



CITY OF YORBA LINDA

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COMMUNITY DEVELOPMENT

February 3, 2014

Mr. Ron Tippetts, Planner
Current & Environmental Planning Section
County of Orange
OC Planning Services
P.O. Box 4048
Santa Ana, California 92702-4048

Subject: Comments on the November 2013 Esperanza Hills Draft Environmental Impact Report (Project No. PA120037)

Dear Mr. Tippetts:

The City of Yorba Linda has reviewed the County's November 2013 Esperanza Hills Draft Environmental Impact Report (EIR). Given the site's proximity to the City of Yorba Linda, and the potential for the Project to affect our communities, residents, and infrastructure, we have identified concerns related to the adequacy of the analysis under the California Environmental Quality Act (CEQA).

The City's comments on the Draft EIR are attached for your consideration and review. The City requests that the County revise the Draft EIR to fully address the attached comments and recirculate the document for public review to ensure compliance with CEQA.

We appreciate the opportunity to review the Draft EIR for the Esperanza Hills Project, and request to be included on any future CEQA distribution pertaining to the Project. Should you have any questions, please do not hesitate to contact me at 714.961.7130, or at sharris@yorbalinda.org.

Sincerely,

Steven K. Harris, AICP
Director of Community Development
City of Yorba Linda

cc: Mayor and Members of the Yorba Linda City Council
Mark Pulone, Yorba Linda City Manager
Todd Litfin, Yorba Linda City Attorney

GENERAL COMMENTS ON THE DRAFT EIR

1. The Draft EIR concludes that no significant unavoidable impacts involving air quality and aesthetics (scenic vistas and visual character) would occur as part of the proposed Project. The EIR's methodologies in analyzing these environmental issues appear to utilize aggressive assumptions to reach less than significant conclusions. For a project that includes as much as 16 million cubic yards of grading and substantial landform alteration, it is typical to see significant unavoidable adverse impacts related to short-term construction-related pollutant emissions and aesthetics.
2. The Esperanza Hills Draft EIR evaluates two options for site access, both of which propose primary and/or emergency access across the Cielo Vista property. Primary and emergency access are key aspects and environmental concerns associated with the proposed Esperanza Hills Project. The EIR acknowledges that an agreement between property owners must be entered into for the offsite improvements, prior to issuance of permits. However, the EIR does not propose alternative primary and/or emergency access that would not cross the Cielo Vista property, in the event an agreement is not successfully reached.
3. Given the potential for cumulative impacts when considering Cielo Vista combined with Esperanza Hills, the cumulative analyses for each project must address the other as a related project within their respective cumulative analyses. The Esperanza Hills EIR is unclear/inconsistent in its treatment of Bridal Hills (and other related projects) in the EIR's cumulative impact analyses. The Project Description Section (Page 4-2, Section 4.2, Paragraph 5) states that "Bridal Hills has been included in the Project analysis." This statement can be interpreted as Bridal Hills being assumed part of the Project. However, the author could be trying to communicate that Bridal Hills was assumed as part of the baseline condition, since the statement is included in the Existing Conditions Section. For greater confusion, the Summary of Cumulative Impacts Section (Page 7-1) states that Bridal Hills has been considered in the air quality, transportation/traffic, and population/housing cumulative analyses; however, Bridal Hills is not listed in Table 7-1-1, *Description of Related Projects*. Clarification regarding whether Bridal Hills is part of the baseline condition, with Project condition, or cumulative condition (a related cumulative project) is required. It is concerning that certain aspects of Bridal Hills (and other related projects) are assumed under different conditions rather than only the cumulative condition. This could invalidate the Project and cumulative impact analyses and findings of significance.
4. As noted within the City's NOP comment letter regarding the Project, the City of Yorba Linda would have discretionary approval authority over the proposed Project. As such, the City should be considered a responsible agency for the Project under CEQA Guidelines Section 15381.
5. The document often does not cite sources.

1.0 INTRODUCTION

Page/Section - Specific Comments

1. Page 1-1, Section 1.1, Bullet 2: "Zoning designation" is incorrect. Unincorporated OC is divided into zones or districts (per Orange County Municipal Code (OCMC) Section 7-9-49). Land use designations pertain to General Plan land use, while zones/districts pertain to zoning. Change "zoning designations" to "zoning districts." This change is global throughout EIR.
2. Page 1-1, Section 1.1, Bullet 3: Regarding reference to "Map," should be specific, since VTTM number is known. Revise to "proposed VTTM 17522." This change is global throughout EIR.
3. Page 1-2, Section 1.3, Last Sentence: The primary purpose of the Notice of Preparation (Section 21092) is to provide notice to the public. Please revise.
4. Page 1-3, Section 1.3, Line 1: Regarding reference to "The Comment letters," revise as "NOP comment letters received during the NOP review period" to avoid confusion with future Draft EIR comment letters.
5. Page 1-3, Table 1-3-1: The summary of main comments received in response to NOP public review period is missing. Please add.
6. Page 1-4, Section 1.3, Sentence 1: Revise/update to reflect the actual number of days (60?) in the Draft EIR public review period.
7. Page 1-4, Section 1.4, Bullet 2: The entire OC Code, not only the OC Zoning Code should be incorporated by reference. The correct title is "Codified Ordinances of the County of Orange." Please add.
8. Page 1-4, Section 1.4, Bullet 2: The entire City of Yorba Linda Municipal Code should be incorporated by reference. Please add.
9. Page 1-4, Section 1.4, Bullet 8: Regarding reference to OC 7A - Ready, Set, Go! It is a Program, not a document. Please revise/state the Program's pertinent documents.

2.0 EXECUTIVE SUMMARY

Global Comments

1. This Section must be revised/updated for consistency with the comments presented in Section 4 and Sections 5.1 through 5.15 below.
2. A summary of the Alternatives is not included in this section.

3.0 PROJECT HISTORY AND BACKGROUND

Page/Section - Specific Comments

1. Page 3-1, Section 3, Paragraph 1: The statement “substantially undeveloped” regarding the site is misleading. The site is undeveloped, except for various utilities/easements. Cielo Vista is introduced; discuss Bridal Hills, as well.
2. Page 3-1, Section 3, Paragraph 2: Need to clarify acreage for Murdock “larger parcel” (547 plus 469 equals 1,016?). Specify anticipated residential uses (? dwelling units).
3. Page 3-1, Section 3, Paragraph 4: Reference to “been designed to...” is out of place, since this is Background and History. Move to Project Description.
4. Page 3-1, Section 3, Paragraphs 2-5: Given the project site is unincorporated OC, discussions relevant to OC (i.e., paragraphs 4/5) should be before and separate from the Yorba Linda discussion (paragraph 2, line 5). Please add a discussion of the OC General Plan growth assumption. Please consolidate the Yorba Linda discussion (2005). Both are needed, but separate.
5. Page 3-1, Section 3, Paragraph 5: The reference to “381 structures” is not relevant to the Project. Add a discussion describing the Project site’s post fire condition.

4.0 PROJECT DESCRIPTION

Global Comments

1. This Section doesn’t provide sufficient detail pertaining to various Project components, including the Specific Plan, Vesting Tentative Tract Map (VTTM), and construction phasing/schedule.
2. This Section fails to describe the Pre-Annexation/Municipal Services Agreement and Preliminary Grading Plan.
3. All roadway sections or street improvements that are not of a public agency standard shall be deemed private streets and privately maintained.

Page/Section - Specific Comments

1. Page 4-1, Section 4.1, Paragraph 2, Line 5: Capitalize “Family.”
2. Page 4-1, Section 4.1, Paragraph 2: Statement “Chino Hills State Park, which lies between developed land in Orange, San Bernardino, and Riverside counties,” is not entirely accurate, since park is also surrounded by more open space/undeveloped lands. Please omit “developed land in.”
3. Page 4-1, Section 4.2, Paragraph 1: The sentence “The property supports a mix of habitats, including...” is misleading. For consistency with Table 5.3-2, identify all

habitats and use areas. List according to predominance. Also note they were affected to varying degrees, as a result of the 2008 Freeway Complex Fire, and refer to *Fire* discussion below.

4. Page 4-1, Section 4.2, Paragraph 2: The sentence “Four intermittent drainages are....” combines discussions on drainages with canyons, per Exhibit 4-8. However, there are seven drainages on or near the site; see Exhibit 5-24 and Table 5-3-3. As a result, identifying four canyons and four drainages in Exhibit 4-8 is confusing. For clarification and consistency, revise Exhibit 4-8 to show all seven drainages, and revise/replace discussions.
5. Page 4-2, Section 4.2, Paragraph 1: Canyon A is not described. Canyon B crosses more than just the western portion of site and multiple properties. Canyon C is not described. Revise/add discussions. Describe existing hiking and equestrian trails.
6. Page 4-2, Section 4.2, Paragraph 2: Add “Zone” to “Whittier Fault” and clarify that it is an Alquist-Priolo Earthquake Fault Zone (A-P Zone).
7. Page 4-2, Section 4.2, Paragraph 2: The term “used for” is misleading and overstates the functions of the water and energy utility easements on the site. Revise discussion; consider using “traversed by.”
8. Page 4-2, Section 4.2, Paragraph 2: The sentence “Oil production is anticipated to continue on the Project Site at existing locations” is out of place, since this is Existing Conditions. Move to *Project Characteristics* and discuss what is proposed.
9. Page 4-2, Section 4.2, Paragraph 4: The sentence “Because of the potential fire hazard....” is out of place, since this is Existing Conditions. Move to *Project Characteristics*.
10. Page 4-2, Section 4.2, Paragraph 5: The sentence “Therefore, Bridal Hills has been included in the Project analysis” is confusing, as it can be construed as being part of the Project. It is assumed the author is trying to communicate that Bridal Hills has been assumed as part of the baseline condition, since the statement is included in the *Existing Conditions* Section. Refer to General Comments on the Draft EIR Comment #3.
11. Page 4-2, Section 4.2, Table 4-2-1: Lists surrounding property owners not surrounding land uses. Please revise and add a discussion detailing the surrounding land uses.
12. Page 4-11, Section 4.3: Sections 4.3 and 4.0 are both named *Project Description*. To avoid confusion, rename Section 4.3 to “Project Characteristics.”
13. Page 4-11, Section 4.3, Paragraph 1: The two options are introduced here in the second sentence referring to exhibits. However, there is no nexus to the approach taken in the EIR. To clarify, a sentence should be added following the exhibit references briefly explaining that the EIR addresses two options equally and that they vary primarily with respect to the primary connection and secondary emergency access roadway alignments, as further described below.

14. Page 4-11, Section 4.3: The primary Project components, as identified in Section 1.1, *Purpose of the DEIR*, are: Specific Plan; Vesting Tentative Tract Maps; and Pre-Annexation/Municipal Services Agreement. Additional entitlements (General Plan Amendment and Zone Change) are also identified. Although, the Specific Plan is a primary Project component that will serve the planning and regulatory functions of development of the Project site, this function is obscure in Section 4.3 and the Specific Plan is only mentioned in passing. To better communicate the Specific Plan's role, this section would benefit by introducing the Specific Plan in first paragraph and organize the balance of the section consistent with the Specific Plan document.
 - a. Two additional Project components, the VTTM and Construction/Phasing are not discussed in sufficient detail. The purposes of Vesting Tentative Tract Map (VTTM) No. 17522 are included in Section 4.7.3, but no description (number of parcels, acreages, etc.) or Exhibit is provided. Please describe VTTM and Construction/Phasing in greater detail. Two additional Project components are not mentioned at all in this section: Pre-Annexation/Municipal Services Agreement; and Preliminary Grading Plan. Each Project component/action should be discussed in sufficient detail in Section 4.3 to support the impact analyses and conclusions.
15. Page 4-11, Section 4.3, Paragraph 4: Given an agreement between property owners would be key to providing adequate site and emergency access to the Project, it should not be mentioned merely in passing. This agreement should be discussed in greater detail and added to the list of "permits and other approvals."
16. Page 4-12, Section 4.3, Access: The descriptions of Options 1 and 2 included in this *Access* Section are essentially the same as descriptions included in the *Project Entry* Section (page 4-19) below. Additionally, the acreage descriptions provided here pertain to the VTTM/grading discussions, but not access. The *Project Entry* Section below is a misnomer; it should be renamed "Access and Circulation" and the discussion from Page 4-12 moved/consolidated with the Page 4-19 discussion. The acreages, etc. should be included in the VTTM Section, per comment above.
17. Page 4-18, Section 4.3, Trails, Paragraph 1: Esperanza Hills Homeowners' Association is misspelled.
18. Page 4-18, Section 4.3, Trails, Paragraph 2: Three trail systems are introduced, but only one (equestrian) is described. Add descriptions of other (multi-use and pedestrian) trail systems.
19. Page 4-18 Trails: Will these trails be available to the adjacent public access or only privately to the Esperanza Hills HOA?
20. Page 4-18 Parks/Open Space: There is reference to off-leash dog areas. Are these areas enclosed with a fence? If not, there may be a conflict with the City's municipal code regarding off-leash dogs.

21. Page 4-19, Section 4.3, Fuel Modification: This Section references a “Fuel Modification/Fire Protection Plan,” which is assumed to be the “Fire Protection and Emergency Evacuation Plan” (Appendix J). Please refer to Plan according to its actual title and consistently throughout EIR. Please refer reader to Appendix J in this paragraph. References to other plan/documents throughout the EIR should similarly be consistent with their actual and throughout EIR.
22. Page 4-19, Section 4.3, Project Entry: Rename to Access and Circulation and discuss circulation per Exhibit 4-12.
23. Page 4-20 Section 4.3 Infrastructure: The last paragraph refers to 3 cell towers on-site will the City of Yorba Linda have opportunity to view and approve the camouflage type(s) presented?
24. Pages 4-21 and 4-23, Section 4.3, Exhibits 4-12 and 4-13: Traffic calming features shall be considered for all downhill streets.
25. Page 4-25, Section 4.4: Is this Environmental Features discussion trying to communicate the Project “design features” (PDF)? If so, this should be clarified. Also, include a statement that the PDF would be required as conditions of approval (COA). If PDFs, then the section is incomplete, since many are discussed throughout impact analyses.
26. Page 4-25, Section 4.5: Refer to Section 4.3 discussion above regarding Specific Plan not being discussed in sufficient detail.
27. Page 4-25, Section 4.6, Construction Schedule: The *Construction Schedule* is described in paragraph form and difficult to follow. The commencement and completion dates are not specified/discussed. Paragraph 1 in Section 4.3 and Table 4-3-1 discuss two phases. No discussion is provided in the construction schedule. This lack of detail creates potential for inconsistencies in assumptions, etc., and could invalidate impact analyses and conclusions. The section states grading would take up to two years and that it would be balanced onsite. However, the grading/estimated earthwork for the Project (for each option) is not discussed in the Project Description; instead, it’s included in the Air Quality Section; see also Table 5-2-6. A new Preliminary Grading Plan section is needed, as well as the Preliminary Grading Plan Exhibits for each option. It is noted, a Preliminary Grading Plan is provided for Alternative Option 2A.
28. Page 4-26, Section 4.6, Paragraph 1: Best management practices are intended to minimize construction-related impacts on water quality; surrounding uses is too broad.
29. Page 4-26, Section 4.7: Pre-Annexation/Municipal Services Agreement, DOGGR Permit, agreement between property owners (for offsite improvements), and resource agency permits should be added to this Section.
30. Section 4.7.3: VTTM 17522 is a proposed Project component - not future. Replace “will include preparation of” with “proposes.” See comment above regarding need for additional detail on VTTM 17522.

31. Page 4-26, Section 4.8: Add a drainage and water quality objective that addresses protection of drainage facilities, sustainable/low impact development (LID), and the Clean Water Act.

5.1 AESTHETICS

Global Comments

1. The analysis does not adequately describe the resultant wall features (e.g., retaining walls or secondary soundwalls), which descriptions of the locations, lengths, and maximum wall heights. This analysis needs to clearly identify these structures, which would have views to them, how would they change the character of the community, if they are consistent with the regulatory requirements regarding these structures, and if any additional mitigation measures are necessary.
2. The Aesthetics Section does not mention the proposed Specific Plan. With regard to Aesthetics, this regulatory tool proposed is important because it regulates the proposed character of the project. The analysis should identify what regulations would be imposed on the project and that the project is consistent. Then an analysis should be presented on how these imposed regulations impact the character of the surrounding community.
3. The impact analysis identifies measures that the Applicant would be required to implement measures. However, it is not clear what the regulatory implementing tool (e.g., the existing Municipal Code, which no longer applies, or the proposed specific plan) is being referred to, or if this is referring to a proposed mitigation measure.
4. A methodology for the preparation of the photosimulations should be summarized. Also, project feature assumptions should be discussed. The Draft EIR should clearly identify which build options were simulated and why. In addition to the proposed structures, the Draft EIR should identify what landscaping was simulated, including whether or not the managed vegetation was included, whether or not 5-year, 10-year, or mature vegetation growth was assumed. Other assumptions would include wall features (such as retaining walls, soundwalls, or the proposed fire wall noted in Section 5.7).
5. The View analysis should be broken up between scenic vistas/views and general views that represent a potential change in character/quality at the site and in the surrounding area. With regard to scenic vistas/views, the Regulatory Framework should be pulled in to identify the community's intent for the view and whether or not project implementation maintains those community goals and objectives. For those views pertaining to the character/quality, it should be clearly identified how the project is changing the character and whether or not those changes are consistent with the existing character and if those changes result in landscape quality degradation.

Page/Section - Specific Comments

1. Page 5-1, 1st Paragraph, 3rd Sentence: Delete the word "logically".

2. Page 5-2, 3rd Paragraph: This discussion should also clarify whether or not City of Yorba Linda Parks (e.g., XX) have views toward the project site.
3. Page 5-4, 1st Paragraph: This discussion should be included in the existing conditions rather than the regulatory framework.
4. Page 5-9, Last Paragraph: This discussion references two existing oil wells, whereas there is actually three existing operating oil wells. These wells are also noted to possibly be relocated to the Cielo Vista Project. The Cielo Vista Draft EIR does not mention taking on new oil operations at this site. The analysis should clarify that no impacts to the future Cielo Vista residents would occur.
5. Page 5-27, Long-Term Impacts Analysis: This analysis needs to be revised to clearly state what changes to the character of the view result. A discussion of the project's consistency with a particular Regulatory Framework goals and objects for particular views need to be clearly identified in order to come to a conclusion if the project impacts particular views in the City/County.
6. Page 5-27, Long-Term Impacts Analysis: Throughout this section, the Draft EIR states that the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings, but the analysis does not specify why for each particular View.
7. Page 5-57, 2nd Paragraph: This discussion should reference whether or not the proposed grading and Specific Plan Regulatory Framework pertaining to grading are consistent with the City of Yorba Linda's Hillside Ordinance. As this City ordinance is key in maintaining the existing character/quality of the surrounding area, it is important to note if this project is changing that established landscape.
8. Page 5-59, Last Paragraph: This discussion should include the City's Hillside Development Ordinance (particularly with respect to grading activities).
9. Page 5-62, 5.1.7, Level of Significance After Mitigation: This section needs to be updated accordingly. Specific ways that PDFs and Mitigation Measure reduce impacts to particular designated scenic views/vistas (including those from City of Yorba Linda Parks, the State Park, and scenic view corridors such as SR-91) and the overall character/quality of the site and the area needs to be clearly identified. With regard to the character quality, the Draft EIR should specifically identify City/County goals and objectives for both scenic vistas and character quality, the PDFs and Mitigation Measures need to clearly identify how those are being achieved, and the project and proposed Specific Plan need to clearly identify consistency with the City of Yorba Linda's Hillside Grading Ordinance.
10. Page 5-64, 2. Long Term: This discussion needs to be revised, no mitigation measures were recommended.

5.2 AIR QUALITY

Global Comments

1. The analysis uses an outdated version of the CalEEMod program. The analysis should be updated with the latest version (version 2013.2.2).
2. The analysis should address the project's consistency with the SCAQMD 2012 Air Quality Management Plan.
3. The analysis should address any emissions or potential impacts to the proposed residences from the on-site oil wells that will remain in operation and their potential impact to the proposed residential uses.
4. Pursuant to guidance issued by the Office of Planning and Research, the construction analysis should address Naturally Occurring Asbestos. Refer to: http://opr.ca.gov/planning/publications/asbestos_advisory.pdf.

Air Quality Technical Study Comments

In addition to the applicable comments to Section 5.2 of the Draft EIR, the following comments apply to the technical study:

1. The technical study should include a project description to clearly define what is being analyzed in the study.
2. Health Risk Assessment Outputs: Based on the reported annual emissions of 0.96 tons, the source emissions rate of 0.34×10^{-2} grams per second appears too small (by a factor of 10). Please provide additional description of the methodology including the source treatment.
3. Health Risk Assessment Outputs: Please provide the CalEEMod outputs that were utilized for the health risk analysis. The analysis indicates that CalEEMod 2013.2.2 was used. However, only CalEEMod 2011.1.1 model outputs are included with the document.
4. Page 2 of the Health Risk Assessment: Please fix the typo for "0.0.009 $\mu\text{g}/\text{m}^3$ ", which is the value associated with the Annual Average $\text{PM}_{2.5}$ (one-hour x 0.1).
5. Page 2 of the Health Risk Assessment (table footnotes): Please include text to explain why the 70 year exposure was used considering that construction activities would last approximately 8 years.

Page/Section - Specific Comments

1. Table 5.2-1, Air Quality Monitoring Summary (2006-2011): This table should include the monitoring data for year 2012.

2. Table 5.2-3, Ambient Air Quality Standards: Please update the Ambient Air Quality Standards table. CARB posted an updated version on June 4, 2013. The updated table includes the federal annual standard of 12 $\mu\text{g}/\text{m}^3$ for PM_{10} concentrations.
3. Page 5-77, Sensitive Receptors: The sensitive receptor discussion should include residential areas, schools, and parks within a one-mile radius of the project site. More sensitive receptors would potentially be impacted by the project than those adjacent to the access roads.
4. Table 5-2-6, Earthwork Quantities and Distance Estimates: Provide a source for the grading volumes. This information is not included in the project description.
5. Page 5-80: The analysis references a reduction in off-road emissions by 33 percent. This is an oversimplification as it does not apply all equipment across the board. Therefore, construction emissions may be underestimated. Off-Road 2007 load factors may be adjusted per CARB's October 2010 emissions inventory updates. However, these load factors have been updated in CARB's Off-Road 2011 Model. It should be noted that the latest off-road load factors are incorporated into CalEEMod version 2013.2.2. It is strongly recommended that the latest version of CalEEMod be used.
6. Page 5-80, Last Paragraph: Please provide sources for the earthwork and grading volumes.
7. Page 5-80, Last Paragraph: The text notes that grading would occur over two years. The CalEEMod outputs note that grading was modeled for 390 days (approximately 18 months). Page 4-25 (Section 4.6, Construction Schedule) of the Project Description states that the grading phase for Planning Area 1 would be 6 to 10 months and 6 to 8 months for Planning Area 2. This results in a total duration ranging from 12 to 18 months.

As the CalEEMod outputs and the SCAQMD thresholds are based on daily emissions, spreading grading activities over a period longer than 12 months would underestimate emissions. Grading should be modeled for a 12-month duration to depict a "worst case" condition that is identified in the project description.

8. Page 5-83, Health Risk Analysis: Please tabulate the results of the dispersion modeling and cancer risk calculations.
9. Page 5-83, Health Risk Analysis: The analysis should explain the methodology for the risk assessment and include a description of the source type, source treatment, wind speed, year of construction that had the highest emissions, etc.
10. Table 5.2-10, Risks and Hazards Construction-Related Significance Thresholds: The table should identify the source for these thresholds.
11. Table 5.2-11, Age Sensitivity Factor Thresholds: Provide the source for these thresholds.
12. Page 5-84: The analysis should describe which source receptor area the project is located in.

13. Page 5-85: The analysis states that the closest residence to the project is 600 feet away. However, the discussion on page 5-77 states that the closest residences are 50 feet away. Please update the analysis to be consistent with page 5-77 or explain why a different distance is used.
14. Page 5-85: The analysis should address any potential impacts to the Cielo Vista project, which would be located immediately to the west of the proposed project and could potentially be occupied by 2015.
15. Page 5-88, Mitigation Measures: All mitigation measures should indicate specific timing (e.g., prior to the issuance of building permits) and responsibility for verification.
16. Page 5-89, Mitigation Measures: The third bullet of Mitigation Measure AQ-1 should specify that diesel oxidation catalysts shall achieve 40 percent reduction to be consistent with what was modeled in CalEEMod.
17. Page 5-89, Long Term, Operational Impacts: This section states that emissions would not exceed SCAQMD threshold with implementation of the following mitigation measures. However, no mitigation measures follow. Please revise this section as necessary (e.g., no operational mitigation measures are necessary).

5.3 BIOLOGICAL RESOURCES

Global Comments

1. The descriptions of the existing conditions are difficult to follow for pre- and post-fire conditions. The last paragraph on page 5-94 communicates that a fire occurred and that the section would describe the pre- and post-fire conditions. The discussions in the subsections that follow (pages 5-97 and on) switch back and forth between the two conditions within the same paragraph; beginning with paragraph 2a (page 5-97) and following. This section would be better served if the resources were described as follows: Resource X: pre-fire conditions; post-fire conditions; and anticipated recovery/post-fire succession (anticipated future); Resource Y: pre-fire conditions; post-fire conditions; and anticipated recovery/post-fire succession; etc.
2. The conclusions of significance sometimes rely on implementation of Project Design Features (PDF), in order to avoid or lessen Project impacts. However, further assurance is needed, as to their implementation, such as a requirement to include PDFs as Conditions of Approval (COA). Additionally, the feasibility of some of the proposed PDFs is questionable.
3. The conclusions of significance sometimes rely on implementation of plans/programs (i.e., Revegetation Plan, Detailed Restoration Program, Habitat Mitigation and Monitoring Program, and Environmental Awareness Program), in order to avoid or lessen Project impacts. However, these plans/programs are deferred to the future (i.e., prior to grading permit issuance), which is discouraged by CEQA. Additionally, the mitigation measure's effectiveness and EIR significance conclusions are questionable. These plans and programs should be evaluated as part of the EIR.

4. Some mitigation is vague, lacking details, performance standards, and milestones.

Page/Section - Specific Comments

1. Page 5-94, Section 5.3.1, Paragraph 3: Plants are listed; however, there is no mention of the wildlife that was targeted for focused surveys.
2. Page 5-98, Section 5.3.1, Sentence 2 and Last Sentence: It is unclear in sentence 2 whether Table 5-3-2 outlines pre- or post-fire conditions; this is not answered until the last sentence. Move the last sentence to beginning of paragraph and consolidate with sentence 2.
3. Page 5-111, Section 5.3.1, Special Status Plant and Wildlife Species: The special status plant species that are first discussed are those that were observed. The process that occurred previously is not discussed. This section would be better served if Appendix D Sections 2.2 and 2.3 were summarized and Appendix D Tables 4-2 and 4-3 included.
4. Page 5-111, Section 5.3.1, Special Status Plants Observed: Focused plant surveys were conducted for 11 species (see page 5-94, paragraph 3). This section states five plant species were observed. Regarding the other six (6) species, please state survey findings and conclusions (i.e., are not anticipated to occur given the absence of suitable habitat).
5. Page 5-115, Section 5.3.1, Special Status Wildlife, Paragraph 1: It is unclear how many focused wildlife surveys were conducted; numerous according to Table 5-3-1. Three focused surveys are introduced in the following Special Status Birds section, implying only those three. Please address focused wildlife surveys in Paragraph 1 and add conclusion regarding wildlife species that were not surveyed (i.e., they are not anticipated to occur given the absence of suitable habitat); see also Comment #1 above.
6. Page 5-142, Section 5.3.4, Line 1: Please remind the reader in a footnote where global and state rankings are defined.
7. Page 5-143, Section 5.3.4, Impacts to Special Status Plant Resources: Add a conclusion regarding the plant species that were surveyed, but not documented (i.e., "XX were surveyed and not observed, and are not anticipated to occur given XX; therefore, the Project would result in no impact to XX.")
8. Page 5-149, Section 5.3.4, Impacts to Special Status Wildlife Resources: This section does not discuss the wildlife species that were surveyed and documented, as did the preceding Special Status Plant Resources section (see Comment #7). Also, add a conclusion regarding the wildlife species that were surveyed, but not documented (i.e., "XX were surveyed and not observed, and are not anticipated to occur given XX; therefore, the Project would result in no impact to XX.")
9. Page 5-158, Section 5.3.4, Introduction of Trash and Debris: Project Design Features are introduced here; see Global Comment #2 above.

10. Page 5-160, Section 5.3.4, Human Intrusion: Why is Mitigation Measure BIO-9 the first introduced, with no mention of Mitigation Measures BIO-1 through BIO-8.
11. Page 5-162, Section 5.3.4, Sentence 1: The feasibility of a PDF that prohibits outdoor cats is questionable; see Global Comment #2 above.
12. Page 5-162, Section 5.3.5, Project Design Features: Why do PDFs begin with PDF-11? Also, if PDF's are assigned a number, please identify in each impact analysis the proposed PDF by number.
13. Page 5-163, Section 5.3.5: In all PDFs, please change "will" to "shall."
14. Pages 5-164-166, Section 5.3.6, BIO-1, BIO-2, BIO-3, BIO-4: Measures are deferred; see Global Comment #3 above.
15. Page 5-163, Section 5.3.6, All Mitigation Measures: In all MMs, please change "will," "would," and "should" to "shall."
16. Page 5-163, Section 5.3.8, Cumulative Impacts: This section provides too much detail on the Project impact, instead of summarizing. Also, the cumulative analysis emphasizes only Cielo Vista and Bridal Hills; no mention of other related projects.

5.4 CULTURAL RESOURCES

Global Comments

No global comments.

Page/Section - Specific Comments

1. Page 5-190, first paragraph, fourth sentence: "...along with an historical archaeological resource" should be "along with a historical archaeological resource."
2. Page 5-190, second paragraph: This paragraph states that SB-18 consultation was conducted in June 2008, nearly six years ago. NAHC was contacted in 2012 but it does not appear that any updated tribal consultation has been conducted since 2008. Please clarify and explain why updated consultation is not required.
3. Page 5-190, paragraph 3: Please clarify what is meant regarding the survey methodology citation of "intensive pedestrian survey"? Describe the extent of fieldwork and transects, etc.
4. Page 5-194, paragraph 2: As noted above, please clarify what is meant regarding the survey methodology citation of "intensive pedestrian survey"? Describe the extent of fieldwork and transects, etc.

5.5 GEOLOGY AND SOILS

Global Comments

1. The impact analyses generically state that mitigation is recommended, but provide no description of the measure. A long list of mitigation measures is provided in Section 5.5.4, however, there is no nexus to the impact analyses.
2. The impact analyses often conclude an “acceptable level.” These conclusions should be revised to “less than significant” or “less than significant with mitigation incorporated.”
3. Each issue area section includes a “Level of Significance After Mitigation Measure” subsection near the end of the Section, which provides a conclusion of significance for the impact. This is true even if mitigation measures are not required/proposed for a particular impact, causing confusion to the reader. Additionally, given the conclusions of significance are not provided in the context of the impact analyses, the reader is forced to search for the final conclusion of significance elsewhere in the section (often many pages later) in the Level of Significance After Mitigation Measure subsection. This format creates disconnects in the impact analyses.

Page/Section - Specific Comments

1. Page 5-203, Section 5.5, Sentence 1: The term “on-site soil conditions that have the potential to...” Implies only soil conditions could impact the proposed Project. Delete “soil.”
2. Page 5-203, Section 5.5, Paragraph 2: Discusses the purpose of the “geotechnical investigation,” which is assumed to be the previously identified “Geotechnical Review.” Please refer to documents consistently throughout. Also, please describe the other assessments/studies.
3. Page 5-206, Section 5.5.1, Sentence 2: Add statement to end of sentence that the Whittier Fault Zone also traverses the Project site, as illustrated on Exhibit XX.
4. Page 5-206, Section 5.5.1, Paragraph 1: In second to last sentence, please clarify what is meant by “within the parcel area,” since this encompasses the majority of the Project site.
5. Page 5-206, Section 5.5.1, Paragraph 2: The first sentence describes the Whittier Fault Zone in relation to the site. Move to preceding paragraph; see Comment #3 above.
6. Page 5-206, Section 5.5.1, Paragraph 2: The sentence beginning “In addition to severe ground shaking...” is out of place; move to Fault Rupture discussion.
7. Page 5-206, Section 5.5.1, Paragraph 2: The sentence beginning “The Whittier Fault poses the most...” is out of place, since this is Existing Conditions. Move to impact analysis.

8. Page 5-206, Section 5.5.1, Paragraph 3: First sentence is out of place, since it refers to conceptual design plan; move to impact analysis. Simply intro Report here.
9. Page 5-206, Section 5.5.1, Paragraph 3: Replace “Option depict” with “Option 2 depict.”
10. Page 5-206, Section 5.5.1, Paragraph 3: Last line, add a space after “5.5.3,” and delete last word “below.”
11. Page 5-206, Section 5.5.1, Ground Rupture: First part of paragraph 2 (through “11,000 years”) is out of place. Mover/consolidate with introduction of Whittier Fault Zone above.
12. Page 5-206, Section 5.5.1, Ground Rupture: In paragraph 2, sentence beginning “There is potential for primary...” clarify what area; refer reader to an Exhibit.
13. Page 5-206, Section 5.5.1, Ground Rupture: In paragraph 2, sentence beginning “Surface rupture due to a” Is out of place, since this Existing Conditions. Mover to impact analyses.
14. Page 5-211, Section 5.5.1, Geologic Setting: This section is out of place, since it is preceded and followed by site-specific discussions. Please move to Geology on page 5-203.
15. Page 5-211, Section 5.5.1, Landslides: In paragraph 2, sentence beginning with “Existing geologic maps indicate....” Clarify which areas. Refer reader to an Exhibit.
16. Page 5-214, Section 5.5.1, Whittier-Elsinore Fault Zone: Discussions regarding the Whittier Fault Zone are provided here and in Sections 3 and 4 above. Please move these up and consolidate three discussions.
17. Page 5-214, Section 5.5.1, Whittier-Elsinore Fault Zone: Paragraph 2 is out of place, since this is Existing Conditions. Also, the Whittier Fault is not the only fault with potential to cause strong ground shaking at the Project site. Please discuss others also.
18. Page 5-214, Section 5.5.1, Historical Seismicity and Earthquake History: This section is out of place, since it refers to historic events. Move to between #3 and #4 above.
19. Page 5-217, Section 5.5.1, Landslide Deposits/Debris Flows: This section describes the conditions, however, doesn’t state whether or not they are present on the Project site. If so, please refer reader to an Exhibit.
20. Page 5-218, Section 5.5.1, Compressible Soils: See Comment #19 above.
21. Page 5-218, Section 5.5.1, Compressible Soils: Last sentence is out of place, since this is Existing Conditions. Move to impact analysis.
22. Pages 5-218 and 219, Section 5.5.1, Sections 11 through 15: See Comment #19 above.

23. Page 5-219, Section 5.5.1, Previous Site Studies: Please tell reader where these studies are available for review or confirm their findings were verified/incorporated by the 2013 study.
24. Page 5-220, Section 5.5.1, Previous Site Studies: Paragraph 2, which refers to the American Geotechnical study, is out of place, since the 2013 study is current, not previous. Suggest consolidate with introduction on page 5-203.
25. Page 5-223, Section 5.5.3: The Project impacts involving soil erosion are not addressed in this section. Suggest replace all "will" to "would." Also, this section would be better served if it were outlined/analyzed according to the thresholds identified in Section 5.5.2.
26. Page 5-223, Section 5.5.3, Paragraph 5: Sentence 2 refers to "the roadway" however doesn't identify which roadway.
27. Page 5-225, Section 5.5.3, Paragraph 3: Please provide a significance conclusion; see Global Comment #3 above.
28. Page 5-225, Section 5.5.3, Ground Rupture: Paragraph 1 is out of place, since it pertains to earthquakes. Please move.
29. Page 5-228, Section 5.5.3, Paragraph 1: Following sentence 1, insert sentence regarding Exhibit, which is the second to the last one in the same paragraph.
30. Page 5-228, Section 5.5.3, Option 1 Access and Option 2 Access: These discussions are out of place, since access features are already introduced on page 5-223. Move/consolidate these discussions with previous.
31. Page 5-230, Section 5.5.3, Alquist-Priolo Act: This discussion (through "are to be avoided" in paragraph 3) is out of place, since it is regulatory. Please move/consolidate with regulatory discussion. Also, please add discussion to regulatory of what is mandated by Act.
32. Pages 5-230-231, Section 5.5.3, Alquist-Priolo Act: Discussion beginning "Field exploration for preparation..." through "Appendix G of this DEIR" on the following page (paragraph 1) is out of place, since this is Impacts. Please move to Existing Conditions.
33. Page 5-231, Section 5.5.3, Faulting: "Faulting" is not a CEQA threshold/potential hazard. Suggest consolidate with "Ground Rupture" discussion on Page 5-225.
34. Page 5-231, Section 5.5.3, Faulting: Following first sentence, refer reader to an Exhibit.
35. Page 5-232, Section 5.5.3, Faulting: Line 1 begins discussion of Fault Hazard Report, however, discussion should be preceded by discussion/introduction of Report recommendations regarding the 120-foot and 50-foot seismic setback zones.

36. Page 5-232, Section 5.5.3, Geologic Setting: What CEQA threshold/potential hazard is addressed here? Section is out of place, since this is Impacts. Please move to Existing Conditions.
37. Page 5-235, Section 5.5.3, Sections e, f, and g: Please relate these to a particular threshold and provide a significance conclusion; see Global Comment #3 above.
38. Page 5-238, Section 5.5.3, Fault Hazard Report Recommendations: This discussion is out of place and should be consolidated with/follow the ground rupture and faulting discussions on pages 5-225 and 5-231.
39. Page 5-238, Section 5.5.3, Fault Hazard Report Recommendations: Sentence 1 in paragraph 4 should be followed by an exhibit that clearly shows the 120-foot and 50-foot seismic setback zones and clearly demonstrates that no habitable structures are proposed within the setback zones. Exhibit should also clearly illustrate those non-habitable structures (i.e., bridges, roads, etc.) that are proposed within the setback zones.
40. Page 5-239, Section 5.5.3, Paragraph 1: There is a reference to “ongoing studies.” Please verify that these ongoing studies and future findings will not alter these EIR conclusions.
41. Page 5-239, Section 5.5.3, Paragraph 3: Sentence 1 states that “conceptual design level geotechnical studies should be conducted.” This raises an issue of deferment; refer to Comment # 57 below.
42. Page 5-239, Section 5.5.3, Paragraph 4: Sentence 1 states that a “finalized version of the Fault Hazard Report should be...” There is no other mention in this Section that the Report needed finalizing. Please clarify.
43. Page 5-239, Section 5.5.3, Paragraph 5: The sentence beginning with “Therefore, the risk of surface rupture hazards to...” should be followed by reference to an exhibit that supports this conclusion; see Comment #39 above. Also, the basis for the conclusion that the risk is low is “because active faults do not extend into areas designated for habitable structures.” This is incorrect. Instead, the basis for the conclusion should be “because the proposed habitable structures would not be located within designated seismic setback zones, as illustrated on Exhibit X.”
44. Page 5-239, Section 5.5.3, Paragraph 5: The sentence beginning with “The risk to improvements proposed within...” should be revised to “The risk to improvements other than habitable structures proposed within...”
45. Page 5-239, Section 5.5.3, Paragraph 5: The last sentence beginning with “In addition, no habitable...” is out of place and is stated in the following paragraph.

46. Page 5-239, Section 5.5.3, Paragraph 6: This paragraph also discusses habitable and non-habitable structures, and is redundant with the preceding paragraph. Please consolidate paragraphs 5 and 6.
47. Page 5-240, Section 5.5.3, Paragraph 2: A significance conclusion is not provided. A statement should be added concluding that impacts would be reduced to less than significant following implementation of the recommended mitigation measures, which involve x, y, and z.
48. Page 5-240, Section 5.5.3, Paragraph 4: See Comment #47 above.
49. Page 5-241, Section 5.5.3, Surficial Slope Stability: Regarding the last paragraph, see Comment #47 above.
50. Page 5-245, Section 5.5.3, Paragraph 3: See Comment #47 above.
51. Page 5-245, Section 5.5.3, c and d: Regarding the last paragraphs in each section, see Comment #47 above.
52. Page 5-248, Section 5.5.3, Compressible Soils: See Comment #47 above.
53. Page 5-248, Section 5.5.3, Corrosive Soils: The presence of these soil conditions should be determined now. Also, see Comment #47 above.
54. Page 5-248, Section 5.5.3, Expansive Soils: The presence of these soil conditions should be determined now. Also, see Comment #47 above.
55. Page 5-250, Section 5.5.3, f, g, and h: See Comment #47 above.
56. Page 5-251, Section 5.5.4, Mitigation Measures: For all measures, change to “shall.”
57. Page 5-251, Section 5.5.4, Mitigation Measures: The mitigation measures identify necessary studies/investigations, in order to avoid or lessen Project impacts. However, these studies/investigations are often deferred to the future (i.e., prior to building permit issuance), which is discouraged by CEQA. These studies/investigations should be evaluated as part of the EIR, in order to determine the mitigation measure’s effectiveness in avoiding/reducing an impact.
58. Page 5-251, Section 5.5.4, Mitigation Measures: The milestone for implementation of many mitigation measures is “prior to building permit,” which is too late in development process, given Global Comment #2, and since most must be reflected in Grading Plans, it is recommended each mitigation measures milestone for implementation be re-evaluated and revised to “prior to grading permit.”
59. Page 5-251, Section 5.5.4, Mitigation Measures: This list of MM should be preceded by a MM similar to the following:

GEO-1 Prior to issuance of a Grading Permit, the OC Director of XX shall verify that:

- The Grading Plan was prepared in accordance with the latest edition of the California Building Code by a civil engineer registered in this State;
- Complies with the recommendations specified in the Geotechnical Review (American Geotechnical, Inc., August 2013) and the Fault Hazard Assessment Report (American Geotechnical, Inc., November 2013); and
- Incorporates the Geotechnical and Fault Hazard Reports recommended corrective actions, which are likely to prevent structural damage to each structure proposed to be constructed in the area where geotechnical/soils problems exist.

60. Page 5-251, Section 5.5.4, GEO-4 and GEO-5: GEO-5 is a variation of GEO-4. Consolidate these MM.

61. Page 5-252, Section 5.5.4, GEO-11: GEO-11 is a variation of GEO-4 and GEO-5. Consolidate these MM.

62. Page 5-255, Section 5.5.7: The geology and soils analysis should verify and add a conclusion that on-site and off-site grading for the Project combined with other grading at a nearby related project (i.e., Cielo Vista and Bridal Hills) would not result in cumulative impacts involving unstable geologic units resulting in onsite or offsite landslides, lateral spreading, subsidence, or collapse.

5.6 GREENHOUSE GAS EMISSIONS

Global Comments

1. The analysis uses an outdated version of CalEEMod. The analysis should be updated with the latest version (CalEEMod version 2013.2.2).

Greenhouse Gas Emissions Technical Study Comments

In addition to the applicable comments to Section 5.2 and Section 5.6 of the Draft EIR, the following comments apply to the technical study:

1. The technical study should include a project description to clearly define what is being analyzed in the study.
2. Health Risk Assessment Outputs: Based on the reported annual emissions of 0.96 tons, the source emissions rate of 0.34×10^{-2} grams per second appears too small (by a factor of 10). Please provide additional description of the methodology including the source treatment.
3. Health Risk Assessment Outputs: Please provide the CalEEMod outputs that were utilized for the health risk analysis. The analysis indicates that CalEEMod 2013.2.2 was used. However, only CalEEMod 2011.1.1 model outputs are included with the document.

4. Page 2 of the Health Risk Assessment: Please fix the typo for "0.0.009 µg/m³", which is the value associated with the Annual Average PM_{2.5} (one-hour x 0.1).
5. Page 2 of the Health Risk Assessment (table footnotes): Please include text to explain why the 70 year exposure was used considering that construction activities would last approximately 8 years.

Page/Section - Specific Comments

1. Page 5-259, Baseline Air Quality: This section includes information pertaining to criteria air pollutants and not greenhouse gases (GHGs). This section should include a discussion of GHGs.
2. Page 5-262 through 5-264, Ambient Air Quality Standards, Federal Clean Air Act Amendments, California Air Resources Board, Air Quality Management Plan: These sections describe various regulations associated with criteria air pollutants instead of GHGs. These sections should be removed as they have no bearing on the regulatory setting of GHGs.
3. Page 5-265, Thresholds of Significance: The last two paragraphs and the following page include various information on the emissions thresholds for criteria pollutants and do not pertain to GHGs. This information is not applicable in this section.
4. Page 5-269, Table 5-6-7, GHG Emissions Reductions from State Regulations: The analysis should use CalEEMod Version 2013.2.2. This version of CalEEMod uses EMFAC2011 mobile source emissions factors, which includes the Pavley standards and the Low Carbon Fuel Standards.
5. Table 5-270 and Table 5-6-8, Design Control Measures and Potential Effectiveness: The analysis should use CalEEMod (which uses the California Air Pollution Control Officers document, *Quantifying Greenhouse Gas Mitigation Measures* [August 2010]) to quantify GHG project design features/mitigation measures. Achievement of the necessary GHG reduction target should be demonstrated through the quantifiable measures in CalEEMod. Those reduction measures should also be specifically identified in the mitigation measures (Section 5.6.5 of the Draft EIR).
6. Page 5-272, Mitigation Measure GHG-1: This mitigation measure is included without a nexus to an impact. Additionally, SCAQMD Rule 445 (Wood-Burning Devices) prohibits wood-burning fireplaces and only allows gas-fueled fireplaces to be installed in new residential development. Therefore, Mitigation Measure GHG-1 is not necessary.

5.7 HAZARDS AND HAZARDOUS MATERIALS

Global Comments

1. This section needs to be simplified. The information presented from the Technical Studies, enclosed in the Appendix of the Draft EIR, is too complex and confusing to the reader. This section does not need to include technical information regarding

topography, vegetation, and climate that were discussed in the Technical Studies, but rather this information should be summarized into a quick paragraph so that the reader can clearly see that this information is important to understand the findings of the fire analysis, but this information is not crucial for defining the existing hazards and hazardous materials environment at the project site. As currently presented, this information is not clear to the reader.

2. The impact analysis needs to clearly state the communications that have occurred to date with the Orange County Fire Authority. The section should clearly state if the OCFA agrees that the proposed Fuel Modification Plan and Emergency Access are adequate to support the proposed Project (under each Option), given the site is in a Very High Fire Hazard Severity Zone.
3. The impact analysis identifies measures that the Applicant would be required to implement measures. However, it is not clear what the regulatory implementing tool (e.g., the existing Municipal Code, which no longer applies, or the proposed specific plan) is being referred to, or if this is referring to a proposed mitigation measure.

Phase I Environmental Site Assessment Report (Appendix I)

In addition to the applicable comments to Section 5.7 of the Draft EIR, the following comments apply to the technical study:

1. The acreage presented in the Phase I ESA does not match the Project Description. Section 5.7 of the Draft EIR should clearly identify what areas the Phase I ESA covered.
2. Page 2, Section 1.3: This significant assumptions do not match those identified in the project description. The Aesthetics Section in the Draft EIR states that two existing oil wells may be closed and relocated to the Cielo Vista site. This assumption needs to be updated and appropriate recommendations should be made accordingly. Section 5.7 of the Draft EIR should be revised accordingly as well.

Fire Protection and Emergency Evacuation Plan (Appendix J)

In addition to the applicable comments to Section 5.7 of the Draft EIR, the following comments apply to the technical study:

1. Upon a public records request with the Metropolitan Water District's Santiago Tower, video footage of the Freeway Complex Fire at the project site is available. Per this footage, the project site completely burns within 37 minutes. The model used for the fire analysis should be updated to reflect this information accordingly. The Draft EIR should be updated to reflect the revised analysis presented in this technical study.

Page/Section - Specific Comments

1. Page 5-278, 4th Paragraph, Last Sentence: This sentence refers to an off-site impact area. It is not clear what area this is referring to.

2. Page 5-283, 2nd Paragraph: This discussion needs to be updated to reflect the information presented on page 5-288 regarding the lack of existing fire flow during this 2008 Freeway Complex Fire.
3. Page 5-289, Last Paragraph: This discussion appears to be referring to Project Information and not existing conditions. Please revise/clarify.
4. Page 5-290, 2nd Paragraph, 2nd Sentence: This statement is not consistent with the Phase I ESA (provided as Appendix I), which identifies 10 aboveground storage tanks.
5. Page 5-290, 3rd Paragraph: There was no Phase II completed for the site, why is this in the existing conditions?
6. Table 5-7-5, Oil Well Observations: This information is in the Technical Study, it should just be summarized in the existing conditions of the section.
7. Page 5-295, Regulatory Setting: The Federal, State, and local regulations pertaining to hazardous materials and emergency evacuation need to be included. The existing regulatory framework pertaining to oil drilling operations (e.g. State of California Division of Oil, Gas and Geothermal Resources), need to also be included.
8. Page 5-295, Last Paragraph: There is no need to re-state the project description and site plans. This format does not match the other topic areas of discussion throughout the Draft EIR.
9. Page 5-310, 1st Paragraph 1: The Aesthetics Section of the Draft EIR does not discuss a Fire Wall, as identified here.
10. Mitigation Measure Haz-3: This measure is worded that a RAP must be prepared. However, under certain circumstances, this may not be necessary. This measure needs to be re-worded consistent with the State regulatory requirements for previously abandoned oil wells.
11. Mitigation Measure Haz-4: This measure is worded that a RAP must be prepared. However, under certain circumstances, this may not be necessary. This measure needs to be re-worded consistent with the State regulatory requirements for oil well closure procedures.
12. Mitigation Measure Haz-11: This measure seems programmatic. Should new water infrastructure, not considered as part of this Draft EIR, be required, those activities would be required to obtain CEQA clearance.
13. Page 5-337, 3rd Paragraph: This discussion should be presented in the Existing Conditions section.

5.8 HYDROLOGY AND WATER QUALITY

Global Comments

1. Comments on Appendix K, Preliminary Drainage Reports, and Appendix L, Conceptual Water Quality Management Plan, are provided below. These comments also apply to DEIR Section 5.8, Hydrology and Water Quality, and should be updated accordingly.

Appendix K – Preliminary Drainage Reports

1. The Orange County Hydrology Manual (OCHM) Addendum No. 1 dated 1996, requires that hydrology analysis for mitigation utilize an expected value analysis for comparison of existing and proposed flowrates, not a high confidence. High Confidence analysis is used for storm drain design. Therefore, all comparisons of existing and proposed flowrates should utilize expected value flowrates.
2. Documentation on the assumption of natural cover (dense) for existing and proposed needs to be provided. The OCHM uses specific types of natural cover with varying degrees of percentage coverage (poor, fair, good). Based on the description, it appears the project is using a natural cover for Grass, Annual or Perennial with Good Cover. Based on a Google Earth review it appears that portion of the watershed have tree cover down in the canyons, this is not reflected in the hydrology analysis using grasses as the natural cover type. The use of good cover needs to be documented with ground photos and a land use cover map for both existing and proposed should be provided.
3. The proposed condition analysis utilizes a percentage impervious of 20% for the 2 du/acre assumption; the OCHM recommends an average value of 30%. Justification should be provided for the use of a non-standard percentage impervious.
4. The approach of having mitigation for flow increases in the debris/detention basins upstream of the developed reduces the amount of sediment available to the downstream watercourse, which may significantly impact erosion in the downstream natural channels, especially when combined with the reduced sediment supply from the impervious surfaces of the development. This is critical in determining the stability of Drainage Area A as the downstream natural channel is directly adjacent to proposed grading for the proposed development. CEQA Checklist Item C. for Hydrology and Water Quality does not appear to be adequately addressed. Per Section 5.5.2 of the Orange county Technical Guidance Document (TGD):

“Detention/retention basins should be designed to receive flows from developed areas only, for both design optimization as well as to avoid intercepting coarse sediments from open spaces that should ideally be passed through to the stream channel. Reduction in coarse sediment loads contributes to downstream channel instability.”
5. Page 6: “The existing condition results were adjusted by interpolation to make the area match the proposed condition area.” Please justify the adjustment of areas, it is unclear what is being interpolated and why interpolation is necessary. Areas for existing and

proposed conditions should match in order to assure that adequate mitigation is provided and that CEQA Checklist Item C. for Hydrology and Water Quality is addressed.

6. Table 1: Where is the 174 cfs difference shown in the 10-year per the text? Table 1 shows 10-year 24-hour differences of 108.2 cfs and 84 cfs.
7. Table 2: Why aren't 10-year events shown in Table 2?
8. Incorrect AMC values appear to have been used in some of the Rational Method Analysis, all analysis should be consistent with the OCHM including Addendum No. 1.
9. For the purposes of flood control mitigation flood control detention and water quality facilities should be considered impervious.

Appendix L – Conceptual Water Quality Management Plan

1. Per the Orange County Technical Guidance Document Section 5.5.2 “discharge at a rate below the critical rate for adverse impacts.” The WQMP Hydromodification Study does not indicate how the “critical rate for adverse impacts” was defined. The critical rate is not necessarily the existing flow rate.
2. Hydromodification Summary Table Option 1 – The area for Basin 4 could not be verified for the proposed condition, the rational method indicates that the area should be 118 acres not 107.1.
3. Hydromodification Summary Tables – The comparison shown seems incorrect. Basins 1, 2, and 3 discharge to the same natural channel, therefore, the comparison for existing and proposed should be made at the outlet to the natural stream, not at each detention basin. The fact that the existing and proposed tributary acreages are the same seems unlikely as there are differences in the Watershed A in Drainage Area A in the hydrology study.
4. WQMP Features: Provide Green Street design BMPs and Low Impact Development design BMPs throughout the Project site. The Project shall implement the Low Impact Development (LID) design process to arrive at the appropriate BMPs. Preferred site treatment options shall be applied to the maximum extent possible.

5.9 LAND USE AND PLANNING

Global Comments

No global comments.

Page/Section - Specific Comments

1. Section 5.9.2, Regulatory Setting: The Regulatory Setting discusses several documents that establish land use regulations that are applicable to the proposed project. Each

document should first be generally described including its components, purpose, and specific relationship to the project/project site. The discussion, as written, does not articulate the purpose of these documents and how they regulate land use.

2. Page 5-398: The discussion of the Esperanza Specific Plan in the Regulatory Setting is inaccurate, as this Specific Plan is being proposed as part of the project. This discussion should be revised to discuss a Specific Plan and its requirements, purpose, and approval process by the County.
3. Exhibit 5-95: Should be updated to identify the project site.
4. Page 5-402 and 5-403: References to specific chapters or sections of the Yorba Linda Zoning Ordinance should be provided.
5. Page 5-414, OC LUE Policy 3: It is unclear if the first sentence is making a statement or referring to the proposed project.
6. Page 5-414, OC LUE Policy 4: The statement that the project provides a backbone for a comprehensive system of bikeways is misleading.
7. Page 5-417 Policy 6.2: This references a trail down to San Antonio Park and the equestrian center - please change "center" to arena.
8. Page 5-418, Policy 3: The analysis does not address the compatibility of facilities in relation to the proposed land uses.
9. Page 5-419, OCFA Goal 1: It is unclear if the Fire Protection and Emergency Evacuation Plan has been coordinated with the Cielo Vista development since the proposed project would utilize its roadway system for emergency access. Does the plan consider evacuation associated with both areas?
10. Page 5-424, Goal 1: The discussion should identify the County's parkland requirement in order to demonstrate if the project meets the requirement.
11. Page 5-424, Table 5-9-6: This table refers to "active", when it appears most of the acres are passive with limited active amenities and acreage to be called "active"
12. Page 5-425, Policy 2.32: The discussion states the project exceeds the County requirement, but does not state what the requirement is. Discussion should be updated or refer to the Recreation section that shows how the project would meet the requirement. See previous comment on Page 524, Table 5-9-6 and compared to the examples given of active park requirement.
13. Page 5-425, Policy 4.1: The discussion should refer to the Noise section to show how the project would not exceed County noise standards.
14. Page 5-425, Goal 6: The discussion is not clear. Does an impact occur?

15. Page 5-431 2nd paragraph: This paragraph is repeated three times
16. Page 5-433, First Paragraph: The discussion compares the proposed project to the development density of the Cielo Vista project. The impact discussion should reference the proposed project to existing conditions. The Cielo Vista project is not approved and should not be used to determine potential impacts associated with the proposed Esperanza project.
17. Page 5-434, "Land Use Element": There is an asterisk at the end of the paragraph, but no reference or text associated with it.
18. Page 5-434, Policy 1.5: The discussion should show how the proposed project meets the City and County requirement.
19. Page 5-435, Goal 3: The analysis references Casino Ridge. Clarify where this development is located in relation to the project site.
20. Page 5-438, Policy 11.1: The text refers to "Project Design Features". These features should be clearly identified in the Project Description.
21. Page 5-439, Goal 1: The text states the project's internal circulation system will also serve the Bridal Hills project. It is unclear if Bridal Hills is being considered as a cumulative project or within the project analysis.
22. Page 5-440, Goal 3 and Policy 3.1: The discussion should show how the proposed project meets the City's requirement. These parks appear to be mini parks/greenbelts, where the City is deficient is in larger neighborhood and community parks. How do these parks meet the needs of the existing residents if they will not have access via the gated community. Future residents needs won't be met because of the need to provide large more active parks, such as neighborhood and community parks that allow for programmable space unlike the proposed miniparks/greenbelts.
23. Page 5-441, Trails: Again since this is a gated community will the surrounding community have access to these trails?
24. Page 5-442, Goal 5: The analysis discussion is unclear if an impact occurs.
25. Page 5-443, Policy 5.3: The discussion states the OCSD has recently expanded its personnel for the project area and City to adequately serve the residents. Clarify if the recent expansion to meet existing demand or growth, including the proposed project.
26. Page 5-456, Table 5-9-21: The Bridal Hills development is not identified as a cumulative project.
27. The following typographical errors are noted:
 - Page 5-395, under Regional Setting. The second to the last sentence needs a period.
 - Page 5-396, the footnote needs to be corrected.

- Page 5-408, under Regional Planning Programs, add “Air” before “Quality Management Plan”.
- Page 5-409, second sentence, add “the” between “within” and “jurisdiction”.
- Page 5-417, under Analysis of Policy 5.5, add “Linda” after “City of Yorba”.
- Page 5-421, fourth paragraph, correct “lease Bell’s vireo habitat” to “least” and “per-construction” to “pre-construction”.
- Page 5-431, the third and fourth paragraphs are the same as the second paragraph and should be deleted.
- Page 5-435, under Goal 3 Analysis, change “trials” to “trails”.
- Page 5-435, under Policy 5.3 Analysis, add “be” between “will” and “sited”.
- Page 5-448, RTP/SCS G4 Analysis, second to the last sentence, change “inspection” to “intersection”.

5.10 NOISE

Global Comments

1. There is no analysis of stationary source noise impacts. At a minimum, the analysis should consider the noise emanating from the on-site oil wells that will remain in operation and their potential noise impact to the proposed residential uses.

Page/Section - Specific Comments

1. Page 5-450, Ambient Noise Levels: The discussion regarding ambient noise levels does not discuss what the times of day or duration of the noise measurements. There is also no discussion of what equipment was used or how it was calibrated. This discussion should be included, and the noise meter output files and field sheets should be included in Appendix N.
2. Page 5-472, Construction Noise: The analysis is based on summing up the noise levels of three large pieces of equipment and identifying what that noise level would be at distances ranging from 100 to 1,000 feet away. A major issue with this assumption is that sensitive receptors are closer than 100 feet from the construction activities. Also, based on the extent of grading activities, there would likely be more than three pieces of equipment operating in close proximity to each other. It is recommended that the noise analysis be conducted using the Federal Highway Administration Roadway Construction Noise Model (RCNM). This model is not limited to roadway construction projects and has a more up to date inventory of noise levels for construction equipment. The modeled equipment should be consistent with what was modeled for the construction air quality analysis (i.e., the CalEEMod model), and should be propagated from the edge of the grading limits. Although the City and County ordinances exempt construction noise, a significant impact could still be created if the baseline noise levels are adversely affected by the construction equipment noise.
3. Page 5-473, Construction Worker Noise: The analysis identifies that construction related traffic would result in a noise level of 54 dBA at 50 feet from the roadway centerline. However, there is no model data in Appendix N to substantiate this finding. The calculation sheets should be included so this finding can be verified. Also, this

discussion needs to include a discussion of where the workers would park and where the construction equipment would be staged.

4. Page 5-475, Construction Related Vibration: The analysis bases its analysis on a distance of 600 feet between the nearest sensitive receptor and where the construction activity takes place. However, based on the site plan, grading activities will occur much closer to sensitive uses. The analysis should revise the analysis to reflect the distance between the nearest sensitive uses and the edge of grading activities. Also, please confirm that a vibratory roller will not be used for construction.
5. Page 5-475, Long Term Vehicle Noise: The model outputs associated with the traffic noise assessment were not included within Appendix N. Therefore, the modeled noise levels could not be verified. Furthermore, the analysis identifies that although a significant increase is created Aspen Way, Via Del Agua, and Stonehaven Drive, no mitigation is feasible as the resultant noise level is less than 65 dBA CNEL. Although noise barriers would be impractical, the analysis should consider options such as rubberized asphalt coatings along these roadways to reduce the traffic noise impact.
6. Page 5-480, Mitigation Measures: In order to further reduce construction related noise impacts, the following measures should be incorporated as mitigation:
 - Construction noise reduction methods such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible. Unattended construction vehicles shall not idle for more than 5 minutes when located within 500 feet from residential properties.
 - Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 500 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. This notification shall give a contact phone number for any questions or complaints. All complaints shall be responded to in a method deemed satisfactory by the County of Orange.

5.11 POPULATION AND HOUSING

Global Comments

1. Uses 2008 instead of current 2013 population and housing data as baseline existing conditions.
2. The Section provides multiple sources of population and housing estimates and forecasts, which are conflicting.
3. The population and housing data for the relevant geographies (i.e., unincorporated OC and City of Yorba Linda) should be discussed separately, logically, and consistently.

Quantified data is better communicated in tables, rather than in paragraph form. A sample outline for population (and also for Housing) is as follows:

County of Orange

- Past trends;
- Existing 2013;
- Forecasts (OC GP);
- Forecasts (SCAG).

Unincorporated OC

- Past trends;
- Existing 2013;
- Forecasts (OC GP);
- Forecasts (SCAG).

City of Yorba Linda

- Past trends;
- Existing 2013;
- Forecasts (OC GP);
- Forecasts (SCAG).

Page/Section - Specific Comments

1. Page 5-483, Section 5.11, Paragraph 1: Specify which planning periods for the Housing Elements. Add the Department of Finance and Southern California Association of Governments to this paragraph.
2. Page 5-483, Section 5.11.1: County, SCAG, and RHNA discussions are out of place. Move to Regulatory Setting.
3. Page 5-484, Section 5.11.1, Population: The Department of Finance provides more current (1/1/13) population estimates for both unincorporated OC and City of Yorba Linda. Please update.
4. Page 5-484, Section 5.11.1, Population, Last Line: In statement "input relative to housing....," replace "housing" with "households," which are occupied housing units. SCAG forecasts households- not housing.
5. Page 5-485, Section 5.11.1, Tables 5-11-1, 5-11-2, and 5-11-3: Add existing (2013) estimates and SCAG forecasts for Project buildout year (2020?) to these Tables.
6. Page 5-487, Section 5.11.2, City of Yorba Linda General Plan - Housing Element: This Section's trends and growth forecasts conflict with data provided in Existing Conditions section, and actually belong there instead. This section should focus on the RHNA and unmet housing needs instead of trends and forecasts. RHNA and unmet housing needs for each geography and for each cycle should be summarized in tables, instead of paragraphs. As previously noted, the 2008 data is outdated; replace with current 2013 data.

7. Page 5-488, Section 5.11.2, Bullet 2: Following statement “provides up to 536 new housing units....,” add footnote that further explains assumed population growth: “Assuming 3.2 persons per household, the forecast population growth for the Murdock Area Plan is approximately 1,715 persons.”
8. Page 5-489, Section 5.11.4: The impact analysis switches back and forth between County and City; separate the discussions. Separate the impact analyses for existing, General Plans (OC and Yorba Linda), RHNA, and SCAG. For each geography, the analysis of housing and population growth over existing 2013 conditions is missing. Also analyze housing and population growth in the contexts of OC GP, Yorba Linda GP, and SCAG forecasts. Identify the Project horizon/buildout year.
9. Page 5-489, Section 5.11.4, Paragraph 3: Cite source for persons per household. For last, is 5th cycle (2014-2021) correct? Change to 4th cycle (2008-2014). Establish what the unmet housing need is for each geography, for each cycle, according to income category; this is best communicated in tables. Given the type of proposed housing, it would likely be in the above moderate category. Therefore, evaluate the Project’s effect on unmet housing needs, according to income category; not by total need.
10. Page 5-489, Section 5.11.4, Table 5-11-5: In Table title, should “2010” be “2008,” which is the planning period for the 4th cycle?
11. Page 5-490, Section 5.11.4, Table 5-11-6: Table is out of place; move to follow “Yorba Linda General Plan Housing Element” paragraph.
12. Page 5-490, Section 5.11.4, Second Full Paragraph: Specify the remaining RHNA need. After the second sentence, explain/support conclusions. Suggest combining unmet needs for each planning period for above moderate then analyze Project.
13. Page 5-490, Section 5.11.4, Yorba Linda General Plan Housing Element, Sentence 3: The EIR states that the City’s regional housing needs of 2,039 additional units during the 2008-2014 planning period, has not been met. Two sentences later and again on page 5-487, it states that the 2008-2014 Housing Element notes a deficit of 757 housing units. There are inconsistencies regarding both RHNA and unmet needs for both City and County. Please correct.
14. Page 5-490, Section 5.11.4, Last Paragraph: The section is missing impact conclusions. The impact analysis must conclude whether the Project “induces substantial population growth” through new homes. Also, the impact analysis must conclude whether the Project induces substantial population growth through extension of roads.
15. Page 5-491, Section 5.11.7: Why are related projects listed separately in Tables 5-11-7 and 5-11-8? What about Bridal Hills? Please consolidate tables, but list OC separate from City. The cumulative housing/population growth estimate is incorrect, therefore, analysis is incorrect. Please revise to include all cumulative projects.

16. Page 5-492, Section 5.11.7, Paragraph 1: Cumulative housing impacts to RHNA/unmet housing needs should be analyzed separately for OC and City, since Housing Elements are distinct.
17. Page 5-492, Section 5.11.7, Paragraph 2, Sentence 4: This sentence addresses the Esperanza Hills and Cielo Vista projects; why call out Cielo Vista separate from other cumulative projects in unincorporated OC? Analysis should be cumulative: all in unincorporated OC and all in City.

5.12 PUBLIC SERVICES

Global Comments

1. Regarding the discussion on parks included in Section 5.12, it is redundant with Section 5.13. Suggest consolidate with Section 5.13.

Page/Section - Specific Comments

1. Page 5-493, Section 5.12: Add statement introducing which public services are addressed in this section.
2. Page 5-493, Section 5.12.1, Paragraph 1: Redundant with the following discussions. Consolidate with each issue area that follows, as appropriate.
3. Page 5-493, Section 5.12.1, *Police Services*: Note OCSD service response ratio, if any.
4. Page 5-493, Section 5.12.1, *Fire/Paramedic Services*: Please clarify that there are five stations in the area, but Station 32 is the closest.
5. Page 5-495, Section 5.12.1, *Schools*: Add capacity to each school. May be better communicated in a table.
6. Page 5-496, Section 5.12.1, *Parks*, end of Paragraph 1: Cite source for state ratio. Discuss the City's adopted standard also.
7. Page 5-496, Section 5.12.1, *Libraries*: Reference to "typical range of resources" is vague; possibly volumes, square feet, etc. Cite source for "Yorba Linda Library is currently inadequate..." Does the Assessment provide a standard for library volumes?
8. Page 5-497, Section 5.12.1, *Other Facilities – Hospitals/Medical Centers*: The sentence "The Proposed Project will be..." is out of place, since this is Existing Conditions. Revise statement.
9. Page 5-497, Section 5.12.2: Paragraph 2 beginning with "In addition,..." is out of place, since this is thresholds. Please move to Existing Conditions section. Please cite source for City's standard. Please cite source for "the remaining two acres..."

10. Page 5-498, Section 5.12.3, *Police Services*: The standard noted earlier in section regarding police services is five minutes. Also, a standard noted earlier in section regarding fire services is similar to this. Please verify correct police services standard.
11. Page 5-498, Section 5.12.3, *Police Services*: The sentence beginning with "During the January 2013..." and the following sentence should be moved to the Existing Conditions section. Also, please cite source.
12. Page 5-498, Section 5.12.3, *Police Services*: Regarding impact conclusion (last sentence), there is no evidence/standard to support this conclusion.
13. Page 5-498, Section 5.12.3, *Police Services*: Add a conclusion statement addressing threshold and verifying that "no new police protection facilities or expansion of existing facilities would be required" per threshold.
14. Page 5-498, Section 5.12.3, *Fire/Paramedic Services*: In Sentence 1, add the word "calls" after "up to 61" and "call" after "up to 1.0."
15. Pages 5-499 and 5-500, Section 5.12.3, *Fire/Paramedic Services*: This discussion regarding wildland fire hazards (i.e., all of the information on page 5-499 and the first four paragraphs on page 5-500) belong in the Hazards and Hazardous Materials section. Please refer reader to that section and only summarize here.
16. Page 5-505, Section 5.12.3, *Fire/Paramedic Services, Last Paragraph*: The sentence "In the event the OCFA disagrees with the....." implies the OCFA is/will be reviewing the Dudek Report. The OCFA's determination regarding response times and recommendations, as well as their overall findings regarding the Fire Protection and Emergency Evacuation Plan, should be disclosed in this EIR (here and in the Hazards Section).
17. Page 5-505, Section 5.12.3, *Fire/Paramedic Services, Last Paragraph*: Add a conclusion statement addressing threshold and verifying that "no new fire/paramedic facilities or expansion of existing facilities would be required" per threshold.
18. Page 5-505, Section 5.12.3, *Schools*: Paragraph 1 and associated bullets are out of place, since this is impact analysis. Please move to Existing Conditions section.
19. Pages 5-505-506, Section 5.12.3, *Schools*: Paragraph 3, continuing on next page, ending with "186 students" is out of place, since this is impact analysis. Please move to Existing Conditions section. Also move Table 5-12-3.
20. Page 5-506, Section 5.12.3, *Schools, Top of Page*: To first complete sentence, please add statement verifying that sufficient space exists for 177 new students; "As shown in Table 5-12-XX, sufficient capacity exists..."
21. Page 5-506, Section 5.12.3, *Schools*: Table 5-12-3 is out of place, since this is impact analysis. Please move to Existing Conditions section. Also add capacity for each school, in order to demonstrate sufficient space exists.

22. Page 5-506, Section 5.12.3, Schools, End of Full Paragraph 2: Add a conclusion statement addressing threshold and verifying that “no new school facilities or expansion of existing facilities would be required” per threshold.
23. Page 5-506, Section 5.12.3, Parks: Is there an exhibit to illustrate the information described in Sentence 1?
24. Page 5-506, Section 5.12.3, Parks: At the end of the Paragraph 1, add statement “The environmental impacts of the proposed parks and recreational facilities are analyzed in Sections 5.1 through 5.15 of this EIR.”
25. Page 5-506, Section 5.12.3, Parks, County of Orange: Following second sentence, add a statement regarding the Project’s parkland demand of 2.7 per acres.
26. Page 5-507, Section 5.12.3, Parks, City of Yorba Linda General Plan: Following fourth sentence, add a statement regarding the Project’s parkland demand of 4.4 acres, based on population of 1,088. In the following sentence, revise to read “The parkland acreage for the Proposed Project (12 to 13 acres) will be...”
27. Page 5-507, Section 5.12.3, Libraries, County of Orange: Most of this paragraph, beginning with “The Orange County.....” and ending with “..... is in Brea,” is out of place, since this is impact analysis. Please move to Existing Conditions section. Leave only a summary in Section 5.12.3.
28. Page 5-507, Section 5.12.3, Libraries, City of Yorba Linda: Most of this paragraph, beginning with “Both libraries.....” and ending with “..... sources to construct a new facility” is out of place, since this is impact analysis. Please move to Existing Conditions section. Leave only a summary in Section 5.12.3.
29. Page 5-507, Section 5.12.3, Libraries, City of Yorba Linda: Cite source for sentence beginning with “This would meet the industry standard....”
30. Page 5-507, Section 5.12.3, Libraries, City of Yorba Linda General Plan: Regarding last sentence that concludes Project impact would be reduced with construction of a new library, please expand discussion/provide supporting data that the Project’s demand was assumed part of the new library. Also, add a statement that indicates that library expansions would undergo a separate CEQA review.
31. Page 5-508, Section 5.12.3, Hospitals: Cite source or provide evidence to support this conclusion.
32. Page 5-508, Section 5.12.4, PS-1: See comment regarding Page 5-505 above. The OCFA’s determination regarding response times and recommendations, as well as their overall findings regarding the Fire Protection and Emergency Evacuation Plan, should be disclosed in this EIR (here and in the Hazards Section).
33. Page 5-508, Section 5.12.5, Schools: Cielo Vista is a cumulative project; why called out here?

34. Page 5-509, Section 5.12.5, Hospitals: At top of page, regarding conclusion of “no impacts will occur.” Would no impacts occur or would they be less than significant?
35. Page 5-509, Section 5.12.5, First Full Paragraph: Mitigation Measures PS-1 and PS-2 pertain only to payment of fees for fire protection and schools. Therefore, statement that “...payment of required fees would occur with public service providers...” is incorrect. Please revise.
36. Page 5-509, Section 5.12.5: This section focuses almost entirely on Project and not on cumulative projects (1,787 dwellings). Please revise.

5.13 RECREATION

Global Comments

1. This section does not address the City’s Draft Parks and Recreation Master Plan Update. This most recent Draft document includes the most accurate and relevant information regarding the Park In-lieu requirements and parkland inventory. Please view the Council Meeting and Staff Report from January 7, 2014 in regards to the Park In-lieu updates that have been adopted and will be implemented February 20, 2014. The next posting and review of the DRAFT Parks and Recreation Master Plan Update will be at the Parks and Recreation Commission Meeting on February 20, 2014. The entire document will be presented at this time. Please add a discussion to the regulatory section.
2. Park J is proposed underneath SCE transmission lines, potentially requiring preparation of an EMF study. Not an inviting appeal for residents.
3. The proposed dog park is located within the gated community. The Yorba Linda residents expressed a lack of public benefit from the development. The dog park could benefit the community for public use if it were located at the entry to Esperanza Hills at Esperanza Hills Pkwy and San Antonio Road or at the community entrance in Park I – Orange Park. Were these statements made at the public workshop? How was this public input received? Is there parking available for the public community or do they park down the street and walk into the gated community. If so this impacts the public streets as well.
4. The Project proposes equestrian trails and multipurpose trails internal and external to the private gated community. However, the proposed trails do not provide a continuous path or loop connection for Trails 35a and 36 that are consistent with the General Plan Update - Riding, Hiking, and Bikeway Trails Component - April 5, 2005. Many of the trails are exclusive to residents of the Project and are not for public use. Therefore, please revise the proposed Conceptual Trails Plan to include the continuity of the public use Earthen Multipurpose Trails 35a and 36 as indicated in the City of Yorba Linda – General Plan Update - Riding, Hiking, and Bikeway Trails Component - April 5, 2005.

5. The Draft EIR should categorize the type of parks beyond “passive” or “active”, and define them using the standard types such as minipark/greenbelt vs. neighborhood or community park. The Draft EIR should refer to the definition of types of parks by reviewing the most recent City of Yorba Linda DRAFT Parks and Recreation Master Plan Update. Next posting and review will be available just prior to and at the Parks and Recreation Commission Meeting on February 20, 2014.

Page/Section - Specific Comments

1. Page 5-512 to 5-513: The existing conditions should identify the distance of each park from the project site. Any existing parkland deficiencies for the County or City should also be identified, such as neighborhood and community parks for Yorba Linda. The Open Space discussion does not identify open space within the County. The project site is designated as Open Space by the County.
2. Page 5-514, Section 5.13.2: The Regulatory section should identify and include discussions of the following documents: 1) City of Yorba Linda **DRAFT** Parks and Recreation Master Plan Update (see Global Comment #1); and 2) City of Yorba Linda Municipal Code Title 17 (in particular, the sections relevant to parks and recreational facilities). It is noted, Municipal Code Title 17 and Park in-lieu fees have been updated as of January 7, 2014 and will go into effect February 20, 2014.
3. Page 5-520: The analysis should consider the potential impact on City parks specifically related to sports fields, as these facilities are not included within the project site.
4. Page 5-536: Under the Trails discussion, it notes that it is anticipated a park area will also be constructed in the land owned by the City. The discussion needs to clarify the location of this park and its size. Is this park identified in “The City of Yorba Linda **DRAFT** Parks and Recreation Master Plan Update”? Also see Global Comment #1. The Draft EIR should also clarify which park this discussion refers to.
5. Pages 5-541-542: The City does not agree that the proposed miniparks/greenbelts will mitigate the impact of more residents/children needing programmable space as well. See the previous comments made regarding Page 5-440, Goal 3 and Policy 3.1: The discussion should show how the proposed project meets the City’s requirement.
6. Page 5-542, Cumulative Impacts: The discussion references the Cielo Vista project, but does not appear to consider the other cumulative project and overall impact on County and City recreation facilities.

5.14 TRANSPORTATION AND TRAFFIC

Global Comments

1. Peak hour factors (PHF) were not applied in the ICU analysis of the study intersections under any of the analysis scenarios. Therefore, the reported ICU calculations are reflecting a better LOS than what existing and future peak hour operations should reflect.

Peak hour factors are usually applied in the ICU 2000 and HCM 2000 methods of intersection analysis to take into account the peaking characteristics of traffic within the peak hour. It is usually based on the peak 15-minute period. The application of peak hour factors in ICU analysis is discussed in the Federal Highway Administration (FHWA) Signalized Intersections: Informational Guide (August 2004).

2. Peak (95th percentile) queue lengths should be evaluated at the southbound approaches of the intersections of San Antonio Way, Yorba Linda Blvd./Via Del Agua and Yorba Linda Boulevard/Stonehaven Drive to determine if peak queuing will potentially block access to and from side streets immediately north of the intersections. In the scenario where Aspen Way is used for access, a queuing analysis should also be provided for the westbound approach of Aspen Way to San Antonio Road. There are two residential units on the north side of Aspen Way and a nearby cul-de-sac (Willow Tree Lane) that may have access blocked during the morning peak periods.
3. The traffic counts used in the traffic study were conducted in early 2012 and are now over one year old and almost two years old. Consideration should be given to conducting updated traffic counts.
4. The City's existing traffic signal system is running on time-of-day plans and it is not capable of handling special signal timing required for fire emergency evacuation. The Esperanza Hills Project should contribute fair-share funding towards the cost to upgrade the City's current traffic signal system to a traffic responsive system.
5. The project must provide justification that it has the legal right to require third parties to extend or allow Aspen Way, Stonehaven Drive, or San Antonio Road approximately 1,850 feet south of Aspen Way to connect to the project.

Page/Section - Specific Comments

2. Comments on Appendix O, Traffic Impact Analysis Report, are provided below. These comments also apply to Section 5.14, Transportation and Traffic, of the Draft EIR and should be updated accordingly.

Appendix O – Traffic Impact Analysis Report

1. Section 3.1 – Existing Street System: The TIA states that the posted speed limit on Stonehaven Drive and on Via Del Agua is 35 miles per hour (mph). This is incorrect, there are signs immediately north of Yorba Linda Boulevard showing that the posted speed limit is 25 mph on Stonehaven Drive, and is 30 mph on Via Del Agua. Please revise.
2. Section 5.2 – Project Traffic Distribution and Assignment – Option 1: First bullet on page 14 in this section states that Via Del Agua and Stonehaven Drive are “major traffic carriers” in proximity to the project site. These are both local roadways designed to carry relatively low traffic volumes, please revise statement accordingly.

3. Section 6.1 – Ambient Traffic Growth: First sentence on page 17 refers to “horizon year background growth” to describe ambient growth factor calculated for Year 2020 Cumulative Conditions. Reference to “horizon year” is confusing in this sentence, that term is typically applied to a long-range future condition (i.e. 2035).
4. Section 9.1 – Existing Plus Option 1 Traffic Conditions: The Cielo Vista Project has not yet been approved and conditions of approval have not been finalized. At a minimum the Esperanza Hills project should be responsible for contributing a fair share amount to the needed signalization of the Yorba Linda Boulevard/Via Del Agua intersection.
5. Section 10.0 – Project-Related Fair Share Contribution – Option 1: Section 10.0 should include a table showing project fair share contribution toward installing traffic signal at Yorba Linda Boulevard / Via Del Agua to mitigate significant impact under Existing Plus Project conditions.
6. Section 11.3 – Emergency Access – Option 1: There is no discussion of how the project will impact emergency evacuation time for the surrounding areas that will share access.
7. Figure 11-2 – Emergency Access Plan – Option 1: The proposed secondary access road will impact the proposed Cielo Vista Site Plan. The alignment of proposed secondary access road should be shown superimposed on the current Cielo Vista Site Plan.
8. Section 11.4 – Via Del Agua and Stonehaven Drive Assessment – Option 1: The statement that this residential street loop functions similar to a Commuter roadway is unfounded. The term Commuter roadway suggests that there is a substantial amount of through traffic on the road. This residential loop road provides direct access to homes via driveways along the loop as well as indirect access for a number of cul-de-sac streets. Existing daily traffic on the loop road is highest on Via Del Agua just north of Yorba Linda Boulevard where traffic flows reach about 2,350 vehicles per day. Peak hour volumes are just under 250 vehicles per hour. The TIA text should discuss that with the additional traffic from 378 dwelling units in the Esperanza Hills project and 95 dwelling units in the Cielo Vista Project, the traffic volumes on the residential loop road will more than double and the function of the loop road will change from a local residential street to a Commuter roadway.

The traffic study arbitrarily calculates a physical capacity for the loop road and relates the forecast volume to the estimated capacity to derive Level of Service for the motorists using the street. The concern on this residential street should not be the Level of Service for the motorist but instead the “environmental capacity” of this residential street. This context sensitive capacity is related to environmental factors that impact the residents living along the street. In Section 11.2 – Internal Circulation Evaluation, the study references the recommended local street volume criteria of 1,500 vehicles per day and the study carefully points out that none of the streets internal to the project will have traffic volumes over this criteria. The conclusion given in the text states that “therefore, motorists are expected to enter/exit their driveways comfortably and safely, without undue congestion.” The same or similar criteria should be applied to the Via Del Agua and Stonehaven Drive residential loop road. Based on research of the topic of environmental capacity, there are at least six traffic related factors that are considered in

the determination of environmental capacity: noise, pollution, nuisance, safety, speed and volume. As traffic volumes increase the other environmental factors become more of a concern to residents. A review of numerous sources that have addressed the topic of environmental capacity for residential streets has identified a range of daily traffic volumes that are considered suitable for residential streets. The volumes range from 1,500 to 3,000 per day. The 2035 forecast volume with the Esperanza Hills project is between 4,900 vehicles per day on Stonehaven Drive to 5,450 vehicles per day on Via Del Agua. This is well above the highest threshold that is commonly considered as acceptable for residential streets.

9. Section 11.5 – Queuing Assessment – Option 1: Report states that analysis methodology calculates the 85th percentile (design value) queue lengths to determine queuing impacts. The maximum value (95th percentile) queue lengths should be evaluated instead to address project-related queuing impacts.
10. Table 11-1 Eastbound Left-Turn Queue Analysis Along Yorba Linda Boulevard at Via Del Agua (Option 1): In Table 11-1, the eastbound left-turn queue length is approximately the same under all scenarios with the project, and it is not clear whether or not the existing plus project queues assume signalization at the Yorba Linda/Via Del Agua intersection.

The far left column of Table 11-1 reads “*Southbound Left-Turn along Yorba Linda Blvd at Via Del Agua*”, please correct to “*Eastbound*”.

11. Section 13.0 – State of California (Caltrans) Methodology: The traffic impact analysis only took into consideration the State-controlled signalized intersections in the project study area. This project is estimated to generate over 3,600 trips per day, why weren't SR-91 freeway segments or ramp operations at the Weir Canyon Road/SR-91 interchange evaluated for this TIA report?
12. Section 14.1 – Option 2 Assessment: Stonehaven Drive is misspelled in last sentence of first paragraph, please correct.
13. Section 15.2 – Year 2020 Plus Option 2 and Option 2A Project Traffic Conditions: As previously addressed in Comment #9, this report should not assume that mitigation of the significant impact at Yorba Linda Boulevard / Via Del Agua is entirely the responsibility of the adjacent Cielo Vista Project. The Cielo Vista Project has not yet been approved and conditions of approval have not been finalized. At a minimum the Esperanza Hills project should be responsible for contributing a fair share amount to the needed signalization of the Yorba Linda Boulevard/Via Del Agua intersection.
14. Section 17.4 – San Antonio Road Assessment – Option 2 and Option 2A: The statement that this residential street functions similar to a Commuter roadway is unfounded. It is a local residential street and has some homes that have direct driveway access to the street. The concern on this residential street should not be the Level of Service for the motorist but instead the “environmental capacity” of this residential street. This context sensitive capacity is related to environmental factors that impact the residents living along the street. In Section 17.2 – Internal Circulation Evaluation – Option 2 and Option 2A, the study references the recommended local street volume

criteria of 1,500 vehicles per day and the study carefully points out that none of the streets internal to the project will have traffic volumes over this criteria. The conclusion given in the text states that "therefore, motorists are expected to enter/exit their driveways comfortably and safely, without undue congestion". The same or similar criteria should be applied to the Via Del Agua and Stonehaven Drive residential loop road. A review of numerous sources that have addressed the topic of environmental capacity for residential streets has identified a range of daily traffic volumes that are considered suitable for residential streets. The volumes range from 1,500 to 3,000 per day. The current daily traffic volume on San Antonio Road is approximately 3,100 vehicles per day just north of Yorba Linda Boulevard and has reached the reasonable environmental capacity for this street. The 2035 forecast volume on San Antonio Road with the Esperanza Hills project is 8,830 vehicles per day which is well above the highest threshold of 3,000 vehicles per day that is commonly considered as acceptable for residential streets.

15. Section 17.5 – Queuing Assessment – Option 2 and Option 2A: Report states that analysis methodology calculates the 85th percentile (design value) queue lengths to determine queuing impacts. The maximum value (95th percentile) queue lengths should be evaluated instead to address project-related queuing impacts.

Table 17-1 shows an 85th percentile queue length of 286 feet for the eastbound left-turn lane at Yorba Linda Boulevard / San Antonio Road during the PM peak hour (Year 2035). On page 62, the TIA report recommends extending the eastbound left-turn lane to 275 feet including the transition. Excluding the transition (assuming 90 feet), only 185 feet will be provided for stacking.

This recommendation will not be adequate to address the project's queuing impact at Yorba Linda Boulevard / San Antonio Road for Options 2 and 2A. A minimum stacking length of 300 feet should be provided for the eastbound left-turn lane Yorba Linda Boulevard / San Antonio Road to accommodate the peak queue length. It appears that due to the spacing between the intersections of Yorba Linda Boulevard / Via Pedra and Yorba Linda Boulevard / San Antonio Road, extending the eastbound left-turn lane to 300 feet is not feasible. Therefore, it is recommended that other measures be considered to reduce queuing to a length that can be accommodated by the eastbound left-turn lane that is recommended in the TIA report (185 feet plus 90-foot transition).

16. Figure 17-3: Recommended left-turn lane measurement is not visible in Figure 17-3, please show length of striping and transition length in figure.
17. Section 18.0 – Summary of Findings and Conclusions: The *Existing Plus Option 1 Project Improvements* identifies that installation of a three-phase traffic signal at Yorba Linda Boulevard / Via Del Agua will mitigate the project's significant impact but states that it is a planned improvement associated with the Cielo Vista Project. The Cielo Vista Project has not yet been approved and conditions of approval have not been finalized. At a minimum the Esperanza Hills project should be responsible for contributing a fair share amount to the needed signalization of the Yorba Linda Boulevard/Via Del Agua intersection.

The *Existing Plus Option 2 and Option 2A Project Improvements* identifies that installation of a three-phase traffic signal at Yorba Linda Boulevard / Via Del Agua will mitigate the project's significant impact but states that it is a planned improvement associated with the Cielo Vista Project. The Cielo Vista Project has not yet been approved and conditions of approval have not been finalized. At a minimum the Esperanza Hills project should be responsible for contributing a fair share amount to the needed signalization of the Yorba Linda Boulevard/Via Del Agua intersection.

5.15 UTILITIES AND SERVICE SYSTEMS

Global Comments

No global comments.

Page/Section - Specific Comments

1. Page 5-626, Water Service: The discussion of proposed conditions studied by the NEAPS should be moved to the proposed project discussion. Existing conditions, including capacities and any deficiencies should be identified in this section.
2. Page 5-635 to 5-641: The project impact discussion refers to final design to ensure adequate systems are provided to serve the project. A mitigation measure should be added to ensure these systems are provided.
3. Page 5-644, Last Paragraph: Reference is made to the "Friend" project. This project is not listed in the cumulative projects.
4. Page 5-649, Mitigation Measures U-1 and U-2: Reference a Development Agreement with the YLWD. Additional information should be provided regarding the Development Agreement and what it will include, as it seems it will be the mechanism to which water and sewer facilities and service will be provided. It should be clear that adequate storage capacity and improvements will be in place to serve the development in accordance with the final design.

6.0 ALTERNATIVES

Global Comments

1. The Section would benefit from adding a summary of the Project's significant unavoidable impacts, per Section 10, Inventory of Significant unavoidable Impacts. It is noted, the transportation/traffic significant unavoidable impacts identified in Section 5.14.7 are missing from Section 10, they were likely not considered in the Alternative's analysis.
2. Table 6-4-1 is a summary table that compares the "Alternative to the Project." The Alternatives analysis is confusing and conflicts with Table 6-4-1, since it switches between comparing the "Project to the Alternative" versus the "Alternative to the Project," the latter being the correct approach.

3. The analyses often lack conclusions and some do not specifically state whether the Alternative avoids a significant unavoidable impact (i.e., GHG, Noise, or Transportation).
4. The No Project Alternative description switches between the No Project/No Development Alternative (property remains in its current condition) and a No Project/Existing OC Zoning Alternative (property is developed per existing OC zoning). The Section would benefit from adding the No Project/Existing OC Zoning Alternative.
5. Conclusions for each issue area regarding whether the Alternative is superior or inferior to the Project (or neither) are not consistently provided. The first statement is provided under Section 6.5.1, Geology.
6. This section should clarify the approach to analyzing alternatives. Is each alternative compared to both Project Options 1 and 2, or either Project Option 1 or 2. To avoid confusion, this section would be better served if the Alternative is compared to either Option 1 or 2, depending on which option resulted in the greater impact.

Page/Section - Specific Comments

1. Page 6-1, Section 6.1, Paragraph 3: This paragraph, which discusses the Project site's land use designation and zoning is out of place. Please move to No Project Description and Land Use. Also, the General Plan does not zone a property, it establishes the land use designation. Please differentiate between General Plan designation and zoning "district" or "zone."
2. Page 6-3, Section 6.3, Paragraph 1: It is unclear whether the statement "the alternatives discussed in this section were rejected for the following reasons" refers to Project Alternatives 1 to 5 or the alternatives considered but not advanced, since the following paragraph again states "these alternatives fail to carry out the goals and objectives of the proposed project." Please clarify and consolidate discussions,
3. Page 6-3, Section 6.3, Paragraph 2, Bullet 1: The site is designated OS (5). This is a global change throughout EIR.
4. Page 6-3, Section 6.3, Paragraph 2, Bullet 1: The Project site's designation (County and City General Plans) are out of place. This paragraph focuses on Project rather than an Alternative location. Additionally, this section doesn't support the conclusion that no feasible alternative location exists. An analysis with conclusion should be added. Potential reasons may include: 1) the proponent doesn't own and can't acquire an alternative location; 2) the Project's significant effects would not be avoided with a particular alternative site; and/or 3) other sites are unsuitable due to developmental constraints (i.e., topography, biological resources, etc.).
5. Page 6-3, Section 6.3, Paragraph 2, Bullet 2: Based on the EIR conclusion in Section 5.7, *Hazards*, regarding emergency access/evacuation, and to support infeasibility of this

Alternative, please explain why providing both Stonehaven Drive and Aspen Way access is not needed to avoid/lessen potential impact involving emergency access/evacuation.

6. Page 6-6, Section 6.5.1, Paragraphs 1-2: The description and analysis of the No Project Alternative is confusing. The No Project Alternative is described as the site will “remain in current state.” However, this paragraph also states that the site would be built to more intense uses. Per CEQA 15126.6(e)(3)(A), the no project alternative analysis usually proceeds along one of two ways. (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. (B) If the project is a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.

Please revise this description and section to analyze a “No Project/No Development Alternative”, which differs from a “No Project/Existing OC Zoning” Alternative. Thus, if the site were to remain in its current vacant condition, Project-related impacts would be mostly *avoided* (not lessened or fewer as is concluded in the subsequent analyses). Please revise the No Project/No Development Alternative analysis to exclude references to more intense uses. This section would benefit from evaluating also the “No Project/Existing OC Zoning” Alternative.

7. Page 6-8, Section 6.5.1, GHG, Second Sentence: This discussion is confusing. It is assumed that this paragraph implies the Alternative would avoid the Project’s significant unavoidable impacts, not that the impacts would remain. Please revise discussion.
8. Page 6-8, Section 6.5.1, Hazards and Hazardous Materials: While the proposed fire prevention measures would be implemented, as many as many as 340 additional dwelling units plus 1,088 additional persons would be exposed to potential wildland fire hazards. Disagree with conclusion that this alternative is inferior to Project.
9. Page 6-6, Section 6.5.1, Air Quality: GHG statement is out of place; move to GHG section.
10. Page 6-7, Section 6.5.1, Geology: In last line, the conclusion “is therefore superior...” [or “is therefore inferior”] is missing from most analyses. Also, disagree with conclusion that this Alternative is inferior to the Project, since it would avoid the Project’s proposed grading, and exposing additional housing and persons to potential geologic/seismic hazards.
11. Page 6-8, Section 6.5.1, Hydrology and Water Quality: Disagree with conclusion that this Alternative is inferior to the Project, since it would avoid the Project’s erosion and water quality impacts.

12. Page 6-9, Section 6.5.1, Land Use: See #6 above regarding No Project/No Development versus No Project/Existing OC Zoning. Some of this discussion pertains to that new Alternative.
13. Page 6-10, Section 6.5.1, Population: Significant environmental effects are not the issue. Instead, address whether this Alternative would induce population/housing growth more or less than the Project.
14. Page 6-10, Section 6.5.1, Recreation: Revise statement that impacts would be “no greater than the Project,” since this is inconclusive. Instead, conclude whether this Alternative would lessen or avoid the Project’s impacts and conclude whether it is inferior/superior (or neither) to Project.
15. Page 6-11, Section 6.5.1, Utilities: Disagree with conclusion that this Alternative would result in greater impacts than the Project, since it would avoid the Project’s demand for utilities. Also, the two reservoirs are proposed to meet demand created by the Project-not existing demands. Add conclusion regarding superior or not to Project impacts.
16. Page 6-12, Section 6.6.1, Description: No need to restate Project options in this detail. It is already in the Project Description. It creates confusion. Suggest highlighting how this Alternative differs from Project Option 1 and Project Option 2. For example, how does this Alternative compare to Option 1 (i.e., is grading different or is the development area larger, etc.). Then provide an analysis in comparison to Option 2.
17. Page 6-20, Section 6.6.1, Description, Paragraph 3: It serves no purpose to compare Project options (334 versus 340 dwelling units), since EIR approach is a maximum of 340 in Population and Housing analysis.
18. Page 6-20, Section 6.6.1, Aesthetics: Compare the Alternative to the Project; not to existing conditions.
19. Page 6-16, Section 6.6.1, Air Quality, Sentence 2: This sentence states the site disturbance due to grading is the same for all options. However, this subsequent discussions conflict with this statement, since they highlight the differences. If the dwelling units are equal to Option 2 then why are the concentrations different from Option 2? If the grading volume is the only difference from the Project, then state that the Traffic and other operational emissions are equal to Option 2, however, the construction-related emissions would differ. The conclusion in the last paragraph incorrectly states that impacts would be identical. On Tables 6-6-2 and 6-6-3, add Project (Options 1 and 2) information side by side. Add final conclusion regarding this Alternative’s inferiority/superiority.
20. Page 6-20, Section 6.6.1, Biological Resources: Add final conclusion regarding this Alternative’s inferiority/superiority.
21. Page 6-23, Section 6.6.1, GHG: If Option 2A involves more grading than the Project, why are the GHG construction emissions less than the Project’s? Table 6-6-10 shows all options do not result in same emissions; refer to Air Quality comment above.

22. Page 6-24, Section 6.6.1, Hazards: This analysis doesn't address the added benefit, if any, of a different emergency evacuation. Would the potential wildland fire hazard (emergency access/evacuation) be the same with the different access? Please add conclusion as appropriate.
23. Page 6-31, Section 6.6.1, Land Use, Last Sentence: The statement that "Therefore, no environmental impacts" is not pertinent, since issue is land use. Conclude whether this Alternative conflicts with the County General Plan or Code. How does it compare to the Project impacts?
24. Page 6-33, Section 6.6.1, Noise: Add conclusion whether significant unavoidable impacts associated with the Project would be avoided with this Alternative.
25. Page 6-37, Section 6.6.1, Traffic: Too much Project detail is provided; suggest only summarize or list in bullet form.
26. Page 6-50, Section 6.7.1, Description: This section should focus only on describing Option 2B and highlight how Alternative differs from Project. Exclude detailed discussion on Project; only summarize. Exclude all discussions regarding Option 2A- it's another Alternative. Note, CEQA requires an analysis of alternatives to the Project- not alternatives to other alternatives; this becomes too confusing and conflicts with Table 6-4-1. This section would benefit from an Option 2B Site Plan exhibit.
27. Page 6-54, Section 6.7.1, Aesthetics: In sentence 1, clarify as compared to Project. Option 2A discussion causes confusion; describe only Option 2B. Last sentence, "or the other options presented" compares alternative to other alternative, which is confusing; refer to previous comment.
28. Page 6-54, Section 6.7.1, Air Quality: Don't compare Alternative to all access options; only to Project. It is noted, this issue recurs in all following analyses, requiring revisions to each.
29. Page 6-62, Section 6.7.1, Noise: Table 6-7-2 refers to Option 1 and Table 6-7-3 refers to option 2A. To avoid confusion, suggest rename to Option 2B and state (same as XX).
30. Page 6-76, Section 6.7.1, Attain Objectives: Statement "this Alternative would result in fewer hazards impacts, because the provision of two entry/exit roads.." is incorrect since Project Option 2 proposes access via Aspen plus 2 secondary routes. Conclusion is true for traffic, but not for wildland fire hazards.
31. Page 6-58, Section 6.7.1, Hazards, Paragraph 3: Disagree with conclusion, since the two access roads provided under Option 2B are fewer than three access roads provided under Option 2. (Unless this conclusion can be supported by discussion on overall roadway evacuation capacities, as opposed to number of access roads.)
32. Page 6-78, Section 6.8.1, Description: Please clarify proportionate share reductions, as compared to the Project: 122 (36%) fewer dwellings and 159 (34%) smaller Project area. Clarify whether Option 1 or Option 2 access is assumed for this Alternative.

33. Page 6-80, Section 6.8.1, Air Quality: In second to last sentence, the conclusion is incorrect, since Project would not result in significant unavoidable air quality impacts. Instead, this Alternative would result in fewer short- and long-term air quality impacts.
34. Page 6-80, Section 6.8.1, Biological: Inaccurate statement in first sentence. This Alternative would reduce Project area by 159 acres, but not necessarily the biological impact area by 159 acres, given the proposed open space. Suggest change "disturbed" to "Project." Address whether impacts to any specific resources would be avoided, if PA2 is excluded.
35. Page 6-81, Section 6.8.1, Hazards: Disagree with conclusion in last sentence, since 36% fewer dwellings/persons would be exposed to potential hazards. Also, the PA2 reservoir is proposed to meet demand created by PA2 development, which would not occur under this Alternative.
36. Page 6-82, Section 6.8.1, Hydrology: Disagree with conclusion in last sentence, since 36% fewer dwellings/persons would be developed, resulting in proportionate decreases in water quality and erosion impacts.
37. Page 6-82, Section 6.8.1, Land Use, Sentence 1: How was 0.46 DU/AC calculated? PA1 involves 218 DU/310 AC = 0.70 DU/AC. Therefore, statement that this Alternative is ½ Project density is incorrect.
38. Page 6-83, Section 6.8.1, Noise: Need conclusion whether this Alternative is inferior/superior (or neither) to Project.
39. Page 6-83, Section 6.8.1, Population: Disagree with conclusion in last sentence, since Population/Housing section did not analyze impact to RHNA, according to income category and unmet housing needs for 4th and 5th cycles.
40. Page 6-84, Section 6.8.1, Traffic: Conclude whether this Alternative would avoid the Project's significant adverse traffic impacts.
41. Page 6-86, Section 6.9.1, Description: Clarify proportionate increases, as compared to the Project: +129 (+38%) DU. What about golf course contemplated by General Plan? Verify 469 DU versus 536 DU (as stated on page 6-90).
42. Page 6-86, Section 6.9.1, Aesthetics: Last sentence, disagree with conclusion, since 38% more development, therefore, greater impacts to vistas, visual character, and open space.
43. Page 6-88, Section 6.9.1, Geology: Disagree with conclusion in last sentence, since 38% additional dwellings/persons would be exposed to potential geologic/seismic hazards. Also, likely more grading.
44. Page 6-88, Section 6.9.1, Hazards: Disagree with conclusion in last sentence, since 38% additional dwellings/persons would be exposed to potential wildland fire hazards.

45. Page 6-90, Section 6.9.1, Population: The CEQA threshold is would Alternative induce substantial population growth, which is not addressed here. Note, 38% more population growth than Project. Also, verify 536 DU versus 469 DU (as stated on page 6-86, paragraph 1).
46. Page 6-91, Section 6.9.1, Public Services: Clarify 38% greater demand, therefore, greater impacts, although both this Alternative and Project would result in less than significant impacts.
47. Page 6-93, Section 6.10, Sentence 1: What about the Project's significant adverse traffic impacts?

7.0 SUMMARY OF CUMULATIVE IMPACTS

Global Comments

1. This Section does not adequately summarize the cumulative analyses provided in Sections 5.1 through 5.15.
2. Refer to General Comments on the Draft EIR Comment #3.

8.0 GROWTH-INDUCING IMPACTS

Global Comments

1. This Section fails to analyze whether the Project would:
 - Remove an impediment to growth (e.g., establishment of an essential public service or provision of new access to an area);
 - Foster population growth indirectly through extension of roads or other infrastructure.
2. The comments outlined above for Section 5.11, Population and Housing, apply to Section 8.0 also.
3. This Section should primarily address the Project's growth in population and housing, in the context of SCAG's growth forecasts for OC and the City of Yorba Linda.

9.0 INVENTORY OF MITIGATION MEASURES

Global Comments

1. This Section must be revised/updated for consistency with the comments presented in Sections 5.1 through 5.15 above.

10.0 INVENTORY OF SIGNIFICANT UNAVOIDABLE IMPACTS

1. Page 10-1, Paragraph 1: The greenhouse gas emissions significant unavoidable impacts noted here are inconsistent with Page 5-273 (Section 5.6.8). Please replace text.
2. Page 10-1, Paragraph 2: The noise significant unavoidable impacts noted here are inconsistent with Page 5-482 (Section 5.10.8). Please replace text.
3. Page 10-1: The transportation/traffic significant unavoidable impacts identified in Section 5.14.7 are missing from this section. Please copy to this section.