



City of Brea



March 14, 2016

Mr. Greg Rehmer, Senior Planner
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92886

Dear Mr. Rehmer:

I am writing in regard to the Notice of Preparation (NOP) for the proposed Yorba Linda General Plan Update. The City of Brea appreciates this opportunity to comment on the NOP and provide input for the environmental review. Our comments regarding the NOP are provided below:

1. Transportation/Traffic—The City of Brea respectfully requests that the EIR provide a complete analysis of potential traffic impacts from the proposed project upon Brea streets and intersections. Appropriate mitigation measures and conditions of any project approval should be proposed to address any identified impacts.

The City of Brea appreciates the early dialog that the City of Yorba Linda have provided us regarding this project and we look forward to continuing our communication as the project moves forward.

Thank you again for the opportunity to comment on the NOP. If you have any questions regarding Brea's response, please feel free to reach me at 714/990-7674.

Sincerely,

Jennifer A. Lilley, AICP
City Planner

cc: William Gallardo, City Manager
David Crabtree, Development Services Director



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

March 15, 2016

2016 MAR 18 A 6:48
PLANNING DIVISION

Greg Rehmer, Senior Planner
City of Yorba Linda
Community Development Dept., Planning Division
150 North Third Street
Burbank, CA 91502

**Notice of Preparation of a CEQA Document for the
City of Yorba Linda General Plan Update Project**

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

Air Quality Analysis

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

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

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

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

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

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

Mitigation Measures

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

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

Data Sources

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

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Gordon Mize, Air Quality Specialist by e-mail at gmize@aqmd.gov or by phone at (909) 396-3302.

Sincerely,

Jillian Wong

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



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

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



April 6, 2016

Mr. Greg Rehmer
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92885
grehmer@yorba-linda.org

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Yorba Linda General Plan Update (SCH# 2016031025)

Dear Mr. Rehmer:

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

The City of Yorba Linda (City) is preparing an update to its General Plan, which was initially adopted in 1993. The update will focus on the following elements: land use, circulation, housing, conservation, open space, noise, and safety. The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential project impacts on biological resources.

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river,

stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the City's Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹

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

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DEIR should include the following information.
 - a) CEQA Guidelines, section 15125 (c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008²). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
 - c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

2 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
 - c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
 - d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

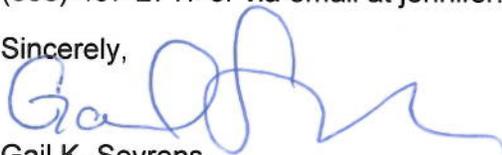
6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts.

The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

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

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

ec: Scott Morgan (State Clearinghouse)

Serving:

Anaheim
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Fountain Valley
Fullerton
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La Palma
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Tustin
Villa Park
County of Orange
Costa Mesa
Sanitary District
Midway City
Sanitary District
Irvine Ranch
Water District
Yorba Linda
Water District

April 7, 2016

Greg Rehmer, Senior Planner
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92885



**SUBJECT: Notice of Preparation of a Draft Environmental Impact Report
for the City of Yorba Linda General Plan Update**

This letter is in response to the Notice of Preparation of a Draft Environmental Impact Report for the Yorba Linda (City) General Plan Update, which updates the City land use, circulation, and other physical changes that have occurred since the adoption of the City 1993 General Plan.

The City is within the jurisdiction of the Orange County Sanitation District (OCSD). OCSD has several regional sewers that serve the City. If there are large General Plan changes that will increase sewer flows, OCSD will request that both the City and regional sewer systems be modeled to understand any potential impacts to the sewer systems. And the City will review, update, and provide updated sewer maps to OCSD for our records. Please use the following flow factors, unless the City has more accurate flow factors, to estimate current and future flows in the Draft Environmental Impact Report:

- 727 gpd/acre for estate density residential (0-3 d.u. /acre)
- 1488 gpd/acre for low density residential (4-7d.u. /acre)
- 3451 gpd/acre for medium density residential (8-16 d.u./acre)
- 5474 gpd/acre for medium-high density residential (17-25 d.u./acre)
- 7516 gpd/acre for high density residential (26-35 d.u./acre)
- 2262 gpd/acre for commercial/office
- 3167 gpd/acre for industrial
- 2715 gpd/acre for institutional
- 5429 gpd/acre for high intensity industrial/commercial
- 150 gpd/room for hotels and motels





Greg Rehmer
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April 7, 2016

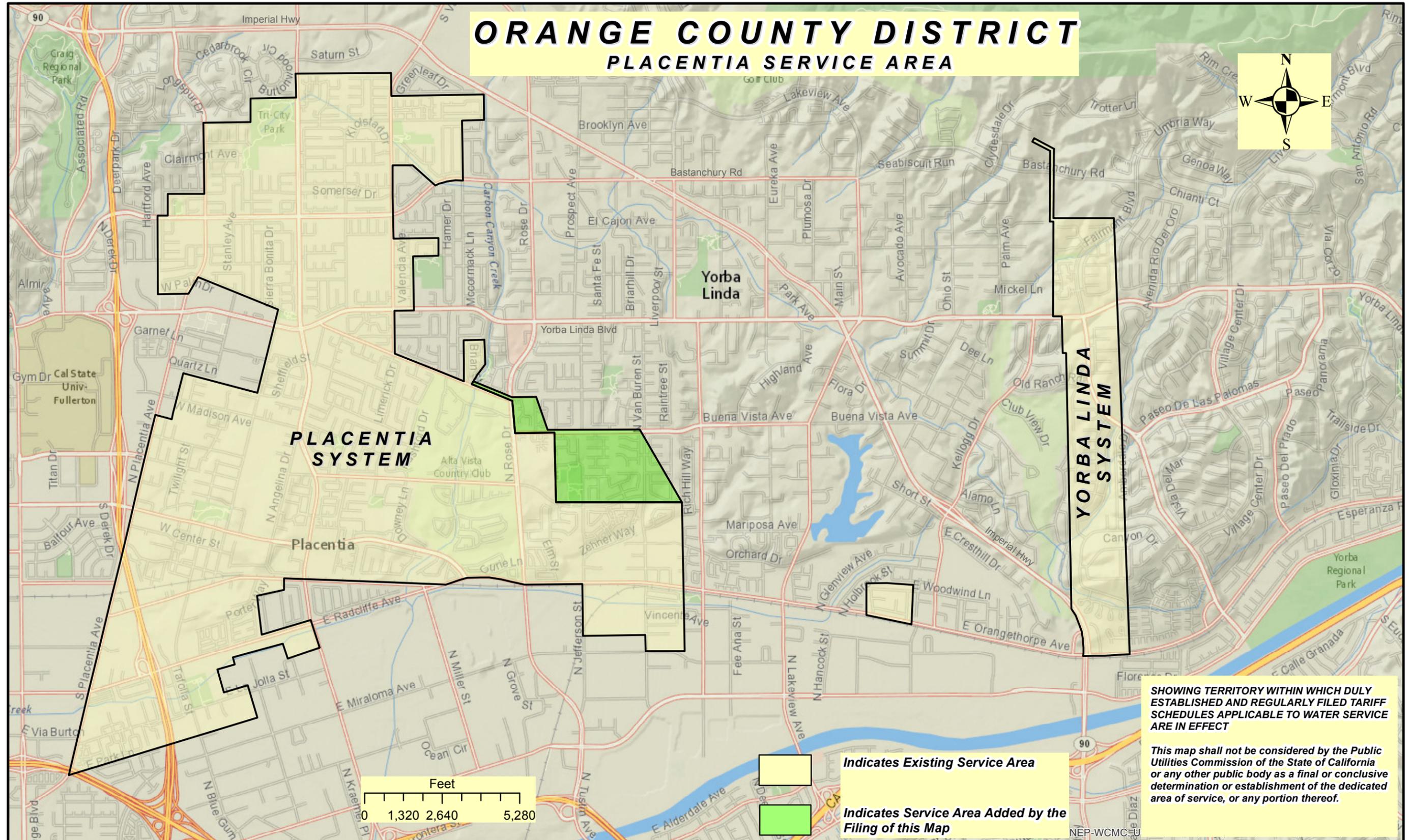
Also, please note that any construction dewatering within the City (public or private) that involves discharges to the local or regional sanitary sewer system must be permitted by OCSD prior to discharges. OCSD staff will need to review/approve the water quality of any discharges and the measures necessary to eliminate materials like sands, silts, and other regulated compounds prior to discharge to the sanitary sewer system.

Thank you for the opportunity to comment on the proposed General Plan Update. If you have any questions, please contact me at 714-593-7462.

A handwritten signature in blue ink, appearing to read "K. Hadden", is written over the typed name.

Kevin Hadden
Principal Staff Analyst

KH:gc



(To be inserted by Utility)

Advice Letter No. 1560-W

Decision No. _____

ISSUED BY

R.J. SPROWLS

PRESIDENT

(To be inserted by Cal P.U.C.)

Date Filed: March 21, 2014

Effective: April 21, 2014

Resolution No. _____



CHAIR
DEREK J. MCGREGOR
Representative of
General Public

VICE CHAIR
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Councilmember
City of Tustin

LISA BARTLETT
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5th District

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City of Mission Viejo

ALTERNATE
ANDREW DO
Supervisor
1st District

ALTERNATE
JAMES FISLER
Director
Mesa Water District

ALTERNATE
KATHRYN FRESHLEY
Representative of
General Public

CAROLYN EMERY
Executive Officer

April 6, 2016

Mr. Greg Rehmer, Senior Planner
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92885



Subject: Comments on Notice of Preparation of a Draft
Environmental Impact Report for the City of Yoba Linda
General Plan Update

Dear Mr. Rehmer:

Thank you for this opportunity to comment on the Notice of Preparation (NOP) of a Program Environmental Impact Report (PIER) for the proposed General Plan Update Project. LAFCO's were established by the State Legislature in 1963 and are governed by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 ("CKH" Government Code Section 56000 et seq.). Under the Act, LAFCOs are responsible for jurisdictional boundary changes involving cities and special districts. LAFCOs are also required to establish spheres of influence for each city and special district within the county and enact policies that encourage the logical and orderly development of areas within spheres to address the present and future municipal service demands. A sphere of influence is "a plan for the probable physical boundaries and service area of a local agency, as determined by the Commission (Government Code Section 560786).

Because of this legislative charge, the Orange County Local Agency Formation Commission (OC LAFCO) is interested in reviewing the PEIR for the City's proposed General Plan Update Project. As a responsible agency involving future annexations to the City of Yorba Linda, OC LAFCO recommends that the City include land use designations for all the unincorporated territories located within the City's sphere of influence that is presented in the Yorba Linda General Plan Location Map attached to the Notice of Preparation.

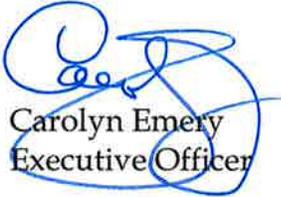
Comments on Notice of Preparation of a Draft Environmental Impact Report for the City of
Yuba Linda General Plan Update

April 6, 2016

Page 2 of 2

OC LAFCO staff appreciates the opportunity to comment on the City's NOP for the PEIR and request future opportunities to review the PEIR when it is available. If you have any questions about the comments provided in this letter, please contact Benjamin Legbandt, Project Manager at blegbandt@oclafco.org or (714) 640-5100.

Sincerely,



Carolyn Emery
Executive Officer



April 7, 2016

Mr. Greg Rehmer, Senior Planner
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, California 92885
Phone: (714) 961-7137
E-mail: grehmer@yorba-linda.com

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Yorba Linda General Plan Update [SCAG NO. IGR8790]

Main Office
818 West 7th Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

Dear Mr. Rehmer,

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

Officers

President
Cheryl Viegas-Walker, El Centro

First Vice President
Michele Martinez, Santa Ana

Second Vice President
Margaret Finlay, Duarte

Immediate Past President
Carl Morehouse, San Buenaventura

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

Executive/Administration Committee Chair

Cheryl Viegas-Walker, El Centro

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the City of Yorba Linda General Plan Update in Orange County. The proposed project includes updates to land use, circulation, and other physical changes that have occurred since its Adopted 1993 General Plan.

Policy Committee Chairs

Community, Economic and Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Deborah Robertson, Rialto

Transportation
Alan Wapner, San Bernardino Associated Governments

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

Sincerely,

Ping Chang
Program Manager II, Land Use and Environmental Planning

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

COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE CITY OF YORBA LINDA GENERAL PLAN UPDATE [SCAG NO. IGR8790]

CONSISTENCY WITH RTP/SCS

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

2012 RTP/SCS GOALS

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

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

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

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

RTP/SCS STRATEGIES

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

REGIONAL GROWTH FORECASTS

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

	Adopted SCAG Region Wide Forecasts		Adopted City of Yorba Linda Forecasts	
	Year 2020	Year 2035	Year 2020	Year 2035
Population	19,663,000	22,091,000	69,700	69,400
Households	6,458,000	7,325,000	22,600	22,800
Employment	8,414,000	9,441,000	17,200	17,300

MITIGATION

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

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

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

3347 MICHELSON DRIVE, SUITE 100

IRVINE, CA 92612-8894

PHONE (949) 724-2086

FAX (949) 724-2592

TTY 711

www.dot.ca.gov



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March 15, 2016

Mr. Greg Rehmer
City of Yorba Linda
Planning Division
4845 Casa Loma Avenue
Yorba Linda, CA. 92885

File: IGR/CEQA
SCH#: 2016031025
Log #: 4650
SR-91, SR-90

Dear Mr. Rehmer:

Thank you for the opportunity to review and comment on the **Notice of Preparation for the Yorba Linda General Plan Update**. The City of Yorba Linda is preparing an update to its Adopted 1993 General Plan, complying with California Government Code Section 65300. The General Plan is a long-term policy document that serves as a blueprint to guide the City's vision for land use and development over the next 20-plus years. The purpose of the Yorba Linda General Plan Update is to update land use, circulation and other physical changes that have occurred since the adoption of the 1993 General Plan.

Caltrans Local Development-Intergovernmental Review program reviews impacts of local development to the transportation system, including the State Highway System. The Department works to ensure that local land use planning and development decisions include the provision of transportation choices, including transit, intercity rail passenger service, air service, walking and biking, when appropriate. The Department advocates community design (e.g. urban infill, mixed use, transit oriented development) that promotes an efficient transportation system and healthy communities.

The Department of Transportation (Caltrans) is a commenting agency on this project and has the following comments for your consideration.

1. Caltrans District 12 agrees with the Office of Planning and Research (OPR) which recommends the following. That local jurisdictions view all transportation projects, new or retrofit, as opportunities to improve safety, access, and mobility for all travelers and recognize pedestrian, bicycle, and transit modes as integral elements of their transportation system.

2. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of the general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks. These networks should allow for all users to effectively travel by motor vehicle, foot, bicycle, and transit to reach key destinations within their community and the larger region. The standard practice should be to construct complete streets while prioritizing project selection and project funding so that jurisdictions accelerate development of a balanced, multimodal transportation network.
3. Creating connected, accessible, and complete systems of circulation networks and ensuring access to opportunities within a community and region requires coordination between land use and circulation planning. Due in part to the connection between transportation funding and greenhouse gas reduction established in SB 375, vehicle miles traveled (VMT) is becoming an increasingly important metric of circulation element performance.
4. Because the circulation element is required to correlate with the land use element, it should account for the features of the particular community. For example, the circulation element may demonstrate that health care facilities and commercial destinations are not accessible via public transit from the affordable and senior housing planned in the land use and housing elements, highlighting the need for additional transit. Mapping transportation options as part of the general plan process may help identify gaps to address. The land use and circulation elements are essential places to plan for mobility and access for all community members. Pedestrian and bicycle routes in the circulation element should connect parks and schools with residential areas identified in the land use element. Moreover, truck routes should be directed away from sensitive users and designated instead to serve areas designed for commercial and industrial uses in the land use element. Speed limits and roadway design should reflect the area's nearby uses.

Mr. Greg Rehmer
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Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. Caltrans is available to meet with the city if you would like to discuss any State Routes. If you have any questions or need to contact us, please do not hesitate to call Aileen Kennedy at (949) 724-2239.

Sincerely,



MAUREEN EL HARAQUE
Branch Chief, Regional-Community-Transit Planning
District 12

c: Scott Morgan, Office of Planning and Research