

Ganahl Lumber Project

Final Environmental Impact Report

SCH No. 2019050015



City of San Juan Capistrano

May 2020

**Volume I:
Responses to Comments**

LSA



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FINAL ENVIRONMENTAL IMPACT REPORT

**GANAHL LUMBER PROJECT
CITY OF SAN JUAN CAPISTRANO
SCH #2019050015**

May 2020

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1.0 INTRODUCTION

This document comprises the Final Environmental Impact Report (EIR) for the proposed Ganahl Lumber Project (project). It is composed of a revised version of the Draft EIR (with ~~striketrough~~ and underline showing changes from the original text), Technical Appendices (with ~~striketrough~~ and underline showing changes from the original text), written comments received on the Draft EIR, and responses to those comments. The revised version of the Draft EIR and technical appendices are bound separately as Volume II.

In compliance with Section 15201 of the *State CEQA Guidelines*, the City of San Juan Capistrano (City) has provided opportunities for public participation in the environmental process. The City distributed an Initial Study (IS) and Notice of Preparation (NOP) on May 22, 2019, to the California State Clearinghouse, responsible agencies, and interested parties for a 30-day public review period. The City also made the IS and NOP available on the City's website to inform agencies and the public about the proposed project and to solicit input on the scope of the Draft EIR. The IS and NOP described the project and identified potential environmental impacts associated with project development and operation. In addition, the City held a public scoping meeting at the San Juan Capistrano Community Center on Thursday, June 6, 2019, to present the proposed project and to solicit input from interested parties regarding environmental issues that should be addressed in the Draft EIR. Appendix A of the Draft EIR contains a copy of the Initial Study/Notice of Preparation (IS/NOP) and comments received. Section 2.2.2 of the Draft EIR identifies areas of concern raised in response to the NOP or at the scoping meeting.

The California Environmental Quality Act (CEQA) requires a Draft EIR to have a review period lasting at least 45 days for projects that have been submitted to the California State Clearinghouse for review (*State CEQA Guidelines*, Section 150105(a)). As required by the *State CEQA Guidelines* Section 15087, the City provided a public Notice of Availability (NOA) of the Draft EIR for the Ganahl Lumber Project at the same time it filed a Notice of Completion (NOC) with the State Clearinghouse. The Draft EIR was circulated for public review for a period of 45 days, from January 6, 2020, to February 19, 2020.

The City used several media to solicit comments on the Draft EIR. The City placed the NOA in the Orange County Register on January 6, 2020. The NOA was mailed to the last known name and address of agencies, organizations, and individuals who previously requested such notice in writing. The City submitted the Draft EIR to the State Clearinghouse for distribution to, and review by, State agencies. The City made copies of the Draft EIR available at two locations: the City of San Juan Capistrano Development Services Department and the San Juan Capistrano Public Library. In addition, the City posted the Draft EIR and all technical appendices on the City website.

The City received nine (9) comment letters on the Draft EIR. Comments were received from State, regional, and local agencies, and members of the public. The comments are included in and responded to in this Final EIR. Comments that address environmental issues are responded to thoroughly. Comments that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not

relevant to environmental issues do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

Section 15088 of the *State CEQA Guidelines*, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
- c) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
 - 1. Revise the text in the body of the EIR; or
 - 2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the comments received on the Draft EIR, and no significant new information has been added that would require recirculation of the document pursuant to State CEQA Guidelines, section 15088.5. A revised version of the Draft EIR has been prepared to make minor corrections and clarifications to the Draft EIR as a result of comments received during the public review period. Therefore, as stated above, this Final EIR includes a revised version of the Draft EIR (with ~~striketrough~~ and underline showing changes from the original text), Technical Appendices (with ~~striketrough~~ and underline showing changes from the original text), written comments received on the Draft EIR, and responses to those comments.

1.1 INDEX OF COMMENTS RECEIVED

The following is an indexed list of the agencies that commented on the Draft EIR. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed or coded with a number as shown in Table 1.A below.

Table 1.A: Comments Received During the Public Comment Period

Comment Code	Signatory	Date
State		
S-1	California Department of Fish and Wildlife South Coast Region	02/18/2020
S-2	Office of Planning and Research State Clearinghouse and Planning Unit	02/20/2020
Local		
L-1	Orange County Local Agency Formation Commission	01/21/2020
L-2	City of Dana Point	02/18/2020
L-3	Orange County Transportation Authority	02/19/2020
L-4	South Coast Water District	02/19/2020
Regional		
R-1	Southern California Regional Rail Authority	10/03/2019
Members of the General Public (Individuals and Organizations not affiliated with government agencies)		
P-1	Christine Johnson	01/21/2020
P-2	Juaneño Band of Mission Indians, Acjachemen Nation	03/19/2020

1.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the indexed/coded comment letters are provided on the following pages. The comment index numbers are provided in the upper right corner of each comment letter, and individual comments within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins. As noted in some of the responses, the City has made some text revisions to the Draft EIR in response to certain comments. The proposed revisions to the Draft EIR are bound separately but are part of this Final EIR, as described above.

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2.0 RESPONSES TO COMMENTS

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2.1 STATE AGENCIES

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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 18, 2020

S-1

Sergio Klotz, Assistant Director
City of San Juan Capistrano Development Services
32400 Paseo Adelanto
San Juan Capistrano, CA 92675
sklotz@sanjuancapistrano.org

**Subject: Ganahl Lumber Project (PROJECT)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH# 2019050015**

Dear Mr. Klotz:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of San Juan Capistrano for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Juan Capistrano

Objective: The Project proposes to develop three separate areas that would respectively contain a lumber hardware store and yard, two drive-through restaurants, and a crushed gravel area for long-term vehicle storage. Primary Project activities include grading and excavation, utility improvements, building construction, paving, and landscape installation.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

S-1-1

S-1-2

Location: The proposed Project is located on an approximately 17-acre site in the City of San Juan Capistrano in Orange County, California. The Project site is generally bounded to the south by Stonehill Drive, to the west by San Juan Creek Channel and Trail, to the east by the Los Angeles – San Diego – San Luis Obispo rail corridor, and to the north by the Capistrano Valley Mobile Estates mobile home park. The parcel contains existing vegetation that may provide suitable habitat for nesting birds, including two mature red willow trees (*Salix laevigata*) that will be removed as part of project implementation.

Timeframe: May 2020 through May 2022.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of San Juan Capistrano in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

I. Mitigation Measure or Alternative and Related Impact Shortcoming

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

COMMENT #1: Mitigation Measure BIO-1 (MM BIO-1) Pre-Construction Surveys for Nesting Birds

Section 4.3.8.2

Issue: MM BIO-1 is insufficient to reduce potential impacts to nesting birds below significant due to the proposed timing of preconstruction surveys.

Specific impact: MM BIO-1 describes pre-construction surveys for nesting birds, should activities with potential to disrupt nesting birds be scheduled during the bird breeding season (February through August for raptors and March through August for songbirds). MM BIO-1 indicates that surveys will be conducted within 14 days prior to construction activities; however, that timeframe is insufficient to identify nesting bird presence in the Project area. A two-week timeframe allows the possibility for birds to locate onsite and potentially establish nests after the survey has been conducted but before construction has started. Pre-construction surveys should be conducted as close to the time of potential disruption as possible in order to minimize the Project's impacts to nesting birds.

Why impact would occur: Special status bird species with low-to-moderate potential to occur on the Project site include white-tailed kite (*Elanus leucurus*; CDFW Fully Protected Species), burrowing owl (*Athene cunicularia*; California Species of Special Concern), California horned lark (*Eremophila alpestris actia*; CDFW Watch List), and California gnatcatcher (*Poliophtila californica*; Endangered Species Act - listed- threatened). Proposed Project activities include grading and removal of vegetation that could impact potential nesting and foraging habitat for those species.

S-1-2

S-1-3

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Mitigation Measure #1:

To reduce impacts to less than significant: CDFW recommends that nesting bird surveys be conducted a maximum of 3 days prior to construction-related activities including clearing of vegetation, grubbing, or grading. If nesting birds are identified on the Project site, the mitigation measures outlined in MM BIO-1 should be followed.

As written, MM BIO-1 prescribes nesting bird surveys to be conducted within 14 days prior to construction activities during breeding season. To avoid or minimize impacts to nesting birds, CDFW recommends that MM BIO-1 be amended to read as follows:

Mitigation Measure BIO-1 (MM BIO-1): If activities with the potential to disrupt nesting birds are scheduled to occur during the bird breeding season (January 15th through September 15th for raptors and February 15th through August 31st for songbirds), a pre-construction nesting bird survey shall be conducted by a qualified biologist. The project Applicant shall hire a qualified biologist to conduct a preconstruction presence/absence survey for nesting birds no more than 3 days prior to site disturbance and submit the survey results to the Director of the City of San Juan Capistrano (City) Development Services Department, or designee. If nesting birds are not detected, no further action is necessary. The nest surveys shall include the project site and up to 500 feet in adjacent areas where project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the California Department of Fish and Wildlife (CDFW) and prior to issuance of any grading or construction permits. Measures shall include establishment of an avoidance buffer until nesting has been completed. The width of the buffer will be determined by the project biologist. Typically, this is a minimum of 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. The monitoring biologist will monitor the nest(s) during construction and document any findings to be confirmed by the Director of the City of San Juan Capistrano Development Services Department, or designee. A report will be made available to CDFW upon request.

S-1-3

Per CEQA Guidelines Section 21081.6(a)(1), the Department has provided the City of San Juan Capistrano with a suggested mitigation measure and recommendations (Comment #1).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

S-1-4

Sergio Klotz, Assistant Director
City of San Juan Capistrano Development Services
February 18, 2020
Page 4 of 4

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City of San Juan Capistrano in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, Environmental Scientist at (858) 636-3159 or Jessie.Lane@wildlife.ca.gov.

Sincerely,



David A. Mayer
Acting Environmental Program Manager
South Coast Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

City of San Juan Capistrano. 2020. Ganahl Lumber Project: Draft Environmental Impact Report. SCH# 2019050015.

S-1-5

2.1.1 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) SOUTH COAST REGION

Letter Code: S-1

Date: February 18, 2020

Response to Comment S-1-1

The comment is introductory and describes the role of CDFW as California's Trustee Agency for fish and wildlife resources. The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Environmental Impact Report (EIR). No further response is required.

Response to Comment S-1-2

The comment summarizes the project description and location, and notes that the vegetation that would be removed as part of project implementation may provide suitable habitat for nesting birds. As described in Section 4.3, Biological Resources, of the Draft EIR, the project would be required to comply with Mitigation Measure BIO-1, which requires the completion of a pre-construction nesting bird survey if activities with the potential to disrupt nesting birds are scheduled to occur during the bird breeding season. In the Final EIR, the measure has been revised to require that pre-construction nesting bird surveys be done 3 days prior to site disturbance instead of 14 days, as explained in Response to Comment S-1-3, below. With implementation of Mitigation Measure BIO-1, as revised in the Final EIR, the project's impacts to nesting birds would be less than significant.

Response to Comment S-1-3

The comment states that Mitigation Measure BIO-1 is insufficient to reduce potential impacts to nesting birds due to the proposed timing of pre-construction surveys. As circulated in the Draft EIR, Mitigation Measure BIO-1 states that a pre-construction presence/absence survey for nesting birds will be conducted no more than 14 days prior to site disturbance. The comment correctly states that a 2-week timeframe would allow the possibility for birds, including special-status bird species with a low to moderate potential to occur on the project site, to establish nests after the survey has been conducted but before construction starts. CDFW's recommendation to amend Mitigation Measure BIO-1 to state that nesting bird surveys shall be conducted a maximum of 3 days prior to construction-related activities has been incorporated into the Final EIR by way of revisions that were made to the relevant measure reflected in the Draft EIR (refer to page 4.3-12 of the Final EIR). Information added to Section 4.3, Biological Resources, of the Final EIR represents a more conservative approach to the timing of implementation of mitigation and has been revised out of an abundance of caution. TAs such, this revision does not constitute "significant new information," as defined by *State CEQA Guidelines* Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment S-1-4

The comment acknowledges the California Environmental Quality Act (CEQA) requirement to incorporate information developed in environmental impact reports into a database that may be used to make subsequent or supplement environmental determinations. The comment also requests that any special-status species and natural communities detected during project surveys be reported to the California Natural Diversity Database (CNDDB). As described in Section 4.3, Biological Resources, of the Draft EIR, no special-status plant or animal species were observed on

the project site during the biological site surveys conducted on September 12, 2017, and December 14, 2018. The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment S-1-5

The comment summarizes the requirement to pay applicable CDFW fees at the time of filing a notice of determination in order for the underlying project approval to be operative, vested, and final. The City acknowledges this requirement. The comment also provides contact information for personnel at CDFW should future coordination efforts be necessary. The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 20, 2020

S-2

Sergio Klotz
San Juan Capistrano, City of
32400 Paseo Adelanto
San Juan Capistrano, CA 92675



Subject: Ganahl Lumber Project
SCH#: 2019050015

Dear Sergio Klotz:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 2/19/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

S-2-1

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

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

S-2-2

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2019050015/3>. Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly.**

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

S-2-3

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

2.1.2 CALIFORNIA OFFICE OF PLANNING AND RESEARCH STATE CLEARINGHOUSE

Letter Code: S-2

Date: February 20, 2020

Response to Comment S-2-1

The comment states that the State Clearinghouse distributed the Draft Environmental Impact Report (EIR) to selected State agencies for review and that the review period closed on February 19, 2020. The comment provides directions for what to do in the event the comment package provided by the State Clearinghouse to the City of San Juan Capistrano (City) is not in order. The City found no issues with the comment package as provided.

Response to Comment S-2-2

The comment cites Section 21104(c) of the California Public Resource Code and directs the City to check the California Environmental Quality Act (CEQA) database for submitted comments on the Draft EIR. The City has confirmed receipt of all comments submitted to the State Clearinghouse and has responded to each of the comment letters from State agencies individually. Refer to Response to Comment Letter S-1.

Response to Comment S-2-3

The comment acknowledges that the City complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. No additional response is required.

2.2 LOCAL AGENCIES

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L-1

January 16, 2020

REGULAR MEMBERS

CHAIR
CHERYL BROTHERS
CITY MEMBER

VICE CHAIR
DOUGLASS DAVERT
SPECIAL DISTRICT MEMBER

IMMEDIATE PAST CHAIR
DEREK J. MCGREGOR
PUBLIC MEMBER

LISA BARTLETT
COUNTY MEMBER

DR. ALLAN BERNSTEIN
CITY MEMBER

JAMES FISLER
SPECIAL DISTRICT MEMBER

DONALD P. WAGNER
COUNTY MEMBER

ALTERNATES

WENDY BUCKNUM
CITY MEMBER

KATHRYN FRESHLEY
SPECIAL DISTRICT MEMBER

LOU PENROSE
PUBLIC MEMBER

MICHELLE STEEL
COUNTY MEMBER

STAFF

CAROLYN EMERY
EXECUTIVE OFFICER

Sergio Klotz
Assistant Development Services Director
City of San Juan Capistrano
32400 Paseo Adelanto
San Juan Capistrano, CA 92675

RECEIVED

JAN 21 2020

DEVELOPMENT SERVICES

Subject: Notice of Draft Environment Impact Report for the Ganahl Lumber Project

Dear Mr. Klotz:

On behalf of the Orange County Local Agency Formation Commission ("OC LAFCO"), we would like to thank you for this opportunity to provide written comments on the Draft Environmental Impact Report prepared for the Ganahl Lumber Project.

As you know, OC LAFCO seeks to serve the citizens of Orange County by facilitating constructive changes in governmental structure and boundaries through actions that resolve intergovernmental issues, by fostering orderly development and governance, and by promoting the efficient delivery of services. OC LAFCO also seeks to serve as a resource for local governments and citizens by providing a structure for sharing information among stakeholders in Orange County. To that end, we recognize the effort that the City of San Juan Capistrano has made in its analysis of the Project under the California Environmental Quality Act ("CEQA"), and submit the following comment:

"The Draft Environmental Impact Report should discuss the anticipated transfer of the City of San Juan Capistrano's water and wastewater utilities to Santa Margarita Water District. In addition, the report should reference the District's capacity to provide adequate water and wastewater services to the Ganahl Lumber Project."

In addition to the above, and as permitted under CEQA and the Ralph M. Brown Act, OC LAFCO requests that it be added to the mailing list for any and all notices related to the Project. This request specifically includes copies of any and all CEQA notices as well as any and all public

L-1-1

L-1-2

L-1-3



Notice of Draft Environment Impact Report for the Ganahl Lumber Project

January 16, 2020

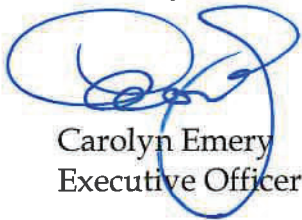
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meetings and/or hearing notices for the Project. The satisfaction of this written request is required both by CEQA (Public Resources Code, § 21092.2) and the Ralph M. Brown Act (Government Code, § 54954.1). Please send copies of any and all such notices to the following:

Orange County Local Agency Formation Commission
2677 N. Main Street, Suite 1050
Santa Ana, CA 92705
Attn: Gavin Centeno, Policy Analyst
Email: gcenteno@oclafco.org

Thank you again for the opportunity to comment on this matter. Should you have any questions regarding this request, please contact Gavin Centeno at gcenteno@oclafco.org or 714-640-5100.

Sincerely,



Carolyn Emery
Executive Officer

cc: Benjamin Siegel, City of San Juan Capistrano
Daniel Feron, Santa Margarita Water District

L-1-3

2.2.1 ORANGE COUNTY LOCAL AGENCY FORMATION COMMISSION (OC LAFCO)

Letter Code: L-1

Date: January 16, 2020

Response to Comment L-1-1

This comment is introductory and describes the role of OC LAFCO. It does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-1-2

This comment states that the Draft EIR should discuss the anticipated transfer of the City of San Juan Capistrano's (City) water and wastewater utilities to the Santa Margarita Water District (SMWD) and the SMWD's capacity to provide water and wastewater services to the project.

As discussed in Section 4.14, Utilities and Service Systems, of the Draft EIR, it was determined that the project-related increase in demand for potable water service would not result in a significant impact with regard to the City's ability to meet existing service commitments and provide adequate supply to existing and projected future customers. As determined in the IS/NOP (Appendix A of the Draft EIR), wastewater systems were determined to have sufficient capacity to serve the project's projected demand for the collection and treatment of wastewater in addition to existing commitments.

The transfer of provider responsibilities from the City's Utility Department to SMWD involves the annexation of existing City-owned and operated utility systems infrastructure into the boundaries and operations of SMWD. The annexation constitutes a change in organization of the utility systems and assumption of operational responsibilities rather than the development of new or additional utility systems or a shift in the supply of water. Regardless of the water/wastewater system operator, the proposed project would comply with Regulatory Compliance Measures UTL-1 through UTL-3 and Mitigation Measures UTL-1 and UTL-2, which would reduce project-related impacts to water and wastewater systems to less than significant levels.

Specifically, Mitigation Measure UTL-1 would require preparation of a Water Capacity Study, which would include a review of the existing water distribution system that would serve the project site to confirm that it has available capacity to convey the water required by the proposed project's uses. Mitigation Measure UTL-2 would require preparation of a Sewer Feasibility Study, which would include a review of the existing sewer system that would serve the project site to confirm that it has available capacity to accept the wastewater flow generated by the proposed project's uses. Any required water and wastewater improvements would be identified in the Water Capacity Study and Sewer Feasibility Study, respectively, and in the event of a deficiency, the project Applicant would be required to pay a fair-share portion of the cost to improve or replace water and/or sewer lines to ensure sufficient capacity. Performance standards included in Mitigation Measures UTL-1 and UTL-2 would require payment of a fair-share portion of the cost of improvements if either the Water Capacity Study and/or Sewer Feasibility Study identify deficiencies. As such, the Draft EIR determined that project-related impacts related to the expansion and operation of water and wastewater treatment facilities would be less than significant with the incorporation of mitigation. With preparation of the Water Capacity Study and Sewer Feasibility Study as required by Mitigation

Measures UTL-1 and UTL-2, SMWD's capacity to provide water and wastewater services to the project will be considered.

In addition, per the terms of the Annexation Agreement between the City and the SMWD, the City's water rights would be transferred to the SMWD upon annexation of the City's water and wastewater services into the SMWD.¹ Therefore, because the water supplies identified in the City's 2015 Urban Water Management Plan (UWMP) would be made available to the SMWD to meet the needs of the City, the conclusion made in Threshold 4.14.2 in the Draft EIR related to water supply (less than significant impacts) remains valid.

Information added to Section 4.14, Utilities and Service Systems, of the Final EIR includes references to the SMWD to account for the possibility that SMWD will be the utility providing water and sewer service at the time Mitigation Measures UTL-1 and UTL-2 are implemented. Additionally, clarification was provided stating that water supplies identified in the City's 2015 UWMP would be made available to SMWD to meet the needs of the City, and therefore, impacts related to water supply would remain less than significant. These revisions disclose a potential change in the utility provider from the City's Utility Department to SMWD, and do not change the analysis or significance determinations contained in the Draft EIR. As such, these revisions do not constitute "significant new information," as defined by *State CEQA Guidelines* Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-1-3

The comment requests that OC LAFCO be added to the mailing list for any and all notices related to the project, pursuant to the California Environmental Quality Act (CEQA) and the Ralph M. Brown Act. OC LAFCO specifically requests copies of any and all CEQA notices as well as any and all public meetings and/or hearing notices for the project. The comment provides contact information for future distribution of CEQA notices and related materials.

Notice will be provided as requested. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

¹ City of San Juan Capistrano City Council, Resolution No. 20-01-21-03, adopted on January 21, 2020.



February 18, 2020

L-2

City of San Juan Capistrano
Sergio Klotz, Assistant Development Services Director
32400 Paseo Adelanto
San Juan Capistrano, CA 92625

**SUBJECT: RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE PROPOSED GANAHL LUMBER PROJECT**

Dear Mr. Klotz:

Thank you for meeting with City of Dana Point staff on February 13, 2020, to discuss the subject Draft Environmental Impact Report (DEIR) for the Ganahl Lumber Project. Based on our discussions and a review of the DEIR, the City of Dana Point offers the following comments regarding the Project. We have prepared these comments with the assistance of Dana Point staff, the City Attorney's office, and an outside technical review by Richard Barretto with Linscott Law and Greenspan Engineers (LLG). The memorandum prepared by LLG is provided as Attachment A. The City's proposed striping modifications for Stonehill Drive are provided as Attachment B.

L-2-1

The City of Dana Point appreciates the opportunity to comment on this project's DEIR. Should you have any questions regarding the information presented herein, please feel free to contact me directly at (949) 248-3574.

Sincerely,

Matthew Sinacori
Director of Public Works/City Engineer

Attachments

CC: Mark Denny, City Manager
Brenda Wisneski, Director of Community Development
Matthew Kunk, Principal Engineer
Belinda Deines, Interim Principal Planner

COMMENTS ON THE GANAHL LUMBER PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Purported Significant Unavoidable Traffic Impacts/Traffic Comments:

- | | | |
|---|--|-------|
| <ul style="list-style-type: none"> • CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring feasible alternatives and mitigation measures. Under CEQA, a lead agency must consider a reasonable range of alternatives to a proposed project and adopt feasible mitigation measures to minimize a project's significant impacts. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-2 |
| <ul style="list-style-type: none"> • The proposed Project, including the signalized intersection, will cause significant environmental impacts within the City of Dana Point, especially at the intersection of Del Obispo Street and Stonehill Drive. This intersection not only serves through traffic to and from Dana Point but also serves as a major connection for San Juan Capistrano residents and uses along Del Obispo Street to the I-5 onramps. The Project will also significantly impact Stonehill Drive between Camino Capistrano and Del Obispo Street. The DEIR states that these impacts are "considered significant and unavoidable . . . because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity." That conclusion is unjustified. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-3 |
| <ul style="list-style-type: none"> • The proposed Project should review traffic access points and redirect trips away from Stonehill Drive if possible. There are multiple access roads planned to the site that could potentially be used to redirect trips. The City of San Juan Capistrano should evaluate other alternatives for access (redirecting trips away from Stonehill) and coordinate with neighboring agencies and stakeholders. The EIR should evaluate those alternatives and impacts, and consider mitigation if applicable. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-4 |
| <ul style="list-style-type: none"> • As discussed in the attached technical review by Linscott Law and Greenspan Engineers, adding a third eastbound through-lane on Stonehill Drive, between Del Obispo Street and Camino Capistrano, is feasible and would mitigate the impacts identified above. While the proposed mitigation for improvements along Stonehill Drive would require inter-jurisdictional coordination between the cities of Dana Point and San Juan Capistrano, Dana Point is ready and willing to work with San Juan Capistrano to implement these necessary improvements. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-5 |
| <ul style="list-style-type: none"> • Given the DEIR's acknowledgment that the Project will have significant traffic impacts, the City of San Juan Capistrano is required to ensure that feasible measures are defined and enforceable, with adequate sources of funding for implementation. The feasible mitigation identified by Dana Point must be incorporated into the Project as a required mitigation measure. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-6 |
| <ul style="list-style-type: none"> • A new traffic signal is proposed on Stonehill Drive at the Project driveway. Please assure that the driveway is aligned with the opposing access to the South Coast Water District site. Also, please assure and document in the DEIR that a crosswalk is not going to be placed across Stonehill Drive, and that directional signage should be installed to tell the public to not cross there and to direct them to other alternatives. Alternatives would be the intersection at Stonehill and Camino Capistrano or to use the undercrossings along San Juan Creek. | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-7 |

General Comments:

- | | | |
|--|--|---|
| <ul style="list-style-type: none"> • With the proposed lumber yard and building supply sales uses, day laborers and associated nuisance issues can result. Dana Point requests that adequate mitigation | <div style="border-left: 1px solid black; height: 100px; margin-left: 5px;"></div> | L-2-8
<div style="text-align: center;">↓</div> |
|--|--|---|

measures are provided to require the applicant to address loitering, trash and debris, sanitation and other issues.

- Section 3.3.3 Circulation and Access: Provide clarification as to whether the proposed signalized driveway will be designed as an intersection at Stonehill Drive that will provide southbound access to the South Coast Water District property.

L-2-8

L-2-9

Air Quality:

- Page 4.2-7 states, “The prevailing wind directions are mostly from the south-southwest, which would most likely follow the northerly direction up through the San Juan Creek channel.” Please provide a reference for this statement. The previous section, 4.2.3.1 Regional Climate, states the winds shift daily. Please clarify and provide sources for wind patterns.
- Page 4.2-15 and 4.2-16 states, “According to SCAQMD guidance...” and “As discussed previously, according to SCAQMD guidance...” Please provide a source or reference for the noted guidance. The discussed guidance results in the comparison Table 4.2.E: Regional Operations Emissions of the project not exceeding Regional thresholds. Additional Regional Operations Emissions, including the neighboring existing automobile sales and service uses, industrial uses, and traffic on Stonehill do not seem to be accounted for in a Regional threshold shown on Table 4.2.E Please provide the SCAQMD source to prepare a project evaluation of Air Quality with only the project emissions compared to Regional Air Quality thresholds.
- Page 4.2-19 states, “...The emissions shown in Table 4.2.H include all on-site project-related stationary sources, as well as 10 percent of the project-related mobile sources.” Please provide the basis for including only 10 percent of the traffic generated by the Project in this calculation. With the project description including a lumber yard delivery fleet of vehicles, vehicle storage, and a signalized intersection, it seems appropriate to assess emissions including all of these mobile sources, perhaps at some peak condition. It appears that a more conservative analysis is likely to demonstrate the Project will exceed the LSTs for PM10 and or PM2.5.

L-2-10

L-2-11

L-2-12

Greenhouse Gas Emissions:

- The GHG analysis is misleading in that it purports to apply “SCAQMD thresholds,” notwithstanding the source of the thresholds used in the analysis is a 10-year-old draft document, and such thresholds were never adopted by SCAQMD.
- Page 4.7-10: Defining a retail project’s “service population” to include patrons (in addition to employees) is improper and results in significantly understating the Project’s GHG impacts. “Service population” is typically defined as residents and employees; customers and visitors cannot properly be included in service population. If the service population was calculated correctly, using only employees (since there are no residents here), the Project’s emissions per service population would be 30.5 MT/yr. That number far exceeds the thresholds used in the DEIR, indicating that the Project has significant GHG impacts that must be appropriately disclosed and mitigated.
- Page 4.7-12: The DEIR wrongly asserts that the proposed Project is consistent with SCAG’s RTP/SCS Goal 4, to “[p]reserves and ensures a sustainable regional transportation system. As indicated above, the DEIR specifically states that there are “significant unmitigated impacts” for traffic and the Traffic Impact Analysis does not

L-2-13

L-2-14

L-2-15

identify alternatives to improve future capacities. As such, the City of Dana Point requests that the EIR be revised to include and require alternative mitigation along Stonehill Drive, consistent with the goals and policies of the RTP/SCS.

L-2-15

Geology and Soils:

- Page 4.6-5 and 4.6-13 states, “...lateral spreading is not anticipated to occur on the project site because the recently constructed sheet pile system along the San Juan Creek levee (a separate project) penetrates below the lowest liquefiable layer identified within the project site for protection of the levee.” Please provide the liquefaction analysis by the applicant or County of Orange to justify this statement. Lateral spreading and liquefaction analyses are required to mitigate a potential hazard to a regional flood prevention channel.
- Per previous statement: It is the understanding of Dana Point staff that the sheet pile system was solely designed for flood management and did not include any lateral spreading analysis. Please investigate further within the EIR, and note additional comments in this area are expected once the technical study is reviewed in detail.
- Page 4.6-15 states: “All shoring shall be designed in accordance with the latest edition of the Trenching and Shoring Manual (Caltrans 2011)...” It is unclear why a shoring project in San Juan Capistrano would be required to meet a Caltrans standard. Please clarify if this Manual was adopted by the City of San Juan Capistrano or other resolution requiring compliance.
- Page 4.6-5 states, “In total, seismic settlements due to liquefaction could be up to 2 inches.” It is unclear in section 4.6 the allowable settlement criteria or threshold for mitigation. The foundation recommendations on Page 4.6-16 references, “areas where settlements cannot be tolerated by spread/strip footings.” It is not clear where these areas are located, what is the settlement amount that is tolerated, and the mitigation proposed.
- The liquefaction and lateral spreading analysis should be reviewed by a 3rd party consultant specializing in such areas.
- MM GEO-1, Sections: Incorporation of and Compliance with the Recommendations in the Geotechnical Investigation and Geotechnical Review and Future Testing, should include a statement that the City of Dana Point shall review and approve the final geotechnical liquefaction and lateral spreading analysis and recommendations for any impacts to the San Juan Creek or Stonehill Bridge.

L-2-16

L-2-17

L-2-18

L-2-19

L-2-20

L-2-21

Hazards and Hazardous Materials:

- MM HAZ-1 should include a statement that the removal and disposal of all material shall not be transported through the City of Dana Point or surrounding Cities without separate notification and permitting as required.
- The required Construction Contingency Plan submitted for review and approval shall include the approval of all Cities proposed along the haul route for any material under review.
- Page 4.8-2: Replace “Victor” with “Victoria” for reference to address of Dick Simon Marine at 25802 Victoria Boulevard, Dana Point.

L-2-22

L-2-23

L-2-24

Hydrology and Water Quality:

- | | |
|--|--------|
| <ul style="list-style-type: none"> • General Comment #1: The City of Dana Point is finalizing the preparation and submittal of a Letter of Map Revision (LOMR), involving this property. The preliminary results of the LOMR would establish the property in the AE zone (Flood Hazard Zone A with an established Elevation). The preliminary information and mapping has been shared with the City of San Juan Capistrano. There is no discussion of this in the section. | L-2-25 |
| <ul style="list-style-type: none"> • General Comment #2: The San Juan Creek Levee is not accredited by FEMA as a flood control channel. The assumptions of containment, time of concentration, and performance during a peak storm event are all without basis. The outlets, flap gates, and containment of floodwater in the San Juan Creek are not confirmed by FEMA or Orange County Flood Control District. | L-2-26 |
| <ul style="list-style-type: none"> • General Comment #3: All hydraulic analysis of the site and storm drain outlets shall be based on San Juan Creek Watershed Hydrology Study, March 2008 by PACE, and Baseline Floodplain Hydraulics for San Juan Creek, April 2010 by PACE. | L-2-27 |
| <ul style="list-style-type: none"> • General Comment #4: City of San Juan Municipal Code Section 8-11.120(a) states that "...the cumulative effect of the proposed development, when combined with all other development, will not increase the water surface elevation of the base flood more than one foot at any point within the City." Per Section 8-11.107 and General Comment #1, the proposed project is in a floodway and is required to not increase the base flood elevation. There is no discussion of compliance with the Municipal Code section included in the section. | L-2-28 |
| <ul style="list-style-type: none"> • City of San Juan Municipal Code Section 8-11.117 appears to apply to this proposed project as well. Please include a discussion on all applicable municipal code sections or a general statement of Section 8-11 all sections apply. See page 4.9-14. | L-2-29 |
| <ul style="list-style-type: none"> • As discussed in Section 4.9 and Appendix H, during the 100-yr storm, stormwater will be directed to neighboring properties, specifically the railroad and other undefined properties. City of San Juan appears to have adopted the Orange County Grading and Excavation Code, per Sec. 8-2.01. Adoption of the 2016 California Building Codes. SUBARTICLE 11 DRAINAGE AND TERRACING of the Orange County Code refers to Sub article 11 of the Orange County Grading Manual for drainage. Sub article 11 of the Grading Manual states: <i>All drainage facilities shall be designed to carry runoff to the nearest point of discharge approved by the OC Building official and/or other appropriate jurisdictional authority as a safe place to deposit such water.</i> The proposed outlet onto neighboring properties does not appear consistent with the City's adopted codes. | L-2-30 |
| <ul style="list-style-type: none"> • As discussed in Section 4.9 and Appendix H, during the 100-yr storm, stormwater will be directed to neighboring properties, specifically the railroad and other undefined properties. Per General Comment#4, the resulting increase in the base flood elevation is discussed as a 4% increase, but not stated in feet or shown to be compliant with the City's Code requirements. | L-2-31 |
| <ul style="list-style-type: none"> • As discussed in Section 4.9 and Appendix H, during the 100-yr storm, stormwater will be directed to neighboring properties, specifically the railroad and other undefined properties. The discussed "existing drainage culvert" is not shown on a map or plan or shown to be adequately sized to accept additional stormwater. | L-2-32 |
| <ul style="list-style-type: none"> • Thresholds 4.9.3.ii, 4.9.3.iii and 4.9.3.iv all appear to require additional analysis and mitigation measures. | L-2-33 |

- RCM WQ-5, should include a reference to San Juan Municipal Code Section 8.11 and statement that no floodwater from the 100yr storm will be directed to adjacent properties. | L-2-34
- RCM WQ-7 should include a statement that the CLOMR and LOMR should be based upon the most recent San Juan Creek Hydrology available from neighboring Cities or the Orange County Flood Control District, including the studies outlined in General Comment #3. | L-2-35

Land Use and Planning:

- The 2009 OCTA Commuter Bikeways Strategic Plan identifies a proposed bicycle corridor along the east bank of San Juan Creek. Please confirm and demonstrate that the proposed project, including the project driveway, gate/fencing, and emergency ingress/egress easements, will not conflict with regional connectivity plans and recreation policies for potential development of bicycle trail access to Doheny State Beach. Refer and provide comments on Threshold 4.12.1 regarding potential conflicts with plans and policies for the circulation system of bicycle facilities. | L-2-36

Noise:

- Appendix I – Noise Impact Assessment; Pages 22, 29: The mobile home park located south of the subject site across from Camino Capistrano/Doheny Park Road is not located within the City of San Clemente as described in the report. The mobile home park is located within City of Dana Point jurisdiction and should be revised to reflect accurate information. | L-2-37

Transportation:

- The existing Ganahl Lumber store in Dana Point generates significant day laborer pedestrian activity on public sidewalks and private property along Doheny Park Road. Consider designating adequate onsite area with shade and facilities for day laborers to minimize conflicts between automobiles and pedestrians, especially along the street frontage on Stonehill Drive, the project driveway, and restaurant drive-through lanes. Ensure that a pedestrian crosswalk is provided at the proposed signalized intersection. | L-2-38
- See attached memorandum. | L-2-39

Utilities & Service Systems:

- Page 4.14-1 outlines the requested easements from South Coast Water District for utility and access roads. The status of these access and utility easements is unclear. Please clarify. | L-2-40
- Additional statements should be added to all Mitigation Measures ensuring a 5-foot separation from all proposed utilities and utility connections to the Stonehill Bridge. | L-2-41

MEMORANDUM

To: Matt Sinacori, P.E., City Engineer
City of Dana Point

Date: February 7, 2020

From: Richard E. Barretto, P.E., Principal
LLG, Engineers

LLG Ref: 2.11.3225.3

Subject: ***Ganahl Lumber Development Project TIA Peer Review
San Juan Capistrano, CA***

Linscott, Law & Greenspan Engineers (LLG) is pleased to submit the following review of the traffic study for *Ganahl Lumber Development Project Traffic Impact Analysis* prepared by LSA Associates, Inc., dated September 2019. The Project TIA evaluates the potential traffic impacts associated with the development of a 161,385 square-foot (SF) Ganahl Lumber hardware store and lumber yard, a 399-space storage facility, and fast-food restaurant uses. The Project is located immediately north of Stonehill Drive between the San Juan Creek channel/trail and the BNSF Railway line in the City of San Juan Capistrano, CA. Access to the Project site will be provided by one (1) signalized driveway on Stonehill Drive.

Study Area and Analysis Scenarios

- The TIA considered twelve (12) existing key study intersections for analysis, inclusive of one (1) project driveway. Of the twelve intersections, four (4) intersections are also within City of Dana Point jurisdiction. Additionally, eight (8) roadway segments were also considered for analysis. Of the eight roadway segments, two (2) segments are also within City of Dana Point jurisdiction. It is our understanding that the study intersections were approved by the City. Hence, we concur with the study intersection assessed in the TIA is sufficient to assess the impacts of the Project.
- The TIA analyzed thirteen (13) scenarios for the weekday daily, AM peak hour, and PM peak hour, which include the following:
 - Existing conditions,
 - Existing Plus Project conditions (Preferred Project, Alternative 1, Alternative 2, and Alternative 3),
 - Existing Plus Project Plus Year 2024 Cumulative conditions (Preferred Project, Alternative 1, Alternative 2, and Alternative 3),
 - Buildout (Year 2040) Plus Project conditions (Preferred Project, Alternative 1, Alternative 2, and Alternative 3).

Project Description

- The site is currently developed as a vehicle storage facility with 752 spaces. The project plans to develop a 161,385 SF Ganahl Lumber hardware store and lumber yard (inclusive of 16,311 SF of overhang areas), a 399-space storage facility, and fast-food restaurant uses. There are four alternatives proposed for the fast food uses:

LINSCOTT
LAW &
GREENSPAN

engineers

Engineers & Planners
Traffic
Transportation
Parking

Linscott, Law &
Greenspan, Engineers
2 Executive Circle
Suite 250
Irvine, CA 92614
949.825.6175
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www.llgengineers.com

Pasadena
Irvine
San Diego
Woodland Hills

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L-2-43

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- Preferred Project: 6,000 SF fast-food restaurant
- Alternative 1: No fast food restaurant
- Alternative 2: 2,000 SF fast food restaurant
- Alternative 3: 4,000 SF fast food restaurant

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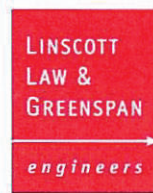
- For each project alternative, vehicle access to the project site will be provided via a proposed signalized driveway at Stonehill Drive and the southwest corner of the project site. A deceleration lane will be constructed as part of the project.
- The proposed project would replace the existing Ganahl Lumber hardware store located at 34162 Doheny Park Road, Capistrano Beach, CA 92624 approximately 0.5 miles south of the project site.

Project Trip Generation and Assignment

- Trips for the existing land use were forecasted based on existing counts. Similarly, trips for the storage facility component of the proposed project were forecasted using trip rates derived from the collected counts at the existing site. Trips for the Ganahl Lumber facility were forecasted based on data surveyed from existing Ganahl Lumber facilities in Costa Mesa, Anaheim and Los Alamitos. Trips for the fast food restaurants were generated based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual* 10th Edition (2017) using ITE Land Use 934: Fast Food Restaurant with Drive-Through Window.
- *Table E* summarizes the trip generation forecast for the Preferred Project alternative, which is forecast to generate a “net” total of 3,486 daily trips with 312 AM peak hour trips and 219 PM peak hour trips.
- *Table F* summarizes the trip generation forecast for Alternative 1, which is forecast to generate a “net” total of 2,073 daily trips with 189 AM peak hour trips and 121 PM peak hour trips.
- *Table G* summarizes the trip generation forecast for Alternative 2, which is forecast to generate a “net” total of 2,544 daily trips with 230 AM peak hour trips and 153 PM peak hour trips.
- *Table H* summarizes the trip generation forecast for Alternative 3, which is forecast to generate a “net” total of 3,015 daily trips with 271 AM peak hour trips and 186 PM peak hour trips.
- Project trip distributions were developed using select zone model plots obtained from Orange County Transportation Analysis Model (OCTAM). Separate distributions were created for the proposed Project and the existing Ganahl Lumber site.

L-2-44

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Page 3



Existing Traffic Volumes

- Existing traffic volumes were collected over three (3) consecutive days in November 2018. The existing peak hour turning movement volumes are based on the average of the three days of data.
- Two (2) study intersections located in San Juan Capistrano are designated as “hot spot” intersections. Existing volumes for these intersections were based on the peak 30-minute volume multiplied by 2. The following locations are considered “hot spot” intersections:
 - Camino Capistrano/San Juan Creek Road
 - Camino Capistrano/I-5 Southbound Ramps

Year 2024 Cumulative Traffic Volumes

- The project is anticipated to open by Year 2024. To account for background traffic growth, an ambient growth factor of 1.0% per year was applied to existing (Year 2018) traffic counts.
- Cumulative projects were also included as part of the background traffic. Review of *Tables U* and *V* indicates that twenty (20) cumulative projects are located within the project’s vicinity. These twenty (20) cumulative projects are forecast to generate 23,088 daily trips, 2,045 AM peak hour trips and 1,963 PM peak hour trips.

Buildout (Year 2040) Traffic Volumes

- General Plan Buildout conditions were developed using forecast volumes obtained from OCTAM by applying the national Cooperative Highway Research Program (NCHRP) post-processing methodologies.

Level of Service Analysis

- Consistent with the City of San Juan Capistrano criteria, intersections were evaluated using both the Intersection Capacity Utilization (ICU) methodology and the Highway Capacity Manual 6th Edition (HCM 6) methodology. For intersections that are located within Dana Point jurisdiction, intersections were evaluated using the ICU methodology.
- Level of service analyses results for Existing Plus Project, Existing Plus Project Plus Cumulative, and Buildout conditions are summarized in the following table:

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L-2-45

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Page 4



Ganahl Lumber Development Project 161,385 sf Hardware Store and Lumber Yard 399-space Vehicle Storage Facility Fast-Food Restaurant Use (4 Alternatives)	Facility Type	Significant Project Impact								
		Existing Plus Project			Existing Plus Project Plus Cumulative			Buildout		
		AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
Preferred Project	Intersection	No	No	-	Yes ¹	No	-	Yes ¹	No	-
6,000 sf of Fast-Food Restaurant Use	Roadway Segment	-	-	Yes ²	-	-	Yes ²	-	-	Yes ²
Project Alternative 1	Intersection	No	No	-	No	No	-	No	No	-
No Fast-Food Restaurant Use	Roadway Segment	-	-	Yes ³	-	-	Yes ³	-	-	Yes ³
Project Alternative 2	Intersection	No	No	-	No	No	-	No	No	-
2,000 sf of Fast-Food Restaurant Use	Roadway Segment	-	-	Yes ²	-	-	Yes ²	-	-	Yes ²
Project Alternative 3	Intersection	No	No	-	Yes ¹	No	-	Yes ¹	No	-
4,000 sf of Fast-Food Restaurant Use	Roadway Segment	-	-	Yes ²	-	-	Yes ²	-	-	Yes ²

¹ Intersection impact at Del Obispo Street/Stonehill Drive.

² Roadway segment impacts at Stonehill Drive between Camino Capistrano and Project Driveway, and Stonehill Drive between Project Driveway and Del Obispo Street.

³ Roadway segment impact at Stonehill Drive between Camino Capistrano and Project Driveway.

sf = square-foot/square feet

- Review of the table above indicates that the project is expected to significantly impact the intersection of Del Obispo Street/Stonehill Drive under Existing Plus Preferred Project Plus Cumulative, Existing Plus Project Alternative 3 Plus Cumulative, Buildout Plus Preferred Project, and Buildout Plus Project Alternative 3 conditions.
- Review of the table above indicates that the project is expected to significantly impact Stonehill Drive between Camino Capistrano and Project Driveway under all scenarios. The project is also expected to significantly impact Stonehill Drive between the Project Driveway and Del Obispo Street under all scenarios for the Preferred Project, Project Alternative 1, and Project Alternative 3.
- The TIA report indicates that the aforementioned impacts are considered "significant and unavoidable because there is no available right-of-way as a feasible improvement to widening Stonehill Drive to provide additional roadway capacity". However, after discussion and coordination with City staff, the City of Dana Point recommends that a third eastbound through-lane on Stonehill Drive, between Del Obispo Street and Camino Capistrano, be implemented as mitigation at this impacted intersection. This would also mitigate the impacted roadway segments of Stonehill Drive between Camino Capistrano and the project driveway as well as between the project driveway and Del Obispo Street. Attached at the end of this letter for your reference are the intersection level of service results along with the daily roadway segment results with implementation of a third eastbound through lane between Del Obispo and Camino Capistrano. As stated above, the implementation of this added lane would mitigate the projects impact. The City of Dana Point has validated the feasibility of these improvements via the preparation of conceptual improvement plans. Approval from the City of San Juan Capistrano and coordination between the two jurisdictions would be required to

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L-2-46

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implement these improvements. Subsequently, the proposed Project would be required to pay its fair share towards these improvements. The fair share amount will be determined based on traffic implications and economic consideration.

Given the above, it is recommended that the report be updated to reflect the mitigation identified above and remove any reference of "significant unavoidable impacts". Attachment A, located at the end of this letter highlights the pages that need revisions (Pages 31, 41, 46, 51, 62, 68, 72, 76, 84, 90 and 94). In addition, please update the level of service tables to include the mitigation identified above. The following tables need revisions which are included in Attachment A (Tables K, N, Q, T, W, Y, AB, AE, AF, AH, AI, AK, AN, AQ, AR and AT).

In addition, and as a result of the mitigation mentioned above, it is recommended that *Section 4.12 Transportation of the Draft EIR for the Ganahl Lumber Project dated January 2020* be updated accordingly. Attachment B located at the end of this letter highlights the DEIR pages and tables of Section 4.12 that need to be reviewed/updated.

Site Access Analysis

- Access to the project site will be provided via one (1) proposed signalized driveway at Stonehill Drive and the southwest corner of the project site. The proposed signal will be coordinated with the existing signal at Camino Capistrano/Stonehill Drive.
- The project driveway is forecast to operate at LOS C or better during both peak hours for all scenarios based on both ICU and HCM methodology.
- A traffic signal at the driveway is warranted under all scenarios for the Preferred Project alternative, Alternative 2, and Alternative 3. Although a signal is not warranted under Alternative 1, a signal is still recommended to ensure safe ingress and egress for the project site.

Construction Analysis

- The total construction worker and truck trip generation is 256 daily trips, 52 AM peak hour trips, and 52 PM peak hour trips. Since the construction trips are less than the net project trip generation, additional analysis is not required.

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L-2-47

L-2-48

L-2-49

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Additional Comments:

- | | |
|--|--------|
| 1. Figure 4: It appears that the volumes at the "hot spot" locations in San Juan Capistrano may have some discrepancies in the PM peak hour. Please review and revise accordingly if necessary. | L-2-50 |
| 2. Page 62, fifth Paragraph, second sentence: Include Stonehill Drive between Project Driveway and Del Obispo Street. | L-2-51 |
| 3. Table AI: Del Obispo Street/Stonehill Drive also operates at LOS D during the PM peak hour, therefore please highlight the box accordingly. | L-2-52 |
| 4. Tables K, N, Q, T, Y, AB, AE, AH, AK, AN, AQ, AT: We are unable to replicate/confirm the project ADT volumes. However, changes to the project trips are not anticipated to affect the overall findings of the report. | L-2-53 |
| 5. Appendix C: Please include Existing conditions synchro reports. | L-2-54 |

* * * * *

We appreciate the opportunity to provide this review for the City of Dana Point. If you have any questions, please contact me at (949) 825-6175.

cc: File
Shane Green, P.E. LLG



TABLE A
EXISTING PLUS PROJECT PLUS CUMULATIVE PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Time Period	(1) Existing Plus Project Plus Cumulative Traffic Conditions [a]		(2) Existing Plus Project Plus Cumulative Traffic Conditions with Mitigation	
		ICU	LOS	ICU	LOS
<u>Preferred Project</u>					
9. Del Obispo Street at Stonehill Drive	AM	0.815	D	0.703	C
	PM	0.745	C	0.742	C
<u>Alternative 3</u>					
9. Del Obispo Street at Stonehill Drive	AM	0.813	D	0.701	C
	PM	0.744	C	0.741	C

Notes

[a] = Values referenced from *Ganahl Lumber Development Project TIA*, prepared by LSA.

L-2-55





TABLE B
BUILDOUT PLUS PROJECT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Time Period	(1) Buildout Plus Project Traffic Conditions [a]		(2) Buildout Plus Project Traffic Conditions with Mitigation	
		ICU	LOS	ICU	LOS
<u>Preferred Project</u>					
9. Del Obispo Street at Stonehill Drive	AM	0.855	D	0.737	C
	PM	0.801	D	0.801	D
<u>Alternative 3</u>					
9. Del Obispo Street at Stonehill Drive	AM	0.853	D	0.730	C
	PM	0.800	C	0.800	C

Notes

[a] = Values referenced from *Ganahl Lumber Development Project TIA*, prepared by LSA.

L-2-55



TABLE C
EXISTING PLUS PROJECT ROADWAY SEGMENT LEVEL OF SERVICE

Key Intersection	(1) Existing Plus Project Traffic Conditions [a]					(2) Existing Plus Project Traffic Conditions with Mitigation				
	Lanes	LOS E Capacity	ADT	V/C	LOS	Lanes	LOS E Capacity	ADT	V/C	LOS
<u>Preferred Project</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	34,983	0.933	E	5D	46,900	34,983	0.746	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	33,031	0.881	D	5D	46,900	33,031	0.704	C
<u>Alternative 1</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	33,882	0.904	E	5D	46,900	33,882	0.722	C
<u>Alternative 2</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	34,249	0.913	E	5D	46,900	34,249	0.730	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	32,825	0.875	D	5D	46,900	32,825	0.700	B
<u>Alternative 3</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	34,617	0.923	E	5D	46,900	34,617	0.738	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	32,927	0.878	D	5D	46,900	32,927	0.702	C

Notes
[a] = Values referenced from *Ganahl Lumber Development Project TIA*, prepared by LSA.

L-2-55



TABLE D
EXISTING PLUS PROJECT PLUS CUMULATIVE ROADWAY SEGMENT LEVEL OF SERVICE

Key Intersection	(1) Existing Plus Project Plus Cumulative Traffic Conditions [a]					(2) Existing Plus Project Plus Cumulative Traffic Conditions with Mitigation				
	Lanes	LOS E Capacity	ADT	V/C	LOS	Lanes	LOS E Capacity	ADT	V/C	LOS
<u>Preferred Project</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	35,963	0.959	E	5D	46,900	35,963	0.767	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	34,011	0.907	E	5D	46,900	34,011	0.725	C
<u>Alternative 1</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	34,862	0.93	E	5D	46,900	34,862	0.743	C
<u>Alternative 2</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	35,229	0.939	E	5D	46,900	35,229	0.751	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	33,805	0.901	E	5D	46,900	33,805	0.721	C
<u>Alternative 3</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	35,597	0.949	E	5D	46,900	35,597	0.759	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	33,907	0.904	E	5D	46,900	33,907	0.723	C

Notes

[a] - Values referenced from *Ganahl Lumber Development Project TIA*, prepared by LSA.

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TABLE E
BUILDOUT PLUS PROJECT ROADWAY SEGMENT LEVEL OF SERVICE

Key Intersection	(1) Buildout Plus Project Traffic Conditions [a]					(2) Buildout Plus Project Traffic Conditions with Mitigation				
	Lanes	LOS E Capacity	ADT	V/C	LOS	Lanes	LOS E Capacity	ADT	V/C	LOS
<u>Preferred Project</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	36,737	0.98	E	5D	46,900	36,737	0.783	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	34,728	0.926	E	5D	46,900	34,728	0.740	C
<u>Alternative 1</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	35,636	0.95	E	5D	46,900	35,636	0.760	C
<u>Alternative 2</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	36,003	0.96	E	5D	46,900	36,003	0.768	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	34,522	0.921	E	5D	46,900	34,522	0.736	C
<u>Alternative 3</u>										
6. Stonehill Drive between Camino Capistrano at Project Driveway	4D	37,500	36,371	0.97	E	5D	46,900	36,371	0.776	C
7. Stonehill Drive between Project Driveway and Del Obispo Street	4D	37,500	34,624	0.923	E	5D	46,900	34,624	0.738	C

Notes

[a] = Values referenced from *Ganahl Lumber Development Project TLA*, prepared by LSA.

L-2-55

ATTACHMENT A

L-2-56

Preferred Project (6,000 sf of Fast-Food Restaurant Use)

Figure 8a shows the resulting Existing Plus Preferred Project peak-hour traffic volumes.

Tables I and J summarize the results of the Existing Plus Preferred Project peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Preferred Project ICU and HCM worksheets are contained in Appendices B and C, respectively. As shown in Table I, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU methodology. As shown in Table J, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Preferred Project impact would not occur at any study area intersection based on the ICU and HCM methodologies.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implemented. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

ratios, and LOS are presented in the study area intersections, including the hot-spot roadways, are anticipated to operate at satisfactory LOS based on the ICU methodology. As shown in Table J, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Preferred Project impact would not occur at any study area intersection based on the ICU and HCM methodologies.

project driveway and between the project driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively, in the Existing Plus Preferred Project condition. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Preferred Project condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 1 (No Fast-Food Restaurant Use)

Figure 8b shows the resulting Existing Plus Project Alternative 1 peak-hour traffic volumes.

Tables L and M summarize the results of the Existing Plus Project Alternative 1 peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Project Alternative 1 ICU and HCM worksheets are contained in Appendices B and C, respectively. As shown in Table L, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU methodology. As shown in Table M, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 1 impact would not occur at any study area intersection based on the ICU and HCM methodologies.

Existing Plus Project Alternative 1 condition. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for Stonehill Drive between the project driveway and Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project Alternative 1 condition. Although a significant project impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the project driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 2 (2,000 sf of Fast-Food Restaurant Use)

Figure 8c shows the resulting Existing Plus Project Alternative 2 peak-hour traffic volumes.

Tables O and P summarize the results of the Existing Plus Project Alternative 2 peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Project Alternative 2 ICU and HCM worksheets are contained in Appendices B and C, respectively. As shown in Table O, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU methodology. As shown in Table P, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 impact would not occur at any study area intersection based on the ICU and HCM methodologies.

Existing Plus Project Alternative 2 condition. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project Alternative 2 condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Project Alternative 3 (4,000 sf of Fast-Food Restaurant Use)

Figure 8d shows the resulting Existing Plus Project Alternative 3 peak-hour traffic volumes.

Tables R and S summarize the results of the Existing Plus Project Alternative 3 peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Project Alternative 3 ICU and HCM worksheets are contained in Appendices B and C, respectively. As shown in Table R, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU methodology. As shown in Table S, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 3 impact would not occur at any study area intersection based on the ICU and HCM methodologies.

Existing Plus Project Alternative 3 roadway segment ADT volumes, v/c ratios, and LOS are presented

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Hot-spot roadways, with the exception of Stonehill Drive between the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively, in the Existing Plus Project Alternative 3 condition. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project Alternative 3 condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

EXISTING PLUS PROJECT PLUS CUMULATIVE CONDITION

According to the project applicant, the project (all project alternatives) will open in 2024. To develop a Year 2024 condition, an ambient growth rate of 0.5 percent per year (i.e., 3 percent total growth) was applied to the existing 2018 traffic counts. This condition also included the proposed project trips (all project alternatives) and manually assigned trips generated by approved/pending (cumulative) projects. Application of a 0.5 percent per year growth rate to the existing traffic volumes is considered conservative and would account for any additional future development in the project vicinity. Figure 9 shows the locations of the cumulative projects.

Table U summarizes the list of cumulative projects provided by City staff in November 2018. This list was reviewed to identify projects in the vicinity of the project site that would contribute traffic in the study area beyond the ambient growth already assumed. The cumulative projects trip generation is summarized in Table V. The volume development files for the cumulative projects are provided in Appendix E. The total trip generation for the cumulative projects was manually assigned to the project study area as illustrated on Figure 10.

Preferred Project (6,000 sf of Fast-Food Restaurant Use)

The Existing Plus Preferred Project Plus Cumulative peak-hour traffic volumes are shown on Figure 11a.

Tables W and X summarize the results of the Existing Plus Preferred Project Plus Cumulative peak-hour LOS analysis for the study area intersections, respectively. The results are contained in Appendixes W and X.

As shown in Table W, the intersection of Stone Hill Drive and Del Obispo Street is forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Preferred Project impact would not occur at this intersection based on the HCM methodology.

This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Preferred Project impact would occur at one study area intersection based on the ICU methodology.

As shown in Table X, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Preferred Project impact would not occur at any study area intersection based on the HCM methodology.

Existing Plus Preferred Project Plus Cumulative peak-hour traffic volumes, and LOS are presented in Appendixes W and X for the study area intersections, including the hot-spot roadways, at the intersection of Stone Hill Drive and Del Obispo Street (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Preferred Project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 1 (No Fast-Food Restaurant Use)

The Existing Plus Project Alternative 1 Plus Cumulative peak-hour traffic volumes are shown on Figure 11b.

Tables Z and AA summarize the results of the Existing Plus Project Alternative 1 Plus Cumulative peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Project Alternative 1 Plus Cumulative ICU and HCM worksheets are contained in Appendices B and C, respectively.

As shown in Table Z, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Project Alternative 1 would not add 0.01 or greater to the v/c ratio at this intersection (0.006). Therefore, a significant Project Alternative 1 or cumulative impact would not occur at any study area intersection based on the ICU methodology.

As shown in Table AA, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 1 or cumulative impact would not occur at any study area intersection based on the HCM methodology.

Existing Plus Project Alternative 1 Plus Cumulative peak-hour LOS are presented in Table AB. As Table AB indicates, all study area intersections, including the hot-spot roadways, are forecast to operate at satisfactory LOS based on the ICU methodology. However, the v/c ratio for Stonehill Drive between Camino Capistrano and the project driveway (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratio for Stonehill Drive between Camino Capistrano and the project driveway would increase by 0.040. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano, Stonehill Drive between the project driveway and Del Obispo Street, and Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Project Alternative 1 impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the project driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Project Alternative 2 (2,000 sf of Fast-Food Restaurant Use)

The Existing Plus Project Alternative 2 Plus Cumulative peak-hour traffic volumes are shown on Figure 11c.

Tables AC and AD summarize the results of the Existing Plus Project Alternative 2 Plus Cumulative peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Existing Plus Project Alternative 2 Plus Cumulative ICU and HCM worksheets are contained in Appendices B and C, respectively.

As shown in Table AC, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Project Alternative 2 would not add 0.01 or greater to the v/c ratio at this intersection (0.008). Therefore, a significant Project Alternative 2 or cumulative impact would not occur at any study area intersection based on the ICU methodology.

As shown in Table AD, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 or cumulative impact would not occur at any study area intersection based on the HCM methodology.

Existing Plus Project Alternative 2 LOS are presented in Table AE. The hot-spot roadways, are forecast to operate at satisfactory LOS based on the ICU methodology. San Juan Creek Road between Valle Road and Camino Capistrano and the project driveway and Del Obispo Street (LOS E), and Valle Road between Valle Road and Camino Capistrano (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.049 and 0.011, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Project Alternative 2 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 3 (4,000 sf of Fast-Food Restaurant Use)

The Existing Plus Project Alternative 3 LOS are presented in Table AF and Figure 11d.

Tables AF and AG summarize the results of the peak-hour LOS analysis for the study area intersections, respectively. The Existing Plus Project Alternative 3 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

As shown in Table AF, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). Project Alternative 3 would add 0.01 to the v/c ratio at this intersection (0.010). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Project Alternative 3 impact would occur at one study area intersection based on the ICU methodology.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

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As shown in Table AG, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 3 or cumulative impact would not occur at any study area intersection based on the HCM methodology.

Existing Plus Project Alternative 3 Plus Cumulative roadway segment ADT volumes, v/c ratios, and

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

ng the hot-spot roadways, are in Juan Creek Road between Valle Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street (LOS E), and

Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively. These are

considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c

ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps.

Although a significant Project Alternative 3 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

BUILD OUT CONDITION

LSA prepared future traffic forecasts (provided in Appendix F) for Buildout (Existing Plus Project [for all project alternatives] Plus General Plan Buildout) conditions using the long-range traffic modeling tool, the Orange County Transportation Analysis Model (OCTAM). Prior to preparation of this forecast data, LSA coordinated with City staff on the selection of a traffic model and the model inputs (i.e., land uses and highway network data). OCTAM is a travel demand model derived from the Southern California Association of Governments (SCAG) Regional Model that provides more specific land use and network information for Orange County.

The intersection and roadway segment traffic volumes for Year 2040 Without Project conditions were developed using the OCTAM base year (2012) and future year (2040) model unconstrained networks. Raw traffic model data from OCTAM base and future year model runs were post-processed using National Cooperative Highway Research Program (NCHRP) 255 methodologies to develop peak-hour turning movement volumes at each study area intersection and roadway segment. The following describes the methodology used to post-process model volumes to develop peak-hour intersection volumes for Year 2040 Buildout conditions:

Preferred Project (6,000 sf of Fast-Food Restaurant Use)

The Buildout (2040) (including the Preferred Project) peak-hour traffic volumes are shown on Figure 13a.

Tables AI and AJ summarize the results of the Buildout (2040) peak-hour LOS analysis for the study area intersections using the HCM methodology. Worksheets are contained in the Appendix.

As shown in Table AI, the intersection of Stonehill Drive and Del Obispo Street is forecast to operate at satisfactory LOS based on the HCM methodology. The v/c ratio at this intersection (0.012) is less than the v/c ratio at this intersection (0.012).

This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Preferred Project impact would occur at one study area intersection based on the ICU methodology.

As shown in Table AJ, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Preferred Project impact would occur at one study area intersection based on the HCM methodology.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

As shown in Table AK, the intersection of Stonehill Drive and Del Obispo Street is forecast to operate at satisfactory LOS based on the HCM methodology. The v/c ratios for Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Preferred Project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

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Project Alternative 1 (No Fast-Food Restaurant Use)

The Buildout (2040) (including Project Alternative 1) peak-hour traffic volumes are shown on Figure 13b.

Tables AL and AM summarize the results of the Buildout (2040) peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Buildout ICU and HCM worksheets are contained in Appendices B and C, respectively.

As shown in Table AL, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Project Alternative 1 would not add 0.01 or greater to the v/c ratio at this intersection (0.007). Therefore, a significant Project Alternative 1 impact would not occur at any study area intersection based on the ICU methodology.

As shown in Table AM, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 1 or buildout impact would not occur at any study area intersection based on the HCM

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. (Please revise the report accordingly).

As shown in Table AN, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 1 or buildout impact would not occur at any study area intersection based on the HCM methodology. However, the v/c ratio for Stonehill Drive between Camino Capistrano and the project driveway would increase by 0.040. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano, Stonehill Drive between the project driveway and Del Obispo Street, and Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Project Alternative 1 impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the project driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 2 (2,000 sf of Fast-Food Restaurant Use)

The Buildout (2040) (including Project Alternative 2) peak-hour traffic volumes are shown on Figure 13c.

Tables AO and AP summarize the results of the Buildout (2040) peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. The Buildout ICU and HCM worksheets are contained in Appendices B and C, respectively.

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As shown in Table AO, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Project Alternative 2 would not add 0.01 or greater to the v/c ratio at this intersection (0.008). Therefore, a significant Project Alternative 2 impact would not occur at any study area intersection based on the ICU methodology.

As shown in Table AP, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 or buildout impact would not occur at any study area intersection based on the HCM methodology.

Buildout roadway segment AP, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 or buildout impact would not occur at any study area intersection based on the HCM methodology.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

As Table AQ indicates, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 or buildout impact would not occur at any study area intersection based on the HCM methodology.

Del Obispo Street would increase by 0.049 and 0.011, respectively.

These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps. Although a significant Project Alternative 2 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Project Alternative 3 (4,000 sf of Fast-Food Restaurant Use)

The Buildout (2040) (including Project Alternative 3) peak-hour traffic volumes are shown on Figure 13d.

Tables AR and AS summarize the results of the area intersections using the ICU and HCM methodologies. Worksheets are contained in Appendices B and C.

As shown in Table AR, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). Project Alternative 3 would add 0.01 to the v/c ratio at this intersection (0.010). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Project Alternative 3 impact would occur at one study area intersection based on the ICU methodology.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implement. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

As shown in Table AS, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 3 or buildout impact would not occur at any study area intersection based on the HCM methodology.

Remove language about "significant unavoidable impact" since a feasible mitigation could be implemented. We recommend including mitigation that would consist of adding a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

are presented in Table AT. As Table AT shows, the hot-spot roadways, are forecast to operate at satisfactory LOS between Valle Road and Camino Capistrano and the project driveway (LOS E), Valle Road and Del Obispo Street (LOS E), and Valle Road and Stonehill Drive (LOS F). The v/c ratios for Stonehill

Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps.

Although a significant Project Alternative 3 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the project driveway and between the project driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

ACCESS AND ON-SITE CIRCULATION ANALYSIS

Vehicle access to the project site will be provided via a proposed signalized driveway at Stonehill Drive and the southwestern corner of the project site. Due to the proximity of the proposed signal to the existing signal at Camino Capistrano/Stonehill Drive, the signal would be coordinated to minimize vehicle delays, stops, and queuing. A deceleration lane in the westbound direction would be constructed on Stonehill Drive to enhance safety and traffic flow for right-turn access to the project site. An LOS analysis has been conducted at the proposed traffic signal at Stonehill Drive and the southwestern corner of the project site. Based on the results of this analysis, this intersection is forecast to operate at LOS C or better during both peak hours for all scenarios using the ICU and HCM methodologies. Therefore, the proposed signalized driveway at Stonehill Drive is expected to operate at satisfactory LOS. In addition, two outbound lanes will be provided at the project driveway for left and right turns.

SIGNAL WARRANT ANALYSIS

A peak-hour traffic signal warrant analysis has been prepared to determine whether a traffic signal is justified at the project driveway and Stonehill Drive. The analysis is based on Warrant 3, Peak Hour Warrant (70% Factor), of the nine warrants presented in the California Manual on Uniform Traffic Control Devices (CAMUTCD). The 70 percent factor has been used because the speed limit along Stonehill Drive adjacent to the project site is 50 mph, which exceeds the 40 mph criteria along a major street (i.e., Stonehill Drive) per Warrant 3. The CAMUTCD signal warrant analysis worksheets are provided in Appendix G.

LSA

Table K: Existing Plus Preferred Project Roadway Segment Level

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project	2 Existing Plus Project			3 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,500	23,755	0.633	B	287	24,042	0.641	E	0.008	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	430	24,595	0.656	B	0.012	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,500	24,407	0.651	B	232	24,639	0.657	B	0.006	No
	Costco-AAMCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,500	19,681	0.525	A	98	19,779	0.527	A	0.002	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-5	19,465	0.779	C	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	2,584	34,983	0.933	E	0.069	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	102	1,774	0.554	A	0.031	No
	westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	0.039	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	0.027	No
	westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	0.024	No
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D	532	33,031	0.881	D	0.017	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	31	1,643	0.513	A	0.009	No
	westbound	2	3,200	898	0.281	A	26	924	0.289	A	0.008	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	0.006	No
	westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	0.007	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	0.001	No

¹ = exceeds City's Level of Service criteria

italics = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

¹ Segment is considered a "Hot Spot" location (LOS E is acceptable).

² Segment is located in Dana Point (LOS C is acceptable).

³ A significant project impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (2) is E or F.

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Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Table N: Existing Plus Project Alternative 1 Roadway Segment Level of Service

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project ADT	2 Existing Plus Project			3 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,500	23,755	0.633	B	4	23,759	0.634	B	0.001	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	G1	24,226	0.646	B	0.002	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,500	24,407	0.651	B	-276	24,131	0.643	B	-0.008	No
	Costco-AAMCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,500	19,681	0.525	A	-312	19,369	0.517	A	-0.008	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-12	19,458	0.778	C	-0.001	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	1,483	33,882	0.904	E	0.040	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	55	1,727	0.540	A	0.017	No
	westbound	2	3,200	904	0.283	A	11	981	0.307	A	0.024	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	49	1,349	0.422	A	0.016	No
	westbound	2	3,200	1,417	0.443	A	37	1,454	0.454	A	0.011	No
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D	322	32,721	0.873	D	0.009	No
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	17	1,629	0.509	A	0.005	No
	westbound	2	3,200	898	0.281	A	13	911	0.285	A	0.004	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	8	1,270	0.397	A	0.003	No
	westbound	2	3,200	1,406	0.439	A	11	1,417	0.443	A	0.004	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	10	12,711	1.017	F	0.001	No

¹ = exceeds City's Level of Service criteria

Italics = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

² Segment is considered a "Hot Spot" location (LOS E is acceptable).

³ Segment is located in Dana Point (LOS C is acceptable).

⁴ A significant project impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (2) is E or F.

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Table Q: Existing Plus Project Alternative 2 Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project ADT	2 Existing Plus Project			3 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,500	23,755	0.633	B	99	23,854	0.636	E	0.003	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	184	24,349	0.649	E	0.005	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,500	24,407	0.651	B	-106	24,301	0.648	E	-0.003	No
	Costco-AAMCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,500	19,681	0.525	A	-174	19,507	0.520	A	-0.005	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-9	19,461	0.778	C	-0.001	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	1,850	34,249	0.913	E	0.049	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	70	1,742	0.544	A	0.021	No
	westbound	2	3,200	904	0.283	A	98	991	0.312	A	0.029	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	60	1,360	0.425	A	0.019	No
	westbound	2	3,200	1,417	0.443	A	50	1,467	0.458	A	0.015	No
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D	426	32,825	0.875	D	0.011	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	22	1,634	0.511	A	0.007	No
	westbound	2	3,200	898	0.281	A	17	915	0.286	A	0.005	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	12	1,274	0.398	A	0.004	No
	westbound	2	3,200	1,406	0.439	A	15	1,421	0.444	A	0.005	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	13	12,714	1.017	F	0.001	No

¹ = exceeds City's Level of Service criteria

² = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

² Segment is located in Dana Point (LOS C is acceptable).

¹ A significant project impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (2) is E or F.

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Table T: Existing Plus Project Alternative 3 Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project	2 Existing Plus Project			3 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,500	23,755	0.633	B	192	23,947	0.639	B	0.006	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,160	0.644	B	306	24,471	0.653	B	0.009	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,500	24,407	0.651	B	64	24,471	0.653	B	0.002	No
	Costco-AAMCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,500	19,681	0.525	A	-38	19,643	0.524	A	-0.001	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-7	19,463	0.779	C	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	2,218	34,617	0.923	E	0.059	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	87	1,759	0.550	A	0.027	No
	westbound	2	3,200	904	0.283	A	110	1,014	0.317	A	0.034	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	73	1,373	0.429	A	0.023	No
	westbound	2	3,200	1,417	0.443	A	63	1,480	0.463	A	0.020	No
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D	328	32,927	0.878	D	0.014	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	25	1,637	0.512	A	0.008	No
	westbound	2	3,200	896	0.281	A	22	920	0.288	A	0.007	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	16	1,278	0.399	A	0.005	No
	westbound	2	3,200	1,406	0.439	A	18	1,424	0.445	A	0.006	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	15	12,716	1.017	F	0.001	No

¹ = exceeds City's Level of Service criteria

² = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A significant project impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (2) is E or F.

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Table W: Existing Plus Preferred Project Plus Cumulative Summary (ICU)

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Ex. Plus Proj. Plus Cumul.		Cumulative Impact ²	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	0.375	A	0.374	A	0.427	A	-0.001	No
		PM	0.495	A	0.496	A	0.566	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	0.477	A	0.483	A	0.532	A	0.006	No
		PM	0.615	B	0.620	B	0.673	B	0.009	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.504	A	0.538	A	0.015	No
		PM	0.721	C	0.732	C	0.774	C	0.011	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.636	B	0.698	A	0.017	No
		PM	0.695	B	0.713	C	0.772	C	0.018	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.237	A	0.264	A	-0.002	No
		PM	0.424	A	0.426	A	0.459	A	0.002	No
6 Doheny Park Rd/Victoria Blvd ¹	Signal	AM	0.359	A	0.339	A	0.372	A	-0.020	No
		PM	0.460	A	0.433	A	0.464	A	-0.027	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.476	A	0.509	A	0.011	No
		PM	0.660	B	0.667	B	0.706	C	0.007	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.319	A	0.352	A	0.000	No
		PM	0.427	A	0.427	A	0.481	A	0.000	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.770	C	0.815	D	0.012	Yes
		PM	0.694	B	0.703	C	0.745	C	0.008	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.571	A	0.000	No
		PM	0.614	B	0.614	B	0.732	C	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.668	B	0.682	B	-	No
		PM	N/A	N/A	0.564	A	0.577	A	-	No

= exceeds City's Level of Service (LOS) criteria

ICU = Intersection Capacity Utilization

LOS = level of service

N/A = not applicable (evaluated using the Highway Capacity Manual methodology)

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A cumulative impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Intersection is located in Dana Point (The City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Existing plus Cumulative no Project (ICU = 0.803 AM, 0.737 PM).

⁵ The intersection is currently two-way stop controlled. A signal is proposed as part of the project.

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Table Y: Existing Plus Preferred Project Plus Cumulative Roadway Segment Level

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E	1			Project	2			3			4		
				Existing				Existing Plus Project			Ex. + Proj. + Cumul.			Project Impact ³		
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No	
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	287	24,042	0.641	B	26,514	0.707	C	0.008	No	
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	430	24,595	0.636	B	26,971	0.719	C	0.012	No	
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwy	4D	37,300	24,407	0.651	B	232	24,639	0.637	B	27,018	0.720	C	0.006	No	
	Costco-AA VCO Dwy to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	98	19,779	0.527	A	22,016	0.587	A	0.002	No	
San Juan Creek Rd	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-5	19,465	0.779	C	23,611	0.944	E	0.000	No	
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	2,584	34,983	0.933	E	35,963	0.959	E	0.069	Yes	
	AM Peak Hour	eastbound	2	3,200	1,672	0.523	A	102	1,774	0.554	A	1,823	0.570	A	0.031	No
		westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	1,056	0.330	A	0.039	No
	PM Peak Hour	eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	1,425	0.445	A	0.027	No
		westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	1,536	0.480	A	0.024	No
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	632	33,031	0.881	D	34,011	0.907	E	0.017	Yes	
	AM Peak Hour	eastbound	2	3,200	1,612	0.504	A	31	1,643	0.513	A	1,691	0.528	A	0.009	No
		westbound	2	3,200	898	0.281	A	26	924	0.289	A	950	0.297	A	0.008	No
	PM Peak Hour	eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	1,320	0.413	A	0.006	No
		westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	1,470	0.459	A	0.007	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	16,944	1.356	F	0.001	No	

¹ exceeds City's Level of Service criteria

ADT/Cs = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

² Segment is considered a "Hot Spot" location (LOS E is acceptable).

³ Segment is located in Dana Point (LOS C is acceptable).

⁴ A cumulative impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

LSA

Table AB: Existing Plus Project Alternative 1 Plus Cumulative Roadway Segment Level

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project	2 Existing Plus Project			3 Ex. + Proj. + Cumul.			4 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	4	23,759	0.634	B	26,231	0.699	B	0.001	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	61	24,226	0.646	B	26,602	0.709	C	0.002	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwy	4D	37,300	24,407	0.651	B	-276	24,131	0.643	B	26,510	0.707	C	-0.008	No
	Costco-AAMCO Dwy to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	-312	19,369	0.517	A	21,606	0.576	A	-0.008	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-12	19,458	0.778	C	23,604	0.944	E	-0.001	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	1,483	33,882	0.904	E	34,862	0.930	E	0.040	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	55	1,727	0.540	A	1,777	0.555	A	0.017	No
	westbound	2	3,200	904	0.283	A	77	981	0.307	A	1,008	0.315	A	0.024	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	49	1,349	0.422	A	1,388	0.434	A	0.016	No
	westbound	2	3,200	1,417	0.443	A	37	1,454	0.454	A	1,497	0.468	A	0.011	No
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	322	32,721	0.873	D	33,701	0.899	D	0.009	No
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	17	1,629	0.509	A	1,677	0.524	A	0.005	No
	westbound	2	3,200	898	0.281	A	13	911	0.285	A	937	0.293	A	0.004	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	8	1,270	0.397	A	1,309	0.409	A	0.003	No
	westbound	2	3,200	1,406	0.439	A	11	1,417	0.443	A	1,459	0.456	A	0.004	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	10	12,711	1.017	F	16,937	1.355	F	0.001	No

¹ exceeds City's Level of Service criteria

² *calcs* = peak-hour link analysis

for No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A cumulative impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

L-2-56



Table AE: Existing Plus Project Alternative 2 Plus Cumulative Roadway Segment Level

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1			Project	2			3			4			
				Existing				ADT	V/C	LOS	ADT	V/C	LOS	Ex. + Proj. ADT	+ Cumul. V/C	Project Impact ³ Δ V/C	Yes/No
				ADT	V/C	LOS											
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	99	23,854	0.636	B	26,326	0.702	C	0.003	No		
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	184	24,349	0.649	B	26,725	0.713	C	0.005	No		
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Drwy	4D	37,300	24,407	0.651	B	-106	24,301	0.648	B	26,680	0.711	C	-0.003	No		
	Costco-AA VCO Drwy to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	-174	19,507	0.520	A	21,744	0.580	A	-0.005	No		
San Juan Creek Rd	Valle to Camino Capistrano	4D	23,000	19,470	0.779	C	-9	19,461	0.778	C	23,607	0.944	E	-0.001	No		
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	1,850	34,249	0.913	E	35,229	0.939	E	0.049	Yes		
	AM Peak Hour	eastbound	2	3,200	1,672	0.523	A	70	1,742	0.544	A	1,792	0.560	A	0.021	No	
		westbound	2	3,200	904	0.283	A	93	997	0.312	A	1,024	0.320	A	0.029	No	
	PM Peak Hour	eastbound	2	3,200	1,300	0.406	A	60	1,360	0.425	A	1,400	0.438	A	0.019	No	
		westbound	2	3,200	1,417	0.443	A	50	1,467	0.458	A	1,510	0.472	A	0.015	No	
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	426	32,825	0.875	D	33,805	0.901	E	0.011	Yes		
	AM Peak Hour	eastbound	2	3,200	1,612	0.504	A	22	1,634	0.511	A	1,682	0.526	A	0.007	No	
		westbound	2	3,200	898	0.281	A	17	915	0.286	A	942	0.294	A	0.005	No	
	PM Peak Hour	eastbound	2	3,200	1,262	0.394	A	12	1,274	0.398	A	1,313	0.410	A	0.004	No	
		westbound	2	3,200	1,406	0.439	A	15	1,421	0.444	A	1,463	0.457	A	0.005	No	
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	13	12,714	1.017	F	16,940	1.355	F	0.001	No		

¹ exceeds City's Level of Service criteria

² *italic* = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

² Segment is located in Dana Point (LOS C is acceptable).

¹ A cumulative impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

LSA

**Table AF: Existing Plus Project Alternative 3 Plus Cumulative
 Summary (ICU)**

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Ex. Plus Proj. Plus Cumul.		Cumulative Impact ²	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	0.375	A	0.374	A	0.427	A	-0.001	No
		PM	0.495	A	0.496	A	0.566	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	0.477	A	0.481	A	0.530	A	0.004	No
		PM	0.615	B	0.618	B	0.671	B	0.007	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.500	A	0.534	A	0.011	No
		PM	0.721	C	0.729	C	0.771	C	0.008	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.632	B	0.694	A	0.013	No
		PM	0.695	B	0.708	C	0.767	C	0.013	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.235	A	0.262	A	-0.004	No
		PM	0.424	A	0.425	A	0.457	A	0.001	No
6 Doheny Park Rd/Victoria Blvd ⁴	Signal	AM	0.359	A	0.337	A	0.370	A	-0.022	No
		PM	0.460	A	0.432	A	0.463	A	-0.028	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.472	A	0.506	A	0.007	No
		PM	0.660	B	0.664	B	0.703	C	0.004	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.318	A	0.352	A	-0.001	No
		PM	0.427	A	0.426	A	0.480	A	-0.001	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.768	C	0.813	D	0.010	Yes
		PM	0.694	B	0.702	C	0.744	C	0.007	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.571	A	0.000	No
		PM	0.614	B	0.614	B	0.732	C	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.651	B	0.665	B	-	No
		PM	N/A	N/A	0.549	A	0.562	A	-	No

— = exceeds City's Level of Service (LOS) criteria

ICU = Intersection Capacity Utilization

LOS = level of service

N/A = not applicable (evaluated using the Highway Capacity Manual methodology)

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A cumulative impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Intersection is located in Dana Point (The City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Existing plus Cumulative no Project (ICU= 0.803 AM, 0.737 PM).

⁵ The intersection is currently two-way stop controlled. A signal is proposed as part of the project.

L-2-56



Table AH: Existing Plus Project Alternative 3 Plus Cumulative Roadway Segment Level

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project ADT	2 Existing Plus Project			3 Ex. + Proj. + Cumul.			4 Project Impact ¹	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	192	23,947	0.639	B	26,419	0.705	C	0.066	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	306	24,471	0.633	B	26,847	0.716	C	0.069	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwy's	4D	37,300	24,407	0.651	B	64	24,471	0.633	B	26,850	0.716	C	0.002	No
	Costco-AAVCO Dwy's to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	-38	19,643	0.524	A	21,880	0.583	A	-0.001	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-7	19,463	0.779	C	23,609	0.944	E	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	2,218	34,617	0.923	E	35,597	0.949	E	0.059	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	87	1,759	0.550	A	1,808	0.565	A	0.027	No
	westbound	2	3,200	904	0.283	A	110	1,014	0.317	A	1,041	0.325	A	0.034	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	73	1,373	0.425	A	1,412	0.441	A	0.023	No
	westbound	2	3,200	1,417	0.443	A	63	1,480	0.463	A	1,523	0.476	A	0.020	No
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	528	32,927	0.878	D	33,907	0.904	E	0.014	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	25	1,637	0.512	A	1,686	0.527	A	0.008	No
	westbound	2	3,200	898	0.281	A	22	920	0.288	A	946	0.296	A	0.007	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	16	1,278	0.399	A	1,317	0.412	A	0.005	No
	westbound	2	3,200	1,406	0.439	A	18	1,424	0.445	A	1,466	0.458	A	0.006	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	15	12,716	1.017	F	16,942	1.355	F	0.001	No

¹ = exceeds City's Level of Service criteria

² = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A cumulative impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

LSA

Table AI: Buildout (Preferred Project) Intersection Level of

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Buildout		Buildout Impact ²	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	0.375	A	0.374	A	0.447	A	-0.001	No
		PM	0.495	A	0.496	A	0.599	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	0.477	A	0.483	A	0.572	A	0.006	No
		PM	0.615	B	0.620	B	0.757	C	0.009	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.504	A	0.566	A	0.015	No
		PM	0.721	C	0.732	C	0.842	D	0.011	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.636	B	0.726	C	0.017	No
		PM	0.695	B	0.713	C	0.803	D	0.018	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.237	A	0.274	A	-0.002	No
		PM	0.424	A	0.426	A	0.474	A	0.002	No
6 Doheny Park Rd/Victoria Blvd ¹	Signal	AM	0.359	A	0.339	A	0.387	A	-0.020	No
		PM	0.460	A	0.433	A	0.496	A	-0.027	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.476	A	0.535	A	0.011	No
		PM	0.660	B	0.667	B	0.739	C	0.007	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.319	A	0.368	A	0.000	No
		PM	0.427	A	0.427	A	0.502	A	0.000	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.770	C	0.855	D	0.012	Yes
		PM	0.694	B	0.703	C	0.801	D	0.007	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.645	B	0.000	No
		PM	0.614	B	0.614	B	0.810	D	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.668	B	0.707	C	-	N/A
		PM	N/A	N/A	0.564	A	0.635	B	-	N/A

¹ = exceeds City's Level of Service (LOS) criteria

ICU = Intersection Capacity Utilization

LOS = level of service

N/A = not applicable (evaluated using the Highway Capacity Manual methodology)

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A buildout impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Intersection is located in Dana Point (The City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Buildout no Project (ICU= 0.843 AM, 0.794 PM).

⁵ The intersection is currently two-way stop controlled. A signal is proposed as part of the project.

L-2-56

LSA

Table AK: Buildout (Preferred Project) Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project ADT	2 Existing Plus Project			3 Buildout			4 Project Impact ¹	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano San Juan Creek Rd	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	287	24,042	0.641	B	26,591	0.709	C	0.008	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	430	24,595	0.636	B	28,298	0.755	C	0.012	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,300	24,407	0.651	B	232	24,639	0.637	B	28,358	0.756	C	0.006	No
	Costco-AA VCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	98	19,779	0.527	A	23,112	0.616	B	0.002	No
	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-5	19,465	0.779	C	24,790	0.992	E	0.000	No
	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	2,584	34,983	0.933	E	36,737	0.980	E	0.069	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	102	1,774	0.554	A	1,919	0.600	A	0.031	No
	westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	1,111	0.347	A	0.039	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	1,457	0.455	A	0.027	No
	westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	1,747	0.546	A	0.024	No
Stonehill Dr	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	632	33,031	0.881	D	34,728	0.926	E	0.017	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	31	1,643	0.513	A	1,778	0.556	A	0.009	No
	westbound	2	3,200	898	0.281	A	26	924	0.289	A	1,015	0.317	A	0.008	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	1,352	0.423	A	0.006	No
	westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	1,667	0.521	A	0.007	No
	Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	17,788	1.423	F	0.001

¹ exceeds City's Level of Service criteria

² peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A buildout impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

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Table AN: Buildout (Project Alternative 1) Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project	2 Existing Plus Project			3 Buildout			4 Project Impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	4	23,759	0.634	B	26,308	0.702	C	0.001	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	61	24,226	0.646	B	27,929	0.745	C	0.002	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,300	24,407	0.651	B	-276	24,131	0.643	B	27,850	0.743	C	-0.008	No
	Costco-AA VCO Dwys to Las Vegas - SR-1 NB Ramp ⁴	4D	37,300	19,681	0.525	A	-312	19,369	0.517	A	22,702	0.605	B	-0.008	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-12	19,458	0.778	C	24,783	0.991	E	-0.001	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	1,483	33,882	0.904	E	35,636	0.950	E	0.040	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	55	1,727	0.540	A	1,872	0.585	A	0.017	No
	westbound	2	3,200	904	0.283	A	77	981	0.307	A	1,063	0.332	A	0.024	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	45	1,349	0.422	A	1,421	0.444	A	0.016	No
	westbound	2	3,200	1,417	0.443	A	37	1,454	0.454	A	1,708	0.534	A	0.011	No
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	322	32,721	0.873	D	34,418	0.918	E	0.009	No
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	17	1,629	0.509	A	1,764	0.551	A	0.005	No
	westbound	2	3,200	898	0.281	A	13	911	0.285	A	1,002	0.313	A	0.004	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	8	1,270	0.397	A	1,341	0.419	A	0.003	No
	westbound	2	3,200	1,406	0.439	A	11	1,417	0.443	A	1,656	0.518	A	0.004	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	10	12,711	1.017	F	17,781	1.422	F	0.001	No

¹ exceeds City's Level of Service criteria

² policy - peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A buildout impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

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LSA

Table AQ: Buildout (Project Alternative 2) Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E	1			Project	2			3			4					
				Existing				ADT	V/C	LOS	ADT	V/C	LOS	ADT	V/C	LOS	Project Impact ³	Δ V/C	Yes/No
				ADT	V/C	LOS													
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,500	23,755	0.633	B	99	23,854	0.636	B	26,403	0.704	C	0.003	No				
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,163	0.644	B	184	24,349	0.649	B	28,052	0.748	C	0.005	No				
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,500	24,407	0.651	B	-106	24,301	0.648	B	28,020	0.747	C	-0.003	No				
	Costco-AA MCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,500	19,681	0.525	A	-174	19,507	0.520	A	22,840	0.609	B	-0.005	No				
San Juan Creek Rd	Valle to Camino Capistrano	4U	23,000	19,470	0.779	C	-9	19,461	0.778	C	24,786	0.991	E	-0.001	No				
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	1,850	34,249	0.913	E	36,003	0.960	E	0.049	Yes				
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	70	1,742	0.544	A	1,887	0.590	A	0.021	No				
	westbound	2	3,200	904	0.283	A	93	997	0.312	A	1,079	0.337	A	0.029	No				
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	60	1,360	0.425	A	1,432	0.448	A	0.019	No				
	westbound	2	3,200	1,417	0.443	A	50	1,467	0.458	A	1,721	0.538	A	0.015	No				
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D	426	32,825	0.875	D	34,522	0.921	E	0.011	Yes				
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	22	1,634	0.511	A	1,769	0.553	A	0.007	No				
	westbound	2	3,200	898	0.281	A	17	915	0.286	A	1,007	0.315	A	0.005	No				
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	12	1,274	0.398	A	1,344	0.420	A	0.004	No				
	westbound	2	3,200	1,406	0.439	A	15	1,421	0.444	A	1,660	0.519	A	0.005	No				
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	13	12,714	1.017	F	17,784	1.423	F	0.001	No				

¹ exceeds City's Level of Service criteria

²olics = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

² Segment is located in Dana Point (LOS C is acceptable).

³ A buildout impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

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LSA

Table AR: Buildout (Project Alternative 3) Intersection Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Buildout		Buildout Impact ²	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	0.375	A	0.374	A	0.446	A	-0.001	No
		PM	0.495	A	0.496	A	0.599	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	0.477	A	0.481	A	0.570	A	0.004	No
		PM	0.615	B	0.618	B	0.756	C	0.007	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.500	A	0.563	A	0.011	No
		PM	0.721	C	0.729	C	0.840	D	0.008	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.632	B	0.722	C	0.013	No
		PM	0.695	B	0.708	C	0.800	C	0.013	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.235	A	0.273	A	-0.004	No
		PM	0.424	A	0.425	A	0.473	A	0.001	No
6 Doheny Park Rd/Victoria Blvd ⁴	Signal	AM	0.359	A	0.337	A	0.385	A	-0.022	No
		PM	0.460	A	0.432	A	0.494	A	-0.028	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.472	A	0.531	A	0.007	No
		PM	0.660	B	0.664	B	0.735	C	0.004	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.318	A	0.367	A	-0.001	No
		PM	0.427	A	0.426	A	0.502	A	-0.001	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.768	C	0.853	D	0.010	Yes
		PM	0.694	B	0.702	C	0.800	C	0.006	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.645	B	0.000	No
		PM	0.614	B	0.614	B	0.810	D	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.651	B	0.690	B	-	N/A
		PM	N/A	N/A	0.549	A	0.620	B	-	N/A

■ = exceeds City's Level of Service (LOS) criteria

ICU = Intersection Capacity Utilization

LOS = level of service

N/A = not applicable (evaluated using the Highway Capacity Manual methodology)

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A buildout impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Intersection is located in Dana Point (The City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Buildout no Project (ICU= 0.843 AM, 0.794 PM).

⁵ The Intersection is currently two-way stop controlled. A signal is proposed as part of the project.

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Table AT: Buildout (Project Alternative 3) Roadway Segment Level of Service

Update the table to include the level of service results with implementation of a third eastbound through lane along Stone Hill Drive between Del Obispo and Camino Capistrano. Please revise the report accordingly.

Roadway	Segment	No. of Lanes	LOS E Capacity	1 Existing			Project	2 Existing Plus Project			3 Buildout			4 Project impact ³	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ¹	4D	37,300	23,753	0.633	B	192	23,947	0.639	B	26,496	0.707	C	0.006	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,300	24,163	0.644	B	306	24,471	0.633	B	28,174	0.751	C	0.009	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Dwys	4D	37,300	24,407	0.651	B	64	24,471	0.633	B	28,190	0.752	C	0.002	No
	Costco-AA VCO Dwys to Las Vegas - SR-1 NB Ramp ²	4D	37,300	19,681	0.525	A	-38	19,643	0.524	A	22,976	0.613	B	-0.001	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-7	19,463	0.779	C	24,788	0.992	E	0.000	No
	Camino Capistrano to Project Driveway	4D	37,300	32,399	0.864	D	2,218	34,617	0.923	E	36,371	0.970	E	0.059	Yes
	AM Peak Hour eastbound	2	3,200	1,672	0.523	A	87	1,759	0.550	A	1,904	0.595	A	0.027	No
	westbound	2	3,200	904	0.283	A	110	1,014	0.317	A	1,096	0.343	A	0.034	No
	PM Peak Hour eastbound	2	3,200	1,300	0.406	A	73	1,373	0.429	A	1,445	0.452	A	0.023	No
	westbound	2	3,200	1,417	0.443	A	63	1,480	0.463	A	1,734	0.542	A	0.020	No
	Project Driveway to Del Obispo ³	4D	37,300	32,399	0.864	D	528	32,927	0.878	D	34,624	0.923	E	0.014	Yes
	AM Peak Hour eastbound	2	3,200	1,612	0.504	A	25	1,637	0.512	A	1,772	0.554	A	0.008	No
	westbound	2	3,200	898	0.281	A	22	920	0.288	A	1,011	0.316	A	0.007	No
	PM Peak Hour eastbound	2	3,200	1,262	0.394	A	16	1,278	0.399	A	1,349	0.422	A	0.005	No
	westbound	2	3,200	1,406	0.439	A	18	1,424	0.445	A	1,663	0.520	A	0.006	No
Stonehill Dr															
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	15	12,716	1.017	F	17,786	1.423	F	0.001	No

¹ = exceeds City's Level of Service criteria

² = peak-hour link analysis

For No. of Lanes, D = divided, and U = undivided

ADT = average daily trips

LOS = level of service

V/C = volume-to-capacity ratio

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (LOS C is acceptable).

⁵ A buildout impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

ATTACHMENT B

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See comments recommended on the
TIA. Update the EIR accordingly.

As shown in Table 1.A, the project proposes a total building area of 167,385 sf within Areas A and B. A majority of the development would be located within Area B. Out of the total building area, 16,311 sf is proposed as overhang area; an overhang area is defined as the exterior floor area covered by projections that extend past the edge of the building, such as eaves. Consequently, the project proposes 151,074 sf of total floor area, which is defined as the total area inside the buildings. Project components specific to the individual development areas are described in greater detail below.

The proposed project includes a utility easement travelling north/south from the northwestern corner of Area C to Avenida Aeropuerto; the easement would be located immediately west of the mobile home park adjacent to the project site to provide future private emergency access to and from the project site to the north.

See Chapter 3.0, Project Description, for a complete description of the project components.

1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

As described in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, the proposed project would not result in significant unavoidable adverse impacts related to aesthetics; air quality; biological resources; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; tribal cultural resources; or utilities and service systems. In addition, as described in Section 2.0, Introduction, the project would have no impacts related to agricultural resources, mineral resources, population and housing, public services, recreation, and wildfire. However, the proposed project would result in significant and unavoidable traffic impacts.

The project would result in conflicts with City Administrative Policy No. 310, which was adopted by the City in 1998 for the purpose of establishing thresholds for determining traffic impacts. As discussed in Section 4.12, Transportation, the project would result in potentially significant impacts at two roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway, and between the Project Driveway and Del Obispo Street) in the Existing Plus Project condition. No feasible mitigation is available to reduce the impacts on these two roadway segments. There is no available right-of-way along these roadway segments to construct improvements that would provide additional roadway capacity. Therefore, significant and unavoidable impacts would occur at these roadway segments.

In addition to potentially significant impacts at the same two roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway, and between the Project Driveway and Del Obispo Street) the proposed project would also result in potentially significant impacts at the intersection of Del Obispo Street/Stonehill Drive in the Existing Plus Project Plus Cumulative and General Plan Buildout (2040) scenario. No feasible mitigation is available to reduce the impacts on these roadway segments and the impacted intersection. As described above, there is no available right-of-way along these segments of Stonehill Drive to construct improvements that would provide additional roadway capacity. In addition, there is insufficient available right-of-way along Del Obispo Street and Stonehill Drive in the vicinity of the impacted intersection to construct improvements.

Further, the impacted intersection is located within the City of Dana Point, and mitigation cannot be enforced within another jurisdiction outside the City of San Juan Capistrano. Therefore, significant and unavoidable impacts would occur at the intersection of Del Obispo Street/Stonehill Drive and two roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway, and between the Project Driveway and Del Obispo Street).

1.5 ALTERNATIVES

The following alternatives to the proposed project were selected for consideration, including the No Project Alternative as required by CEQA:

1.5.1 Alternative 1: No Restaurant Uses

Alternative 1 would allow for the future construction of a 161,385 square-foot (sf) Ganahl Lumber hardware store and lumber yard and a 399-space vehicle storage facility, but no drive-through restaurant uses would be developed. Alternative 1 represents a reduction in 6,000 sf of drive-through restaurant use as compared to the proposed project. Under Alternative 1, Area A would provide 150 parking spaces, compared to 62 parking spaces provided in Area A as part of the proposed project.

Most components of the proposed project, such as outdoor lighting, circulation and access, signage, utilities and drainage, sustainability features, landscaping, and construction phasing, and grading, would not significantly change with the implementation of Alternative 1. Components specific to Area A, such as the location of walkways, retaining walls fences, and gates, would also not change under Alternative 1. The modification and installation of existing and new utilities and infrastructure associated with the proposed project would still occur under Alternative 1. Although Alternative 1 would not involve the development of structures on Area A as the proposed project would, the entirety of Area A would still be cleared, excavated, graded, and paved to accommodate surface parking.

1.5.2 Alternative 2: 2,000 Square Feet of Restaurant Uses

Alternative 2 would allow for the future construction of a 161,385 sf Ganahl Lumber hardware store and lumber yard, a 399-space vehicle storage facility, and 2,000 sf of drive-through restaurant uses, which represents a reduction of 4,000 sf of drive-through restaurant uses as compared to the proposed project. This would most likely result in one restaurant tenant and would reduce daily traffic trips to/from the site. Alternative 2 would provide 80 parking spaces, compared to 62 parking spaces provided in Area A as part of the proposed project.

Most components of the proposed project, such as outdoor lighting, circulation and access, signage, utilities and drainage, sustainability features, landscaping, and construction phasing and grading, would not significantly change with the implementation of Alternative 2. Components specific to Area A, such as the location of walkways, retaining walls, fences, and gates, would also not change under Alternative 2.

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GANAHL LUMBER PROJECT
 SAN JUAN CAPISTRANO, CALIFORNIA

See comments recommended on the
 TIA. Update the EIR accordingly.

Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measures, and Levels of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
4.12: Transportation		
<p>Threshold 4.12.1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?</p> <p>Potentially Significant Impact. The total construction worker and truck trip generation (in PCEs) would be 256 ADT, 52 a.m. peak-hour trips (42 inbound and 10 outbound), and 52 p.m. peak-hour trips (10 inbound and 42 outbound). Because the construction trip generation would be significantly less than the net trip generation of the proposed project (which would generate 3,486 ADT, 312 a.m. peak-hour trips and 213 p.m. peak hour trips), construction traffic impacts would be less than significant.</p> <p>The proposed project would be required to comply with General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would also be required to comply with City Council Policy No. 310, which establishes metrics for determining traffic impacts, consistent transportation-related goals and policies in the City's General Plan, and the Orange County Congestion Management Program (CMP) (2017). However, the project would result in conflicts with Administrative Policy No. 310 due to project-related significant unavoidable impacts to roadway segments in the Existing Plus Project Condition.</p>	<p>No feasible mitigation is available to reduce project-related impacts on identified roadway segments.</p>	<p>Significant and Unavoidable Impact.</p>

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See comments recommended on the
 TIA. Update the EIR accordingly.

Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measures, and Levels of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
<p>Threshold 4.12.2: Conflict or be inconsistent with CEQA Guidelines section 15064.3 or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p> <p>Less than Significant Impact. The proposed project would replace an existing Ganahl Lumber hardware store located at 34162 Doheny Park Road in Capistrano Beach (approximately 0.50 mile south of the project site). Because the proposed project would replace an existing Ganahl Lumber hardware store within close proximity to the project site, provide local-serving retail/restaurant uses, and replace the existing vehicle storage spaces, there would be no net increase in vehicle miles travelled (VMT) within the project area as a result of project implementation. At this time, the City has not adopted a methodology to analyze VMT impacts within its jurisdiction. In addition, the City does not currently have thresholds or standards in place for assessing potential VMT impacts. Therefore, this information is provided for disclosure purposes only, and traffic impacts in this Draft EIR for CEQA purposes are based on the City's LOS thresholds.</p>	No mitigation is required.	Less than Significant Impact.
<p>Cumulative Transportation Impacts.</p> <p>Potentially Significant Impact. All study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). The project would add more than 0.01 to the v/c ratio at this intersection (0.012). This is considered a significant unavoidable impact because there is no available</p>	No feasible mitigation is available to reduce cumulative impacts.	Significant and Unavoidable Impact.

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See comments recommended on the
 TIA. Update the EIR accordingly.

Table 1.B: Summary of Potential Environmental Impacts, Project Design Features, Mitigation Measures, Compliance Measures, and Levels of Significance

Potential Environmental Impact	Project Design Features, Mitigation Measures, and Compliance Measures	Level of Significance After Mitigation
right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. In addition, this intersection is located within the City of Dana Point and mitigation cannot be enforced within another jurisdiction outside the City of San Juan Capistrano. Therefore, a significant impact would occur at one study area intersection based on the ICU methodology.		
<p>4.13: Tribal Cultural Resources</p> <p>Threshold 4.13.2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> <p><i>Less than Significant Impact with Mitigation Incorporated.</i> A Cultural Resources Survey, a SLF through the NAHC, and AB 52 Native American consultation were conducted for the proposed project. No evidence that the proposed project would result in a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC section 21074, was identified during these efforts. Although there is no evidence of tribal cultural resources on the City, the City requires monitoring for development projects in culturally sensitive areas. Due to the location of the project</p>	Refer to Mitigation Measure CUL-1, above.	Less than Significant impact.

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See comments recommended on the
TIA. Update the EIR accordingly.

Table 4.12.B: Existing Intersection Level of Service Summary (HCM)

	Intersection	Control	Peak Hour	Existing	
				Delay (sec)	LOS
1	Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	13.1	B
			PM	15.2	B
2	Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	18.4	B
			PM	24.5	C
3	Camino Capistrano/Avenida Aeropuerto	Signal	AM	23.3	C
			PM	27.7	C
4	Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	27.6	C
			PM	31.2	C
5	Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	15.5	B
			PM	29.4	C
6	Doheny Park Rd/Victoria Blvd ²	Signal	AM	N/A	N/A
			PM	N/A	N/A
7	Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ²	Signal	AM	N/A	N/A
			PM	N/A	N/A
8	Doheny Park Rd/SR-1 SB Off-Ramp ²	Signal	AM	N/A	N/A
			PM	N/A	N/A
9	Del Obispo St/Stonehill Dr ²	Signal	AM	N/A	N/A
			PM	N/A	N/A
10	Valle Rd/San Juan Creek Rd	Signal	AM	12.2	B
			PM	19.9	B
11	Valle Rd/I-5 NB Ramps - La Novia Ave	Roundabout	AM	7.7	A
			PM	9.7	A
12	Project Driveway/Stonehill Dr	TWSC	AM	>50.0	F
			PM	>50.0	F

Note: ■ = exceeds the City of San Juan Capistrano's LOS criteria

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² Intersection is located in Dana Point (the City of Dana Point uses ICU not HCM for impact threshold).

HCM = Highway Capacity Manual LOS = level of service sec = seconds

ICU = intersection capacity utilization N/A = not applicable TWSC = two-way stop control

Table 4.12.C: Existing Roadway Segment Level of Service Summary

Roadway	Segment	No. of Lanes ¹	LOS E Capacity	Existing		
				ADT	V/C	LOS
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ²	4D	37,500	23,755	0.633	B
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Driveways	4D	37,500	24,407	0.651	B
	Costco-AAMCO Driveways to Las Vegas - SR-1 NB Ramp ³	4D	37,500	19,681	0.525	A
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D
	Project Driveway to Del Obispo ³	4D	37,500	32,399	0.864	D
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F

Note: ■ = exceeds the City of San Juan Capistrano's LOS criteria

¹ D = divided, and U = undivided

² Segment is considered a "Hot Spot" location (LOS E is acceptable).

³ Segment is located in Dana Point (the City of Dana Point considers LOS C acceptable).

ADT = average daily trips LOS = level of service SB = southbound V/C = volume-to-capacity ratio

I-5 = Interstate 5 NB = northbound SR-1 = State Route 1

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See comments recommended on the
TIA. Update the EIR accordingly.

Operation – Significant and Unavoidable Impact. The proposed project would be required to comply with General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would also be required to comply with City Council Policy No. 310, which establishes metrics for determining traffic impacts, consistent transportation-related goals and policies in the City's General Plan, and the Orange County Congestion Management Program (CMP) (2017). The project's consistency with these plans is described in detail below.

Conformance with the General Plan. The proposed project would be required to comply with transportation related goals and policies in the City's General Plan (refer to Section 4.12.3.4, above, for a list of goals and policies applicable to the proposed project) as described below.

As previously stated, vehicle access to the project site will be provided via a proposed signalized driveway at Stonehill Drive and the southwestern corner of the project site.¹ Due to the proximity of the proposed signal to the existing signal at Camino Capistrano/Stonehill Drive, the signal would be coordinated to minimize vehicle delays, stops, and queuing. A deceleration lane in the westbound direction would be constructed on Stonehill Drive to enhance safety and traffic flow for right-turn access to the project site. An LOS analysis was conducted at the proposed traffic signal at Stonehill Drive and the southwestern corner of the project site, which confirmed that this intersection would operate at LOS C or better during both peak hours using the ICU and HCM methodologies.

In addition to adding a signal at the intersection of the Project Driveway and Stonehill Drive, the project would also connect the project site to nearby sidewalks and bicycle routes on Stonehill Drive through the installation of new sidewalks that would travel from Stonehill Drive to the Project Driveway and internal parking areas. The project would also allow for the continuation of existing on-street (Class II) bike lanes provided on Camino Capistrano (east of the project site), Stonehill Drive (west of the project site), and Del Obispo Street (west of the project site). These existing bicycle lanes also serve to connect the project area with the San Juan Creek Trail (west of the site) and surrounding residential, employment, commercial, and recreational destinations. As such, the project would be consistent with the City's goals of providing a circulation system that meets the needs of the community and minimizing conflict between vehicles, pedestrians, equestrians, and bicycles (Circulation Element Goals 1 and 4). In addition, the installation of the proposed signal would be consistent with the City's intention of installing street improvements within areas where necessary to improve safety and improving the circulation system in concert with land development (Circulation Element Policies 1.1 and 4.3). As such, the proposed project would not conflict with applicable provisions in the City's General Plan Circulation Element.

Conformance with Administration Policy No. 310. City Council Policy No. 310 requires development projects to conduct a transportation impact analysis to analyze conformance with

¹ Installation of the proposed signal is included as part of the project because of the results of a peak-hour traffic signal warrant analysis, which concluded installation of a traffic signal would be warranted under the Existing Plus Project condition.

See comments recommended on the
TIA. Update the EIR accordingly.

Table 4.12.F: Existing Plus Project Intersection Level of Service Summary (HCM)

Intersection	Control	Peak Hour	1		2		3	
			Existing		Existing Plus Project		Project Impact ²	
			Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	13.1	B	13.1	B	0.0	No
		PM	15.2	B	15.2	B	0.0	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	18.4	B	18.6	B	0.2	No
		PM	24.5	C	24.7	C	0.2	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	23.3	C	23.4	C	0.1	No
		PM	27.7	C	28.3	C	0.6	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	27.6	C	28.4	C	0.8	No
		PM	31.2	C	33.9	C	2.7	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	15.5	B	15.5	B	0.0	No
		PM	29.4	C	29.4	C	0.0	No
6 Doheny Park Rd/Victoria Blvd ³	Signal	AM	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A
9 Del Obispo St/Stonehill Dr ³	Signal	AM	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A
10 Valle Rd/San Juan Creek Rd	Signal	AM	12.2	B	12.2	B	0.0	No
		PM	19.9	B	19.9	B	0.0	No
11 Valle Rd/I-5 NB Ramps - La Novia Ave	Roundabout	AM	7.7	A	7.7	A	0.0	No
		PM	9.7	A	9.7	A	0.0	No
12 Project Driveway/Stonehill Dr ⁴	Signal	AM	>50.0	F	20.5	C	-	No
		PM	>50.0	F	19.0	B	-	No

Note: ■ = exceeds the City of San Juan Capistrano's level of service (LOS) criteria

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A significant project impact occurs when the delay in (2) minus the delay in (1) is 1.0 seconds or greater, and the LOS in (2) is E or F.

³ Intersection is located in Dana Point (the City of Dana Point uses ICU not HCM for impact thresholds).

⁴ The intersection is currently two-way stop controlled. A signal is proposed as part of the project, which would provide an improvement to delay and LOS.

HCM = Highway Capacity Manual

LOS = level of service

SB = southbound

I-5 = Interstate 5

N/A = not applicable

sec = seconds

ICU = intersection capacity utilization

NB = northbound

SR-1 = State Route 1

In addition to assessing project impacts on roadway intersections, project-related impacts to roadway segments were also evaluated for conformance with City Administrative Policy No. 310. As part of this assessment, the trip generation results for the proposed project were added to existing baseline traffic volumes at study area roadway segments. Existing Plus Project roadway segment ADT volumes, v/c ratios, and LOS are presented in Table 4.12.G. As Table 4.12.G indicates, all study area roadway segments, including the hot-spot roadways, are anticipated to operate at satisfactory LOS with the project, with the exception of Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino

See comments recommended on the
TIA. Update the EIR accordingly.

Table 4.12.G: Existing Plus Project Roadway Segment Level of Service Summary

Roadway	Segment	No. of Lanes ¹	LOS E Capacity	1 Existing			Project ADT	2 Existing Plus Project			3 Project Impact ²	
				ADT	V/C	LOS		ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ³	4D	37,500	23,755	0.633	B	287	24,042	0.641	B	0.008	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	430	24,595	0.656	B	0.012	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Driveways	4D	37,500	24,407	0.651	B	232	24,639	0.657	B	0.006	No
	Costco-AAMCO Driveways to Las Vegas - SR-1 NB Ramp ⁴	4D	37,500	19,681	0.525	A	98	19,779	0.527	A	0.002	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-5	19,465	0.779	C	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	2,584	34,983	0.933	E	0.069	Yes
	AM Peak Hour - eastbound	2	3,200	1,672	0.523	A	102	1,774	0.554	A	0.031	No
	westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	0.039	No
	PM Peak Hour - eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	0.027	No
	westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	0.024	No
	Project Driveway to Del Obispo ⁴	4D	37,500	32,399	0.864	D	632	33,031	0.881	D	0.017	Yes
	AM Peak Hour - eastbound	2	3,200	1,612	0.504	A	31	1,643	0.513	A	0.009	No
	westbound	2	3,200	898	0.281	A	26	924	0.289	A	0.008	No
	PM Peak Hour - eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	0.006	No
	westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	0.007	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	0.001	No

Note: ■ = exceeds the City of San Juan Capistrano's LOS criteria

■ = peak-hour link analysis

¹ D = divided, and U = undivided

² A significant project impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (2) is E or F.

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (the City of Dana Point considers LOS C acceptable).

ADT = average daily trips

I-5 = Interstate 5

LOS = level of service

NB = northbound

SB = southbound

SR-1 = State Route 1

V/C = volume-to-capacity ratio

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See comments recommended on the
TIA. Update the EIR accordingly.

Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively, in the Existing Plus Project condition. These are considered *significant unavoidable impacts* because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

In summary, the project would result in conflicts with City Administrative Policy No. 310 due to project-related *significant unavoidable impacts* to roadway segments in the Existing Plus Project Condition. No mitigation is available to reduce this impact to a less than significant level. Therefore, impacts to roadway segments would remain significant and unavoidable following implementation of the proposed project.

Conformance with the Orange County CMP – Less than Significant Impact. As previously noted, a TIA is required for CMP purposes for any proposed development generating 2,400 or more daily trips, with the exception of developments that will directly access a CMP Highway System roadway segment, for which the threshold for requiring a TIA is reduced to 1,600 or more trips per day. Because the proposed project is estimated to generate 3,486 daily trips, a TIA was prepared for the proposed project in compliance with CMP standards.

Based on CMP requirements, the study area for a project must extend far enough to cover any CMP roadway segment on which the project traffic would represent 3 percent or more of the roadway segment's LOS E capacity. Within San Juan Capistrano, the CMP Highway System includes one arterial – Ortega Highway. The Ortega Highway/Interstate 5 (I-5) ramp intersection is the only CMP intersection in the City. Due to the distance of this intersection to the project site, project-related traffic would not represent 3 percent or more of this intersection's capacity. As such, no further analysis of project-related impacts on CMP roadway segments and/or intersections is required. Therefore, the proposed project would not result in conflicts with the Orange County CMP, and no mitigation would be required.

Threshold 4.12.2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. According to State CEQA Guidelines Section 15064.3(a), project-related transportation impacts are generally best measured by evaluating the project's vehicle miles traveled (VMT). VMT refers to the amount and distance of automobile travel attributable to a project.

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GANAHL LUMBER PROJECT
SAN JUAN CAPISTRANO, CALIFORNIA

See comments recommended on the
TIA. Update the EIR accordingly.

State CEQA Guidelines Section 15064.3(b) sets forth criteria for analyzing transportation impacts, breaking down the methodology based on project type and specifying other criteria for conducting VMT analysis.

For land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects located within 0.5 mi of an existing high-quality transit corridor should be considered to have a less than significant impact. *State CEQA Guidelines* Section 15064.3(b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) of the *State CEQA Guidelines*, Section 15064.3, acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. The regulation goes on to state that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. (*State CEQA Guidelines* Section 15064.3(b)(4)). It is important to note that *State CEQA Guidelines* Section 15064.3(c) states that while an agency may elect to be governed by the provisions of this section immediately, it is not required until July 1, 2020.

The *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) includes recommended thresholds for determining VMT impacts for land use development project. According to the technical advisory, a net increase in total VMT may indicate a significant transportation impact for retail projects because retail development projects typically redistribute shopping trips rather than creating new trips. According to the *Ganahl Lumber Development Project Traffic Impact Analysis*, the proposed project would replace an existing Ganahl Lumber hardware store located at 34162 Doheny Park Road in Capistrano Beach (approximately 0.50 mile south of the project site). In addition, the proposed project would include a fast-food restaurant use, which is intended for nearby residents of the surrounding community and users already driving along Stonehill Drive. The project also includes a vehicle storage lot for 399 vehicles, which will replace the existing vehicle storage lot located on the project site. Because the proposed project would replace an existing Ganahl Lumber hardware store within close proximity to the project site, provide local-serving retail/restaurant uses, and replace the existing vehicle storage spaces, there would be no net increase in VMT within the project area as a result of project implementation.

At this time, the City has not adopted a methodology to analyze VMT impacts within its jurisdiction. In addition, the City does not currently have thresholds or standards in place for assessing potential VMT impacts. Therefore, this information is provided for disclosure purposes only, and traffic impacts in this Draft EIR for CEQA purposes are based on the City's LOS thresholds.

CMP Facilities. As stated above, the Ortega Highway/Interstate 5 (I-5) ramp intersection is the only CMP intersection in the City. Due to the distance of this intersection to the project site, project-related traffic would not represent 3 percent or more of this intersection's capacity. As such, no further analysis of project-related impacts on CMP roadway segments and/or intersections is required. Therefore, the proposed project would not result in conflicts with the Orange County CMP, and no mitigation would be required.

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See comments recommended on the
TIA. Update the EIR accordingly.

4.12.7 Level of Significance Prior to Mitigation

Impacts have been identified related to conflicts with City Administrative Policy No. 310, which was adopted by the City for the purpose of establishing thresholds for determining traffic impacts. Specifically, the following roadway segments were determined to operate at unsatisfactory levels of service in the Existing Plus Project Condition: Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement on these roadway segments to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

4.12.8 Regulatory Compliance Measures and Mitigation Measures

4.12.8.1 Regulatory Compliance Measures (RCMs)

No regulatory compliance measures are required for the proposed project.

4.12.8.2 Mitigation Measures (MMs)

No mitigation is required for the proposed project.

4.12.9 Level of Significance after Mitigation

As previously stated, a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street). These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to provide additional roadway capacity.

4.12.10 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. The cumulative impact area for traffic/transportation is the City of San Juan Capistrano. A list of approved/pending projects provided by the City was reviewed to determine whether projects in the vicinity of the project site (if any) should be included in the cumulative condition. With concurrence from the City, the approved/pending projects listed in Table 4.12.H were identified as cumulative projects.

See comments recommended on the
TIA. Update the EIR accordingly.

4.12.10.1 Project Plus Cumulative (Opening Year 2024) Condition

Significant Unavoidable Impact. According to the project Applicant, the project will open in 2024. To develop a Year 2024 condition, an ambient growth rate of 0.5 percent per year (i.e., 3 percent total growth) was applied to the existing 2018 traffic counts. This condition also included the proposed project trips and manually assigned trips generated by approved and/or pending projects. Application of a 0.5 percent per year growth rate to the existing traffic volumes is considered conservative and would account for any additional future development in the project vicinity.

Table 4.12.H summarizes the list of approved/pending projects provided by City staff. This list was reviewed to identify projects in the vicinity of the project site that would contribute traffic in the study area beyond the ambient growth already assumed.

Tables 4.12.I and 4.12.J summarize the results of the Existing Plus Project Plus Cumulative peak hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. As shown in Table 4.12.I, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). The proposed project would add more than 0.01 to the v/c ratio at this intersection (0.012). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. In addition, this intersection is located within the City of Dana Point and mitigation cannot be enforced within another jurisdiction outside the City of San Juan Capistrano. Therefore, a significant project impact would occur at one study area intersection based on the ICU methodology.

As shown in Table 4.12.J, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant project impact would not occur at any study area intersection based on the HCM methodology.

Existing Plus Project Plus Cumulative roadway segment ADT volumes, v/c ratios, and LOS are presented in Table 4.12.K. As Table 4.12.K indicates, all study area roadway segments, including the hotspot roadways, are forecast to operate at satisfactory LOS, with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

See comments recommended on the
TIA. Update the EIR accordingly.

**Table 4.12.I: Existing Plus Project Plus Cumulative Intersection
Level of Service Summary (ICU)**

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Existing Plus Project Plus Cumulative		Cumulative Impact ¹	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ²	Signal	AM	0.375	A	0.374	A	0.427	A	-0.001	No
		PM	0.495	A	0.496	A	0.566	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ²	Signal	AM	0.477	A	0.483	A	0.532	A	0.006	No
		PM	0.615	B	0.620	B	0.673	B	0.009	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.504	A	0.538	A	0.015	No
		PM	0.721	C	0.732	C	0.774	C	0.011	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.636	B	0.698	A	0.017	No
		PM	0.695	B	0.713	C	0.772	C	0.018	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.237	A	0.264	A	-0.002	No
		PM	0.424	A	0.426	A	0.459	A	0.002	No
6 Doheny Park Rd/Victoria Blvd ³	Signal	AM	0.359	A	0.339	A	0.372	A	-0.020	No
		PM	0.460	A	0.433	A	0.464	A	-0.027	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.476	A	0.509	A	0.011	No
		PM	0.660	B	0.667	B	0.706	C	0.007	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.319	A	0.352	A	0.000	No
		PM	0.427	A	0.427	A	0.481	A	0.000	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.770	C	0.815	D	0.012	Yes
		PM	0.694	B	0.703	C	0.745	C	0.008	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.571	A	0.000	No
		PM	0.614	B	0.614	B	0.732	C	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.668	B	0.682	B	-	No
		PM	N/A	N/A	0.564	A	0.577	A	-	No

Note: ■ = exceeds the City of San Juan Capistrano's LOS criteria

¹ A cumulative impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

² Intersection is considered a "Hot Spot" location (LOS E is acceptable).

³ Intersection is located in Dana Point (the City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Existing plus Cumulative no Project (ICU= 0.803 AM, 0.737 PM).

⁵ The intersection is currently two-way stop controlled. A signal is proposed as part of the project.

I-5 = Interstate 5

N/A = not applicable (evaluated using the

SB = southbound

ICU = intersection capacity utilization

Highway Capacity Manual methodology)

SR-1 = State Route 1

LOS = level of service

NB = northbound

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See comments recommended on the TIA. Update the EIR accordingly.

Table 4.12.K: Existing Plus Project Plus Cumulative Roadway Segment Level of Service Summary

Roadway	Segment	No. of Lanes ¹	LOS E Capacity	1			Project ADT	2			3			4	
				Existing				Existing Plus Project			Existing Plus Project Plus Cumulative			Project Impact ²	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ³	4D	37,500	23,755	0.633	B	287	24,042	0.641	B	26,514	0.707	C	0.008	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	430	24,595	0.656	B	26,971	0.719	C	0.012	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Driveways	4D	37,500	24,407	0.651	B	232	24,639	0.657	B	27,018	0.720	C	0.006	No
	Costco-AAMCO Driveways to Las Vegas - SR-1 NB Ramp ⁴	4D	37,500	19,681	0.525	A	98	19,779	0.527	A	22,016	0.587	A	0.002	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-5	19,465	0.779	C	23,611	0.944	E	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	2,584	34,983	0.931	E	35,963	0.959	E	0.059	Yes
	AM Peak Hour - eastbound	2	3,200	1,672	0.523	A	102	1,774	0.554	A	1,823	0.570	A	0.031	No
	westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	1,056	0.330	A	0.039	No
	PM Peak Hour - eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	1,425	0.445	A	0.027	No
	westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	1,536	0.480	A	0.024	No
	Project Driveway to Del Obispo ⁴	4D	37,500	32,399	0.864	D	632	33,031	0.881	D	34,011	0.907	E	0.017	Yes
	AM Peak Hour - eastbound	2	3,200	1,612	0.504	A	31	1,643	0.513	A	1,691	0.528	A	0.009	No
	westbound	2	3,200	898	0.281	A	26	924	0.289	A	950	0.297	A	0.008	No
	PM Peak Hour - eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	1,320	0.413	A	0.006	No
	westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	1,470	0.459	A	0.007	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	16,944	1.356	F	0.001	No

Note: **D** = exceeds the City of San Juan Capistrano's LOS criteria

Italics = peak-hour link analysis

¹ D = divided, and U = undivided

² A cumulative impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (the City of Dana Point considers LOS C acceptable).

ADT = average daily trips

SB = southbound

I-5 = Interstate 5

SR-1 = State Route 1

LOS = level of service

V/C = volume-to-capacity ratio

NB = northbound

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See comments recommended on the
TIA. Update the EIR accordingly.

4.12.10.2 General Plan Buildout (Year 2040) Condition

Significant Unavoidable Impact. The General Plan Buildout (2040) condition includes all planned circulation improvements consistent with the City's General Plan and all known cumulative projects in the project vicinity.

Tables 4.12.L and 4.12.M summarize the results of the General Plan Buildout (2040) peak-hour LOS analysis for the study area intersections using the ICU and HCM methodologies, respectively. As shown in Table 4.12.L, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). The project would add more than 0.01 to the v/c ratio at this intersection (0.012). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. In addition, this intersection is located within the City of Dana Point and mitigation cannot be enforced within another jurisdiction outside the City of San Juan Capistrano. Therefore, a significant impact would occur at one study area intersection based on the ICU methodology. As shown in Table M, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant project or buildout impact would not occur at any study area intersection based on the HCM methodology.

Buildout roadway segment ADT volumes, v/c ratios, and LOS are presented in Table 4.12.N. As Table 4.12.N indicates, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.069 and 0.017, respectively.

These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

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See comments recommended on the TIA. Update the EIR accordingly.

Table 4.12.L: Buildout (Project) Intersection Level of Service Summary (ICU)

Intersection	Control	Peak Hour	1		2		3		4	
			Existing		Existing Plus Project		Buildout		Buildout Impact ²	
			ICU	LOS	ICU	LOS	ICU	LOS	Δ ICU	Yes/No
1 Camino Capistrano/San Juan Creek Rd ¹	Signal	AM	0.375	A	0.374	A	0.447	A	-0.001	No
		PM	0.495	A	0.496	A	0.599	A	0.001	No
2 Camino Capistrano/I-5 SB Ramps ¹	Signal	AM	0.477	A	0.483	A	0.572	A	0.006	No
		PM	0.615	B	0.620	B	0.757	C	0.009	No
3 Camino Capistrano/Avenida Aeropuerto	Signal	AM	0.489	A	0.504	A	0.566	A	0.015	No
		PM	0.721	C	0.732	C	0.842	D	0.011	No
4 Camino Capistrano/Stonehill Dr - I-5 NB On-Ramp	Signal	AM	0.619	B	0.636	B	0.726	C	0.017	No
		PM	0.695	B	0.713	C	0.803	D	0.018	No
5 Camino Capistrano/Costco - AAMCO Driveways	Signal	AM	0.239	A	0.237	A	0.274	A	-0.002	No
		PM	0.424	A	0.426	A	0.474	A	0.002	No
6 Doheny Park Rd/Victoria Blvd ³	Signal	AM	0.359	A	0.339	A	0.387	A	-0.020	No
		PM	0.460	A	0.433	A	0.496	A	-0.027	No
7 Doheny Park Rd/Las Vegas Ave - SR-1 NB Ramps ³	Signal	AM	0.465	A	0.476	A	0.535	A	0.011	No
		PM	0.660	B	0.667	B	0.739	C	0.007	No
8 Doheny Park Rd/SR-1 SB Off-Ramp ³	Signal	AM	0.319	A	0.319	A	0.368	A	0.000	No
		PM	0.427	A	0.427	A	0.502	A	0.000	No
9 Del Obispo St/Stonehill Dr ^{3,4}	Signal	AM	0.758	C	0.770	C	0.855	D	0.012	Yes
		PM	0.694	B	0.703	C	0.801	D	0.007	No
10 Valle Rd/San Juan Creek Rd	Signal	AM	0.489	A	0.489	A	0.645	B	0.000	No
		PM	0.614	B	0.614	B	0.810	D	0.000	No
11 Valle Rd/I-5 NB Ramps - La Novia Avenue	Roundabout	AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		PM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
12 Project Driveway/Stonehill Dr ⁵	Signal	AM	N/A	N/A	0.668	B	0.707	C	-	N/A
		PM	N/A	N/A	0.564	A	0.635	B	-	N/A

Note: ■ = exceeds the City of San Juan Capistrano's LOS criteria

¹ Intersection is considered a "Hot Spot" location (LOS E is acceptable).

² A buildout impact occurs when the ICU in (2) minus the ICU in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Intersection is located in Dana Point (the City of Dana Point considers LOS C acceptable).

⁴ Δ ICU is the difference between (3) and Buildout no Project (ICU= 0.843 AM, 0.794 PM).

⁵ The intersection is currently two-way stop controlled. A signal is proposed as part of the project.

I-5 = Interstate 5

ICU = Intersection capacity utilization

LOS = level of service

N/A = not applicable (evaluated using the Highway Capacity Manual methodology)

NB = northbound

SB = southbound

SR-1 = State Route 1

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See comments recommended on the
TIA. Update the EIR accordingly.

Table 4.12.N: Buildout (Project) Roadway Segment Level of Service Summary

Roadway	Segment	No. of Lanes ¹	LOS E Capacity	1			Project ADT	2			3			4	
				Existing				Existing Plus Project			Buildout			Project Impact ²	
				ADT	V/C	LOS		ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	Yes/No
Camino Capistrano	I-5 SB Ramps to Avenida Aeropuerto ³	4D	37,500	23,755	0.633	B	287	24,042	0.641	B	26,591	0.709	C	0.008	No
	Avenida Aeropuerto to Stonehill - I-5 NB On-Ramp	4D	37,500	24,165	0.644	B	430	24,595	0.656	B	28,258	0.755	C	0.012	No
	Stonehill - I-5 NB On-Ramp to Costco-AAMCO Driveways	4D	37,500	24,407	0.651	B	232	24,639	0.657	B	28,358	0.756	C	0.006	No
	Costco-AAMCO Driveways to Las Vegas - SR-1 NB Ramp ⁴	4D	37,500	19,681	0.525	A	98	19,779	0.527	A	23,112	0.616	B	0.002	No
San Juan Creek Rd	Valle to Camino Capistrano	4U	25,000	19,470	0.779	C	-5	19,465	0.779	C	24,790	0.992	E	0.000	No
Stonehill Dr	Camino Capistrano to Project Driveway	4D	37,500	32,399	0.864	D	2,584	34,983	0.931	E	36,737	0.980	E	0.059	Yes
	AM Peak Hour - eastbound	2	3,200	1,572	0.523	A	102	1,774	0.554	A	1,919	0.600	A	0.031	No
	westbound	2	3,200	904	0.283	A	126	1,030	0.322	A	1,111	0.347	A	0.039	No
	PM Peak Hour - eastbound	2	3,200	1,300	0.406	A	85	1,385	0.433	A	1,457	0.455	A	0.027	No
	westbound	2	3,200	1,417	0.443	A	76	1,493	0.467	A	1,747	0.546	A	0.024	No
	Project Driveway to Del Obispo ⁴	4D	37,500	32,399	0.864	D	632	33,031	0.881	D	34,728	0.926	E	0.017	Yes
	AM Peak Hour - eastbound	2	3,200	1,512	0.504	A	31	1,543	0.513	A	1,778	0.556	A	0.009	No
	westbound	2	3,200	898	0.281	A	26	924	0.289	A	1,015	0.317	A	0.008	No
	PM Peak Hour - eastbound	2	3,200	1,262	0.394	A	19	1,281	0.400	A	1,352	0.423	A	0.006	No
	westbound	2	3,200	1,406	0.439	A	22	1,428	0.446	A	1,667	0.521	A	0.007	No
Valle Rd	San Juan Creek to I-5 NB Ramps - La Novia	2U	12,500	12,701	1.016	F	17	12,718	1.017	F	17,788	1.423	F	0.001	No

Note: **F** = exceeds the City of San Juan Capistrano's LOS criteria

Italics = peak-hour link analysis

¹ D = divided, and U = undivided

² A buildout impact occurs when the V/C in (2) minus the V/C in (1) is 0.01 or greater, and the LOS in (3) is E or F.

³ Segment is considered a "Hot Spot" location (LOS E is acceptable).

⁴ Segment is located in Dana Point (the City of Dana Point considers LOS C acceptable).

ADT = average daily trips

I-5 = Interstate 5

LOS = level of service

NB = northbound

SB = southbound

SR-1 = State Route 1

V/C = volume-to-capacity ratio

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See comments recommended on the
TIA. Update the EIR accordingly.

4.12.11 Project Alternatives

4.12.11.1 Alternative 1 – No Restaurant Uses

Alternative 1 would allow for the future construction of a 161,385-square-foot (sf) Ganahl Lumber hardware store and lumber yard and a 399-space vehicle storage facility, but would not include any restaurant uses. Based on the same trip generation rates used for the proposed project, Project Alternative 1 is anticipated to generate approximately 2,073 ADT, including 189 trips (105 inbound and 84 outbound) in the a.m. peak hour and 121 trips (52 inbound and 69 outbound) in the p.m. peak hour.

Alternative 1 Existing Plus Project – Significant and Unavoidable Impact. Based on results of the Alternative 1 Existing Plus Project peak-hour LOS analysis for the study area intersections included in the TIA, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU and the HCM methodology. Therefore, a significant Alternative 1 impact would not occur at any study area intersection based on either the ICU or HCM methodologies.

In addition to evaluating project-related study area intersections, the Existing Plus Project analysis for Alternative 1 also evaluated impacts with respect to roadway segment ADT volumes, v/c ratios, and LOS. Results of this analysis indicate that all study area roadway segments, including the hot-spot roadways, are anticipated to operate at satisfactory LOS with Alternative 1, with the exception of Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratio for Stonehill Drive between Camino Capistrano and the Project Driveway would increase by 0.040 in the Existing Plus Alternative 1 condition. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for Stonehill Drive between the Project Driveway and Del Obispo Street and Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Alternative 1 condition and therefore impacts at these locations are not considered significant. Although a significant project impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the Project Driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 1 Existing Plus Project Plus Cumulative (Year 2024) - Significant and Unavoidable Impact. Based on the results of the Alternative 1 Existing Plus Project Plus Cumulative peak-hour LOS analysis included in the TIA, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Alternative 1 would not add 0.01 or greater to the v/c ratio at this intersection (0.006). Therefore, a significant Alternative 1 cumulative impact would not occur at any study area intersection based on the ICU methodology. In addition, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Alternative 1 cumulative impact would not occur at any study area intersection based on the HCM methodology.

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See comments recommended on the
TIA. Update the EIR accordingly.

Alternative 1 Existing Plus Project Plus Cumulative roadway segment ADT volumes, v/c ratios, and LOS were also evaluated in the TIA. Results of this analysis indicate that all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS, with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratio for Stonehill Drive between Camino Capistrano and the Project Driveway would increase by 0.040. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano, Stonehill Drive between the Project Driveway and Del Obispo Street, and Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant Alternative 1 impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the Project Driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 1 Buildout (Year 2040) - Significant and Unavoidable Impact. Based on the results of the Buildout (2040) peak-hour LOS analysis for the study area intersections, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Alternative 1 would not add 0.01 or greater to the v/c ratio at this intersection (0.007). Therefore, a significant Alternative 1 buildout impact would not occur at any study area intersection based on the ICU methodology. All study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Alternative 1 buildout impact would not occur at any study area intersection based on the HCM methodology.

Impacts to roadway segment ADT volumes, v/c ratios, and LOS were also evaluated as part of the Alternative 1 Buildout (Year 2040) analysis. Results of this analysis indicate that all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratio for Stonehill Drive between Camino Capistrano and the Project Driveway would increase by 0.040. This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano, Stonehill Drive between the Project Driveway and Del Obispo Street, and Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant Alternative 1 impact would occur at one study area roadway segment (Stonehill Drive between Camino Capistrano and the Project Driveway), a peak-hour link analysis shows that this segment would operate at satisfactory LOS in both directions during the peak hours.

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See comments recommended on the
TIA. Update the EIR accordingly.

Signal Warrant Analysis. The TIA also included a signal warrant analysis for Alternative 1. Results of this analysis indicate that installation of a traffic signal would not be warranted under any of the existing and forecasted scenarios. Although a traffic signal is not warranted based on the forecast peak-hour traffic volumes at this intersection, a traffic signal is recommended to ensure safe inbound and outbound access to/from the project site along Stonehill Drive.

Summary. Overall, transportation impacts with respect to Alternative 1 would be slightly reduced as compared to the proposed project. Unlike the proposed project, Alternative 1 would not result in significant unavoidable impacts to the intersection of Del Obispo/Stonehill Drive (in the AM peak hour) under the Alternative 1 Existing Plus Project Plus Cumulative, or the Alternative 1 Buildout scenarios. Therefore, although Alternative 1 impacts would be significant and unavoidable, they would be less than those associated with implementation of the proposed project.

Although impacts related to transportation for Alternative 1 would be less than those associated with the proposed project, cumulative impacts associated with Alternative 1 would be cumulatively significant and would be considered significant unavoidable impacts.

4.12.11.2 Alternative 2 – 2,000 Sf of Restaurant Uses

Alternative 2 would allow for the future construction of a 161,385 sf Ganahl Lumber hardware store and lumber yard, a 399-space vehicle storage facility, and 2,000 sf of fast-food restaurant uses. Based on the same trip generation rates used for the proposed project, Alternative 2 is anticipated to generate approximately 2,544 ADT, including 230 trips (126 inbound and 104 outbound) in the a.m. peak hour and 153 trips (69 inbound and 84 outbound) in the p.m. peak hour.

Alternative 2 Existing Plus Project –Significant and Unavoidable Impact. Based on the analysis of the Alternative 2 Existing Plus Project peak-hour LOS analysis, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU and the HCM methodology. Therefore, a significant Alternative 2 impact would not occur at any study area intersection based on either the ICU or HCM methodologies.

An analysis of impacts to roadway segment ADT volumes, v/c ratios, and LOS was also conducted for the Alternative 2 Existing Plus Project scenario. Based on this analysis, all study area roadway segments, including the hot-spot roadways, are anticipated to operate at satisfactory LOS with Alternative 2, with the exception of Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.049 and 0.011, respectively, in the Alternative 2 Existing Plus Project condition. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Alternative 2 Existing Plus Project condition and therefore impacts at these locations are not considered significant. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del

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See comments recommended on the
TIA. Update the EIR accordingly.

Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 2 Existing Plus Project Plus Cumulative (Year 2024) – Significant and Unavoidable Impact. Based on the results of the Alternative 2 Existing Plus Project Plus Cumulative peak-hour LOS analysis, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Project Alternative 2 would not add 0.01 or greater to the v/c ratio at this intersection (0.008). Therefore, a significant Project Alternative 2 or cumulative impact would not occur at any study area intersection based on the ICU methodology.

Based on the HCM methodology, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Project Alternative 2 or cumulative impact would not occur at any study area intersection based on the HCM methodology.

An analysis of traffic impacts with respect to roadway segment ADT volumes, v/c ratios, and LOS was evaluated under the Alternative 2 Existing Plus Project Plus Cumulative scenario. Based on the results of the analysis, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS, with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.049 and 0.011, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant Project Alternative 2 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 2 Buildout (Year 2040) Condition – Significant and Unavoidable. Based on the results of the Buildout (2040) peak-hour LOS analysis, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). However, Alternative 2 would not add 0.01 or greater to the v/c ratio at this intersection (0.008). Therefore, a significant Alternative 2 impact would not occur at any study area intersection based on the ICU methodology. All study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Alternative 2 or buildout impact would not occur at any study area intersection based on the HCM methodology.

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See comments recommended on the
TIA. Update the EIR accordingly.

An analysis of traffic impacts with respect to buildout roadway segment ADT volumes, v/c ratios, and LOS was also conducted for the Alternative 2 Buildout scenario. Based on the results of this analysis, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.049 and 0.011, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant Alternative 2 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Signal Warrant Analysis. The TIA also included a signal warrant analysis for Alternative 2.

Based on the results of this analysis, installation of a traffic signal would be warranted under all scenarios. A traffic signal would be installed at the Project Driveway/Stonehill Drive as an Alternative 2 project design feature.

Summary. Overall, transportation impacts with respect to Alternative 2 would be slightly reduced as compared to the proposed project. Unlike the proposed project, Project Alternative 2 would not result in significant unavoidable impacts to the intersection of Del Obispo Street/Stonehill Drive (in the AM peak hour) under the Alternative 2 Existing Plus Project Plus Cumulative, or the Alternative 2 Buildout scenarios. Therefore, although Alternative 2 impacts would be significant and unavoidable they would be less than those associated with implementation of the proposed project.

Although impacts related to transportation for Alternative 2 would be less than those associated with the proposed project, cumulative impacts associated with Alternative 2 would be cumulatively significant and would be considered significant unavoidable impacts.

4.12.11.3 Alternative 3 - 4,000 SF of Restaurant Uses

Alternative 3 would allow for the future construction of a 161,385 sf Ganahl Lumber hardware store and lumber yard, a 399-space vehicle storage facility, and 4,000 sf of fast-food restaurant uses. Based on the same trip generation rates used for the proposed project, Alternative 3 is anticipated to generate approximately 3,015 ADT, including 271 trips (147 inbound and 124 outbound) in the a.m. peak hour and 186 trips (86 inbound and 100 outbound) in the p.m. peak hour.

Alternative 3 Existing Plus Project – Significant and Unavoidable Impact. Based on the results of the Alternative 3 Existing Plus Project peak-hour LOS analysis, all study area intersections, including the hot-spot intersections, are anticipated to operate at satisfactory LOS based on the ICU



GANAHL LUMBER PROJECT
SAN JUAN CAPISTRANO, CALIFORNIA

See comments recommended on the
TIA. Update the EIR accordingly.

methodology and the HCM methodology. Therefore, a significant Alternative 3 impact would not occur at any study area intersection based on either the ICU or the HCM methodologies.

Traffic impacts with respect to roadway segment ADT volumes, v/c ratios, and LOS were also evaluated as part of the Alternative 3 Existing Plus Project scenario. Based on the results of this analysis, all study area roadway segments, including the hot-spot roadways, are anticipated to operate at satisfactory LOS with Alternative 3, with the exception of Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively, in the Alternative 3 Existing Plus Project condition. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Alternative 3 Existing Plus Project condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 3 Existing Plus Project Plus Cumulative (Year 2024) – Significant and Unavoidable Impact. Based on the results of the Alternative 3 Existing Plus Project Plus Cumulative peak-hour LOS analysis for the study area intersections, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). Alternative 3 would add 0.01 to the v/c ratio at this intersection (0.010). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Alternative 3 impact would occur at one study area intersection based on the ICU methodology.

In addition, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Alternative 3 cumulative impact would not occur at any study area intersection based on the HCM methodology.

Traffic impacts with respect to roadway segments were also evaluated as part of the Alternative 3 Existing Plus Project Plus Cumulative analysis. Based on the results of this analysis, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS, with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road

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See comments recommended on the
TIA. Update the EIR accordingly.

between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant. Although a significant Alternative 3 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Alternative 3 Buildout (Year 2040) Condition– Significant and Unavoidable Impact. Based on the results of the Buildout (2040) peak-hour LOS analysis, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the ICU methodology, with the exception of Del Obispo Street/Stonehill Drive (LOS D in the a.m. peak hour). Alternative 3 would add 0.01 to the v/c ratio at this intersection (0.010). This is considered a significant unavoidable impact because there is no available right-of-way as a feasible improvement to widen Del Obispo Street or Stonehill Drive. Therefore, a significant Alternative 3 impact would occur at one study area intersection based on the ICU methodology.

In addition, all study area intersections, including the hot-spot intersections, are forecast to operate at satisfactory LOS based on the HCM methodology. Therefore, a significant Alternative 3 buildout impact would not occur at any study area intersection based on the HCM methodology.

The Alternative 3 Buildout (2040) peak-hour LOS analysis also included an analysis of project impacts on roadway segments. Based on this analysis, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS E), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F). The v/c ratios for Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street would increase by 0.059 and 0.014, respectively. These are considered significant unavoidable impacts because there is no available right-of-way as a feasible improvement to widen Stonehill Drive to provide additional roadway capacity. However, the v/c ratios do not increase by 0.01 or greater for San Juan Creek Road between Valle Road and Camino Capistrano and for Valle Road between San Juan Creek Road and the I-5 northbound ramps and therefore impacts at these locations are not considered significant.

Although a significant Alternative 3 impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during the peak hours.

Signal Warrant Analysis. The TIA also included a signal warrant analysis for Project Alternative 3.

Based on the results of this analysis, installation of a traffic signal would be warranted under all scenarios for Alternative 3. Therefore, a traffic signal would be installed at the Project Driveway/Stonehill Drive as an Alternative 3 project design feature.

Summary. Overall, transportation impacts with respect to Alternative 3 would be similar to the proposed project. As with the proposed project, Project Alternative 3 would result in significant

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See comments recommended on the
TIA. Update the EIR accordingly.

unavoidable impacts to roadway segments at Stonehill Drive between Camino Capistrano and the Project Driveway, and Stonehill Drive between the Project Driveway and Del Obispo Street in the Existing Plus Project, Existing Plus Project Plus Cumulative, and Alternative 3 Buildout scenarios. Similar to the proposed project, Alternative 3 would also result in significant unavoidable impacts in the AM peak hour to the intersection of Del Obispo Street/Stonehill Drive under the Existing Plus Project Plus Cumulative and Alternative 3 Buildout scenarios. Therefore, Alternative 3 impacts would have similar impacts as those associated with implementation of the proposed project.

Although impacts related to transportation for Alternative 3 would be less than those associated with the proposed project, cumulative impacts associated with Alternative 3 would be cumulatively significant and would be considered significant unavoidable impacts.

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ATTACHMENT B Proposed Striping Modifications

ATTACHMENT B Stonehill Drive Concept and Estimate



2.2.2 CITY OF DANA POINT

Letter Code: L-2

Date: February 18, 2020

Response to Comment L-2-1

This comment is introductory and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Environmental Impact Report (EIR). No further response is required.

Response to Comment L-2-2

This comment states that the consideration of a reasonable range of alternatives and the adoption of feasible mitigation measures to minimize significant impacts are required.

This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis, and therefore, no further response is required.

As discussed in Chapter 5.0, Alternatives, of the Draft EIR, the range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]). In accordance with Section 15126.6(f) of the *State CEQA Guidelines*, the Draft EIR prepared for the project has identified and analyzed a reasonable range of alternatives, which included three reduced project alternatives (refer to Chapter 5.0, Alternatives, of the Draft EIR) which would reduce the number of vehicle trips generated by the project and therefore lessen the identified traffic impacts associated with the proposed project. Further, the Draft EIR proposed the implementation of feasible mitigation measures (refer to 7.0, Mitigation Monitoring and Reporting Program, of the Draft EIR) as required by Public Resources Code (PRC) Section 21081.6.

Response to Comment L-2-3

This comment states that the proposed project would result in significant environmental impacts at the intersection of Del Obispo Street and Stonehill Drive, and Stonehill Drive between Camino Capistrano and Del Obispo Street. This comment suggests that the significant and unavoidable impact determination based on the lack of availability of right-of-way is unjustified.

The feasibility of adding a third eastbound through-lane on Stonehill Drive as part of the proposed project was considered by the City following the receipt of a comment letter from the City of Dana Point. The City engaged in substantial coordination with Dana Point City staff and received extensive

input on this topic. The City of San Juan Capistrano and the City of Dana Point both agree that the widening of Stonehill Drive could reduce project-related impacts. However, because this would require future coordination between the cities and the outcome of that coordination is uncertain, the impact would remain significant and unavoidable if the cities are not able to come to a resolution. As such, including mitigation that requires the widening of Stonehill Drive through the City of Dana Point cannot be guaranteed, and therefore, is not feasible.

Response to Comment L-2-4

This comment states that the proposed project should review traffic access points, and redirect trips away from Stonehill Drive if possible. Further, the comment suggests that the City should evaluate alternatives with alternative access redirecting trips away from Stonehill Drive and coordinate with neighboring agencies and stakeholders. The comment also states that the EIR should evaluate those alternatives and impacts and consider mitigation if applicable.

Alternative access points that are not on Stonehill Drive are not available due to the location of the proposed project, which is bounded by the railroad on the east and San Juan Creek on the west. The project site benefits from a utility easement travelling north/south from the northwestern corner of the project site to Avenida Aeropuerto; the easement is located immediately west of the mobile home park adjacent to the project site. The easement is located on the adjacent owner's property. The project proponent merely benefits from the utility easement and is bound by the terms and conditions of that easement. The project proponent cannot expand the use of the utility easement beyond the purposes set forth in the utility easement. Consequently, neither the project proponent nor the City have authority to convert the use of the utility easement to an easement for access purposes. Finally, across the project site, an existing access easement would remain in place. This easement is not available for public ingress and egress to the project site because it traverses through private property and terminates at the southern edge of the project site. Therefore, the creation of a permanent public roadway through private property at this location is infeasible.

Response to Comment L-2-5

This comment states that adding a third eastbound through-lane on Stonehill Drive, between Del Obispo Street and Camino Capistrano is feasible and would mitigate the impacts identified above under Response to Comment L-2- 2 and that the City of Dana Point is willing to work with the City of San Juan Capistrano to implement those improvements.

See Response to Comment L-2-3. The City of San Juan Capistrano is also willing to work with the City of Dana Point regarding possible future improvements along Stonehill Drive. However, because of the future inter-jurisdictional cooperation that would be required for these improvements, the widening is uncertain and thus cannot be included as mitigation for the Ganahl Lumber Project.

Response to Comment L-2-6

This comment states that given that the proposed project has significant traffic impacts, the City of San Juan Capistrano is required to incorporate feasible measures identified by the City of Dana Point and ensure that they are defined and enforceable with adequate sources of funding for implementation.

See the Response to Comment L-2-3.

Response to Comment L-2-7

This comment requests assurance that the project driveway is aligned with the opposing access to the South Coast Water District site and documentation in the Draft EIR that a crosswalk is not going to be placed across Stonehill Drive, and that directional signage should be installed to notify the public not to cross there and cross at the intersection at Stonehill Drive and Camino Capistrano or to use the undercrossings along San Juan Creek.

The proposed project's signalized intersection and driveway would be aligned with the opposing access to the South Coast Water District site. The City of San Juan Capistrano intends to install a pedestrian crossing across Stonehill Drive when the traffic signal is installed at the project driveway for the following reasons: (1) given that the anticipated pedestrian volume crossing Stonehill Drive would be low, it would not cause disruption to eastbound and westbound traffic; and (2) the project driveway traffic signal will be synchronized with the traffic signal at Camino Capistrano and Stonehill Drive to enhance traffic flow.

Response to Comment L-2-8

This comment states that day laborers and associated nuisance issues can result from the project. This comment requests that adequate mitigation measures be provided to require the project Applicant to address loitering, trash and debris, sanitation, and other issues.

Loitering and associated trash and debris problems are a code enforcement issue and not a CEQA topic issue. These issues would be addressed through the City's code enforcement department. Therefore, because such behaviors are not considered a significant impact, no mitigation is required.

Response to Comment L-2-9

This comment requests clarification in Section 3.3, Circulation and Access, of the Project Description on whether the proposed signalized driveway will be designed as an intersection at Stonehill Drive that will provide southbound access to the South Coast Water District property.

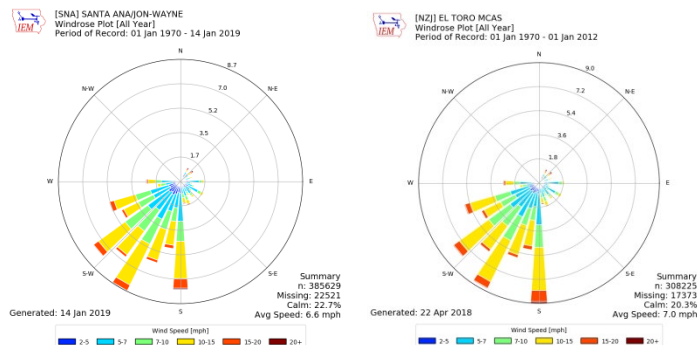
As described throughout the Draft EIR, the signalized project driveway will be designed and aligned to provide southbound access to the South Coast Water District property. The signalized project driveway will function as an intersection.

Response to Comment L-2-10

This comment requests a reference for the following statement: "The prevailing wind directions are mostly from the south-southwest, which would most likely follow the northerly direction up through the San Juan Creek Channel." The comment also points out that Section 4.2.3.1, Regional Climate, states the winds shift daily and asks that we provide sources for wind patterns.

Both references presented in the comment are true. Although the prevailing wind directions are mostly from the south-southwest, the winds do shift daily.

The Iowa Environmental Mesonet maintains an archive of automated airport weather observations from the John Wayne Airport and former Marine Corps Air Station at El Toro². The wind data are historical weather observations expressed as wind roses. Wind roses are a plot providing frequencies of wind direction and wind speed. The historical wind patterns at John Wayne Airport (SNA) and former El Toro Marine Corps Air Station (NZI) present evidence that the local wind directions are from the south-southwest as shown below:



Section 4.2.3.1 of the Draft EIR, Regional Climate, provides a discussion of the wind patterns for the entire South Coast Air Basin. “Across the south coastal region, wind patterns are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. [underlining added for emphasis]” (refer to page 4.2-2 of the Draft EIR). No changes to the Draft EIR text are required.

Response to Comment L-2-11

This comment requests a source or reference for the South Coast Air Quality Management District (SCAQMD) guidance referred to on pages 4.2-15 and 4.2-16 of the Draft EIR. This comment states that Table 4.2.E, Regional Operations Emissions, does not seem to account for additional operations emissions including neighboring existing automobile sales and service uses, industrial uses, and traffic on Stonehill Drive.

As stated on pages 15 to 16 of the *Air Quality and Greenhouse Gas Assessment* prepared by ECORP Consulting, Inc. in 2019 (provided in Appendix B of the Draft EIR), by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulatively considerable. Thus, Table 4.2.E does not account for the current operational emissions of the existing automobile sales and service uses, industrial uses, and existing traffic on Stonehill Drive. Further, the SCAQMD does not recommend the quantification of existing emissions surrounding a proposed project’s location. The term “Regional Significance Thresholds” is used in the assessment

² Iowa Environmental Mesonet. 2019. Wind Roses. Archive of automated airport weather observations including wind direction and wind speed observed at John Wayne Airport (January 1970–January 2019) and former Marine Corps Air Station at El Toro (January 1970 - January 2012). Iowa State University Department of Agronomy. Ames, IA.

of air quality in order to distinguish the SCAQMD's mass daily significance thresholds, which were established to meet the objective of achieving attainment status with state and federal standards, from the SCAQMD's localized significance thresholds (LSTs). The source of all SCAQMD thresholds used in ECORP's *Air Quality and Greenhouse Gas Assessment* is the SCAQMD *Air Quality Analysis Handbook* (available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>).

Response to Comment L-2-12

This comment requests support for including only 10 percent of project-related mobile sources in the localized emissions operations emissions calculations. This comment suggests that it seems appropriate to assess emissions including all of the mobile sources generated by the proposed project, perhaps at some peak condition.

As stated on page 22 of the *Air Quality and Greenhouse Gas Assessment* (ECORP Consulting 2019) (Appendix B of the Draft EIR), according to the SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources or attracts heavy-duty trucks that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed project includes high-turnover restaurants, a hardware store and lumber yard for retail sales, and a vehicle storage lot and thus does not include such uses. While the lumber yard component of the project would accommodate product deliveries that would arrive on heavy-duty trucks, it would not represent a distribution center used by manufacturers, importers, exporters, wholesalers, and transport businesses, which distinguishes the project from a high-cube warehouse or distribution center that predominately accommodates substantial amounts of heavy-duty trucks. As stated in the Project Description of the Draft EIR, the proposed hardware store and lumber yard are anticipated to be served by 10 to 15 vendor trucks daily and would also use 9 trucks for daily customer deliveries.

Therefore, in the case of the proposed project, the operational phase LST protocol does not need to be applied. Nonetheless, for the purpose of full disclosure, the operational phase LST protocol has been applied to the proposed project to the extent possible (refer to pages 4.2-18 – 4.2-19 of the Draft EIR). The applied LST protocol is limited since the project does not actually include the components for warranting an operational LST analysis, as previously described. As further described, the SCAQMD's LST methodology clearly states that "off-site mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the project LST analysis, only emissions generated "on site" were considered. For a worst-case scenario LST assessment, the emissions shown in the *Air Quality and Greenhouse Gas Assessment* include all "on site" project-related stationary (area) sources and 10 percent of the project-related mobile sources. Considering that the longest weighted trip length used in the California Emissions Estimator Model (CalEEMod) for the proposed project is approximately 16.6 miles, 10 percent of this total would represent an on-site travel distance for each car and truck of approximately 1.7 miles. 1.7 miles of on-site travel is the equivalent of every visiting automobile traversing the internal circulation network 5 times upon arrival and another 5 times upon departure from the site. Thus, the 10 percent assumption is conservative and would tend to overstate the actual impact as it is unlikely that visitors to the project site would traverse the entire internal circulation network 10 times. As indicated in the discussion under Threshold 4.2.3 in Section 4.2, Air Quality, (refer to page 4.2-19 of the Draft EIR), the project would result in less than significant impacts related to LSTs during operational activities.

Response to Comment L-2-13

This comment suggests that the greenhouse gas (GHG) analysis is misleading because it applies “SCAQMD thresholds,” and that such thresholds are summarized in a ten-year-old draft document and were never formally adopted by the SCAQMD.

The comment refers to the SCAQMD draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (December 5, 2008) that was developed to provide guidance to lead agencies. On September 28, 2010, SCAQMD Working Group Meeting #15 provided further guidance, including an interim screening-level bright-line threshold of 3,000 metric tons (MT) of CO₂e annually, and an efficiency-based threshold of 4.8 MT of CO₂e per service population per year in 2020 and 3.0 MT of CO₂e per service population per year in 2035. Although these documents are approximately ten years old and were never formally adopted by SCAQMD, they remain the industry standard for analyzing project-related GHG impacts.

The *State CEQA Guidelines* for GHG emissions state the following: CEQA Guidelines Section 15064(b) provides that the “determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data,” and further, states that an “ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting.”

While individual projects are unlikely to measurably affect GHGs, each project incrementally contributes toward the potential for GHGs on a cumulative basis, in concert with all other past, present, and probable future projects. At present, there is not a statewide threshold of significance or particular methodology for measuring GHG impacts. As with most environmental topics, significance criteria are left to the judgment and discretion of the lead agency.

The SCAQMD has adopted a significance threshold of 10,000 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year (MT CO₂e/yr) for permitted (stationary) sources of GHG emissions for which SCAQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group (Working Group) to develop GHG significance thresholds. Based on the last Working Group meeting held in September 2010 (Meeting No. 15), SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1.** Exemptions: If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2.** Consistency with a locally adopted GHG Reduction Plan: If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project’s geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3.** Numerical Screening Threshold: If GHG emissions are less than the numerical screening-level threshold of 3,000 metric tons CO₂e per year, project-level and cumulative GHG emissions are less than significant.

- **Tier 4.** Performance Standards: If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The current recommended approach is per capita efficiency targets. SCAQMD proposes a 2020 efficiency target of 4.8 MT CO₂e per year per service population (MT CO₂e/yr/SP) for project-level analyses. The GHG efficiency metric divides annualized GHG emissions by the service population, which is the sum of residents and employees, per the following equation:

$$\text{Rate of Emission: GHG Emissions (MT CO}_2\text{e/yr)} \div \text{Service Population}$$

The efficiency evaluation consists of comparing the project's efficiency metric to efficiency targets. Efficiency targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals.

The proposed project's GHG emissions were first compared to the SCAQMD interim screening level numeric bright-line threshold of 3,000 MT CO₂e/yr annually. As the proposed project was estimated to exceed this screening threshold, the proposed project's GHG emissions were then compared to the SCAQMD-recommended efficiency-based threshold of 4.8 MT CO₂e per service population per year in 2020, and 3.0 MT CO₂e per service population per year in 2035. As previously described, these thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. The working group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the state Office of Planning and Research (OPR), California Air Resources Board (CARB), the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (Basin), various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. The numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant. The *State CEQA Guidelines* emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. Thus, the City of San Juan Capistrano as the lead agency for the project is entitled to employ SCAQMD recommendations to determine whether GHG emissions from the proposed project would be significant.

It is noted that the proposed project is also evaluated for compliance with the Southern California Association of Government's (SCAG's) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which establishes an overall GHG target for the region consistent with both the target date of Assembly Bill (AB) 32 (2020) and the post-2020 GHG reduction goals of Senate Bill (SB) 32. The City of San Juan Capistrano is a member of SCAG.

Response to Comment L-2-14

This comment suggests that defining a retail project's service population to include patrons is improper and results in significantly understating the project's GHG impacts. Instead, the commenter notes that the analysis should only include project employees in the project's service population.

It is unclear why omitting patrons from the efficiency evaluation would be appropriate because patrons represent the majority of the population that would be served by the project. While patrons visiting the project would not reside on the project site, they would largely reside in the surrounding communities and represent a population that is served by the project's land uses. Additionally, patrons traveling to the project site would represent the dominant source of project GHG emissions and thus would be the primary subject of per capita efficiency. Because the GHG reduction goals of AB 32 apply to the entire state of California and virtually all project patrons would reside in California, they are included in the service population.

It is also noted that the California Supreme Court accepted the use of efficiency-based thresholds, as used in the Draft EIR, which describe GHG emissions on a per capita basis, per service population basis, or some other rate-oriented descriptor in the *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 224 Cal.App.4th 1105 (CBD vs. CDFW; also known as the "Newhall Ranch" case).

The AB 32 Scoping Plan also presents the California Statewide reduction target required by AB 32 based on improved efficiency for all Californians (i.e., reducing per capita emissions of all Californians from 14 to 10 MT CO₂e/year by 2020). Because the project's patrons would be Californians and would be served by the project land uses, they are included in the service population. As stated on page 38 of the *Air Quality and Greenhouse Gas Assessment* (ECORP Consulting 2019), which is included as Appendix B to the Draft EIR, the per capita thresholds represent the rates of emissions needed to achieve a fair share of the State's emission reduction mandate. The use of "fair share" in this instance indicates the GHG efficiency level that, if applied statewide or to a defined geographic area, would meet the statewide year 2020 and post-2020 emissions targets. Such thresholds are determined by dividing the statewide GHG emissions inventory goal (allowable emissions) by the estimated statewide population. This method allows highly efficient projects (e.g., compact development and those located efficiently to promote land use diversity) with higher mass emissions to meet the overall GHG reduction goals promulgated by the State. For these reasons, an efficiency-based threshold grounded on a per capita metric by all Californians served by the project is appropriate.

The Appendix G thresholds for GHG emissions do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the *State CEQA Guidelines* emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. Thus, the City of San Juan Capistrano as the lead agency for the project is entitled to employ SCAQMD recommendations in order to determine whether GHG emissions from the proposed project would be significant. With respect to GHG emissions, the *State CEQA Guidelines* Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The *State CEQA Guidelines* note that an agency has the discretion to either quantify a project's greenhouse gas emissions or rely on a "qualitative analysis or other performance-based standards." (14 California Code of Regulations [CCR] 15064.4(b)). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." (14 CCR 15064.4(c)). Section 15064.4(b) provides that the lead agency should

consider the following when determining the significance of impacts from GHG emissions on the environment: (1) the extent a project may increase or reduce GHG emissions as compared to the existing environmental setting, (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

Response to Comment L-2-15

This comment suggests that the proposed project is inconsistent with SCAG's RTP/SCS Goal 4: "Preserve and ensure a sustainable regional transportation system" because there are "significant unmitigated impacts" for traffic and that the Traffic Impact Analysis does not identify alternatives to improve further capacities. This comment requests that the EIR be revised to include and require alternative mitigation along Stonehill Drive.

It should be noted that Section 4.12, Transportation, indicated that a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street). However, a peak-hour link analysis shows that each segment would operate at satisfactory level of service (LOS) in both directions during the peak hours. See also Response to Comment L-2-3.

The purpose of the Sustainable Communities Strategy (SCS) is to integrate land use and transportation strategies that will achieve California Air Resources Board (CARB) emissions reduction targets for the entire South Coast region. The sustainable regional transportation system identifies the areas for future land uses, residential densities, and building intensities in order to accommodate the needs of the growing population in the South Coast region.

The proposed project would result in the conversion of the currently vacant and underutilized project site to a commercial property with a new lumber yard and hardware store, fast-food restaurants, and a vehicle storage lot. The project site is located directly north of Stonehill Drive, which is a Primary Arterial that runs in an east-west direction through the Cities of Dana Point and San Juan Capistrano. The project would provide access to the site off Stonehill Drive, which would serve to connect the site with the local and regional transportation systems. Moreover, all access improvements included as part of the proposed project would comply with the City and Orange County Fire Authority (OCFA) standards to ensure the safety and reliability of transportation improvements included as part of the project. As stated in the Draft EIR, each roadway segment surrounding the project site would operate at satisfactory LOS except for Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the Interstate 5 (I-5) northbound ramps (LOS F). However, the volume-to-capacity (v/c) ratio does not increase by 0.01 or greater for Valle Road between San Juan Creek Road and the I-5 northbound ramps in the Existing Plus Project condition. Although a significant project impact would occur at two study area roadway segments (Stonehill Drive between Camino Capistrano and the Project Driveway and between the Project Driveway and Del Obispo Street), a peak-hour link analysis shows that each segment would operate at satisfactory LOS in both directions during peak hours. Therefore, the proposed project would be consistent with the goal of preserving a sustainable regional transportation system.

Response to Comment L-2-16

This comment requests the liquefaction analysis by the project Applicant or the County of Orange to justify the statement that “lateral spreading is not anticipated to occur on the project site because the recently constructed sheet pile system along San Juan Creek levee penetrates below the lowest liquefiable layer identified within the project site for protection of the levee.”

Willdan Geotechnical’s review of available published material indicated that extensive investigations including liquefaction and lateral spreading analysis were performed for this section of San Juan Creek Levee Protection for the County of Orange Public Works.^{3,4} The referenced source materials are available for review at the City of San Juan Capistrano Development Services Department.

Lateral spreading potential at the steep embankment of the San Juan Creek Levee has been addressed by reducing the potential for seismic slope deformation to occur. The potential seismic slope deformation before installation of the sheet pile system was estimated to range from 2 to 6 feet. Because the sheet piles have been installed, the estimated potential seismic slope deformation is expected to reduce to less than 2 feet.⁵ The majority of the potential liquefaction in the vicinity of San Juan Creek and the project site would occur at depth, below the bottom of the creek. Therefore, due to the design depth of the sheet pile system at 50 feet below the top of the levee berm (up to 27 feet below the bottom of the San Juan Creek channel) and the absence of a continuous liquefiable layer within the project site, the potential for lateral displacement at the project site is considered to be very low.

Response to Comment L-2-17

This comment states that the sheet pile system was solely designed for flood management and did not include any lateral spreading analysis. This comment requests that this is investigated further in the Draft EIR.

Please see Response to Comment L-2-16 and references for the detailed lateral spreading analysis.

Response to Comment L-2-18

This comment requests clarification on why shoring required for the proposed project would be required to meet California Department of Transportation (Caltrans) standards.

Shoring will be designed in accordance with the latest version of the Caltrans’ 2011 *Trenching and Shoring Manual*. Although the City has not formally adopted the Caltrans *Trenching and Shoring Manual*, it is widely used in San Juan Capistrano and other cities as well as the County of Orange and is an acceptable engineering practice for the design of shoring.

³ AMEC Earth & Environmental, Inc. 2010. *Geotechnical Report San Juan Creek (L01) Channel Levee Protection, Phases 4 & 5 (Station 51+00 to 112+00), San Juan Capistrano, California*. June 24, 2010.

⁴ TetraTech. 2016. *Design Level Analysis for Sheet Pile Wall, San Juan Creek (L01) – Phases 4 & 5, East Levee Station 51+00 to Station 112+00, Orange County, CA*. March 25, 2016.

⁵ Ibid.

Response to Comment L-2-19

This comment requests clarification on the threshold for mitigation in regards to seismic settlements due to liquefaction and on where the “areas where settlements cannot be tolerated by spread/strip footings” are located and what the settlement amount that is tolerated, and the mitigation proposed.

Allowable settlement is not a geotechnical defined criteria. The estimated settlement is calculated using standards of practice available in the industry. The structural engineer utilizes the estimated settlement to design the foundation/structure that can accommodate the estimated settlement to an acceptable deformation level. Although there is no formal written standards used in the industry, engineers always include “safety factors” in their calculations, which are intended to allow an acceptable tolerance for other variables that could affect design integrity.

Response to Comment L-2-20

This comment suggests that the liquefaction and lateral spreading analysis should be reviewed by a third party consultant specializing in these areas.

Third party review of the *Preliminary Geotechnical Investigation* prepared by Willdan was conducted by LGC Geotechnical, Inc. (LGC) (included in Appendix F of the Draft EIR). LGC is a full-service geotechnical consulting firm that has been retained by the City to conduct third party reviews of geotechnical assessments for various projects in San Juan Capistrano on an on-call basis. The firm has been providing such services to the City for more than five years and its list of clients include land developers, residential builders, engineers, architects, school districts, utility companies, commercial builders, and numerous public agencies. The firm has extensive experience in providing geotechnical design reports for public structures and improvements, observation and testing during grading and construction, and third-party review for public agencies. Additional information regarding LGC’s qualifications is on file with the City’s Public Works Department. Therefore, there has been adequate third party review.

Response to Comment L-2-21

This comment suggests that Mitigation Measure GEO-1 should include a statement that the City of Dana Point shall review and approve the final geotechnical liquefaction and lateral spreading analysis and recommendations for any impacts to the San Juan Creek and Stonehill Drive Bridge.

The City of San Juan Capistrano is the lead agency for certification of the EIR and approval of the project. Therefore, it has the ultimate responsibility to ensure that the mitigation incorporated in the Final EIR is implemented as required. The City of San Juan Capistrano will provide the City of Dana Point with a copy the Final EIR, including the adopted Mitigation, Monitoring, and Reporting Program, and will continue to cooperate with the City of Dana Point as requested, should concerns arise during construction activities.

Response to Comment L-2-22

This comment suggests that Mitigation Measure HAZ-1 should include a statement that the removal and disposal of all material shall not be transported through the City of Dana Point or surrounding Cities without separate notification and permitting as required.

Mitigation Measure HAZ-1 will not be revised to require separate notice and permitting from the City of Dana Point or surrounding cities in advance of transporting materials through those cities. As described in the Draft EIR, the Initial Study substantiates that impacts associated with the routine transport, use, or disposal of hazardous materials is less than significant with compliance with existing governmental regulations such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the California Code of Regulations (Title 22). As such, the transport of any hazardous materials would comply with all applicable regulations and associated impacts would be less than significant, and no mitigation is required. No changes to Mitigation Measure HAZ-1 are required.

See also Response to Comment L-2-23, below.

Response to Comment L-2-23

This comment states that the required Construction Contingency Plan submitted for review and approval shall include the approval of all cities proposed along the haul route for any material under review.

As described in Mitigation Measure HAZ-1, any potential need for the disposal of substances would be consistent with local, State, and federal regulations, including any permitting or notification requirements. These requirements mandate the notification of State and local agencies with governing authority over the handling and transport of hazardous waste and responsibility to respond.

Transporters of hazardous waste must be authorized by the California Department of Toxic Substances Control (DTSC), and must comply with the California Vehicle Code, California Highway Patrol (CHP) Regulations (CA Code Regulations, Title 13, Chapter 6, Hazardous Materials); the California State Fire Marshal Regulations (CA Code Regulations, Title 19); United States Department of Transportation (DOT) regulations, Title 49, Code of Federal Regulations (49 Code of Federal Regulations); and U.S. Environmental Protection Agency (U.S. EPA) Regulations, Title 40 Code of Federal Regulations. Any hazardous waste hauled from the site must be transported via the most direct route, using State or interstate highways wherever possible (California Vehicle Code, Section 31303), and the transporter must have a valid registration issued by DTSC, as outlined in Title 22 of the Health & Safety Code and California Code of Regulations.⁶ These regulations do not require the notification and approval of the cities along the haul route.

Title 40, Part 370 of the Federal Code of Regulations requires that, prior to the transport of hazardous materials, notification be provided to the Local Emergency Planning Committee (LEPC), State Emergency Response Commission (SERC), and fire department with jurisdiction over the facility. The City of San Juan Capistrano maintains a Community Emergency Response Team (CERT), and is within the jurisdiction of the Orange County Fire Authority (OCFA) for hazardous materials response. OCFA issues and maintains hazardous materials permits in almost every part of their

⁶ California Department of Toxic Substances Control and California Environmental Protection Agency. 2007. Hazardous Waste Transporter Requirements Fact Sheet. Website: <https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/02/Hazardous-Waste-Transporter-Requirements.pdf> (accessed April 16, 2020).

service area, and maintains a hazardous materials response team to oversee the use, transport, and disposal of hazardous materials, and to respond to hazardous material incidents.⁷

Per California Government Code (GC) Section 8589.7, the California Emergency Management Agency is responsible for the coordination of the appropriate State and local administering agencies that would be required to respond to on-site spills or release of hazardous materials. The agencies to be contacted are dependent on the type of material released or spilled.

In the event that hazardous substances require transport from the site and disposal, the proposed project would comply with applicable federal, State, and local requirements, which do not require the notification and approval of cities having jurisdictional authority along the haul route. No changes to the proposed mitigation are required.

Response to Comment L-2-24

“Victor” will be replaced with “Victoria” as suggested in reference to the address of Dick Simon Marine at 25802 Victoria Boulevard. This will be corrected in the Final EIR.

The revision to the address in Section 4.8, Hazards and Hazardous Materials, of the Final EIR represents a minor correction. As such, this revision does not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-25

This comment states that the City of Dana Point is submitting a Letter of Map Revision (LOMR) that involves the project site. The LOMR would place the project site within Zone AE of the 100-year floodplain (Flood Hazard Zone A with an established flood elevation). The comment also states that the revised floodplain information has been shared with the City of San Juan Capistrano but is not reflected in the Draft EIR.

The project has been designed to comply with all currently published studies and FEMA maps and the drainage plans have been designed in accordance with the CLOMR-F documentation prepared for the project. The current status of the City of Dana Point’s LOMR submittal remains unknown; therefore, all pertinent information pertaining to flood zone compliance is stated in the CLOMR-F document. No revisions to the EIR are necessary in response to this comment.

Response to Comment L-2-26

This comment states that San Juan Creek Levee is not accredited by the Federal Emergency Management Agency (FEMA) as a flood control channel. Additionally, the outlets, flap gates, and containment of floodwater within San Juan Creek are not confirmed by FEMA or the Orange County Flood Control District. Therefore, the assumptions regarding the containment, time of concentration, and performance during peak storm events are without basis.

This comment is not substantial evidence that the proposed project would have an impact on the environment for several reasons.

⁷ Orange County Fire Authority. Standards of Cover Final Report. Website: (accessed April 16, 2020).

First, the comment is focused on the impacts that the flood control channel would have on the project site and adjacent properties. In an opinion issued on December 17, 2015, related to the Bay Area Air Quality Management District CEQA Guidelines, the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. The Supreme Court also found that CEQA requires the analysis of exposing people to environmental hazards in specific circumstances, including the location of development near airports, schools near sources of toxic contamination, and certain exemptions for infill and workforce housing. The Supreme Court also held that public agencies remain free to voluntarily conduct this analysis not required by CEQA for their own public projects (*CBIA v. BAAQMD* [2016] 2 Cal.App.5th 1067, 1083). Here, the proposed project does not exacerbate an existing condition related to the flood control channel. The project would have no impacts to the flood control channel or its functionality. The project has applied for a CLOMR-F and will go through the FEMA process to remove the site from the floodplain. Moreover, the proposed project does not involve any of the specific circumstances that the Supreme Court called out for focused analysis. Thus, for this reason alone, the commenter's request for the City to analyze the functionality of the flood control channel is misplaced.

Second, *State CEQA Guidelines* Section 15096(d) is clear about the role of a responsible agency during the Draft EIR process. Specifically, this section states that "a responsible agency should review and comment on draft EIRs . . . for projects which the responsible agency would later be asked to approve." (*Id.*) *State CEQA Guidelines* Section 15096(d) goes on to say that the responsible agency's comments "shall be limited to those project activities which are within the agency's area of expertise or which are required to be carried out or approved by the agency or which will be subject to the exercise of powers by the agency." The comments raised in this comment are beyond the project activities that are within the City of Dana Point's area of expertise (Orange County Flood Control District and FEMA are the expert agencies in these areas); neither the City of San Juan Capistrano nor the City of Dana Point have approval authority over the activities within the adjacent flood control channel; and Dana Point's comments must be related to the parts of the project over which the City of Dana Point has approval authority (namely, the various needed transportation improvements).

Finally, the *Baseline Floodplain Hydraulics for San Juan Creek* prepared by PACE dated April 2010 was appropriate and focused its analysis on the impacts that would occur on the project site in the event of a 100-year storm event. The commenter is asking the City to conduct an analysis of the actual channel and there is no basis for this request because the project itself does not involve any changes, modifications or impacts to the flood control channel. The *Baseline Floodplain Hydraulics for San Juan Creek* study indicates that during a 100-year storm event the level of San Juan Creek in the vicinity of the project site could exceed the elevation of the creek levees. Should this occur in the existing condition, floodwaters would pond on the project site and ultimately flow to the railroad right-of-way as described in the Preliminary Hydrology and Hydraulics Analysis prepared by Truxaw and Associates (Appendix H to the Draft EIR). In the post-project condition, given the same over-topping parameters, flood waters would also pond on the developed project site and ultimately overflow to the railroad right-of-way, similar to the existing condition. This existing and post project hydrologic condition described in detail in the Preliminary Hydrology and Hydraulics Analysis prepared by Truxaw and Associates and as summarized in Section 4.9, Hydrology and Water Quality, of the EIR is consistent with the flood conditions described in the *Baseline Floodplain Hydraulics for San Juan Creek*. The proposed project has been designed to be in compliance with

FEMA Flood Zone requirements and would not change the flood flow path compared to existing conditions.

Response to Comment L-2-27

This comment states that the hydraulic analysis for the project and storm drain outlets should be based on the *San Juan Creek Watershed Hydrologic Study* (March 2008) and the *Baseline Floodplain Hydraulics for San Juan Creek* (April 2010) prepared by PACE.

The *San Juan Creek Watershed Hydrology Study* prepared by PACE dated August 2008 and the *Baseline Floodplain Hydraulics for San Juan Creek* prepared by PACE dated April 2010 were both reviewed. Based on the review of the *San Juan Creek Watershed Hydrology Study*, Table 5.2 on page 19 of the report indicates that the lag time of the San Juan Creek Watershed 100-year critical flow depth (H_c) storm event determined at the La Novia Stream Gauge, approximately 2 miles upstream from the project site, is 2.39 hours. This lag time is significantly longer than the Time of Concentration of storm water discharge from the proposed project. This information from the *San Juan Creek Watershed Hydrology Study* supports the assumptions noted in the Preliminary Hydrology and Hydraulics Analysis prepared by Truxaw and Associates that the stormwater runoff from the project site in the proposed condition would discharge flow to San Juan Creek prior to high flows closing the flap gates at the outfall structures.

Response to Comment L-2-28

This comment states that the project site is within a floodway and is required to not increase the base flood elevation, as required by the City of San Juan Capistrano Municipal Code Section 8-11.120(a).

According to the FEMA Flood Insurance Rate Map (FIRM), the project site is not within a floodway, but rather is within a floodplain. As correctly stated in the comment, no increase in the base flood elevation is allowed within a floodway. However, up to a 1 foot increase in base flood elevation can be allowed by FEMA in the floodplain, but would require a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR). Because the project site is not located within a floodway, Municipal Code Section 8-11.120(a) is not applicable to the project. Regardless, the proposed development has been designed in accordance with the floodplain requirements of the City of San Juan Capistrano and in accordance with the CLOMR-F that is currently under review with FEMA. The proposed project does not propose raising the surface elevation of the base flood elevation, but does propose raising the proposed structures to be one foot above the City-accepted base flood elevation per City Municipal Code requirements.

Response to Comment L-2-29

This comment states that San Juan Capistrano Municipal Code Section 8-11.117 is applicable to the project and should be discussed in the EIR.

The City of San Juan Capistrano Municipal Code Section 8-11.117, Standards for Subdivisions, applies to the project and has been incorporated into the design of the proposed development.

To clarify the Municipal Code Requirements, the following text was added to Section 4.9.4.4, Local Regulations, in Section 4.9, Hydrology and Water Quality (page 4.9-14 of the Final EIR):

- **Section 8-11.117** of the Municipal Code specifies the design requirements for preliminary subdivision proposals and other proposed developments greater than fifty lots or five acres within a 100-year floodplain. Section 8-11.117 requires that special flood hazard areas and the elevation of the base flood be identified; the elevation of proposed structures and pads be specified in the final subdivision plans; the final pad, lowest floor, and lowest adjacent grade elevations be certified by a registered professional engineer or surveyor; the development be consistent with the need to minimize flood damage; all utilities and facilities be located and constructed to minimize flood damage; and adequate drainage be provided to reduce exposure to flood hazards.

The project design is consistent with the requirements of the City of San Juan Capistrano Municipal Code Section 8-11.117 for the following reasons:

- a) The project plans identify the special flood hazard area and the plans have been engineered in accordance with the CLOMR-F as accepted by the City of San Juan Capistrano and currently under review by FEMA;
- b) The final subdivision plans will specify both Finish Floor and Pad elevations of all proposed structures. Further, during construction, the final pad elevations, lowest floor elevation, and lowest adjacent grade will be certified and incorporated into a LOMR-F that will be reviewed by the City of San Juan Capistrano and processed with FEMA.
- c) The proposed development has been engineered to be consistent with the need to minimize flood damage;
- d) The proposed development will include sewer, gas, electric and water systems located and designed to minimize flood damage; and,
- e) The proposed development has been engineered to provide adequate drainage facilities to reduce exposure to flood hazards.

Regulatory Compliance Measure WQ-6 was revised as follows, to include the requirement that the registered professional engineer or surveyor certify that the project complies with Section 8-11.117 of the Municipal Code:

RCM WQ-6 Flood Hazard Certification. Prior to issuance of any Certificates of Occupancy, the project Applicant shall obtain certification from a registered professional engineer or surveyor that the constructed structures on the project site comply with the requirements of Section 8-11.115 and Section 8-11.117 of the City's Municipal Code. The certification shall be a Federal Emergency Management Agency (FEMA) Elevation Certificate and shall verify that the elevation of the first floor of the completed building is located above the 100-year floodplain and complies with the elevation requirements in Section 8-11.115 of the City's Municipal Code. In addition, the certification shall verify that the on-site structure would not impede or increase the 100-year flood elevations. Additionally, the registered engineer or surveyor shall certify the final pad elevation, lowest floor elevation, and lowest adjacent grade in

compliance with Section 8-11.117 of the City's Municipal Code. The certification shall be submitted to and verified by the City Floodplain Administrator.

Revisions to Regulatory Compliance Measure WQ-6 in Section 4.9, Hydrology and Water Quality, of the Final EIR represent additional information that was included to clarify and provide a more thorough description of the measures to be taken related to the FEMA certification. As such, this revision does not constitute "significant new information," as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-30

This comment states that stormwater runoff from the project would be directed to neighboring properties, including the railroad, during a 100-year storm event. This comment also states that the proposed outlet onto neighboring properties is not in compliance with sub article 11 of the Orange County Grading Manual.

Please refer to Response to Comment L-3-2 for a discussion of stormwater runoff related to the railroad right-of-way. The project would comply with sub article 11 of the County of Orange Grading Manual in that all of the project's drainage facilities have been designed to convey the 100-year storm event to the existing outfalls at San Juan Creek.

Response to Comment L-2-31

This comment cites the discussion in Section 4.9, Hydrology and Water Quality, and Appendix H (*Hydrology and Hydraulics Report* [Joseph C. Truxaw and Associates, Inc. 2019]) of the Draft EIR, which states that the project would increase the 100-year storm overflow runoff volume to the adjacent LOSSAN railroad right-of-way by less than 4 percent. The comment requests that the increase in base flood elevation be stated in feet or shown to be compliant with the City Municipal Code requirements.

No changes to the base flood elevation have been proposed. The base flood elevation was derived from the Letter of Map Revision effective February 11, 2013, as referenced and included in the CLOMR-F, as accepted by the City of San Juan Capistrano and currently under review by FEMA.

Response to Comment L-2-32

The comment states that stormwater runoff during the 100-year storm event will be directed to neighboring properties, including the adjacent LOSSAN railroad right-of-way. However, the existing drainage culvert is not depicted on a map or plan and has not been demonstrated to be adequately sized to accept additional stormwater.

The onsite proposed storm drain is designed to accommodate the additional runoff. This is addressed in the calculations, discussion and maps provided in the *Hydrology and Hydraulics Analysis* included in Appendix H of the Draft EIR.

Response to Comment L-2-33

This comment states that additional analysis and mitigation measures are required for Thresholds 4.9.3.ii, 4.9.3.iii, and 4.9.3.iv.

Please refer to Response to Comments L-2-25 through L-2-32 for additional discussion in response to the previous specific comments related to hydrology. Please refer to Response to Comments L-2-34 and L-2-35 for a response to specific comments related to the mitigation measures in Section 4.9, Hydrology and Water Quality, of the EIR. This comment does not specify what additional analysis or mitigation measures are requested beyond those detailed in Responses to Comments L-2-25 through L-2-32, L-2-34, and L-2-35; therefore, no additional changes to the EIR have been made in response to this comment.

Response to Comment L-2-34

This comment states the Regulatory Compliance Measure WQ-5 should include a reference to the City of San Juan Capistrano Municipal Code Section 8.11 and state that no floodwater from the 100-year storm event would be directed to adjacent properties.

It appears that the commenter is referring to the City of San Juan Capistrano Municipal Code Section 8-11.120(a). Please refer to Response to Comment L-2-28 for a discussion on why this Municipal Code section is not applicable to the project. Please also refer to Response to Comment L-3-2 for a discussion of stormwater runoff related to the railroad right-of-way.

Response to Comment L-2-35

This comment states the Regulatory Compliance Measure WQ-7 should be revised to state that the CLOMR and LOMR should be based upon the most recent San Juan Creek hydrology data available from the neighboring cities and the Orange County Flood Control District, including the *San Juan Creek Watershed Hydrologic Study* (March 2008) and the *Baseline Floodplain Hydraulics for San Juan Creek* (April 2010) prepared by PACE.

The project is complying with all currently published studies and FEMA maps. The CLOMR-F and LOMR-F are not affected by other unpublished documents.

Response to Comment L-2-36

This comment states that the 2009 Orange County Transportation Authority (OCTA) Commuter Bikeways Strategic Plan identifies a proposed bicycle corridor along the east bank of San Juan Creek and requests demonstration that the proposed project would not conflict with regional connectivity plans and recreation policies for potential development of bicycle trail access to Doheny State Beach.

San Juan Creek Trail is an existing trail west of the project site. As described under Threshold 4.12.1 in Section 4.12, Transportation of the Draft EIR, the proposed project does not include any characteristics that would physically impair or otherwise interfere with bicycle facilities and/or pedestrian facilities in the project vicinity. The proposed project would connect nearby sidewalks and bicycle routes including Stonehill Drive (west of the project site), and Del Obispo Street (west of the project site), which serve to connect the project area with the San Juan Creek Trail (west of the site) and surrounding residential, employment, commercial, and recreational destinations. Improvements included as part of the project would not conflict with the potential development of bicycle trail access to Doheny State Beach.

Response to Comment L-2-37

This comment states that the mobile home park located south of the project site across Camino Capistrano/Doheny Park Road is not located within the City of San Clemente as described in the report and should be revised to state that the mobile home park is located within the City of Dana Point.

The Commenter is correct that the mobile home park located south of the site and east of Camino Capistrano/Doheny Park Road is mistakenly identified as being within San Clemente. A correction will be made to Section 4.11, Noise (page 4.11-12 of the Final EIR) to indicate that this mobile home park is located with the City of Dana Point. However, it should be noted that applicable noise standards (mobile noise source standards) are the same for both jurisdictions (65 decibels).

The revision to Section 4.11, Noise, of the Final EIR represents a minor correction. As such, this revision does not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-38

This comment states that the existing Ganahl Lumber store in Dana Point generates significant day laborer pedestrian activity on public sidewalks and private property along Doheny Park Road. This comment suggests the consideration of designating adequate on-site areas with shade and facilities for day laborers to minimize conflicts between automobiles and pedestrians. The comment also states that a pedestrian crosswalk should be provided at the proposed signalized intersection.

See Response to Comment L-2-7.

Response to Comment L-2-39

This comment requests to see the attached memorandum.

The attached memorandum referred to in this comment is titled *Ganahl Lumber Development Project TIA Peer Review San Juan Capistrano, CA* prepared by Linscott Law & Greenspan. Comments in this memorandum are addressed in Responses to Comments L-2-42 through L-2-54, below.

Response to Comment L-2-40

This comment requests clarification on the status of the utility and access easements requested from the South Coast Water District for the proposed project.

The access easement referred to in this comment already exists and is not being altered by the proposed project. This is a real estate issue and there exists no obligation for the Ganahl Lumber Project to provide access under Stonehill Drive for the properties south of Stonehill Drive or establish a utility easement in the same area. This issue will be addressed separately by and between the City of San Juan Capistrano (City), the South Coast Water District (SCWD), Harrison property owners, and Cassidy property owners.

Response to Comment L-2-41

This comment suggests that a statement should be added to all Mitigation Measures ensuring a 5-foot separation from all proposed utilities and utility connections to the Stonehill Drive bridge.

Although this comment requests a 5-foot separation from all proposed utilities and utility connections to the Stonehill Drive bridge, the comment does not provide the reasons for the request or cite the requirement for such a separation. Therefore, no revisions to the EIR or mitigation measures have been made.

Response to Comment L-2-42

This comment is introductory to the memorandum titled *Ganahl Lumber Development Project TIA Peer Review San Juan Capistrano, CA*, and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-2-43

This comment summarizes the study area, analysis scenarios, and project description included in the Traffic Impact Analysis (TIA) (LSA 2019) prepared for the proposed project (provided in Appendix J of the EIR) and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-2-44

This comment summarizes the project trip generation and assignment, and traffic volumes as included in the project TIA (Appendix J of the EIR) and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-2-45

This comment summarizes the significant impacts related to traffic identified in the TIA. No further response is required.

Response to Comment L-2-46

This comment states that the City of Dana Point recommends a third through-lane on Stonehill Drive between Del Obispo Street and Camino Capistrano be implemented as mitigation to address the significant impacts identified in the project TIA. This comment also recommends that the TIA be updated to reflect this mitigation and revisions made to the EIR to reflect the change.

Please refer to Responses to Comments L-2-3 and L-2-5. The suggested mitigation improvements are within and under the jurisdiction of another agency (the City of Dana Point), and therefore their implementation cannot be ensured by, or required by, the City of San Juan Capistrano. Therefore, this mitigation is infeasible and no revisions to the Draft EIR have been made.

Response to Comment L-2-47

This comment recommends revisions to Section 4.12, Transportation, of the Draft EIR, to be updated to add the mitigation measure referred to under Response to Comment L-2-46.

Please refer to Responses to Comments L-2-3 and L-2-5. The suggested mitigation improvements are within and under the jurisdiction of another agency (the City of Dana Point), and therefore their implementation cannot be ensured by, or required by, the City of San Juan Capistrano. Therefore, this mitigation is infeasible and no revisions to the Draft EIR have been made.

Response to Comment L-2-48

This comment summarizes the site access and signal warrant analysis prepared for the proposed project and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-2-49

This comment summarizes the construction worker and truck trip generation prepared for the proposed project and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-2-50

This comment states that the volumes at the “hot spot” locations in San Juan Capistrano that are shown in Figure 4 of the TIA may have some discrepancies in the PM peak hour.

There are no “hot spot” intersection volume discrepancies. Page 7 of the TIA (included as Appendix J of the Final EIR) has been revised to state that the existing volumes at the “hot spot” intersections were balanced for conservation of flow. Conservation of flow means that traffic volumes are adjusted at closely-spaced intersections so the volumes departing/approaching one intersection are equal to the volumes approaching/departing the upstream/downstream intersection.

The revisions to the TIA represent minor corrections. As such, this revision does not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-51

This comment suggests including the text “Stonehill Drive between the Project Driveway and Del Obispo Street” to a sentence on page 62 of the TIA.

The following sentence on page 62 of the TIA will be revised as follows:

“As Table AB indicates, all study area roadway segments, including the hot-spot roadways, are forecast to operate at satisfactory LOS, with the exception of San Juan Creek Road between Valle Road and Camino Capistrano (LOS E), Stonehill Drive between Camino Capistrano and the Project Driveway (LOS E), Stonehill Drive between the Project Driveway and Del Obispo Street (LOS D), and Valle Road between San Juan Creek Road and the I-5 northbound ramps (LOS F).”

This revision was also made to similar text discussing Alternative 1 in Section 4.12, Transportation, of the EIR.

The revisions to the TIA and Section 4.12, Transportation, of the Final EIR represent minor corrections. As such, this revision does not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-52

This comment states that Table AI should reflect that Del Obispo Street/Stonehill Drive also operates at LOS D during the PM peak hour, and therefore should be highlighted accordingly.

The intersection of Del Obispo Street/Stonehill Drive has been highlighted as suggested on Table AI of the revised TIA and Table 4.12.L in Section 4.12, Transportation (page 4.12-28 of the Final EIR).

The revisions to the TIA and Section 4.12, Transportation, of the Final EIR represent minor corrections. As such, these revisions do not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-53

This comment states that the project average daily traffic (ADT) cannot be confirmed or replicated, but that changes to the project trips are not anticipated to affect the overall findings of the report.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR that would require revisions. No further response is required.

Response to Comment L-2-54

This comment requests the inclusion of the existing conditions Synchro reports in Appendix C.

The existing conditions Synchro reports have been included in Appendix C of the revised TIA. The inclusion of existing conditions Synchro reports in Appendix C of the Final EIR represents additional information that was included to provide a more thorough record as requested by the comment. As such, this addition does not constitute “significant new information,” as defined by State CEQA Guidelines Section 15088.5, and therefore recirculation of the Draft EIR is not required.

Response to Comment L-2-55

This comment provide tables containing intersection capacity utilization (ICU) and LOS results compiled by Linscott Law & Greenspan Engineers and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No revisions or further response is required.

Response to Comment L-2-56

This comment highlights several pages of text and tables contained in Section 4.12, Transportation, of the Draft EIR, where the commenter is requesting that the reference to a significant and adverse impact be revised. The comment further states that implementation of a third eastbound through lane along Stonehill Drive between Del Obispo Street and Camino Capistrano is feasible mitigation that would reduce significant impacts.

Please refer to Responses to Comments L-2-3 and L-2-5. The suggested mitigation improvements are within and under the jurisdiction of another agency (the City of Dana Point), and therefore their implementation cannot be ensured by, or required by, the City of San Juan Capistrano. Therefore, no revisions to the Draft EIR have been made.

Response to Comment L-2-57

This comment highlights several pages of text and tables contained in Section 1.0, Executive Summary, and Section 4.12, Transportation, of the Draft EIR, where the commenter is requesting that the reference to a significant and adverse impact be revised.

Please refer to Responses to Comments L-2-3 and L-2-5. The suggested mitigation improvements are within and under the jurisdiction of another agency (the City of Dana Point), and therefore their implementation cannot be ensured by, or required by, the City of San Juan Capistrano. Therefore, no revisions to the Draft EIR have been made.

Response to Comment L-2-58

This comment is a figure depicting the striping modifications for the suggested implementation of a third eastbound through lane along Stonehill Drive between Del Obispo Street and Camino Capistrano. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No revisions or further response is required.

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AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

February 18, 2020

L-3

Mr. Sergio Klotz
Assistant Development Services Director
City of San Juan Capistrano
32400 Paseo Adelanto
San Juan Capistrano, CA 92675

Subject: Notice of Availability of a Draft Environmental Impact Report for the Ganahl Lumber Project

Dear Mr. Klotz:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to provide input on the City of San Juan Capistrano's (Agency) Draft Environmental Impact Report (DEIR) for the Ganahl Lumber Project (Project). The following comments are provided for your consideration:

L-3-1

- The proposed Project is near an active north-south railroad corridor which provides intercounty passenger rail service (e.g., Southern California Regional Rail Authority) and is also utilized by a freight liner (e.g., Burlington Northern Santa Fe). Please ensure the proposed Project's storm drain system is designed in a manner that would not drain onto the railroad right of way (ROW).
- Note that the existing drainage flow from the railroad ROW to the San Juan Creek must be continued to ensure no flooding occurs.
- Please ensure that design and construction plans for the Project be routed through OCTA for review. For example, this includes any potential need for construction access or a temporary construction easement to construct the proposed Project.

L-3-2

L-3-3

L-3-4

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

Dan Phu
Manager, Environmental Programs

c: Jason Lee, OCTA

2.2.3 ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA)

Letter Code: L-3

Date: February 18, 2020

Response to Comment L-3-1

This comment is introductory and summarizes the project description contained in the Draft Environmental Impact Report (EIR). The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-3-2

The comment states that the project site is near an active railroad corridor that provides passenger and freight rail service. The comment requests that the Draft EIR ensure that the proposed project's storm drain system be designed in a manner that would not drain onto the railroad right-of-way (ROW).

According to information provided in Section 4.9, Hydrology and Water Quality, of the Draft EIR, in the existing condition, most of the stormwater runoff from the project site is conveyed to San Juan Creek via outfall structures that are designed with flap gates. In the unlikely event that the flap gates are closed during a storm event due to high flows within San Juan Creek, stormwater would pond on the project site before overflowing the east property line, flowing along the west limit of the Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor, and flowing southerly to discharge to the Pacific Ocean at Doheny State Beach through an existing drainage culvert. In addition, portions of the project site are currently at higher elevation than the adjacent railroad ROW and slope toward and drain directly to the railroad ROW, which is currently below the base flood elevation shown on published FEMA maps.

In the proposed condition, a retaining wall would prevent localized runoff from entering the railroad during most storm events. The project site would be graded to intentionally allow for some on-site ponding to occur. Similar to existing conditions, in the proposed condition in the unlikely event that the flap gates are closed during a storm event due to high flows within San Juan Creek, stormwater would pond on the project site before overflowing the east property line, flowing along the west limit of the LOSSAN rail corridor, and flowing southerly to discharge to the Pacific Ocean at Doheny State Beach through an existing drainage culvert. The on-site ponding combined with the storage capacity of the underground detention storage would limit the increase in discharge volume from the proposed project to the railroad during this unlikely catastrophic flood event.

According to the *Hydrology and Hydraulics Analysis* (Truxaw 2019) prepared for the project, taking into account the combined storage volume, the proposed project would increase the 100-year storm overflow runoff volume by less than 4 percent in the event that a catastrophic flood event occurs. However, due to the lag time between the watershed peak flow and the project site peak flow reaching San Juan Creek, this condition is not expected to occur during the project lifespan and represents a conservative, worst-case scenario to ensure a conservative project design for structure protection. In addition, the railroad tracks would be inundated and inoperable during a 100-year storm event in the existing condition because they would remain below the base flood elevation identified on published FEMA maps. During the low likelihood condition that the project site were to

overflow to the railroad in the proposed condition, the 4 percent increase in overflow to the railroad would not further impede the operations of the railroad because the railroad tracks would already be underwater according to the published FEMA maps. According to the FEMA maps for the area, the LOSSAN rail corridor would flood in a 100 year storm event, regardless of whether or not the proposed project is implemented.

The terrain of the general area in which the site is located slopes from north to south; however, the project site is located in a depression. Stonehill Drive on the south side of the project site, the levee along San Juan Creek on the west side of the site, and the property to the north of the site are all higher in elevation than the project site. The railroad ROW is the only adjoining property that is lower in elevation than the project site. This complicates the development of an engineering solution to accommodate the storm drainage; however, the drainage plans for the project, which are outlined in greater detail in the *Preliminary Water Quality Management Plan* and the *Hydrology and Hydraulics Report* (both reports are included in Appendix H of the Draft EIR), reduce the amount of runoff to the LOSSAN rail corridor under most conditions, with the notable exception of a catastrophic storm event in which the railroad tracks would already be under water. As described above, the LOSSAN rail corridor would be inundated by flood water in this scenario, regardless of whether **or not** the proposed project is built.

Response to Comment L-3-3

This comment states that the existing drainage flow from the railroad ROW to San Juan Creek must be continued to ensure no flooding occurs.

As discussed, in Section 4.9.3.2 in Section 4.9 Hydrology and Water Quality, of the Draft EIR, in the existing condition, a substantial portion of off-site run-off from the LOSSAN rail corridor and the hillside located to the east of the project site is bypassed through the project site via an underground storm drain pipe and natural swales where it is discharged into San Juan Creek via an 48 inch outfall. The proposed project would raise the project site to accommodate development within the flood zone and a 48 inch storm drain would be constructed on the project site to allow for the continued conveyance of off-site runoff from the rail corridor and hillside to the same outfall location along San Juan Creek. Please also refer to Response to Comment L-3-2 for a discussion on changes in stormwater related to the railroad.

Response to Comment L-3-4

The comment states that design and construction plans for the project should be routed through OCTA for review. This includes any potential need for construction access or a temporary construction easement to construct the proposed project.

Construction plans will be submitted to OCTA for review prior to grading. Any need for construction access or temporary construction easements through the adjacent railroad ROW will also be coordinated through OCTA.

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Board of Directors

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President

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Vice President

Douglas Erdman
Director

Wayne Rayfield
Director

William Green
Director

February 19, 2020

Mr. Sergio Klotz
AICP, Assistant Development Services Director
City of San Juan Capistrano
32400 Paseo Adelanto
San Juan Capistrano, CA 92675
SKlotz@sanjuancapistrano.org

L-4

Sent via Electronic Mail and U.S. Mail

Subject: Comment Upon Draft Environmental Impact Report for the Ganahl Lumber Project

Dear Mr. Klotz:

South Coast Water District (the "District") appreciates the opportunity to comment upon the Draft Environmental Impact Report ("DEIR") for the Ganahl Lumber Project ("Project"). The DEIR was issued on January 6, 2020, with the comment period ending on February 19, 2020. Unfortunately, the DEIR fails to adequately describe and offer mitigation for the Project's traffic and circulation impacts.

L-4-1

CEQA requires that a DEIR identify a project's significant environmental effects, identify feasible mitigation measures and project alternatives that may reduce or avoid those impacts, and then determine whether those effects are unavoidable or can be reduced or avoided by adopting mitigation measures or project alternatives. (Pub. Res. Code §§ 21002, 21002.1).

L-4-2

As discussed below, the DEIR fails to adequately address the Project's impacts on ingress and egress to the properties immediately to the south of Stonehill Drive, opposite the Project site. The Project plan's disregard and make no provision for an access easement ("Easement"), in favor of two parcels of property immediately south of Stonehill Drive as granted by the Home Depot, a predecessor owner to the Project site. The DEIR fails entirely to address the environmental impact on traffic and circulation

L-4-3

that will inevitably follow from the disregard of the Easement. In addition, the DEIR fails to address other environmental impacts of the Project, including cumulative traffic impacts of foreseeable projects within the City of Dana Point, including plans for the District's properties a few yards south of Stonehill Drive, opposite the Project site.

L-4-3

I. The DEIR Fails to Adequately Address Traffic and Environmental Impacts of the Project's Improper Failure to Provide for the Easement which Encumbers the Project Site.

The DEIR fails to address the traffic and environmental impact associated with the Project's disregard of the Easement. This easement was granted in 1999 by the then site owner, Home Depot U.S.A., Inc., in favor of the property owners to the south, Cassidy and Harrison and "future owners of all, or any portion, of the Harrison Property and the Cassidy Property" ("Easement"). A copy of the easement is included in Appendix A of the DEIR. The Easement was intended to provide the Harrison and Cassidy properties with adequate ingress and egress across the Project site to access the nearest public road (Stonehill Drive) (see, Easement term 14). The District now owns the Harrison property and is, therefore, is legally entitled to use the Easement.

L-4-4

The District's property is located in the City of San Juan Capistrano, immediately adjacent to the south facing abutment, more than 20 feet high, supporting Stonehill Drive opposite the Project site. The District property is adjacent to the Cassidy property which is also entitled to ingress and egress from Stonehill Drive across the Project site. Both properties are surrounded on three sides by steep, impassable, embankments. And on the fourth side, the two properties are adjacent to a set of frequently used, high speed railroad tracks. The Easement across the Project site is the only feasible, safe ingress and egress between a public roadway and the two properties south of Stonehill Drive, opposite the Project site.

To the west of both the Cassidy and District properties, lays the AT&SF Railway tracks. At present, and for at least thirty years, access to the two properties has been across the railroad tracks via a dangerous, unprotected, "at-grade" RR crossing. For approximately the same time that the at-grade crossing has existed, the AT&SF Railway Company and all federal, state and local safety authorities have agreed that the at-grade crossing must be replaced. The Easement across the Project site is the only feasible replacement.

The issue of the access road/dangerous at-grade crossing was raised in several scoping letters, including the following:

- City of Dana Point's June 28, 2019 comment letter which noted "the proposed access road under Stonehill Drive connecting to properties south of the Project should be included as part of the TIA and project entitlements. Any future traffic impacts or trips should be included in the TIA and EIR." (Letter included in Appendix B to the DEIR)
- OCTA's July 2, 2019 letter noted "The previous property owner of the Project site, Home Depot, conveyed access easements to the Harrison and Cassidy parties to facility with vehicular and pedestrian access to the Harrison Property and the Cassidy Property. Please clarify how the Project would continue to accommodate access for said parties... In addition, the City and the County were to meet certain conditions pursuant to the previous California Public Utilities Commission (CPUC)

L-4-5

L-4-6

decision 90-10-069, dated October 24, 1990. Please comply with the provisions of the CPUC order as appropriate.” (Letter included in Appendix A to the DEIR)

L-4-6

- Metrolink’s June 21, 2019 letter noted “The improved access road should also be designed and constructed to allow adjacent property owners (like the Cassidy Bros. Nursery) to utilize the same roadway, which could potentially eliminate the need for an at-grade crossing of the tracks.” (Letter included in Appendix A to the DEIR)
- South Coast Water District’s June 20, 2019 noted “The Initial Study for the project states that the proposed project includes an easement for a two-land access road extending from southeast side of Area A to the properties immediately south of Stonehill Drive. SCWD requests that the City of San Juan Capistrano arrange for a non-exclusive road, access and utility easement at least 24 feet wide to be granted to SCWD... It is important to have this proposed access road be an all-weather road, planned and coordinated in conjunction with the existing at-grade, non-controlled railroad crossing that currently exists south of the Stonehill Drive bridge for the benefit of the two private property owners, Harrison property and Cassady property, immediately south of Stonehill Drive.” (Letter included in Appendix A to the DEIR)

L-4-7

L-4-8

These issues were not addressed in the DEIR, and the District hereby requests they be adequately addressed.

L-4-9

The DEIR at Page 3-12 (REQUIRED PERMITS, DISCRETIONARY ACTIONS, AND APPROVALS) describes discretionary approvals by the City of San Juan Capistrano, as the Lead Agency. One of the discretionary approvals indicates that the Easement can be modified or vacated:

“Amendment of Deed Restrictions/Easements Affecting the Property: Existing use restrictions imposed on title to the property by Home Depot prior to conveyance to the City and easements granted to adjacent properties may be modified or vacated as part of the project approvals.”

L-4-10

This is a false statement. The District holds the legal right to the Easement which was granted by Home Depot. Nothing has extinguished the Easement, and neither the Project applicant nor the City of San Juan Capistrano may vacate or modify the Easement without compensation to the Easement holder.

The Project’s disregard of the Easement creates environmental impacts which must be addressed in the Project EIR. The DEIR fails to consider the Project’s real traffic and circulation impacts. In particular, the properties will not have the essential ingress and egress provided by the Easement.

During the EIR scoping process, the District commented on the Ganahl project. On page 4.12-1, the DEIR summarizes the District comment as follows:

“The letter from SCWD was received on June 20, 2019, and requested the following: signalization of the intersection at the entrance to the project site accommodate northbound traffic entering the site, as well as southbound traffic using the SCWD access road (south of Stonehill Drive); preparation of a traffic signalization plan; and a secondary

L-4-11

access through the project site for use by the SCWD to allow for ingress/egress to and from Stonehill Drive.”

This mischaracterizes the District’s scoping comment. The Easement is NOT a secondary access. Because of the imperative to close the at-grade RR crossing and the extreme grade separation between the Cassidy and District properties, on one hand, and the surrounding properties, on the other, the Easement across the Project site is by no means a “secondary access.” It is the only safe access. The Project is not entitled to cut off the only reasonable ingress and egress between the two properties and a public street. To do so as the Project plans implicitly propose has impacts on traffic and circulation which constitutes a significant adverse environmental impact which must be analyzed in the EIR and mitigated to a level of insignificance.

L-4-11

II. The DEIR Fails to Adequately Address Cumulative Traffic Impacts of the Project Together with Traffic Volume Generated by Existing and Foreseeable Land Uses within the City of Dana Point, Including the District’s Property to the South of Stonehill Drive.

Stonehill Drive is an arterial street that provides the only access to the Project site. Stonehill Drive traverses the southern portion of the City of Dana Point. The City limits line between Dana Point and San Juan Capistrano is along the southern boundary of the Cassidy property referenced above. Stonehill Drive, as it crosses San Juan Capistrano, is a primary access route between much of Dana Point and the Interstate 5 freeway.

On DEIR page 4.12-21, the methodology for evaluating cumulative impacts was described as follows:

“As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects. The cumulative impact area for traffic/transportation is the City of San Juan Capistrano. A list of approved/pending projects provided by the City was reviewed to determine whether projects in the vicinity of the project site (if any) should be included in the cumulative condition. With concurrence from the City, the approved/pending projects listed in Table 4.12.H were identified as cumulative projects.”

L-4-12

The DEIR improperly limits its analysis of the Project’s traffic impacts to traffic generated within the City of San Juan Capistrano. The DEIR fails to adequately consider the cumulative environmental impact of the Project on traffic/circulation/access taken together with the existing and anticipated traffic generated outside of the City of San Juan Capistrano and, in particular, traffic generated by ingress to an egress from the City of Dana Point along Stonehill Drive.

In addition and in particular, the DEIR fails to adequately discuss the cumulative impact of the traffic generated by the Project together with the traffic generated by existing and planned future land uses on the District’s property located south of Stonehill Drive and extending southward to the PCH overpass crossing San Juan Creek. Access to the District land is on Waterworks Way, a private road, the northern portion of which is within the city limits of San Juan Capistrano. The intersection of Stonehill Drive and Waterworks Way is directly across Stonehill Drive from the entrance to the Projects. The cumulative environmental

impacts on that intersection by traffic generated by the Project and existing and foreseeable land uses on the District property, even though within the City of Dana Point, must be analyzed by the EIR.

Existing uses of District's property include its Groundwater Recovery Plant. In addition, the District's proposed Doheny Seawater Desalination Plant, which is the subject of a certified EIR, is planned to be located on the District's property with access off Stonehill at Waterworks Way. Long term plans call for the District's administration headquarters and operations center also to be located on the same District land. Despite these facts, there is inadequate discussion of the Project traffic impacts together with existing and future land uses on the District land.

L-4-12

Without further analysis of traffic impacts, it is impossible to truly evaluate the effects of the project on traffic/circulation and the resulting environmental impacts. The District requests a more thorough analysis of traffic and resulting impacts.

III. Conclusion

The DEIR contains omissions and lacks substantial evidence to support its conclusions. Instead, substantial evidence shows the Project will likely result in significant, unmitigated traffic impacts. Therefore, the District requests that a revised DEIR to be prepared and circulated.

L-4-13

Respectfully submitted,
SOUTH COAST WATER DISTRICT


Arthur G. Kidman
General Counsel

2.2.4 SOUTH COAST WATER DISTRICT

Letter Code: L-4

Date: February 19, 2020

Response to Comment L-4-1

This comment is introductory and states that the Draft EIR fails to adequately describe and offer mitigation for the project's traffic and circulation impacts. The comment is introductory in nature, and the project's traffic and circulation impacts, as well as feasible mitigation, are discussed in detail in Responses to Comments L-4-3 through L-4-13, provided below.

Response to Comment L-4-2

This comment states that the California Environmental Quality Act (CEQA) requires a Draft EIR to identify a project's significant effects, and identify mitigation measures and project alternatives to reduce or avoid such effects. This comment then summarizes relevant portions of Public Resources Code (PRC) Sections 21002 and 21002.1, which require a lead agency to identify feasible mitigation measures that may reduce or avoid a project's significant impacts.

This comment is a summary of CEQA requirements and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment L-4-3

This comment suggests that the Draft EIR did not adequately address the project's impacts on ingress and egress to the properties immediately south of Stonehill Drive on the west side of the Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor (the Harrison and Cassady properties) by making no provision for an access easement to those properties, and by not addressing the traffic and circulation impacts that may occur from disregarding an access easement to those properties. This comment also claims that the Draft EIR fails to address cumulative traffic impacts of foreseeable projects within the City of Dana Point, including plans for the South Coast Water District's (SCWD) properties on the south side of Stonehill Drive from the project site for the Ganahl Lumber Project.

In 1999, Harrison and Cassady, neighboring parcels to the south of the project site, were granted a non-exclusive access easement over the project site by Home Depot. Pursuant to the terms of that grant of easement, Harrison and Cassady were afforded access over the project site, when the site was improved, as an interim solution. Home Depot's grant of easement terminated at the edge of the project site and did not address access under the Stonehill Drive bridge. The City of San Juan Capistrano purchased the project site from Home Depot and thereby became Home Depot's successor-in-interest under the easement.

According to its terms, this non-exclusive easement is currently in effect. The Harrison (now owned by SCWD) and Cassady properties would continue to benefit from the easement over the project site until such time a reasonably equivalent, alternative access to the properties is constructed off Stonehill Drive. Nothing in the easement obligates the owner of the project site (i.e., either the City or Ganahl) to resolve access to the Harrison and Cassady properties south of the project site's property line. It is possible, although it has not yet been determined, that the private access road

that SCWD constructed to serve its property meets this test of “reasonably equivalent access,” thus terminating the access easement. Regardless, upon completion of the site development plan for the project, the project site would be fully paved and improved with available vehicular circulation which would continue to provide (and not interfere with) the existing access easement for the benefit of the Harrison and Cassady properties. Because the existing easement would be maintained and because circulation on the project site would be adequate, the Commenter’s allegations about increases in traffic impacts as a result of the City’s treatment of the easement is inaccurate.

The access easement on the project site terminates at the southern edge of the project site. Nothing in the recorded access easement obligates Home Depot or its successors-in-interest (i.e., the City or Ganahl) to provide access traversing off-site property under Stonehill Drive or to resolve the current at-grade railroad crossing that provides access to the Cassady and Harrison properties. Pursuit of enhanced access under Stonehill Drive or modification of the at-grade crossing is outside the scope of the current project. However, the City has had several meetings with the County of Orange, OCTA, the City of Dana Point, and SCWD in the interest of developing a long-term plan to eliminate the current at-grade railroad crossing. The City remains fully committed to working with the partner agencies to discuss mutually beneficial access options and any necessary CEQA compliance that would be triggered by the pursuit of those options.

Because the project does not include the construction of a new access road to the Harrison and Cassady properties, the Traffic Impact Analysis (TIA) prepared for the project (Appendix J of the Draft EIR) assumes that ingress and egress to those properties would continue to be taken from Camino Capistrano via the existing at-grade railroad crossing. The proposed project does not impact or change this access point. Because the project does not impact the existing access that the Harrison and Cassady properties have, no physical changes to the environment would result from that non-action.

Refer to Response to Comment L-4-12, provided below, for a response regarding the SCWD’s assertion that the Draft EIR failed to evaluate cumulative traffic impacts of reasonably foreseeable projects in Dana Point, including plans for the SCWD’s properties on the south side of Stonehill Drive from the project site of the Ganahl Lumber Project.

Response to Comment L-4-4

This comment provides background information regarding the access easement described above in Response to Comment L-4-3 and claims that the access easement must be used to replace the at-grade railroad crossing that currently provides access to the Harrison and Cassady properties to the south of the Stonehill Drive bridge.

Please refer to Response to Comment L-4-3. Nothing associated with the current proposed project impedes or prevents the development of a long-term solution to remove the at-grade crossing that the Harrison and Cassady properties currently use for ingress and egress.

Response to Comment L-4-5

This comment recites an excerpt from the City of Dana Point’s scoping comments dated June 28, 2019, regarding the project, requesting that a proposed access road under Stonehill Drive

connecting properties south of the project site should be included as part of the Traffic Impact Analysis (TIA) and project entitlements and any future traffic impacts should be studied in the TIA and EIR.

As discussed above in the Response to Comment L-4-3, the project does not include the construction of a new access road to the Harrison and Cassady properties. Although the site plan for the proposed project would accommodate the future construction of such an access road by providing a gate in the southern portion of the project site that would allow for vehicular access to the south at some point in the future, the construction of an access road beneath the Stonehill Drive bridge that would connect with the Harrison and Cassady properties is not required for the operation of any of the project's proposed land uses; the proposed project has independent utility from this easement. This is a real estate issue and there exists no obligation for the Ganahl Lumber Project to provide access under Stonehill Drive for the properties south of Stonehill Drive or establish a utility easement in the same area. This issue will be addressed separately by and between the City, the South Coast Water District (SCWD), Harrison property owners, and Cassidy property owners. For these reasons, the TIA and the EIR prepared for the project do not evaluate any future traffic impacts or trips associated with existing land uses on the Harrison and Cassady properties.

Response to Comment L-4-6

This comment recites an excerpt from the Orange County Transportation Authority's scoping comments regarding the project dated July 2, 2019, requesting clarification regarding how the project would continue to accommodate access for the property owners of the Harrison and Cassady properties and comply with the California Public Utilities Commission (CPUC) order regarding the closure of the at-grade railroad crossing that provides access to the Harrison and Cassady properties.

Refer to Responses to Comments L-4-4 and L-4-5, provided above.

Response to Comment L-4-7

This comment recites an excerpt from the Southern California Regional Rail Authority's (SCRRA) (Metrolink) scoping comments regarding the project, which are dated June 21, 2019, requesting that the improved access road should allow the Harrison and Cassady property owners to utilize the roadway, which could eliminate the need for the existing at-grade railroad crossing that currently provides access to those properties.

Refer to Responses to Comments L-4-4 and L-4-5, provided above.

Response to Comment L-4-8

This comment recites an excerpt from the SCWD's scoping comments regarding the project, which are dated June 20, 2019, noting that the project includes an easement for a two-lane access road extending from the southeast side of the project site to the Harrison and Cassady properties south of Stonehill Drive. The excerpt also includes a request from SCWD that the City arrange for a non-exclusive road, access and utility easement at least 24 feet wide to be granted to SCWD.

Refer to Responses to Comments L-4-4 and L-4-5, provided above.

Response to Comment L-4-9

This comment claims that the issues raised in the scoping comments were not adequately addressed in the Draft EIR.

The comment is referencing bullet points in the comment letter, which were addressed in Response to Comments L-4-5 through L-4-8, above. No further response is required.

Response to Comment L-4-10

This comment asserts that the easements affecting the project site may not be modified or vacated as part of the project by the City or the project Applicant without compensation to the easement holder. This comment claims that the project's disregard of the easement will deny the Harrison and Cassady properties the ingress and egress provided by the easement, and the EIR fails to consider the project's traffic and circulation impacts.

Refer to Responses to Comments L-4-3 and L-4-5, provided above. Although SCWD's construction of the private access road may provide a reasonably equivalent access to the Harrison and Cassady properties, thus terminating the easement, no determination has been made. Regardless, for the purposes of this project, the easement is being treated as if it remains in effect and would not be modified or vacated as part of the project approvals without prior discussion and agreement with the parties to the easement. The City will also not be amending any deeds affecting the project site as part of its approvals. The Draft EIR will be revised to state:

Amendment of Easements Affecting the Property: Easements granted to adjacent properties may be modified or vacated as part of the project approvals with prior discussion and agreement with the parties to the easement.

Response to Comment L-4-11

This comment recites an excerpt from Section 4.12, Transportation, of the Draft EIR, in which the SCWD's scoping comments were summarized. The comment indicates that the Draft EIR mischaracterizes the SCWD's scoping comment by stating that the SCWD requested secondary access to the Harrison and Cassady properties. The comment expresses strong support for the completion of an access road south of the project site that would connect the Harrison and Cassady properties to Stonehill Drive through the project site. The comment also claims that the project's plans would result in significant traffic and circulation impacts that should be analyzed in the EIR.

Refer to Responses to Comments L-4-4 and L-4-5, provided above.

Response to Comment L-4-12

This comment provides a description of Stonehill Drive and recites an excerpt from the Draft EIR in which the methodology for evaluating cumulative traffic impacts was described. This comment claims that the Draft EIR's cumulative traffic analysis improperly excluded traffic generated by proposed projects in Dana Point, as well as traffic generated by existing and future land uses on the SCWD's properties south of Stonehill Drive, including the SCWD's proposed Doheny Seawater Desalination Plant and long-term plans for a new administration headquarters and operations center.

The existing plus project plus cumulative traffic conditions were developed in coordination with the City. The City Planning Department provided a list of all approved and pending projects in San Juan Capistrano to be included in this scenario. In addition, an ambient traffic volume growth rate of 0.5 percent per year was recommended by the City Traffic Engineer. This rate is conservative because these traffic conditions include traffic volumes of all projects that currently under construction, not yet built, and not yet occupied (approved), as well as all projects currently being processed and considered (pending), in San Juan Capistrano. As such, the existing plus project plus cumulative traffic analysis scenario evaluated in the TIA and Draft EIR reflected the application of a 0.5 percent per year growth rate to the existing 2018 traffic volumes to account for any additional future development in the project vicinity that would be built before the project's anticipated opening year of 2024 (3 percent total growth from 2018 to 2024). This condition also included the proposed project trips and manually assigned trips generated by the approved/pending (cumulative) projects. Therefore, although the cumulative traffic analysis did not expressly include any approved/pending projects in Dana Point or other nearby cities, the analysis reflected ambient growth in traffic. The TIA (and Draft EIR) also included a 2040 build-out analysis scenario that reflected anticipated development that would occur by that date and a corresponding traffic growth rate.

According to the TIA, traffic counts were collected in 3 consecutive days at the existing project site. The average of the 3 days was used to develop the existing trips related to the vehicle storage facility (refer to page 13 of the TIA, which is included as Appendix J of the Draft EIR). Using the traffic counts, the TIA accounted for existing trips using the Stonehill Drive/Waterworks Way intersection, including traffic generated by the SCWD's existing facilities. Although the SCWD's proposed Desalination Plant was not included as a cumulative project in the TIA, a review of the EIR prepared for the Desalinization Plant project (available at <http://www.scwd.org/civicax/filebank/blobdload.aspx?BlobID=8152>) reveals that trip generation and trip assignment associated with operation of the Desalination Plant were not identified. Based on the available information, it appears that operational traffic for the Desalination Plant would be nominal and would not affect the conclusions in the TIA or the EIR for the Ganahl project.

The SCWD did not provide specific details regarding its long-term plans to construct a new administration headquarters and operations center on its property south of Stonehill Drive in its June 20, 2019, comment letter. Without such information, the City could not meaningfully include that activity as a cumulative project in its analysis. It would be highly speculative for the City to assume any size and operational characteristics of any future SCWD office and the associated vehicle trips that such a facility would generate. Therefore, in accordance with *State CEQA Guidelines* Section 15145, the City appropriately evaluated cumulative traffic impacts based on available information rather than engaging in a speculative evaluation.

Response to Comment L-4-13

This comment provides a summary of the points raised in the comment letter and requests that a revised Draft EIR be prepared and circulated because the commenting agency believes that substantial evidence shows the project would likely result in significant, unmitigated traffic impacts.

The City, as Lead Agency, has determined that information provided in this Response to Comments document clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document. A revised version of the Draft EIR has been prepared to make minor corrections and clarifications to the Draft EIR as a result of comments received during the public review period.

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2.3 REGIONAL AGENCIES

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METROLINK.

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY

900 Wilshire Blvd. Suite 1500 Los Angeles, CA 90017

metrolinktrains.com

February 19, 2020

City of San Juan Capistrano
Attn: Mr. Sergio Klotz
Assistant Development Services Director
32400 Paseo Adelanto
San Juan Capistrano, CA 92675

R-1

**RE: Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR)
for the Ganahl Lumber Project**

Dear Mr. Klotz:

The Southern California Regional Rail Authority (SCRRA) has received the NOA for the DEIR for the Ganahl Lumber Project. Thank you for the opportunity to comment on key issues related to SCRRA and operations of the railroad adjacent to the project site.

As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCRRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (Metro), San Bernardino County Transportation Authority (SBCTA), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

The railroad right of way adjacent to the proposed project is operated and maintained by SCRRA and owned by OCTA. There are currently 16 Metrolink trains, 26 Amtrak trains and 5 Burlington Northern Santa Fe (BNSF) freight trains that operate on weekdays through this corridor, with fewer trains on the weekends. Rail traffic along this corridor may increase in the future to address growing demands.

Please find the general comments to the DEIR related to the railroad and its operations listed below.

1. We note that the development proposal includes an easement for an access road, south of the Stonehill Drive bridge overpass to the neighboring properties. This supports the ultimate closure of the Cassady private crossing in accordance with California Public Utilities Commission (CPUC) decision 90-10-069, dated October 24, 1990. The access road should accommodate a turning radius of the largest size of vehicle that will access the adjacent property. The closure of this

R-1-1

R-1-2

crossing is beneficial to all stakeholders and the local community as it will eliminate the risk of incidents associated with the private crossing and eliminate the requirement to sound train horns when approaching this private crossing.

The project is being built along a very active rail line with trains running at high speeds. To maximize safety, the project should include adequate fencing, walls and protections to preclude trespassing into the rail corridor. Please consult SCRRA Engineering and Construction standards and guidelines as necessary at the following web address: <https://metrolinktrains.com/about/agency/engineering-construction/>

2. All work activities within the SCRRA operating corridor and right-of-way, or work activities that affect the operation or safety of trains must be reviewed and approved by SCRRA. The project applicant must obtain prior written authorization from SCRRA for any access to the railroad right of way (ROW) that may be needed for construction, such as the construction of retaining walls that may require a temporary construction easement. SCRRA has right of way encroachment approval procedures, including a Right of Entry process that can be found on our website at the link provided at the following address: <https://metrolinktrains.com/about/agency/engineering-construction/>.

3. No project drainage is permitted onto railroad ROW. Existing drainage of the railroad ROW to the San Juan Creek Bridge through the existing culvert around the northern limits of Area A needs to be maintained or rerouted so as not to cause flooding on the railroad ROW.

4. Placement of storage sheds adjacent to the railroad ROW (Building 6C) should have some setback from the property line to reduce the potential for incidents that could cause stored materials (lumber) to fall onto the railroad ROW. The setback would also allow for ease of maintenance along the property line when needed.

5. The proposed 12,000-gallon diesel refueling tank adjacent to the railroad ROW should have the appropriate setbacks and leakage mitigation to ensure any potential leaks are captured so they do not enter the railroad ROW during the operation of the refueling tank.

6. To assess any requirements for construction (including demolition or alteration of structures) adjacent to the railroad, plans for construction should be sent to the SCRRA Engineering Department at the following address:

SCRRA Engineering Department
Attn: Joe McNeely, Principal Engineer
2558 Supply Street
Pomona, CA 91767

R-1-2

R-1-3

R-1-4

R-1-5

R-1-6

R-1-7

Plans may be sent to Joe and questions addressed via email at mcneelyj@scrra.net

Please consult SCRRA Engineering and Construction standards and guidelines as necessary, including Right of Entry permit concerns, at the following web address:

<https://metrolinktrains.com/about/agency/engineering--construction/>

Thank you again for providing us with a copy of this NOA for the DEIR for review and for allowing us to provide commentary.

If you have any questions, please contact Roderick Diaz, Director of Planning and Development at (213) 452-0455 or via e-mail at diazr@scrra.net.

Sincerely,



Todd McIntyre
Chief Strategy Officer

Cc: Roderick Diaz, SCRRA
Joe McNeely, SCRRA
Anh Truong, SCRRA
Dinah Minter, OCTA

↑
R-1-7

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY (METROLINK)

Letter Code: R-1

Date: February 19, 2020

Response to Comment R-1-1

This comment is introductory and does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Environmental Impact Report (EIR). No further response is required.

Response to Comment R-1-2

This comment indicates that the project includes an easement for an access road south of Stonehill Drive to neighboring properties that are currently required to use an existing at-grade railroad crossing south of Stonehill Drive. This comment expresses support for the closure of the at-grade railroad crossing south of Stonehill Drive and recommends that the access road be built to accommodate the turning radius of the largest vehicle that would access the properties south of Stonehill Drive. This comment also recommends that the project include adequate measures to preclude trespassing into the adjacent Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor.

The access easement referred to in this comment already exists and is not being altered by the proposed project. This is a real estate issue and there exists no obligation for the Ganahl Lumber Project to provide access under Stonehill Drive for the properties south of Stonehill Drive. This issue will be addressed separately by and between the City of San Juan Capistrano (City), the South Coast Water District (SCWD), Harrison property owners, and Cassidy property owners.

As shown in Figure 3.7b and Figure 3.7c in Chapter 3.0, Project Description, of the Draft EIR, an 8-foot-high concrete wall or steel picket fence would separate the project site from the adjacent LOSSAN rail corridor to discourage trespassing and increase safety.

Response to Comment R-1-3

This comment requests that all work activities within the Southern California Regional Rail Authority (SCRRA) right-of-way (ROW) or work activities that affect the operation or safety of trains be reviewed and approved by SCRRA. Work and/or activities that would be subject to written authorization of SCRRA would include construction activities that would require access to the railroad ROW, such as the construction of retaining walls. This comment provides a link to a webpage that describes the ROW encroachment approval procedures.

The City acknowledges that the project Applicant will be required to apply for an encroachment permit from SCRRA for any construction activities that would require access to the railroad ROW.

Response to Comment R-1-4

This comment states that project-related runoff is not permitted onto the railroad ROW and that the existing drainage from the railroad to San Juan Creek should be maintained so as to not cause flooding within the railroad ROW.

Please refer to Responses to Comments L-3-2 and L-3-3 for a discussion of stormwater runoff related to the railroad ROW.

Response to Comment R-1-5

The comment states that storage sheds proposed along the railroad ROW (Building 6C) should be set back from the property line to reduce the risk of stored materials falling onto the railroad ROW.

Building 6C would be set back approximately 4 feet, 6 inches from the eastern boundary of the project site. In addition to this setback, the project site's eastern property line is located approximately 40 feet from the closest of the two railroad tracks in the LOSSAN rail corridor. Therefore, Building 6C would be located approximately 44 feet, 6 inches from the nearest railroad tracks, a distance that would minimize the safety hazards associated with materials stored in Building 6C falling onto the railroad tracks.

Response to Comment R-1-6

The comment states that the proposed 12,000-gallon diesel refueling tank adjacent to the railroad ROW should have an appropriate setback, and leakage mitigation should be provided.

The refueling tank would be set back approximately 7 feet, 6 inches from the eastern boundary of the project site, and would be separated by an 8-foot-high concrete wall or steel picket fence. The refueling tank would be located approximately 50 feet from the nearest railroad tracks in the LOSSAN rail corridor. As discussed in Section 4.8, Hazards & Hazardous Materials, of the Draft EIR, the refueling tank would be designed with double walls and a containment vessel, and would be operated in compliance with all applicable State and federal regulations governing the handling of diesel fuels. Additionally, the tank would meet all National Pollutant Discharge Elimination System (NPDES) requirements, and incorporate Structural Source Control best management practices (BMPs) in the fueling area. As such, leakage would not enter the railroad ROW, and no mitigation is required.

Response to Comment R-1-7

The comment indicates that construction plans should be submitted to the SCRRA Engineering Department at the address provided. The comment also requests that SCRRA Engineering and Construction Guidelines be consulted and provides a link to the materials.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

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2.4 MEMBERS OF THE GENERAL PUBLIC


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Subject: FW: Danahal Lumber Project

From: christine johnson <itistina747@yahoo.com>
Sent: Tuesday, January 21, 2020 2:43 PM
To: Sergio Klotz <SKlotz@sanjuancapistrano.org>
Cc: christine johnson <itistina747@yahoo.com>
Subject: Danahal Lumber Project

Dear City, I have a view of this site from my window at Spinnaker Run condos across the ravine. Please plant thick trees and flowering shrubs along the ravine so it will help the wildlife, filter dirt and help my view. Sorry my comment is late, however I was not able to get through. Please call if you have any questions. 612-2374052 Thank you so much, Christine Johnson

P-1-1

Best Wishes and have a great day! 

2.4.1 CHRISTINE JOHNSON

Letter Code: P-1

Date: January 21, 2020

Response to Comment P-1-1

The comment states that views of the project site are visible from the nearby Spinnaker Run condominiums. The comment suggests the planting of thick trees and flowering shrubs along the side of the project site to help wildlife, filter the dirt, and improve views.

As further discussed in Section 4.1, Aesthetics, of the Draft EIR, the proposed project would enhance the existing visual setting of the project site by converting the existing underutilized property to a developed commercial use featuring high-quality building materials and new landscaping. Additionally, as established in Section 4.3, Biological Resources, of the Draft EIR, the proposed project would result in less than significant impacts to biological resources. As described in Section 4.2, Air Quality, of the Draft EIR, the proposed project would result in less than significant air quality impacts. Therefore, no tree or shrub planting would be required to mitigate impacts related to aesthetics, air quality, or biological resources.

From: Joyce Perry <kaamalam@gmail.com>
Sent: Thursday, March 19, 2020 1:31 PM
To: Sergio Klotz <SKlotz@sanjuancapistrano.org>
Subject: Ganahl Lumber Project DEIR

Dear Mr. Sergio Klotz,

I am writing on behalf of the Juaneno Band of Mission Indians, Acjachemen Nation-Belardes in response to your letter regarding the Draft Environmental Impact Report for the proposed Ganahl Lumber Project.

Please accept our late repose to the Draft EIR. I hope that it is not too late to go on record concerning this project. Because of the numerous ancestral sites near the project area, the fact that ORA-1506 extends into the project area, and the fact that no phase one investigations have taken place, we request that native and archaeological monitors are present during all ground disturbing activities. Additionally, we would like to continue to be consulted with and kept informed as this project progresses.

P-2-1

Húu'uni 'óomaqati yáamaqati.

Teach peace

Joyce Stanfield Perry

Payomkawichum Kaamalam - President

Juaneño Band of Mission Indians, Acjachemen Nation

Tribal Manager, Cultural Resource Director

2.4.2 JUANEÑO BAND OF MISSION INDIANS, ACJACHEMEN NATION

Letter Code: P-2

Date: March 19, 2020

Response to Comment P-2-1

This comment requests that native and archaeological monitors be present during all ground disturbing activities on the project site due to the numerous ancestral sites near the project site, the fact that ORA-1506 extends into the project site, and the fact that no Phase I investigations have taken place. The comment also requests that the City continue to consult with the tribe and keep them informed as the project progresses.

On March 19, 2020, Sergio Klotz, the City's Assistant Director of Development Services provided the following response via email:

Hello Joyce – Hope all is well. Thank you for providing your comments. While they are submitted after the close of the response period, your concerns are addressed by Mitigation Measure CUL-1, which requires monitoring by a qualified archaeological monitor as well as a Native American monitor during ground-disturbing activities in native soils. Specifically, the Draft EIR includes Table 7.A: Mitigation and Monitoring Reporting Program which outlines Mitigation Measure CUL-1:

CUL-1: Cultural Resources Monitoring and Accidental Discovery. Prior to the issuance of grading permits, and in adherence to the recommendations of the cultural resources survey, the project Applicant shall retain, with approval of the City of San Juan Capistrano (City) Development Services Director, or designee, a qualified archaeological monitor. A monitoring plan should be prepared by the archaeologist and implemented upon approval by the City. Prior to issuance of grading permits, the project Applicant, with City approval, shall also retain a Native American monitor to be selected by the City after consultation with interested tribal and Native American representatives. Both monitors shall be present on the project site during ground-disturbing activities to monitor rough and finish grading, excavation, and other ground-disturbing activities in the native soils. Because no cultural resources were identified on the project site, both monitors are not required to be present on a full-time basis, but shall spot check ground-disturbing activities to ensure that no cultural resources are impacted during construction activities. If cultural materials are discovered during site preparation, grading, or excavation, the construction contractor shall divert all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and significance of the find. Project personnel shall not collect or move any archaeological materials or human remains and associated materials. To the extent feasible, project activities shall avoid these deposits. Where avoidance is not feasible, the archaeological deposits shall be evaluated for their eligibility for listing on the California Register of Historical Resources. If the deposits are not eligible, avoidance is not necessary. If the deposits are eligible, adverse effects on the deposits must be avoided, or such effects must be mitigated. Mitigation can include, but is not necessarily limited to: excavation of the deposit in accordance with a data recovery plan (see California Code of Regulations [CCR] Title 4(3) Section 5126.4(b)(3)(C)) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; production of a report detailing the methods, findings, and significance of the archaeological site and associated materials; curation of archaeological materials at an appropriate facility for future research and/or display; an interpretive display of recovered archaeological materials at a local school, museum, or

library; and public lectures at local schools and/or historical societies on the findings and significance of the site and recovered archaeological materials. The City Development Services Director, or designee, shall be responsible for reviewing any reports produced by the archaeologist to determine the appropriateness and adequacy of the findings and recommendations. [italics and highlighting included in original e-mail text]

Please let me know if you should have any questions. Thank you.

Sergio Klotz, AICP
Development Services Department
Assistant Director
949.443.6334

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3.0 FINAL EIR (BOUND SEPARATELY IN VOLUME II)

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