation is required, it shall be accomplished in a manner that reduces risk to below applicable standards and shall be completed prior to issuance of any occupancy permits.
- A2-5 See Response to Comment A2-4.
- A2-6 The construction of the proposed project involves the demolition of an existing building as well as paved surfaces. The Phase I Environmental Assessment states that given the age of the residential and maintenance structures located at the Site, appropriate sampling should be performed by a qualified contractor and if necessary, abatement of asbestos and/or lead based paint materials must occur prior to demolition. This requirement has been incorporated into the project's conditions of approval and also Mitigation Measures. Additionally, all demolition activities would be required to adhere to existing regulations (Occupational Safety and Health Administration Rule 29, California Federal Regulations 1926, and South Coast Air Quality Management District Rule 1403).
- A2-7 DTSC requires that all contaminated soil be safely removed from the project site following state regulations. PPP HAZ-1 and HAZ-2 require compliance with all federal and state regulations for handling of hazardous materials, which includes removal of any contaminated soil from the project site (if it exists). Mitigation

## 2. Response to Comments

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measure HAZ MM-1 ensures that if remediation is required, it shall be accomplished in a manner that reduces risk to below applicable standards and shall be completed prior to issuance of any occupancy permits.

- A2-8 As discussed in DSEIR Section 5.1, Air Quality, during construction of Phases 2 and 3, when some of the residences of Phase 1 could be occupied, there is a potential for significant PM<sub>10</sub> and PM<sub>2.5</sub> LST impacts. While mitigation measures AQ MM-1 through AQ MM-7 would result in reduced emissions during construction, these reductions would not be sufficient to reduce all emissions to a less than significant level. Impact 5.1-2 would remain significant and unavoidable. A health risk assessment is based on risk accumulated over a 70-year lifetime. Given the relatively short-term construction schedule for activities (3 years compared to 70 years) and distance to the nearest sensitive land uses, the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. Therefore, project-related diesel particulate matter impacts during construction would not be significant and a health risk assessment is not necessary.
- A2-9 The site previously included agricultural uses, which involves the use of fertilizers and pesticides. The Phase I Environmental Assessment found no evidence of contamination from these uses. However, the project is required to comply with the existing regulations, including PPP HAZ-1 and HAZ-2, which require compliance with all federal and state regulations for handling of hazardous materials. Mitigation measure HAZ MM-1 ensures that if remediation is required, it shall be accomplished in a manner that reduces risk to below applicable standards and shall be completed prior to issuance of any occupancy permits.
- A2-10 The proposed project would not involve the generation of hazardous substances, as discussed in Initial Study Section 3.8, Hazards and Hazardous Substances. Therefore, the proposed project does not need to obtain a United States Environmental Protection Agency Identification Number. Similarly, because the project does not involve hazardous waste treatment processes or hazardous materials, handling, storage or uses, the project applicant does not need to request authorization from the local Certified Unified Program Agency (CUPA) for the proposed project.
- A2-11 Comment noted. The proposed project does not involve clean up and there is no need for oversight through an Environmental Oversight Agreement (EOA) or Voluntary Clean Up Agreement (VCA). Therefore, no further response is necessary.



## 2. Response to Comments

LETTER A3—Christopher Herre, Branch Chief, Department of Transportation (2 pages)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY		EDMUND G. BROWN Jr., Governor
<b>DEPARTMENT OF TRANSPORTATION</b> District 12 3347 Michelson Drive, Suite 100 Irvine, CA 92612-8894 Tel: (949) 724-2241 Fax: (949) 724-2592		 <i>Flex your power! Be energy efficient!</i>
<b>March 19, 2012</b>		
Carrie Tai City of Lake Forest 25550 Commercentre Drive, Suite 100 Lake Forest, California 92630	File: IGR/CEQA SCH#: 2004071039 Log #: 1433H I-5, SR-241	
<b>Subject: Shea/Baker Ranch</b>		
Dear Ms. Tai:		
Thank you for the opportunity to review and comment on the <b>Supplemental Environmental Impact Report (SEIR) for Shea/Baker Ranch</b> . The proposed project would allow for the development of 2,379 residential units and 25,000 square feet of mixed-use commercial uses on a 386.7 acre site. The project site is located in the northwestern portion of Lake Forest, bounded by Borrego Canyon Wash on the northwest, Bake Parkway on the south, the Foothill Transportation Corridor (SR-241) to the northeast, and an Irvine Ranch Water District reservoir site on the east. The nearest State routes to the project site are SR-241 and I-5.		
<b>Caltrans District 12 is a responsible agency</b> on this project, and has the following comments:		
1. In response to the City's memo dated February 22, 2012 regarding traffic analysis for projects within the Opportunities Study Area (OSA), the Department was unable to locate any HCM analysis for 2030 conditions in the OSA Program EIR or Vacant Land Opportunities Phase 3 Traffic Study dated July 2005. Please provide an HCM analysis for Level of Service (LOS) in the project area.		A3-1
2. In addition, a queuing analysis for I-5 mainline and ramps at Bake Parkway and Lake Forest Drive was requested in prior comments from Caltrans, dated February 13, 2012, but were not addressed in the Notice of Preparation (NOP) comment responses, nor were they included in the OSA PEIR for 2030 conditions. Please provide a queuing analysis for these areas.		A3-2
3. The Department had previously commented on the OSA Draft EIR on March 23, 2006. The letter requested, "Highway Capacity Manual methodology should be used to analyze the Freeway and Toll Road mainline including all interchanges for the AM and PM peak hour volumes to determine the significance of traffic impacts generated by the project," (Comment #4). HCM analysis has not been provided for the Shea/Baker Ranch SEIR or the OSA PEIR to date, and failure to do so will be in direct violation of CEQA.		A3-3
4. The Department had also previously commented on the OSA Draft EIR on March 29, 2006. Our fourth comment on the letter stated, "The Study Area failed to include I-5/Bake Parkway interchange. This interchange falls within the zone of influence of the proposed development and as such, a detailed analysis should be completed." These comments are still standing, as they have not been addressed in the OSA EIR or the Shea/Baker Ranch EIR.		A3-4
<i>"Caltrans improves mobility across California"</i>		

## 2. Response to Comments

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|---|------|
| 5. Caltrans made a comment on the NOP for the Lake Forest Opportunities Study on August 9, 2004 which requested HCM methodology for the analysis of intersections and roads directly adjacent to freeway mainlines and ramps affected by the study area.  | A3-5 |
| 6. According to State CEQA Guidelines, section 15087(c)(4); A list of the significant environmental effects anticipated as a result of the project, to the extent which such effects are known to the lead agency at the time of the notice shall be disclosed in the EIR. The OSA PEIR failed to list the significant environmental effects anticipated as a result of the project due to the absence of a 2030 analysis of HCM mainline and ramps. Failure to comply with the aforementioned statute will be in direct violation of CEQA. | A3-6 |
| 7. CEQA statute 21092.4(a) states, "For a project of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies which have transportation facilities within their jurisdiction which could be affected by the project."  | A3-7 |
| 8. In addition, CEQA statute 21092.4(b) states, "As used in this section, "transportation facilities" includes major local arterials and public transit within five miles of the project site and freeways, highways and rail transit service within 10 miles of the project site." The failure to analyze the intersection of I-5 and Bake Parkway using HCM methodology would be considered a violation of this statute.  | A3-8 |
| 9. CEQA statute 21081.2(e) states, "Nothing in this section relieves a city or county from the requirement to analyze the project's effects on traffic at intersections, or on streets, highways, or freeways, from making a determination that the project may have a significant effect on traffic." Again, failure to analyze the intersection of I-5 and Bake Parkway using HCM methodology would be considered a violation of this statute.  | A3-9 |

We are requesting that our comments be addressed prior to approval of this project. Please continue to keep us informed of this project and any future developments, which could potentially impact the State Transportation Facilities. If you have any questions or need to contact us, please do not hesitate to call Marlon Regisford at (949) 724-2241.

Sincerely,  
  
Christopher Herre, Branch Chief  
Local Development/Intergovernmental Review

C: Scott Morgan, Office of Planning and Research

*"Caltrans improves mobility across California"*



## 2. Response to Comments

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### A3. Response to Comments from Christopher Herre, Branch Chief, Department of Transportation, dated March 19, 2012.

A3-1 The level of service methodology utilized in the SBRA Project Traffic Study is consistent with the lead agency's accepted methods of determining significant impacts. As described in the traffic study, the City utilizes the ICU methodology to analyze traffic impacts. The ICU methodology is the prescribed method used by the City, and has been applied in the OSA Program EIR, LFTM Ordinance and City General Plan, as well as the Orange County Congestion Management Program. Given that the City as lead agency has adopted the ICU methodology for all traffic impact analysis, the traffic studies for the OSA Program EIR and the Shea/Baker Ranch project were prepared consistent with the City's adopted methodology.

A3-2 The certified OSA PEIR analyzed the effects of the projects included within the OSA on the Interstate 5 and SR-241 and concluded that the OSA (inclusive of the proposed project) and cumulative development would cause five segments (I-5 north of El Toro Road [a.m. and p.m. peak hour], I-5 north of Alicia Parkway [a.m. and p.m. peak hour], and SR-241 north of Los Alisos Boulevard [a.m. peak hour]) to operate below standards. However, no freeway mainline segments were forecast to be significantly impacted by the OSA (inclusive of the proposed project) under the year 2030 conditions compared to the 2030 [then] General Plan Scenario. (Refer to page 3.14-53, Table 3.14-16, 2030 Proposed Project Freeway/Tollway Ramp LOS Summary, of the OSA PEIR.) The OSA PEIR also analyzed off-ramps and found that no freeway ramps would be negatively impacted as compared to the 2030 [then] General Plan Scenario.

The proposed SBRA Project is less intense than the development described and analyzed in the OSA PEIR for the SBRA project site. Based on the current project description compared to the OSA PEIR, the SBRA project will generate 10,795 fewer average daily trips (ADT), 690 fewer a.m. peak hour trips and 981 fewer p.m. peak hour trips. The Modified Initial Study / Traffic Analysis did not include an analysis of Interstate 5 (I-5) or Interstate 405 (I-405) because, given the reduction in ADTs and peak hour trips, the City determined that the project-level impacts would be the same or less than those analyzed in the OSA PEIR. The OSA PEIR concluded that a less than significant impact would result in this regard. Thus, because the proposed project is consistent with that analyzed under the OSA PEIR, impacts to freeway mainlines are therefore less than significant.

Based on the peak-hour ramp performance criteria and impact thresholds discussed within the OSA PEIR, no freeway ramps or queuing are forecast to be significantly impacted by the development envisioned under the OSA based on year 2030 conditions when compared to either existing conditions or to the General Plan Scenario. In fact, implementation of the OSA (of which the SBRA Project is a component) would eliminate impacts to five ramps which would occur under the 2030 General Plan Scenario.

As shown in select zone assignments provided in Appendix C of the SBRA Traffic Study, the SBRA project will add approximately 858 daily trips to the freeway system north of Bake Parkway and 563 daily trips between Bake Parkway and Lake Forest Drive. Based on the 2015 forecast Average Daily Traffic (ADT) volume of 377,000

## 2. Response to Comments

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north of Bake Parkway and 381,000 south of Bake Parkway, the project would add less than 1 percent to the freeway system.

Similarly as shown in select zone assignments provided in Appendix C of the SBRA Traffic Study (provided in Initial Study Appendix H; DSEIR Appendix A) , the SBRA project will add approximately 529 daily trips to the freeway system south of Lake Forest Drive. Based on the 2015 forecast Average Daily Traffic volume of 381,000 between Lake Forest Drive and El Toro Road, the project also add less than 1 percent to the freeway system. In either case, the SBRA project would not add significant traffic (i.e., greater than 1 percent) to the freeway system.

- A3-3 As part of the Opportunities Study Area Final Program Environmental Report, the City of Lake Forest provided a response to this comment. Please see attached comments in Appendix A. In addition, please see Response to Comment A3-1 above, which explains the methodology that the City employs for evaluating traffic impacts.
- A3-4 As part of the Opportunities Study Area Final Program Environmental Report, the City of Lake Forest provided a response to this comment. Please see attached comments in Appendix A. Specifically, as explained in RTC CALT2-5, the I-5/Bake Parkway interchange was included within the Lake Forest study area.
- A3-5 Please refer to Response to Comment A3-1 above. In addition, as part of the Opportunities Study Area Final Program Environmental Report, the City of Lake Forest provided a response to this comment. Please see attached comments in Appendix A.
- A3-6 As a preliminary matter, it should be noted that the OSA PEIR was certified on June 3, 2008. In accordance with State CEQA Guidelines section 15094, on June 4, 2008, the City filed a notice of determination to inform the public of its decision to certify the OSA PEIR and to approve the OSA project. Because no action or proceeding alleging that the OSA PEIR does not comply with CEQA were commenced during the applicable statute of limitations, the OSA PEIR is conclusively presumed to comply with CEQA. (Pub. Res. Code § 21167.2.) Thus, to the extent that this comment suggests that the City violated CEQA when it certified the OSA PEIR, those claims are time barred.

To the extent that commenter's claims are directed to the current environmental document – the SEIR -- please refer to Response to Comment A3-2 with respect to 2030 analysis of HCM mainline and ramps. As discussed in Response A3-2, no freeway mainline segments were forecast to be significantly impacted by the OSA (inclusive of the proposed project) under the year 2030 conditions compared to the 2030 [then] General Plan Scenario. As the current SBRA project is less intense than included in the adopted OSA, no new impacts would be identified. The Notice of Completion and Notice of Availability disclosed the DSEIR's conclusion that there would be significant and unavoidable impacts to Air Quality and Greenhouse Gases resulting from the project. Therefore, the City adequately disclosed the project's significant effects pursuant to CEQA Section 15087(c)(4) for this SEIR.



## 2. Response to Comments

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A3-7 The City has complied with the provisions of 21092.4(a) that require consultation with affected agencies. After preparation of a Modified Initial Study for the SBRA Project, the City of Lake Forest determined that a Supplement to the OSA PEIR would be required for the SBRA Project and issued a Notice of Preparation (NOP) and Modified Initial Study on January 12, 2012, in accordance with State CEQA Guidelines section 15082. As required by State CEQA Guidelines section 15082(c)(3), the City called a scoping meeting for the proposed project. The scoping meeting was held on February 1, 2012. One person attended the scoping meeting. No representatives from the Department of Transportation, Department 12, attended the scoping meeting.

Comments received during the public review period, which extended from January 13, 2012, to February 13, 2012 and including comments raised at the Scoping Meeting, can be found in DSEIR Appendix B.

Furthermore, the DSEIR took into consideration all the comments received in response to the NOP. As shown in DSEIR Table 2-1, *NOP Responses*, the Department of Transportation: District 12 provided a comment letter on February 13, 2012. The City of Lake Forest responded that no new impacts related to traffic and transportation facilities would result from implementation of the SBRA Project. See DSEIR Appendix D – OSA Traffic Memo. In addition, copies of the NOP and DSEIR were sent to the Department of Transportation via certified mail during the DSEIR public review period.

The City has made every effort to consult with the Department of Transportation and has diligently responded to all concerns raised by the Department of Transportation throughout this SEIR process.

A3-8 The affected transportation facilities within the study area delineated for the OSA PEIR included the facilities described in the comment. The SBRA Traffic Study reviewed the level of service for the extended study area analyzed in the OSA PEIR based on the lead agency's adopted methodology. It was concluded that impacts to intersections outside of the City limits (e.g., within the City of Irvine, including Bake Parkway/I-5) are no worse than previously presented in the OSA PEIR. As the current SBRA project is less intense than included in the adopted OSA, no new impacts would be identified. Please refer to Response to Comment A3-1 above regarding the methodology used by the lead agency. As a point of clarification, Public Resources Code section 21092.4(b) does not require that the City use the HCM methodology to evaluate impacts at the intersection of I-5 and Bake Parkway, or any other intersection. Therefore, the fact that the City has not utilized the HCM methodology does not violate Public Resources Code section 21092.4(b). Furthermore, the City's adopted a CEQA Significance Threshold Guide, together with the LFTM program, the City's General Plan, and the County's Congestion Management Plan, direct the City to utilize the ICU methodology. Thus, in accordance with State CEQA Guidelines section 15064.7, the City has properly utilized and relied upon the ICU methodology.

A3-9 As a point of clarification, Public Resources Code section 21081.2(e) does not require that the City use the HCM methodology to evaluate impacts at the intersection of I-5 and Bake Parkway, or any other intersection. Therefore, the fact

## *2. Response to Comments*

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that the City has not utilized the HCM methodology does not violate Public Resources Code section 21081.2(e). As explained above in Response to Comment A3-8, the City's existing procedures require that it evaluate traffic impacts according to the ICU methodology. Using that methodology, the City analyzed the project's effect on traffic in the OSA PEIR, and conducted a study as required by the LFTM ordinance for the Shea/Baker proposal which concluded that the traffic generated by the Shea/Baker project would be less than what was analyzed in the OSA PEIR and would not exceed any of the traffic impacts in the OSA PEIR, and would remain less than significant. With respect to the analysis of the intersection of I-5 and Bake Parkway, see response to Comment A3-2. Both the OSA PEIR traffic study and the traffic analysis for the Shea/Baker project were prepared consistent with the City's requirement to use the ICU methodology.



## 2. Response to Comments

LETTER A4– Michael Balsamo, Orange County Public Works (2 pages)

 <p>ORANGE COUNTY <b>Public Works</b> <i>Our Community. Our Commitment.</i></p>	<p><i>Jess A. Carbajal, Director</i> 300 N. Flower Street Santa Ana, CA P.O. Box 4048 Santa Ana, CA 92702-4048 Telephone: (714) 834-2300 Fax: (714) 834-5188</p>
<hr/> <b>RECEIVED</b> APR 24 2012 NCL 12-001 CITY OF LAKE FOREST DEVELOPMENT SERVICES DEPT	
April 23, 2012	
Ms. Carrie Tai, Senior Planner City of Lake Forest 25550 Commercecentre Drive, Suite 100 Lake Forest, California 92630	
SUBJECT: Notice of Preparation of a Draft Environmental Impact Report – Shea Baker Ranch Area Plan and Tentative Tract Map located in the City of Lake Forest	
Dear Ms. Tai:	
The County of Orange has reviewed the Notice of Preparation of a Draft Environmental Impact Report – Shea Baker Ranch Area Plan and Tentative Tract Map and offers the following comment:	
<u>Environmental Resources:</u>	
In response to your request for input on the subject project, Environmental Resources has reviewed the document, and offers the following comments:	
The finding in Section 8, Impacts Not Triggering Further Environmental Review, that there are no new potential Hydrology and Water Quality resource impact issues that were not fully addressed in the OSA PEIR should be clarified and updated with respect to the following:	
The 303(d) list of impaired waters referenced in Modified Initial Study Pages 115-120 is no longer being used, and the 2010 list (approved by EPA) now identifies many more impairments that the project might contribute to, and requires current impact analysis for.	
These now would include officially recognized impairments in Borrego Canyon Wash, for Indicator Bacteria and Ammonia Un-ionized; in Serrano Creek, for Indicator Bacteria, Ammonia Un-ionized, and pH; in San Diego Creek Reach 2, for Nutrients, Indicator Bacteria, Sedimentation / Siltation, and Unknown Toxicity; in San Diego Creek Reach 1, for Nutrients, Sedimentation / Siltation, and Pesticides; and in Upper Newport Bay, for Nutrients, Sedimentation / Siltation, Pesticides, and Indicator Bacteria. Please see the 2010 list at: <a href="http://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/category5_report.shtml">http://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/category5_report.shtml</a> .	
Further, the Modified IS Pages 115 and 118 make no mention of the San Diego Creek and Newport Bay Sediment TMDL, its specific waste discharge requirements and the project's potential impacts.	

A4-1

## 2. Response to Comments

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Ms. Carrie Tai  
City of Lake Forest  
April 23, 2012

If you require any additional information, please contact Grant Sharp at (714) 955-0674.

Sincerely,



Michael Balsamo  
Manager, OC Community Development  
OC Public Works/OC Planning  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Michael.Balsamo@ocpw.ocgov.com](mailto:Michael.Balsamo@ocpw.ocgov.com)

cc: Chris Crompton, Environmental Resources



### A4. Response to Comments from Michael Balsamo, Orange County Public Works, dated April 23, 2012.

#### A4-1 Water Quality Management Plan

The project Water Quality Management Plan (WQMP) was approved by the City in 2010, in conjunction with the Alton Parkway Extension project and associated Environmental Impact Report (Alton Parkway EIR No. 585). The project-level environmental review for the Shea / Baker Ranch project commenced with the preparation of a Modified Initial Study and Notice of Preparation, which tiered off the Opportunities Study Area Program Environmental Impact Report (OSA PEIR). The Modified Initial Study found that there would not be new significant impacts resulting from the project that previously were not analyzed by the OSA PEIR. The WQMP was incorporated by reference in the Modified Initial Study and was subsequently incorporated as part of Chapter 8 (Impacts Found Not to be Significant) of the Supplemental Environmental Impact Report (SEIR).

The SEIR was released for public review between February 24, 2012 and April 10, 2012. The City of Lake Forest received this comment letter from Orange County Public Works after the conclusion of the 45-day comment period, dated April 23, 2012. However, the following response has been prepared to address the concerns of OC Public Works.

#### **Pollutants of Concern**

The WQMP identified pollutants of concern causing impairment of receiving waters, San Diego Creek which drains to Upper Newport Bay which drains to Lower Newport Bay. The pollutants of concern were identified in 2007 by the United States Environmental Protection Agency (USEPA), in accordance with Section 303(d) of the Clean Water Act. Pollutants of concern identified for the site in 2007 were fecal coliform bacteria, selenium, toxaphene, chlordane, copper, DDT, metals, PCBs, and sediment toxicity. Serrano Creek and Borrego Canyon Wash, which are tributaries to San Diego Creek, were not listed as 303(d) impaired water bodies in 2007.

#### **Project Best Management Practices (BMPs)**

Because the Shea / Baker Ranch project discharges into the San Diego Creek, an impaired water body, the approved WQMP includes BMPs to reduce amounts of pollutants from the project that would reach receiving waters. The project would implement the approved WQMP specifying BMPs to be implemented during project design and project operation to avoid or reduce stormwater pollution from project operation.

Site design for stormwater quality protection uses a three-level strategy:

1. Reduce or eliminate post-project runoff;
2. Control sources of pollutants; and, if still needed after (1) and (2),

## 2. Response to Comments

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3. Treat contaminated stormwater before discharging it into the storm drain system or into receiving waters.

For discharge into treatment control BMPs (after BMPs #1 and #2), drainage from 86 percent of the project site would be discharged into the water quality/detention basin before being discharged from the basin to Borrego Creek. Drainage from the balance of the site would pass through filter chambers before discharge to new storm drains on Alton Parkway (ultimately to the Borrego Canyon Wash) and existing storm drains into Serrano Creek. The water quality/detention basin and filter chambers are designed to filter pollutants of concern, such as those on the 303(d) list, prior to discharge into receiving waters.

In 2010, after the preparation of the approved WQMP, the 303(d) list was updated<sup>1</sup> to include pollutants of concern causing impairment of Serrano Creek (pH and Ammonia Unionized) and Borrego Canyon Wash (Ammonia Un-ionized), which are situated upstream from San Diego Creek. These pollutants have been placed on a list for the development of Total Maximum Daily Limits (TMDLs) for discharge. The date for their TMDL development is the year 2021.

The 2010 integrated report also added the following 303(d) listed pollutants impairing San Diego Creek, Upper Newport Bay and Lower Newport Bay. Nutrients (TMDL 1999), Pesticides (TMDL 2004), Sedimentation/Siltation (TMDL 1999).

Effective installation, implementation and maintenance of all project BMPs, which will occur prior to all of the project's discharge point(s) (upstream of) at both Borrego Canyon Wash and Serrano Creek, shall ensure that the project will not result in the discharge of any project pollutants of concern, including 303(d) listed pollutants, which could impair the project's downstream receiving waters of Serrano Creek, Borrego Creek, San Diego Creek, Upper Newport Bay and Lower Newport Bay. Therefore, while Serrano Creek and Borrego Canyon Wash are now listed as impaired water bodies, the project BMPs will ensure that no additional significant impacts occur as a result of the project.



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<sup>1</sup> Per the 2010 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report) which was approved by the California State Water Resources control Board on August 4, 2010 and by the United States Environmental Protection Agency (USEPA) on November 12, 2010.

## 2. Response to Comments

LETTER O1 – Patricia Martz, PhD, President, CA Cultural Resource Preservation Alliance, Inc. (1 page)

**CCRPA**

**California Cultural Resource Preservation Alliance, Inc.**

**P.O. Box 54132  
Irvine, CA 92619-4132**

**An alliance of American Indian and scientific communities working for  
the preservation of archaeological sites and other cultural resources.**

April 3, 2012

Carrie Tai, Senior Planner  
City of Lake Forest  
25550 Commercentre Drive, suite 100  
Lake Forest, CA 92630

**RECEIVED**

APR 05 2012

**CITY OF LAKE FOREST  
DEVELOPMENT SERVICES DEPT**

Re: Draft Supplemental Environmental Impact Report (DSEIR) for the Shea/Baker Ranch Area Plan and Tentative Tract Map

In my letter of February 14, 2012 regarding this project, I expressed our concerns regarding the reliance on archaeological monitoring to identify significant archaeological sites and the wording that an archaeological resource needed to be unique in order to be considered. I did not receive a response to these concerns, but in reading the cultural resource portions of the Draft Environmental Impact report it appears that sites determined to be significant under CEQA guidelines will also be considered. It also appears that some archaeological testing was conducted.

O1-1

The DSEIR seems to consist of regulations/ordinances taken from County of Orange. With the requirements for open space there is an opportunity for preservation of significant archaeological sites, if discovered, however the Section IV Open Space Use Regulations and Site Development Standards barely mention archaeological resources and there is no mention of the potential for preservation. Likewise the sections discussing archaeology (pg. 6 Literature Search, and Subsurface Investigation; and pg. 29 Pregrading and Salvage) focus on excavation as mitigation and do not consider preservation measures. I was surprised to see that salvage excavations are recommended. This is archaic language from pre-CEQA times and has a bad connotation of an expedient and careless excavation to clear the way for construction.

O1-2

In summary, the City of Lake Forest is permitting the development of all most all of its open space and it seems that not one archaeological site will be preserved. Archaeological sites are fragile and non-renewable and archaeology as it is practiced today is a destructive process. These sites hold a special significance for Native American Descendants and are a part of our national heritage. I would hope that the City would place a higher value on these resources and require more consideration to be given to preservation measures.

O1-3

Sincerely,



Patricia Martz, Ph.D.  
President

## *2. Response to Comments*

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## 2. Response to Comments

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### **O1. Response to Comments from Patricia Martz, PhD, President, CA Cultural Resource Preservation Alliance, Inc., dated April 3, 2012.**

- O1-1 The comments were addressed generally in Chapter 2, Table 2-1, *NOP Responses*, of the DSEIR. Table 2-1 states that the Modified Initial Study (DSEIR Appendix A) determined that no new impacts related to cultural resources would result from implementation of the SBRA Project. The project's potential impacts are discussed in Section 3.5, *Cultural Resources*, of the Modified Initial Study. As discussed in Section 3.5, the project site has been extensively studied, including a Phase II Archaeological Evaluation and Phase I Cultural Resources Reconnaissance Survey. Test excavations in 2009 did not recover any artifacts at any known prehistoric sites and it was determined that they have no potential to contribute new information to history and that no further work is required for this site. Twelve archaeological sites were identified on the seven OSA project sites in the OSA PEIR. The specific nature and location of those sites was not disclosed for the protection of those sites and resources. Impacts to archaeological resources were identified as less than significant, after implementation of mitigation. None of those sites are located on the SBRA Project site. As with the OSA PEIR, project impacts to archaeological resources were found to be potentially significant without mitigation. Implementation of Mitigation Measures CR MM-1 through CR MM-4 (OSA PEIR mitigation measures 3.5-1 through 3.5-4) impacts would be reduced to a less than significant level. Therefore, the proposed project does not result in any new impacts compared to those identified in the OSA PEIR.
- O1-2 Consideration of preservation measures is required by the project's mitigation measures. Mitigation Measure CR MM-1 clearly states that "If the archaeological resource is determined to be a unique archaeological resource, options for avoidance or preservation in place shall be evaluated and implemented if feasible. In the event that avoidance or preservation in place is infeasible and the archaeologist determines that the potential for significant impacts to such resources exists, a data recovery program shall be expeditiously conducted." Salvage is an acceptable alternative when preservation in place is not feasible. The project's mitigation measures are adequate, require monitoring, and have been amended to include Native American involvement with any prehistoric archaeological sites newly discovered and to insure that the study of fossils recovered includes a research design that will place these resources into a regional context, not just produce another list. Furthermore, while project proposes approximately 100 acres of open space, the site's existing General Plan land use designations consist of Mixed-Use (MU), Low Density Residential (LDR), Medium Density Residential (MDR), Low-Medium Density Residential (L-MDR), and Open Space (OS). The City of Lake Forest is not permitting the development of "all" or "most all" of its open space. In fact, no development is being permitted on land designated as open space the City's General Plan or Zoning Code.
- O1-3 See Response to Comment O1-02. If the archaeological resource is determined to be a unique archaeological resource, options for avoidance or preservation in place shall be evaluated and implemented if feasible. As discussed in Section 3.5, letters requesting information on any known heritage sites, and containing maps and project information were sent to the 15 Native American contacts on August 8, 2011. Mitigation measure CR MM-1 ensures that Native American representatives shall be

## *2. Response to Comments*

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retained to observe activities if prehistoric archaeological sites are discovered during monitoring of earthmoving.



### 3. *Revisions to the Draft SEIR*

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#### 3.1 INTRODUCTION

This section contains revisions to the DSEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DSEIR publication; and/or (3) typographical errors. Changes made to the DSEIR are identified here in ~~strikeout text~~ to indicate deletions and in underlined text to signify additions.

#### 3.2 DSEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DSEIR.

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**Page 165 and 166, of DSEIR Appendix A, *Initial Study*, is hereby revised globally in response to Comment A3-1, from City of Irvine as follows:**

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Any reference to “Traffic Study Addendum” on page 165-166 of the Initial Study is hereby globally revised and understood to refer to “Construction and Development Phase Addendum Traffic Study.” This study is contained in DSEIR A (Initial Study Appendix H).

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**Page 7-12, Section 7.5.1 *Air Quality*, is hereby revised as follows:**

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Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The project’s unmitigated mobile source emissions would exceed established SCAQMD thresholds for VOC, CO, PM10, and NOx; refer to Table 5.1-15, Long-Term Regional Operational Emissions. Despite implementation of Mitigation Measures AQ MM-1 through AQ MM-45 7, these emissions would remain above SCAQMD thresholds.

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**Page 6, of Initial Study Appendix H, *Traffic Study*, (DSEIR Appendix A) is hereby revised as follows:**

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AFA confirmed that the original study area identified in the OSA EIR is consistent with the latest vacant land proposals and updated land use in adjacent cities (e.g., Irvine). To compile the traffic data, AFA used the LFTAM to obtain the differential between the original (in 2005) and the latest Lake Forest vacant land development assumptions including the SBRA project update. The most recent data for the OSA per the approved Alternative 7 conditions presented for Irvine locations in the extended study area were verified with the most recent Irvine Transportation Analysis Model (ITAM), Version 8.4-10.~~The differential was then applied to the latest ITAM 8.4-10 Post-2030 forecasts resulting in the traffic volumes for the extended study area.~~ A memorandum prepared by AFA describing these findings is included as Appendix B to this traffic study. Their analysis concluded that the proposed project would not result in impacts outside of the City of Lake Forest above and beyond those identified in the OSA EIR.



### *3. Revisions to the Draft EIR*

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*Appendix A. Austin-Foust Associates, Inc. Report dated  
March 2, 2011*



*Appendices*

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## MEMORANDUM

TO: Bob Woodings, City of Lake Forest

FROM: Krys Saldivar, Associate.

DATE: March 2, 2011

SUBJECT: **Lake Forest Traffic Model and Irvine Traffic Model Comparison**

Dear Mr. Woodings:

Austin-Foust Associates, Inc. (AFA) has reviewed the socioeconomic data (SED) included in the Lake Forest Traffic Analysis Model (LFTAM) and the Irvine Transportation Analysis Model (ITAM), 8.4-10 version, for the areas encompassing the Vacant Land Opportunities (VLO) Development Areas in the City of Lake Forest. The attached report presents a comparison of the SED for the two traffic models.

If you have any questions or comments regarding this report, please do not hesitate to contact me via phone (714-667-0496) or e-mail ([krys@austinfoust.com](mailto:krys@austinfoust.com)).

689013mm.doc

## **City of Lake Forest**

# **LAKE FOREST TRAFFIC MODEL AND IRVINE TRAFFIC MODEL COMPARISON**

Austin-Foust Associates, Inc. (AFA) has reviewed the socioeconomic data (SED) included in the Lake Forest Traffic Analysis Model (LFTAM) and the Irvine Transportation Analysis Model (ITAM), 8.4-10 version, for the areas encompassing the Vacant Land Opportunities (VLO) Development Areas in the City of Lake Forest. The SED and resulting trip generation for the two traffic models are presented along with a discussion regarding traffic model forecasts.

### **ZONE STRUCTURE**

In the ITAM, the VLO areas are in two distinct areas referred to as the “primary focus area” and “tier 2” (see Figure 1). The ITAM traffic analysis zones (TAZ) in which the land uses for the VLO areas are located together with other uses are consistent with the Orange County Traffic Analysis Model (OCTAM) 3.2 TAZ boundaries. Figure 2 shows the VLO areas in the LFTAM zone system.

### **SOCIOECONOMIC DATA**

The SED for General Plan buildout conditions (i.e., 2030/Post-2030 ITAM and 2030 LFTAM) in the VLO areas are summarized in Table 1. The SED is compiled according to OCTAM 3.2 (ITAM tier 2 area only), ITAM 8.4-10, and LFTAM zones. As noted above, the zones include not only the Lake Forest VLO land uses but also existing land uses.

### **TRIP GENERATION**

As can be seen in Table 1, the greatest trip generation discrepancy for an area based on percentage is 204 percent which occurs in Baker Ranch with a trip generation that is higher in the LFTAM by around 16,000 average daily trips (ADT) compared to the ITAM. However, the ITAM for Portola Center is higher by around 47 percent with an ADT of around 23,000 more in the ITAM than the LFTAM. The distribution of land uses somewhat balances from area to area and only amounts to a total percentage difference of 10 percent among all the areas analyzed which translates to a higher ADT of around 16,000 in the ITAM than the LFTAM.

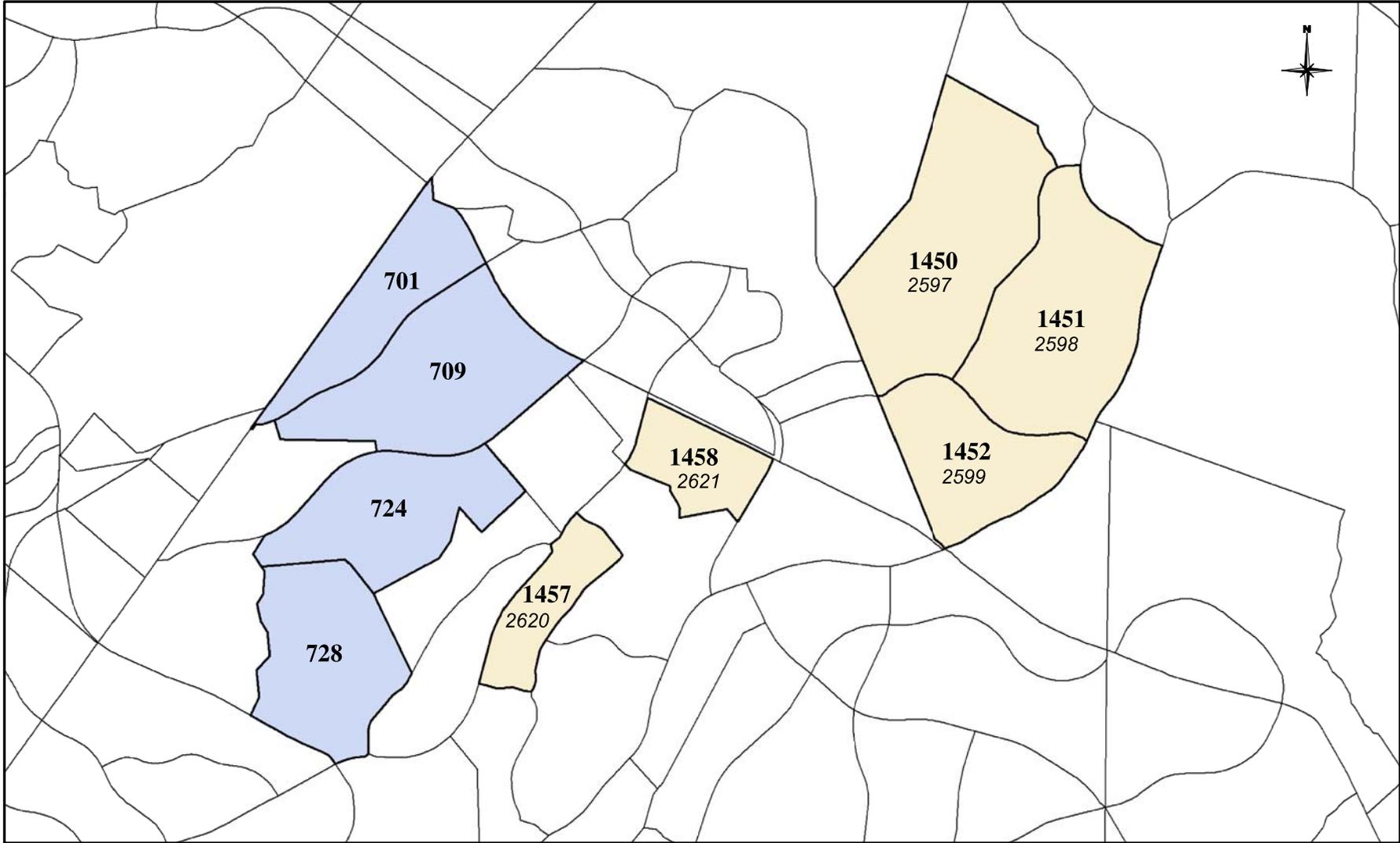
## **TRAFFIC MODEL USAGE**

This section discusses the appropriate use of each traffic model. According to previously Irvine approved project scopes of work (i.e., the 2006 Heritage Fields and the 2008 Planning Area 40 General Plan Amendment/Zone Change traffic studies), any analysis that identifies potential project impact in the City of Lake Forest shall reflect the LFTAM forecasts. Likewise, Lake Forest traffic studies have utilized forecasts from the ITAM to reflect data in the City of Irvine should the traffic study area include locations in the City of Irvine. This method of which traffic model to use was outlined and agreed to by the City of Irvine in a letter that was sent to the City of Lake Forest. We recommend that this practice continue.

Even though both the LFTAM and ITAM are derived from the Orange County Transportation Analysis Model (OCTAM) Version 3.2 maintained by the Orange County Transportation Authority (OCTA), the LFTAM is more detailed in traffic analysis zone structure (enabling better usage access), land uses (that are converted to SED before insertion into the model), highway network and, using existing data, has been calibrated for intersections and roadway locations within the City of Lake Forest. As previously mentioned, the ITAM zone structure in Lake Forest follows the much larger OCTAM zones. The trip generation discrepancy mentioned above also supports that the LFTAM be used for presenting traffic data in the City of Lake Forest.

## **CONCLUSION**

The trip generation between the LFTAM and ITAM is only slightly different with the ITAM being higher. As in past studies, it is recommended that the practice of using LFTAM for forecasting Lake Forest intersections and the ITAM for City of Irvine locations continue for any future traffic analyses involving either city. The LFTAM has a more refined zone structure as well as land uses than the ITAM in the City of Lake Forest. The same can be said for the ITAM.



Legend	
	Project zones within ITAM primary focus area
	Project zones within ITAM tier 2 area
<b>701</b>	ITAM 8.4.10 zone number
<b>2597</b>	OCTAM 3.2 zone number

Figure 1  
 ITAM 8.4-10 AND OCTAM 3.2 ZONES  
 IN LAKE FOREST AREA

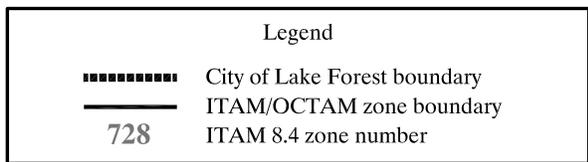
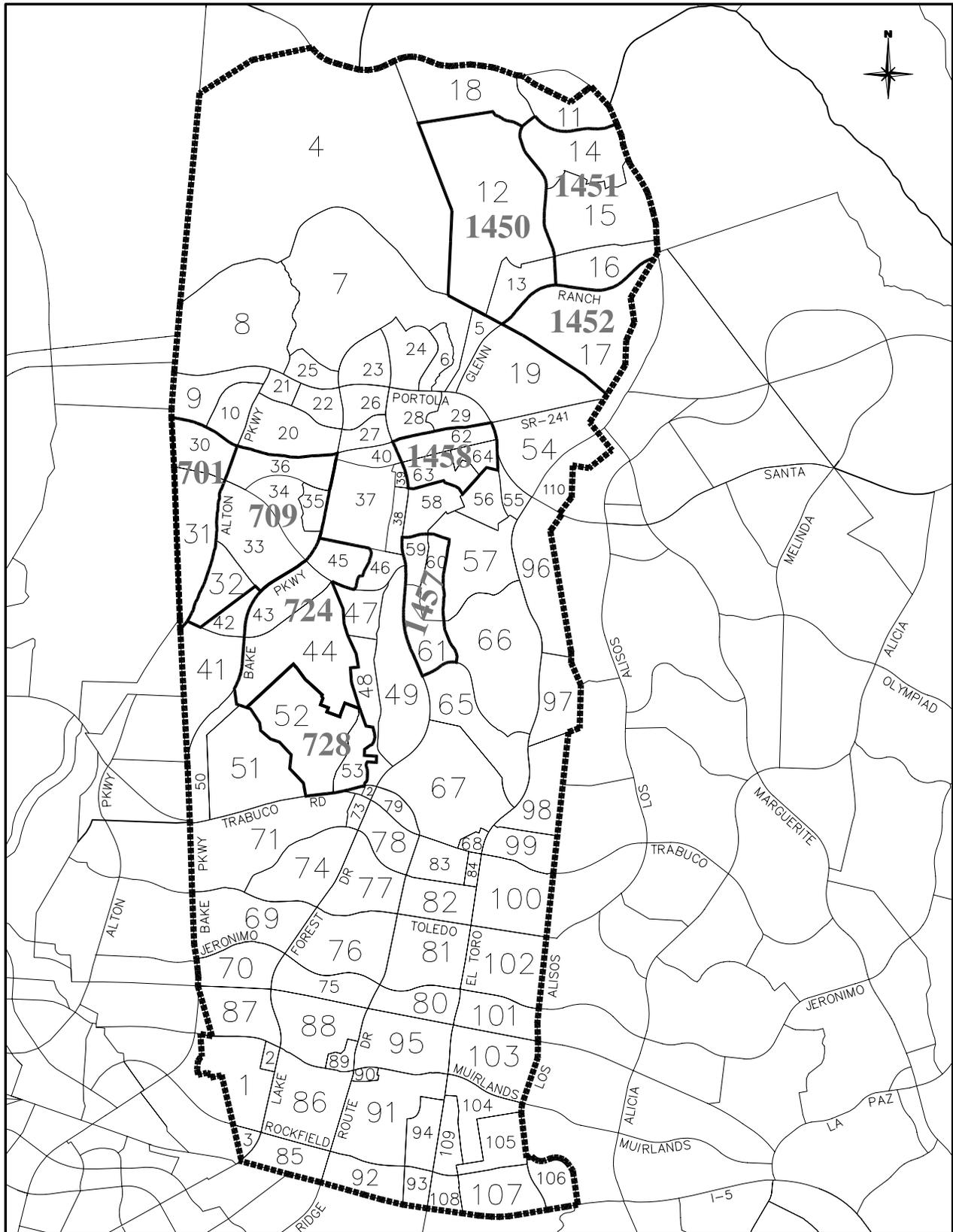


Figure 2  
**LAKE FOREST TRAFFIC ANALYSIS MODEL  
 (LFTAM) ZONE SYSTEM  
 - CITY OF LAKE FOREST**

Table 1

ITAM VERSUS LFTAM SOCIOECONOMIC DATA  
(VACANT LAND OPPORTUNITIES DEVELOPMENT AREAS)

SED CATEGORY	ITAM			LFTAM			Difference		
	Amount	Unit	ADT	Amount	Unit	ADT	Amount	Unit	ADT
<b>SHEA/BAKER PLUS OTHERS</b>									
<b>ITAM 701, LFTAM 30,31</b>									
1	328	DU		358	DU	1,253	30	DU	
2	439	DU		264	DU	686	-175	DU	
3	2,229	Pop		1,831	Pop	989	-398	Pop	
4	1,260	E-R		1,031	E-R	1,289	-229	E-R	
5	50	\$Mil		41	\$Mil	1,186	-9	\$Mil	
6	7	Emp		0	Emp	0	-7	Emp	
7	481	Emp		494	Emp	2,915	13	Emp	
8	1,081	Emp		1,275	Emp	4,208	194	Emp	
TOTAL			13,303			12,526			-777
<b>ITAM 709, LFTAM 32-36</b>									
1	534	DU		862	DU	3,018	328	DU	
2	1,448	DU		616	DU	1,602	-832	DU	
3	5,392	Pop		4,108	Pop	2,218	-1,284	Pop	
4	3,128	E-R		2,369	E-R	2,963	-759	E-R	
5	129	\$Mil		89	\$Mil	2,584	-40	\$Mil	
6	176	Emp		30	Emp	750	-146	Emp	
7	789	Emp		769	Emp	4,537	-20	Emp	
8	1,330	Emp		1,793	Emp	5,917	463	Emp	
TOTAL			30,169			23,589			-6,580
<b>TOTAL SHEA/BAKER PLUS OTHERS</b>									
1	862	DU		1,220	DU	4,271	358	DU	
2	1,887	DU		880	DU	2,288	-1,007	DU	
3	7,621	Pop		5,939	Pop	3,207	-1,682	Pop	
4	4,388	E-R		3,400	E-R	4,252	-988	E-R	
5	179	\$Mil		130	\$Mil	3,770	-49	\$Mil	
6	183	Emp		30	Emp	750	-153	Emp	
7	1,270	Emp		1,263	Emp	7,452	-7	Emp	
8	2,411	Emp		3,068	Emp	10,125	657	Emp	
TOTAL SHEA/BAKER PLUS OTHERS			43,472			36,115			-7,357
									-17%
<b>IRWD PLUS OTHERS</b>									
<b>ITAM 724, LFTAM 43-45</b>									
1	0	DU		150	DU	525	150	DU	
2	816	DU		458	DU	1,191	-358	DU	
3	1,796	Pop		1,740	Pop	940	-56	Pop	
4	1,143	E-R		988	E-R	1,235	-155	E-R	
5	53	\$Mil		38	\$Mil	1,101	-15	\$Mil	
6	57	Emp		53	Emp	1,325	-4	Emp	
7	2,511	Emp		2,198	Emp	12,969	-313	Emp	
8	5,029	Emp		5,066	Emp	16,718	37	Emp	
TOTAL IRWD PLUS OTHERS			39,646			36,004			-3,642
									-9%

Table 1 (cont.)

ITAM VERSUS LFTAM SOCIOECONOMIC DATA  
(VACANT LAND OPPORTUNITIES DEVELOPMENT AREAS)

SED CATEGORY	ITAM			LFTAM			Difference		
	Amount	Unit	ADT	Amount	Unit	ADT	Amount	Unit	ADT
<b>PACIFIC HERITAGE PLUS OTHERS</b>									
ITAM 728, LFTAM 52, 53									
1 Single Family Residential	370	DU		373	DU	1,306	3	DU	
2 Multi-Family Residential	1,175	DU		1,175	DU	3,055	0	DU	
3 Population	4,196	Pop		4,204	Pop	2,270	8	Pop	
4 Employed Residents	2,435	E-R		2,439	E-R	3,049	4	E-R	
5 Income	95	\$Mil		89	\$Mil	2,586	-6	\$Mil	
6 Retail Employment	0	Emp		0	Emp	0	0	Emp	
7 Service Employment	0	Emp		0	Emp	0	0	Emp	
8 Other Employment	22	Emp		22	Emp	72	0	Emp	
<b>TOTAL PACIFIC HERITAGE PLUS OTHERS</b>									
									-323
									-3%
<b>WHISLER PLUS OTHERS</b>									
ITAM 1457 (OCTAM 2620), LFTAM 59-61									
1 Single Family Residential	29	DU		117	DU	410	88	DU	
2 Multi-Family Residential	1,076	DU		1,061	DU	2,759	-15	DU	
3 Population	2,908	Pop		2,793	Pop	1,508	-115	Pop	
4 Employed Residents	1,719	E-R		1,718	E-R	2,148	-1	E-R	
5 Income	48	\$Mil		54	\$Mil	1,567	6	\$Mil	
6 Retail Employment	161	Emp		257	Emp	6,425	96	Emp	
7 Service Employment	476	Emp		203	Emp	1,198	-273	Emp	
8 Other Employment	624	Emp		64	Emp	211	-560	Emp	
<b>TOTAL WHISLER PLUS OTHERS</b>									
									1,817
									13%
<b>BAKER RANCH PLUS OTHERS</b>									
ITAM 1458 (OCTAM 2621), LFTAM 62-64									
1 Single Family Residential	21	DU		0	DU		-21	DU	
2 Multi-Family Residential	0	DU		0	DU		0	DU	
3 Population	94	Pop		0	Pop		-94	Pop	
4 Employed Residents	50	E-R		0	E-R		-50	E-R	
5 Income	2	\$Mil		0	\$Mil		-2	\$Mil	
6 Retail Employment	128	Emp		572	Emp	14,300	444	Emp	
7 Service Employment	128	Emp		981	Emp	5,788	853	Emp	
8 Other Employment	1,340	Emp		1,419	Emp	4,683	79	Emp	
<b>TOTAL BAKER RANCH PLUS OTHERS</b>									
									16,613
									204%

Table 1 (cont.)

ITAM VERSUS LFTAM SOCIOECONOMIC DATA  
(VACANT LAND OPPORTUNITIES DEVELOPMENT AREAS)

SED CATEGORY	ITAM			LFTAM			Difference		
	Amount	Unit	ADT	Amount	Unit	ADT	Amount	Unit	ADT
PORTOLA CENTER PLUS OTHERS									
ITAM 1450 (OCTAM 2597), LFTAM 12,13									
1	382	DU		434	DU	1,519	52	DU	
2	270	DU		300	DU	780	30	DU	
3	2,109	Pop		2,164	Pop	1,168	55	Pop	
4	1,063	E-R		1,218	E-R	1,523	155	E-R	
5	53	\$Mil		48	\$Mil	1,404	-5	\$Mil	
6	104	Emp							
7	258	Emp							
8	1,923	Emp		110	Emp	363	-1,813	Emp	
TOTAL			16,498			6,757			-9,741
ITAM 1451 (OCTAM 2598), LFTAM 14-16									
1	534	DU		1,019	DU	3,567	485	DU	
2	496	DU		198	DU	515	-298	DU	
3	3,265	Pop		3,663	Pop	1,979	398	Pop	
4	1,874	E-R		2,049	E-R	2,562	175	E-R	
5	82	\$Mil		83	\$Mil	2,413	1	\$Mil	
6	214	Emp		0	Emp		-214	Emp	
7	336	Emp		0	Emp		-336	Emp	
8	1,293	Emp		153	Emp	505	-1,140	Emp	
9	1,313	Stu		1,166	Stu	1,049	-147	Stu	
TOTAL			21,306			12,590			-8,716
ITAM 1452 (OCTAM 2599), LFTAM 17									
1	0	DU		198	DU	693	198	DU	
2	0	DU		449	DU	1,167	449	DU	
3	0	Pop		1,812	Pop	978	1,812	Pop	
4	0	E-R		1,039	E-R	1,299	1,039	E-R	
5	0	\$Mil		39	\$Mil	1,136	39	\$Mil	
6	0	Emp		48	Emp	1,200	48	Emp	
7	810	Emp		32	Emp	189	-778	Emp	
8	1,839	Emp		13	Emp	43	-1,826	Emp	
TOTAL			11,411			6,705			-4,706
TOTAL PORTOLA CENTER PLUS OTHERS									
1	916	DU		1,651	DU	5,779	735	DU	
2	766	DU		947	DU	2,462	181	DU	
3	5,374	Pop		7,639	Pop	4,125	2,265	Pop	
4	2,937	E-R		4,306	E-R	5,384	1,369	E-R	
5	135	\$Mil		171	\$Mil	4,953	36	\$Mil	
6	318	Emp		48	Emp	1,200	-270	Emp	
7	1,404	Emp		32	Emp	189	-1,372	Emp	
8	5,055	Emp		276	Emp	911	-4,779	Emp	
TOTAL PORTOLA CENTER PLUS OTHERS			49,215			26,052			-23,163
									-47%
TOTAL AREAS ANALYZED IN THIS TABLE									
			167,561			151,506			-16,055
									-10%

*Appendix B. Revised Table 1, Traffic Study Appendix B (Initial Study Appendix H)*



# *Appendices*

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Table 1

## POST-2030 EXTENDED STUDY AREA INTERSECTION LOS SUMMARY

Intersection	ITAM OSA Alternative 7				ITAM 8.4-10				Difference	
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM
	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS		
100. Portola Pkwy. at SR-241 NB Ramps	.60	A	.74	C	.57	A	.40	A	-.03	-.34
101. Portola Pkwy. at SR-241 SB Ramps	.56	A	.52	A	.45	A	.42	A	-.11	-.10
102. Ridge Valley at Portola Pkwy.	.57	A	.90	D	.65	B	.60	A	.08	-.30
103. Sand Canyon Av. at Portola Pkwy.	.74	C	.71	C	.51	A	.58	A	-.23	-.13
104. Jeffrey Rd. at Portola Pkwy.	.76	C	.62	B	.70	B	.64	B	-.06	.02
105. Alton Pkwy. at Irvine Bl.	.90	D	1.01	F	1.02	F	1.00	E	.12	-.01
With-Mitigation	.76	C	.93	E	.92	E	.89	D	.16	-.04
106. B St. at Irvine Bl.	.81	D	.75	C	.78	C	.77	C	-.03	.02
107. A St. at Irvine Bl.	.81	D	.84	D	.64	B	.62	B	-.17	-.22
108. Ridge Valley at Irvine Bl.	.74	C	.80	C	.73	C	.73	C	-.01	-.07
109. O St. at Irvine Bl.	.76	C	.66	B	.63	B	.74	C	-.13	.08
110. SR-133 NB Ramps at Irvine Bl.	.85	D	.73	C	.90	D	.76	C	.05	.03
111. SR-133 SB Ramps at Irvine Bl.	.79	C	.61	B	.62	B	.61	B	-.17	.00
112. Sand Canyon. Av. at Irvine Bl.	.85	D	.78	C	.75	C	.76	C	-.10	-.02
113. Jeffrey Rd. at Irvine Bl.	.83	D	.87	D	.78	C	.72	C	-.05	-.15
114. SR-133 NB Ramps at Trabuco	.59	A	.53	A	.61	B	.59	A	.02	.06
115. SR-133 SB Ramps at Trabuco	.57	A	.50	A	.47	A	.48	A	-.10	-.02
116. Sand Canyon. Av. at Trabuco	.84	D	.82	D	.73	C	.69	B	-.11	-.13
117. Alton Pkwy. at Toledo Wy.	.72	C	.92	E	.70	B	.70	B	-.02	-.22
118. Alton Pkwy. at Jeronimo Rd.	.72	C	.77	C	.67	B	.55	A	-.05	-.22
119. Alton Pkwy. at Barranca Pkwy.	.81	D	.87	D	.56	A	.64	B	-.25	-.23
120. Marine Wy. at Alton Pkwy.	.87	D	.87	D	.66	B	.65	B	-.21	-.22
121. Alton Pkwy. at Technology	.82	D	.84	D	.60	A	.87	D	-.22	.03
122. Alton Pkwy. at I-5 NB Ramps	.97	E	.58	A	.90	D	.51	A	-.07	-.07
123. Marine Wy. at Rockfield Bl.	.53	A	.56	A	.79	C	.67	B	.26	.11
124. Bake Pkwy. at Muirlands Bl.	.82	D	.85	D	.75	C	.92	E	-.07	.07
125. Bake Pkwy. at Rockfield Bl.	.69	B	.92	E	.76	C	.92	E	.07	.00
With-Mitigation	.76	C	.93	E	.74	C	.85	D	-.02	-.08
126. Bake Pkwy. at I-5 NB Ramps	.99	E	.93	E	.81	D	.58	A	-.18	-.35
127. Bake Pkwy. at I-5 SB Ramps	.87	D	.92	E	.81	D	.86	D	-.06	-.06
128. Bake Pkwy. at ICD	.42	A	.45	A	.53	A	.51	A	.11	.06
129. Lake Forest Dr. at ICD	.73	C	.82	D	.43	A	.56	A	-.30	-.26
130. Ridge Route at Moulton Pkwy.	.58	A	1.12	F	.53	A	.78	C	-.05	-.34
131. Santa Maria Av. at Moulton Pkwy.	.99	E	.99	E	.50	A	.60	A	-.49	-.39
132. El Toro Rd. at Moulton Pkwy.	1.18	F	1.02	F	.85	D	.92	E	-.33	-.10

Table 1

## POST-2030 EXTENDED STUDY AREA INTERSECTION LOS SUMMARY

Intersection	ITAM OSA Alternative 7				ITAM 8.4-10				Difference	
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM
	ICU	LOS	ICU	LOS	ICU	LOS	ICU	LOS		
137. Los Alisos Bl. at Trabuco	.94	E	.79	C	.69	B	.74	C	-.25	-.05
138. Trabuco Rd. at Alicia Pkwy.	.74	C	.94	E	.78	C	.92	E	.04	-.02
139. Jeronimo Rd. at Alicia Pk	.74	C	.78	C	.78	C	.78	C	.04	.00
140. Alicia Pkwy. at Muirlands Bl.	.92	E	.98	E	.67	B	.83	D	-.25	-.15
141. I-5 NB Ramps at Alicia Pkwy.	.39	A	.73	C	.44	A	.68	B	.05	-.05
142. I-5 SB Ramps at Alicia Pkwy.	.70	B	.76	C	.67	B	.75	C	-.03	-.01
143. Los Alisos Bl. at Avd. Carlota	.53	A	.73	C	.52	A	.61	B	-.01	-.12
144. El Toro Rd. at Paseo de Valencia	.64	B	.68	B	.69	B	.85	D	.05	.17