Saddleback Meadows

2nd Revised Vesting Tentative Tract Map No. 15230, Area Plan (AP) 98-2 (181 Units)
Revised Subsequent Environmental Impact Report 566
Initial Study & Addendum No. 2



SEPTEMBER 2022

Prepared for:
Orange County Public Works
Development Services/Planning Services
601 North Ross Street
Santa Ana, CA 92701

County of Orange - OC Public Works
OC Development Services

CONDITIONALLY APPROVED

Approved By: Deputy Director, Development Services
Approval Date: 9/20/2022
Application: CP170051

Stamped By: CanningK

Saddleback Meadows
2nd Revised Vesting Tentative Tract Map No. 15230
Area Plan (AP) 98-2 (181 Units)
Revised Subsequent Environmental Impact Report 566
Initial Study & Addendum No. 2

Prepared For:

Orange County Public Works
Development Services/Planning
601 North Ross Street
Santa Ana, CA 92701

Prepared By:

Ascent Environmental
1230 Columbia Street, Suite 440
San Diego, CA 92101

September 2022

TABLE OF CONTENTS

Section			Page
LIST OF ABBREVIATIONS			III
1	INTRODUCTION		1-1
	1.1	Legal / Entitlement History	1-2
	1.2	Vedanta Society of Southern California Covenant	1-3
	1.3	CEQA Statutory Requirements	1-4
	1.4	RSEIR 566 Addendum No. 2 Findings	1-5
2	PROJECT DESCRIPTION		2-1
3	ENVIRONMENTAL SETTING		3-1
4	SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS		4-1
5	MANDATORY CEQA FINDINGS		5-1
6	ANALYSIS OF IMPACTS AND MITIGATION MEASURES		6-1
	6.1	Land Use and Planning	6-2
	6.2	Agriculture	6-3
	6.3	Population and Housing	6-4
	6.4	Geophysical	6-5
	6.5	Hydrology and Drainage	6-6
	6.6	Water Quality	6-9
	6.7	Transportation/Traffic	6-10
	6.8	Air Quality/Greenhouse Gas	6-11
	6.9	Noise	6-13
	6.10	Biological Resources	6-14
	6.11	Aesthetics/Visual	6-21
	6.12	Cultural/Scientific Resources	6-29
	6.13	Recreation	6-29
	6.14	Mineral Resources	6-31
	6.15	Hazards	6-31
	6.16	Public Services	6-32
	6.17	Utilities and Service Systems	6-33
7	FINDINGS AND DETERMINATION		7-1
8	REFERENCES		8-1
9	PERSONS AND ORGANIZATIONS CONTACTED		9-1

Appendices

A	Hydrology Study and WQMP
B	Traffic Memo
C	Biological Resource Mitigation Plan
D	Fire Protection and Fuel Modification Plan
E	Trabuco Canyon Water District - Water and Sewer Service Letter

Figures

Figure 2-1 Regional Location 2-3
Figure 2-2 Proposed Project (181 Lots) 2-5
Figure 2-3 Modified Project (266 Units) 2-7
Figure 6-1 Biological Resource Mitigation Plan 6-19
Figure 6-2 Visual Simulation A 6-23
Figure 6-3 Visual Simulation B 6-25
Figure 6-4 Visual Simulation C 6-27

Tables

Table 2-1 Recorded/Approved/Proposed Project Comparison 2-2
Table 2-2 Open Space Summary 2-4
Table 6-1 Land Use and Planning Impacts 6-3
Table 6-2 Agriculture Impacts 6-4
Table 6-3 Population & Housing Impacts 6-5
Table 6-4 Geophysical Impacts 6-6
Table 6-5 Hydrology Impacts 6-8
Table 6-6 Water Quality Impacts 6-10
Table 6-7 Transportation/Traffic Impacts 6-11
Table 6-8 Air Quality Impacts 6-13
Table 6-9 Noise Impacts 6-14
Table 6-10 Proposed Project (181 units) Vegetation Impacts and Impact Reduction 6-16
Table 6-11 Proposed Project (181 Units) Vegetation Impact Reduction Comparison with Modified Project (266 Units) 6-16
Table 6-12 Proposed Project (181 Units) Waters of the U.S. Impacts* 6-17
Table 6-13 Proposed Project (181 Units) Waters of the U.S. Impacts Reduction Compared to Modified Project (266 Units) 6-17
Table 6-14 Proposed Project (181 Units) Waters of the State Impacts Reduction* 6-17
Table 6-15 Proposed Project (181 Units) Waters of the State Impacts Reduction Compared to Modified Project (266 Units)* 6-18
Table 6-16 Biological Resource Impacts 6-21
Table 6-17 Aesthetic Impacts 6-22
Table 6-18 Cultural/Scientific Resource Impacts 6-29
Table 6-19 Recreation Impacts 6-30
Table 6-20 Mineral Resources Impacts 6-31
Table 6-21 Hazards Impacts 6-32
Table 6-22 Public Service Impacts 6-33
Table 6-23 Utilities and Service Systems Impacts 6-34

LIST OF ABBREVIATIONS

ADT	average daily trips
Approved Project (283 Units)	2002 approved 283-unit project
Approved VTTM	Vesting Tentative Tract Map 15230
AQMP	Air Quality Management Plan
BMP	best management practice
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	community noise equivalent
County	County of Orange
dB	decibels
du/ac	dwelling units per acre
EIR	Environmental Impact Report
F/TSP	Foothill/Trabuco Specific Plan
GHG	Greenhouse Gas
MCAS	El Toro Marine Corp Air Station
MPAH	Orange County's Master Plan of Arterial Highways
Modified Project (266 Units)	2004 approved 266-Unit project
OCFA	Orange County Fire Authority
OCTAM	Orange County Transportation Analysis Model
POC	points of discharge
PRC	Public Resources Code
Proposed Project (181 Units)	currently proposed 181-unit project
RSA C-43	Regional Statistical Area C-43
RSEIR 566	Final Revised Subsequent Environmental Impact Report 566
RSEIR 566 Addendum No. 1	Final Revised Subsequent Environmental Impact Report 566, Initial Study and Addendum No. 1
RSEIR 566 Addendum No. 2	Final Revised Subsequent Environmental Impact Report 566, Initial Study and Addendum No. 2
RSEIR	Final RSEIR
RWQCB	California Regional Water Quality Control Boards
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCG	Southern California Gas
SEIR Addendum No. 2	Subsequent Environmental Impact Report 566 Addendum No. 1
SEIR	Subsequent EIR
SF	square feet
SWRCB	State Water Resources Control Board
TCWD	Trabuco Canyon Water District

USACE	U.S. Army Corps of Engineers
Vedanta Society	Vedanta Society of Southern California
VTTM	Vesting Tentative Tract Map
WQMP	Water Quality Management Plan

1 INTRODUCTION

This Initial Study and Addendum No. 2 to the Final Revised Subsequent Environmental Impact Report 566 (RSEIR 566 Addendum No. 2) have been prepared pursuant to Section 15164 of the California Environmental Quality Act (CEQA) Guidelines. Final Revised Subsequent Environmental Impact Report 566 (RSEIR 566) was certified by the Orange County Board of Supervisors on November 5, 2002, for the **283-unit project** which is referred to as the "**Approved Project (283 Units).**" Subsequent to approval of the Approved Project (283 Units), the project was modified and the number of units was reduced to 266. The **266-unit project** approved by the county on August 11, 2004 is referred to as the "**Modified Project (266 Units)"**, and the currently proposed **181-unit project** is referred to as the "**Proposed Project (181 Units)"**.

RSEIR 566 Addendum No. 2 analyzes whether there may be new significant impacts as a result of modifications to the Area Plan 98-2 (Modified Project (266 Units) and Revised Tentative Tract Map 15230 for the 266-unit single family residential project, changes to the circumstances under which the Proposed Project (181 Units) is being undertaken or new information of substantial importance (CEQA Guidelines Section 15162 and 15088.5) None of the factors listed in CEQA Guidelines Section 15088.5 trigger the recirculation of certified RSEIR 566. In connection with its approval of the Modified Project (266 Units) , the County-prepared Addendum No. 1 to RSEIR 566. Pursuant to Public Resources Code Section 21067, the County is the Lead Agency responsible for preparing this RSEIR 566 Addendum No. 2.

RSEIR 566 Addendum No. 2 evaluates potential impacts associated with the Proposed Project (181 Units) revisions to the Modified Project (266 Units) evaluated in RSEIR 566 Addendum No. 1. The Proposed Project (181 Units) retains many of the design features associated with the Modified Project (266 Units), including the back cut slope along a portion of the residential lots to screen views of the project from the south and the Ramakrishna Monastery. The project site is located approximately 1/2-mile south of the El Toro Road/Live Oak Canyon Road intersection in the Foothill/Trabuco Specific Plan and the Aliso Creek Corridor Specific Plan Area of unincorporated Orange County.

Based on the analysis conducted in this RSEIR566 Addendum No. 2, the County has determined that the Proposed Project (181 Units) does not result in any new significant impacts, and does not substantially increase any significant environmental impacts previously disclosed and analyzed in RSEIR 566 and RSEIR566 Addendum No. 1. The Proposed Project (181 Units) results in fewer impacts than disclosed in RSEIR 566 Addendum No. 1 for the Modified Project (266 Units). All project impacts will remain less than significant, except for cumulative air quality impacts which, like the Modified Project (266 Units), remain significant due to the project's location in a non-attainment air basin. Therefore, the use of RSEIR 566 Addendum No. 2 for the Proposed Project (181 Units) is the appropriate CEQA document.

RSEIR 566 Addendum No. 2 is prepared pursuant to Section 15164 of the CEQA Guidelines and Section IX of the 2014 Orange County Local CEQA Procedures Manual to evaluate and document the minor changes or additions to the previous analysis of the environmental effects associated with the Saddleback Meadows project. Previous CEQA documentation prepared for the project, including previous development proposals, over the past 43 years is summarized as follows:

- **EIR 059:** In August 1978, the County Board of Supervisors adopted General Plan Amendment 78-1 for the Saddleback Meadows property. Final EIR 059 was prepared and certified in conjunction with the General Plan Amendment.
- **EIR 078:** In 1984, EIR 078 was prepared and certified in connection with the processing of a Development Plan including a subdivision map for 705 manufactured homes and 1.7 acres of neighborhood commercial uses.
- **EIR 561: In February 1996,** EIR 561 was prepared and circulated for 318 detached single-family dwelling units on the 222.2-acre Saddleback Meadows site. On July 30, 1996, the County Planning Commission recommended that the Board of Supervisors certify the EIR and on October 22, 1996, the Board of Supervisors failed to certify the EIR.
- **Subsequent EIR (SEIR) 566** (SEIR 566)**:** In May 1997, SEIR 566 was prepared, circulated, and was certified by the County Planning Commission on December 3, 1997, for a 318 single family dwelling unit project. Subsequently,

the Planning Commission decision was appealed to the County Board of Supervisors. On February 24, 1998, the County Board of Supervisors voted not to grant an appeal of the Planning Commission decision.

- Subsequent EIR 566 Addendum No. 1 (SEIR 566 Addendum No. 1): SEIR Addendum No. 1 was prepared in July 1998. The project evaluated by SEIR Addendum No. 1 included 299 detached single-family dwelling units on 222.2 acres. The Addendum was certified by the County Planning Commission on October 7, 1998 and the Board of Supervisors certified SEIR 566 and SEIR Addendum No. 1 per Resolution No. 98-466 on December 8, 1998.
- Subsequent EIR 566 Addendum No. 2 (SEIR 566 Addendum No. 2): In March 2001, SEIR Addendum No. 2 was prepared to evaluate and document any potential changes in the environmental effects or baseline conditions since the preparation of SEIR Addendum No. 1. The project evaluated by SEIR Addendum No. 2 included 299 detached single-family dwelling units on 222.2 acres. On May 9, 2001, the County Planning Commission failed to certify SEIR Addendum No. 2 and recommended preparation of a new EIR for the 299-unit project. This recommendation was accepted by the Board of Supervisors on May 22, 2001.
- Revised Subsequent EIR 566 (RSEIR 566): in April 2002, Draft RSEIR 566 was prepared and evaluated and updated the potential changes in the environmental effects or baseline conditions analyzed in SEIR Addendum No. 2. The project evaluated by Draft RSEIR 566 provided for 299 detached single-family residential dwelling units. A 283-unit project was evaluated as Alternative 8 in Draft RSEIR 566 which found that all adverse environmental impacts had been avoided or mitigated, except for a cumulative impact to air quality. The Board of Supervisors' findings to approve the project included a Statement of Overriding Considerations in response to the impact air quality. On November 5, 2002, the Board of Supervisors certified Final RSEIR 566 per Resolution No. 02-347 and approved the 283-unit project as Vesting Tentative Tract Map 15230 (Approved VTTM) and related entitlements (collectively, the Approved Project (283 Units).
- Revised Subsequent EIR 566 Addendum No. 1 (RSEIR 566 Addendum No. 1): On August 11, 2004, the County of Orange approved RSEIR 566 Addendum No. 1 that was prepared to evaluate the potential impacts associated with the Modified Project (266 Units).
- Revised Subsequent EIR 566 Addendum No. 2 (RSEIR 566 Addendum No. 2): This document is RSEIR566 Addendum No. 2 and contains an assessment of the potential impacts associated with the Proposed Project (181 Units).

1.1 LEGAL / ENTITLEMENT HISTORY

In 1998, after the County of Orange Board of Supervisors certified SEIR 566, the Vedanta Society of Southern California (Vedanta Society) filed a lawsuit in Orange County Superior Court challenging the Board of Supervisors' approval of a project for 299 detached single-family dwelling units. In January 1999, two additional lawsuits were filed and consolidated into one summary adjudication motion, which was granted by the trial court in April 1999.

The trial court judgment declared that the SEIR had never been validly certified, and the writ of mandate accompanying the judgment directed the County to set aside all approvals for the 299-unit project. The County and California Quartet appealed the judgment. On October 30, 2000, the California Court of Appeal, Fourth Appellate District narrowed, but essentially affirmed, the trial court's judgment and confirmed the order to set aside certification of SEIR 566, as well as all related County approvals, and directed the County to reconsider certification of EIR 566.

In March 2001, SEIR 566 Addendum No. 2 was prepared to evaluate and document any potential changes in environmental effects or baseline conditions since the preparation of Addendum No. 1 to SEIR 566 in August 1998. The 299 detached single-family dwelling unit project was identical to that approved by the County in 1998. Addendum No. 2 included updated traffic and biological resource impact technical studies.

On May 9, 2001, the Planning Commission declined to approve SEIR 566 Addendum No. 2 and recommended preparation of a new EIR for the 299-unit project. This recommendation was upheld by the Board of Supervisors on May 22, 2001. RSEIR 566 was prepared for the 299-unit project. During its review of the 299-unit project, the Planning Commission decided that the alternative analyzed in the RSEIR 566 consisting of 283 units should be approved instead of the 299-unit proposed project. On August 28, 2002, the Planning Commission approved the 283-unit

project because it would lessen environmental impacts on biological resources and was consistent with a Biological Opinion issued by the United States Fish and Wildlife Service in October 2001, while still fulfilling project objectives. The Board of Supervisors certified the RSEIR 566 and approved the Approved Project (283-Units) project on November 5, 2002 (Ordinance 02-008 and Resolutions 02-346, 02-347 and 02-348).

The Saddleback Meadows project consisting of 283 units was approved in 2002 with an amendment to the F/TSP (Zone Change 98-3) that adopted a density cap, development regulations and made a finding that Area Plan 98-2, as conditioned, was consistent with the F/TSP. County of Orange Board Resolution 02-346, including App. A, Nos. 1., 2., 3., 4., 5., 6., 7., 8; included a series of findings that the project was consistent with various provisions of the F/TSP and with the F/TSP in general. The project, based upon approved AP 98-2, as conditioned, has been found to be consistent with the F/TSP.

In December 2002, Vedanta Society, Endangered Habitats League, and Sea and Sage Audubon Society filed a lawsuit in Orange County Superior Court challenging the Board of Supervisors' approval of the Approved Project (283-Units). This action was consolidated with the prior litigation over the SEIR 566 and the 299-unit project which was still before the Superior Court, pending the County's compliance with the court's writ of mandate in that case. Briefing ensued on the County's and California Quartet's Motion to Discharge Writ of Mandate from the previous litigation and the 2002 challenge to the Approved Project (283-Units). Near the end of the Superior Court briefing schedule, the parties pursued a mediated resolution of the disputes concerning the approved 283-unit project.

In May 2004, all parties to the litigation agreed to a settlement. The settlement modified the approved 283-unit project to (a) screen views of the project from the Ramakrishna Monastery and (b) increase the width of the open space along the southerly and easterly edges of the project. Specifically, the Approved Project (283 Units) was modified by reducing the number of residential units in the northern portion of the project, resulting in a significant increase in the minimum width of the open space lot along the eastern property line, and including an approximately thirty-foot tall earthen berm/back cut slope through the central portion of the development area to further screen views of the project's homes from certain vantage points from the south and on the monastery property. The Approved Project (283 Units) was also modified by increasing the number of residential units in the westerly portion of the project, for an overall net reduction of 17 units. These unit reductions resulted in the Modified Project (266 Units), which was evaluated in RSEIR 566 Addendum No. 1.

The Proposed Project (181 Units) evaluated in this RSEIR 566 Addendum No. 2, represents a further reduction in the number of residential units, pursuant to further settlement agreement negotiations with the Vedanta Society. Area Plan 98-2 (181 Units) has been prepared to document changes in project features and establish the overall design character and guidance for the Proposed Project (181 Units) as modified. The 2nd Revised Vesting Tentative Tract Map provides a preliminary site and grading plan for the Proposed Project (181 Units).

1.2 VEDANTA SOCIETY OF SOUTHERN CALIFORNIA COVENANT

The specific effects of the Modified Project (266 Units) on the Ramakrishna Monastery are addressed in a separate settlement between the Vedanta Society of Southern California, a California religious corporation ("Vedanta"), and California Quartet, a California limited partnership ("California Quartet"), and reflected in the May 5, 2004 Covenant, Grant of Easement, and Restrictions Agreement between Vedanta and California Quartet (the "2004 Vedanta Covenant"), as amended by the November 25, 2019 Settlement Agreement ("2019 Settlement Agreement") entered by Consent Award Pursuant to Stipulation on January 31, 2020 ("Consent Award") and in the judgment of the Orange County Superior Court entered on July 28, 2022 in the case of Vedanta Society of Southern California, Petitioner v. California Quartet, Respondent, Case Number 30-2022-01245287-CU-PA-CJ ("the Court Judgment"). The 2004 Vedanta Covenant, as amended by the 2019 Settlement Agreement and the Court Judgment, provides for the parties' respective rights and obligations with respect to the Project. The County of Orange is not party to the 2019 Settlement Agreement.

1.3 CEQA STATUTORY REQUIREMENTS

This RSEIR 566 Addendum No. 2 is the second addendum to certified RSEIR 566, which was originally prepared to evaluate a project for 299 detached single-family homes and included the 2002 approved 283-unit project as an alternative. As a result of the mediated settlement described above, the 283-unit project was ultimately superseded by the Modified Project (266 Units) supported by RSEIR 566 Addendum No. 1. This Addendum No. 2 evaluates the project changes contained in the Proposed Project (181 Units), and compares impacts associated with the 181-unit project to the Modified Project (266 Units) analyzed in RSEIR 566 Addendum No. 1.

The CEQA Guidelines authorize the use of an addendum in connection with a previously certified EIR when only minor changes or additions to the previous environmental analysis are necessary. CEQA Guidelines Section 15164(a) states:

> *The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

Section 21166 of CEQA (Public Res. Code § 21000 et seq.) and CEQA Guidelines Section 15162 identify the criteria to be used by a lead agency to determine whether a new EIR is required when changes to a project analyzed in a previously certified EIR are proposed.

Section 21166 states:

> *When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:*
>
> *(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.*
>
> *(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.*
>
> *(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.*

Section 21166 is further explained in CEQA Guidelines Section 15162:

> *(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*
>
> *(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
>
> *(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
>
> *(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
>
> *(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subsection (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of the approval. If after the project is approved, any of the conditions described in the subsection (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

(d) A subsequent EIR or negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

CEQA Section 21166 and Guidelines Section 15162 require that a determination be made as to whether the project has changed in such a manner that a subsequent or supplement to the prior-certified EIR must be prepared to address new significant impacts arising from changes to the project, changes to the circumstances under which the project is undertaken, or new information regarding a significant effect of the project. If a new subsequent or supplemental EIR is not necessary, but minor additional or technical changes are appropriate to address the modifications to the project and to keep the certified document current and useful, a lead agency may prepare an addendum to the prior certified EIR (CEQA Guidelines §15164). For the reasons set forth below, this RSEIR 566 Addendum No. 2 concludes that none of the three criteria for preparation of a subsequent or supplement to the prior-certified EIR is present, and therefore substantial evidence supports the use of an addendum.

1.4 RSEIR 566 ADDENDUM NO. 2 FINDINGS

Based upon the foregoing information, preparation of Addendum No. 2 to RSEIR 566 as modified by Addendum No. 1 is the appropriate CEQA document to provide project-specific analysis for Proposed Project (181 Units), and to address changes to the approved Modified Project (266 Units). This document is prepared under the authority of Section 15164 of the CEQA Guidelines for the following reasons:

- Only minor changes or additions are necessary to make the previously certified RSEIR 566 and RSEIR 566 Addendum No. 1 adequate under CEQA because the currently Proposed Project (181 Units) proposes less intensity of development than the Modified Project (266 Units) analyzed in RSEIR 566 Addendum No. 1. It results in no new significant environmental impacts not previously addressed in RSEIR 566 and RSEIR 566 Addendum No. 1. RSEIR 566 Addendum No. 2 does not raise important new issues about the significant effects on the environment. The Proposed Project (181 Units) results in a substantial reduction of impacts in all Initial Study checklist environmental factors listed in Section 5, due to the reduced unit count and development footprint. There is no substantial evidence that the Proposed Project (181 Units) would result in any additional or more severe impacts as compared to the Modified Project (266 Units), as mitigated by the measures required within RSEIR 566; or that the Proposed Project (181 Units) would have a significant adverse effect on the environment (Guidelines §15063(b)(1)).

RSEIR 566 was certified for the development of the Approved Project (283 Units), a detached single family residential development project on the project site in connection with earlier approvals granted in 2002 by the county. The certification of an EIR recognizes the continuing utility of the document for subsequent development approvals within the scope of the original approval. The Public Resources Code (PRC) Section 21166 and Guidelines Sections 15162 test provides evidence under applicable law on the question of whether a new environmental document is necessary. This test is a tangible one, and does not challenge the age of a document, but only provides the criteria to test its continuing accuracy and utility.

2 PROJECT DESCRIPTION

The Proposed Project (181 Units) is depicted in the 2nd Revised Vesting Tentative Tract Map 15230 (VTTM) and Area Plan 98-2 (181 Units). The regional location of the project site is shown on **Figure 2-1** and the illustrative site plan for the Proposed Project (181 Units) is shown in **Figure 2-2**. The previously approved Modified Project (266 Units) is shown in **Figure 2-3**. The Proposed Project (181 Units) eliminates the development area previously approved in the easterly portion of the Modified Project (266 Units) and eliminates the adjacent offsite potable water tank and associated access road to the water tank. This represents a 32 percent reduction in units from the Modified Project (266 Units). The Proposed Project (181 Units) development footprint has been reduced, as compared to the Modified Project (266 Units), as summarized in Table 2-1.

The Proposed Project (181 Units) reduces impacts associated with the Modified Project (266 Units), including impacts to biological and aesthetic resources and surrounding land uses, and grading area requirements, all of which previously were found to be less than significant. The Proposed Project (181 Units) has been redesigned to:

- Eliminate 85 residential units from the eastern portions of the project site to increase the distance between proposed development areas and adjacent land uses. The Modified Project (266 Units) proposed a buffer area with a minimum width of 100 feet, and the current Proposed Project (181 Units) proposes to substantially increase the buffer to existing land uses to the north, south and east.
- A substantial reduction in the development impact area from 134.0-acres to 78.3 acres, a 38% reduction.
- An increase in the percentage of the project site devoted to open space from (73% to 84%).
- Eliminate the Modified Project's (266 Units) 1.4-million-gallon offsite water tank and associated access road. The Trabuco Canyon Water District (TCWD) has indicated that they can provide water and sewer service to the project site with other alternatives.
- Reconfigure the local riding and hiking trail that previously extended to the easterly boundary of the project site and proposed construction of an offsite eastern ridgetop rest area. The local riding and hiking trail alignment now parallels the spine road and terminates at the spine road rest area cul-de-sac with a rest area. Signage will be posted limiting the use of the trail from dawn to dusk.
- Continue to include a back cut slope to screen views of the eastern portion of the development area; that is, located along "I" Street and to the east as shown on the 2nd Revised VTTM 152301.
- Continue to include an earthen berm along "G" Street to partially screen views of the project from the Hidden Ridge community and areas to the south.
- Eliminate the residential development area in the eastern portion of the project site while maintaining the same general spine road alignment as the Modified Project (266 units) for the balance of the development area. Minimum residential lot size is 4,000 SF. These design changes result in a net decrease of 85 residential units as compared to the Modified Project (266 Units).
- Substantially widen and increase the acreage of the central open space area to increase the opportunity for wildlife movement, both east-west and north-south.
- Continue to provide the biological resource mitigation/restoration plan. Within the 142.8 acre Biological Resources Mitigation Area, five (5) existing onsite ponds will be preserved, three (3) engineered ponds will be created, and five (5) small hand-constructed ponds will be created for hydrology and habitat purposes. A total of thirteen (13) ponds will be located on site.

The Proposed Project (181 Units) proposes the development of 181 detached single-family residential units on the 222.2-acre site. As compared with the approved Modified Project (266 Units), the gross residential density is reduced from 1.2 dwelling units per acre (du/ac) to 0.8 du/ac with a decrease in average lot size from 6,843 square feet (SF) to

1 The project is subject to a Settlement Agreement with Vedanta. See Section 1.2

6,062 SF, and a minimum lot size of 4,000 SF as a result of the smaller footprint of development. Residential lot sizes range from 4,000 SF to 14,313 SF. There are 32 lettered lots (slope, open space, roads, and trails) The reduced minimum lot size as compared to the previously approved Modified Project (266 Units) is intended to accommodate the reduced grading footprint of the overall project, the statewide demand for greater energy efficiency which would help to reduce greenhouse gas emissions from domestic uses, housing affordability, and is a response to changing market demands. This minimum lot size is also compatible with recently approved and under construction projects in the vicinity, including single family residential lots as small as 3,200 SF (Portola Center). The percentage of the project site proposed for permanent open space is increased to approximately 84 percent (186.6 acres). In addition to the revisions to the residential component, the project will maintain elements of the Modified Project (266 Units) including: the east-west wildlife movement corridor and biological resource enhancement, and the proposed 15-foot open space buffer (proposed during construction) around the northern perimeter of the development area. Temporary construction fencing will be installed along the 15-foot buffer edge and the buffer will allow for temporary stormwater Best Management Practices. The Proposed Project (181 Units) will comply with the current urban storm water runoff requirements of the California Regional Water Quality Control Board (RWQCB). Implementation of the Proposed Project (181 Units) will require the approval of 2nd Revised VTTM 15230 and Area Plan 98-2 (181 Units).

Primary access is provided to the project site via a vehicular gated/controlled spine road, connecting to, and east of, El Toro Road. Secondary gated emergency access is provided via Valley Vista Way.

Implementation of the Proposed Project (181 Units) would directly affect approximately 78.3 acres of the project site (36 percent), which is less than the Modified Project (266 Units), which would have impacted 134 acres (60 percent). 3.2 acres of offsite grading is required for slope and El Toro Road improvements. The Proposed Project (181 Units) requires 6,235,710 cubic yards of remedial grading and 1,226,540 cubic yards of conventional grading for a total grading quantity of 7,462,250 cubic yards. This represents a reduction of approximately 2,000,000 cubic yards as compared to the Modified Project (266 Units). In addition to onsite grading, as with the Modified Project (266 Units), a reduced area of 2.7 acres within the El Toro Road right-of-way would be affected for work such as access road construction and remedial grading.

The previously proposed water tank in the Modified Project (266 Units) on the offsite eastern ridgeline and associated water tank access road are no longer required. Construction of a riding and hiking trail from the spine road to the project's easterly boundary and the onsite ridgetop rest stop has been eliminated and replaced with a shortened onsite trail and rest area.

Since the certification of the RSEIR 566 and adoption of the RSEIR 566 Addendum No. 1, the proposed project has been modified to reduce the total number of residential units that will be developed on site from 266 units to 181 units. Consequently, the recreation impacts of the Proposed Project (181 Units) will also be proportionately reduced.

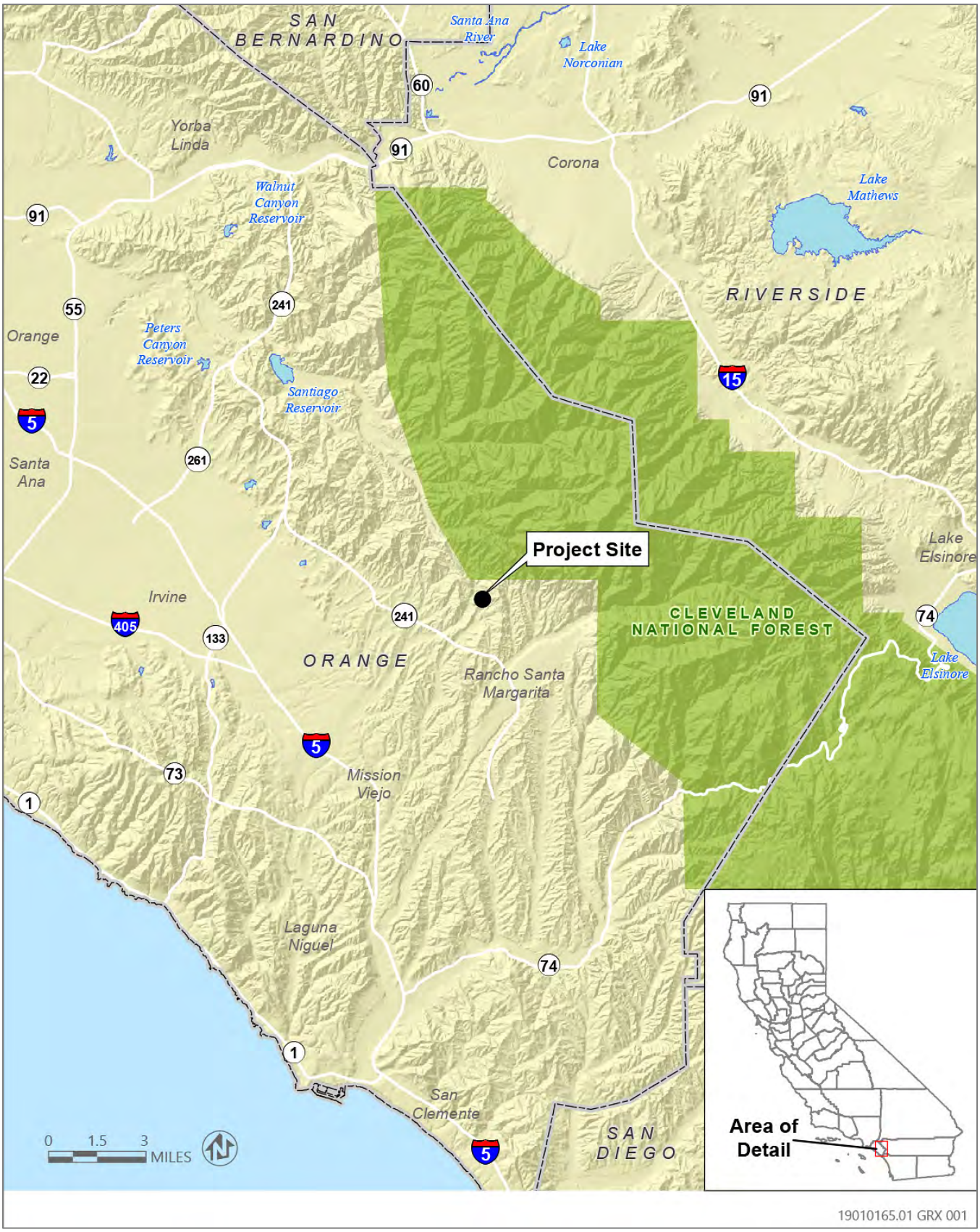
The requirement to construct the regional riding and hiking trail improvements identified in MM 11-2, 11-3 and 11-4 in RSEIR 566 remain in effect, although it has been modified to shorten the trail and relocated the rest area.

Table 2-1 outlines a comparison between the Proposed Project (181 Units), the Modified Project (266 Units), and Final Map 10692 which is currently recorded on the property:

Table 2-1 Recorded/Approved/Proposed Project Comparison

Features	Proposed Project (181 Units)	Modified Project (266 Units)	Recorded Tract 10692
Dwelling Units	181	266	705
Development Area	78.3 AC	134.0 AC	185.1 AC
Minimum Lot Size	4,000 SF	4,500 SF	2,630 SF
Average Lot Size	6,062 SF	6,843 SF	3,960 SF
Gross Density	0.8 DU/AC	1.2 DU/AC	3.03 DU/AC
Percent Open Space	84%	73%	31%
Wildlife Corridor	Yes - Expanded	Yes	No

A comparison of the development footprint of the Modified Project (266 Units) and the Proposed Project (181 Units) is shown in Figure 2-2 and Figure 2-3.



Source: ESRI.

Figure 2-1 Regional Location

Project open space is summarized in Table 2-2.

Table 2-2 Open Space Summary

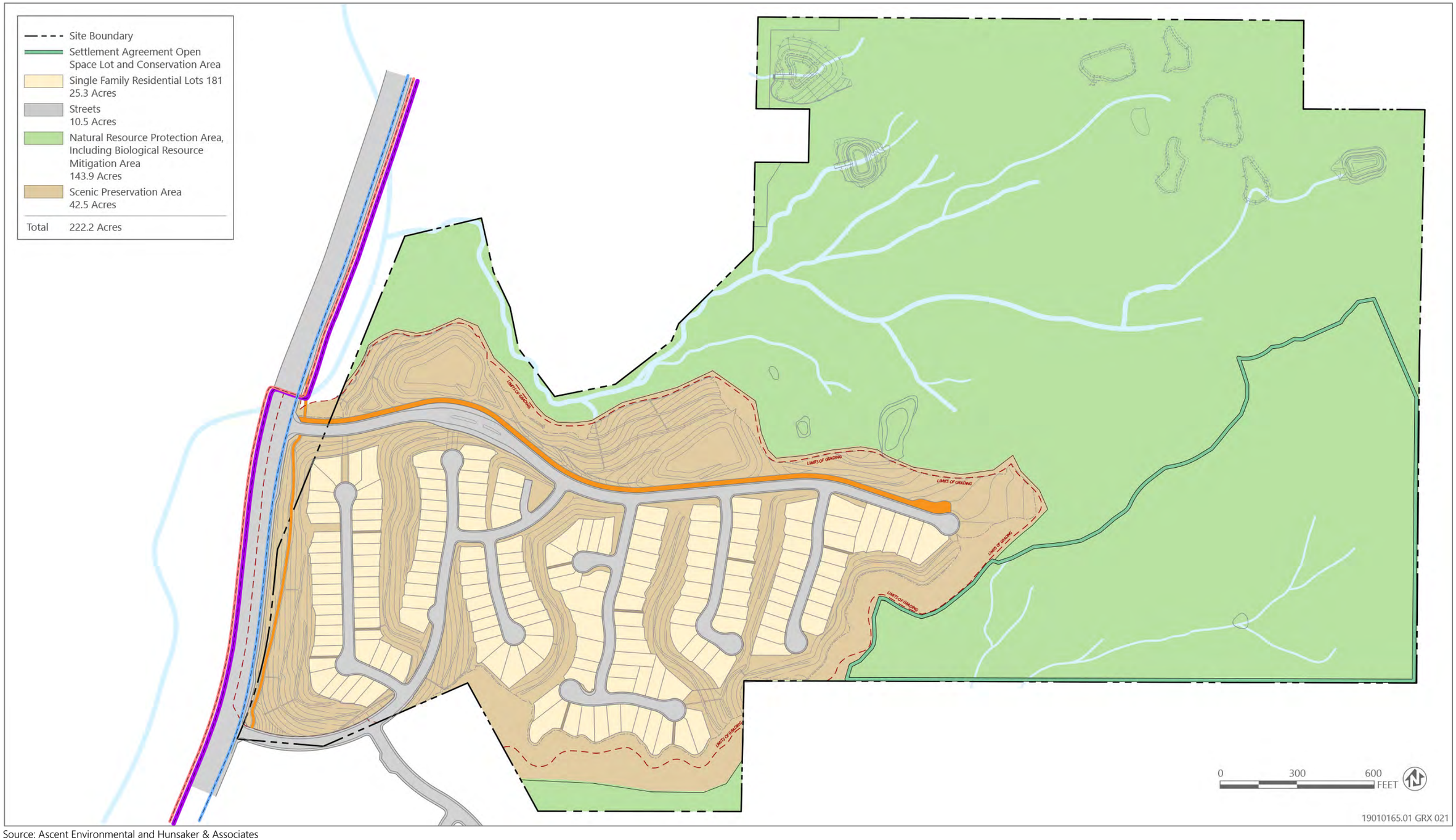
Land Use	Area (acres)*	Portion of Site (Percent)
Natural Resource Protection Area	143.9	64.8
Scenic Preservation Area	42.7	19.1
TOTAL	**186.6**	**84.0**

Natural Resource Protection Area – All onsite undisturbed open space, including the Biological Resource Mitigation Area.

Scenic Preservation Area – All area not included in residential lots, streets, or Natural Resource Preservation Area. It includes fuel modification areas, common lots and the riding and hiking trail.

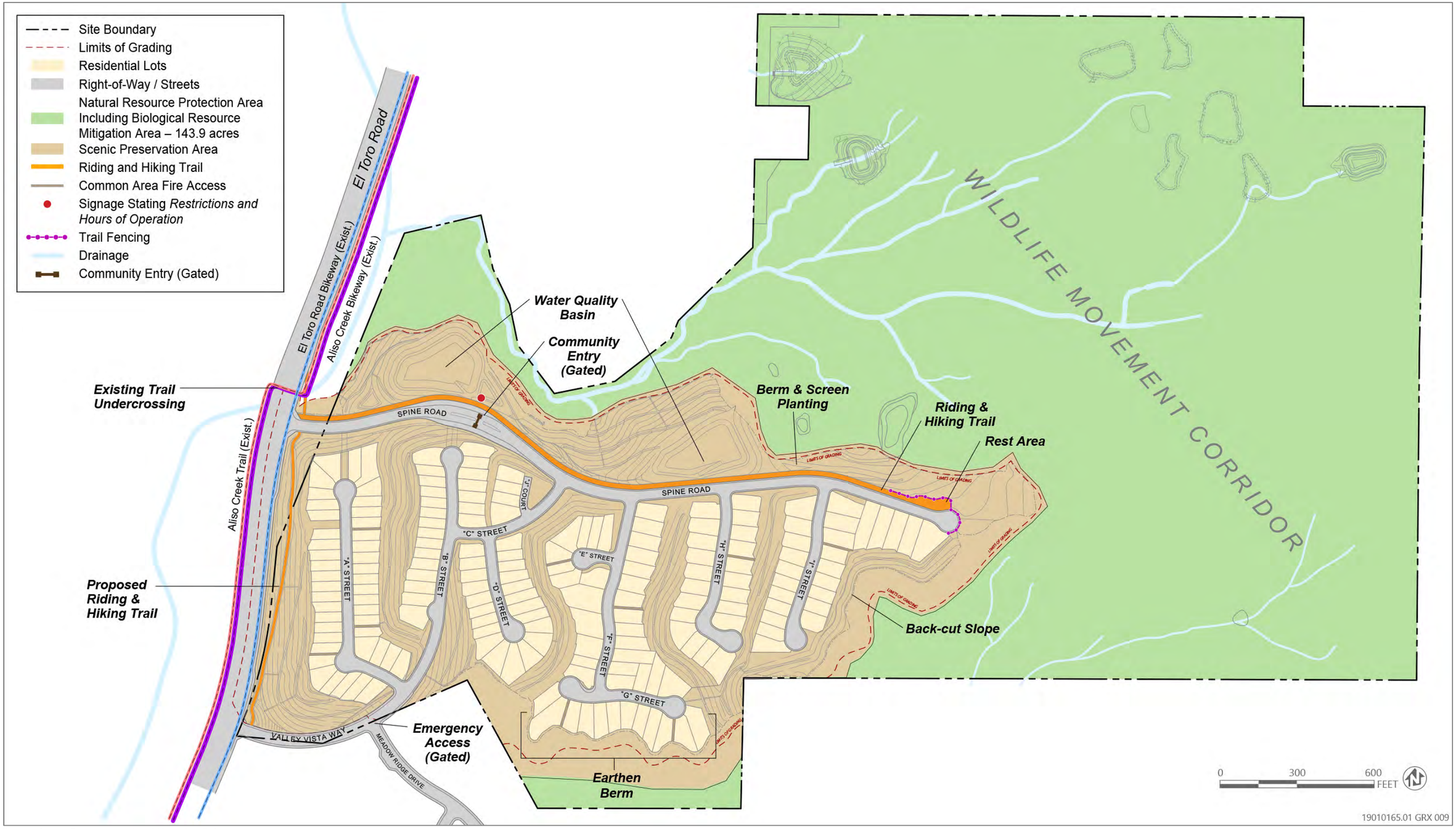
The Proposed Project (181 Units) is consistent with the goals, objectives, policies, and land use designations contained within the Orange County General Plan, the Foothill Trabuco Specific Plan, the Aliso Creek Corridor Specific Plan, and the Orange County Zoning Code.

The existing Federal resource agency permits/agreements previously issued for the proposed project have been extended, and the California Department of Fish and Wildlife ("CDFW") is processing a new streambed alteration agreement that reflects the Proposed Project (181 Units). Pursuant to the Court Judgment, the applicant will dedicate to the California Department of Fish and Wildlife ("CDFW"), the perpetual conservation easement deed for wildlife and habitat conservation purposes over 142.8 acres of the Biological Resource Mitigation Area located within the 143.9 acre Natural Resource Protection Area. The applicant will record an executed irrevocable offer of dedication of the perpetual conservation easement deed for wildlife and habitat conservation purposes to CDFW. The form of the perpetual conservation easement ("Conservation Easement") deed shall be approved by the U.S. Army Corps of Engineers, the U.S. Fish & Wildlife Service, and CDFW. The long term management of the Conservation Easement area will be provided by the San Diego Habitat Conservancy or other land management organization acceptable to the Resource Agencies.



Source: Ascent Environmental and Hunsaker & Associates

Figure 2-2 Proposed Project (181 Lots)



Source: Ascent Environmental and Hunsaker & Associates

Figure 2-3 Modified Project (266 Units)

3 ENVIRONMENTAL SETTING

The existing environmental baseline conditions on the project site are substantially the same as those documented in the certified RSEIR 566 and adopted RSEIR 566 Addendum No. 1. A comparison of 2004 and current project site aerial photographs was conducted to make this determination. The existing environmental setting is described for each environmental factor evaluated in the certified RSEIR 566, RSEIR 566 Addendum No.1 and Section 6.0 of this RSEIR 566 Addendum No 2.

This page intentionally left blank.

4 SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS

Based on this RSEIR 566 Addendum No. 2, implementation of the Proposed Project (181 Units) as compared to the Modified Project (266 Units) will not result in any new significant adverse impacts on the environment that have not been previously analyzed in the RSEIR 566 and RSEIR 566 Addendum No. 1, and will not substantially increase the severity of any previously-identified environmental impacts. This RSEIR 566 Addendum No. 2 evaluates the environmental factors set forth below in connection with the Proposed Project (181 Units). With implementation of the Proposed Project (181 Units) and application of the mitigation measures contained in certified RSEIR 566, impacts to all environmental resources (except for cumulative air quality impacts) will continue to be less than significant, including: land use and planning, agriculture, population & housing, geophysical, hydrology and drainage, water quality, transportation/traffic, air quality, noise, biological resources, aesthetics/visual, cultural/scientific resources, recreation, mineral resources, hazards, public services, and utilities and service systems. Section 6 of this 566 Addendum No. 2 includes a listing of all RSEIR 566 mitigation measures for clarity. No additional mitigation measures have been proposed in this Addendum No. 2 beyond those mitigation measures adopted in connection with the certification of RSEIR 566 and RSEIR 566 Addendum No. 1.

The cumulative impact to air quality, which was overridden by the Board of Supervisors through a Statement of Overriding Considerations when it certified RSEIR 566 in 2002, remains significant and adverse. However, it will be reduced as compared to what was disclosed in RSEIR 566 and RSEIR 566 Addendum No. 1 as the project emissions from the Proposed Project (181 Units), will be substantially less as compared to the Approved Project (283 Units) and the Modified Project (266 Units). Detailed discussion regarding air quality impacts associated with the Proposed Project is found in Section 6.82.

2 The project is subject to a Settlement Agreement with Vedanta. See Section 1.2

This page intentionally left blank.

5 MANDATORY CEQA FINDINGS

CEQA requires mandatory findings be made by the lead agency to determine not only the appropriate type of CEQA document, but also to identify the effects to be analyzed in the document:

a) Do the changes to the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

The Proposed Project (181 Units) represents a reduction in residential units and associated impacts as compared to the Modified Project (266 Units). Environmental effects associated with implementation of the Modified Project (266 Units) have been evaluated in RSEIR 566 and RSEIR 566 Addendum No. 1, and mitigation measures imposed, which will be applicable to the Proposed Project (181 Unit). The Proposed Project (181 Units) will result in either no change or reduced impacts to all environmental impact areas as compared to the Modified Project (266 Units).

The cumulative impact to air quality, which was overridden by the Board of Supervisors through a Statement of Overriding Considerations when it certified RSEIR 566 in 2002, remains significant and adverse. However, it will be reduced as compared to what was disclosed in the RSEIR 566 and RSEIR 566 Addendum No. 1 as the project emissions from the Proposed Project (181 Units), will be substantially less as compared to the Approved Project (283 Units) and the Modified Project (266 Units).

b) Do the changes to the project have the potential to achieve the short-term environmental goals to the disadvantage of the long-term environmental goals?

The Proposed Project (181 Units) represents a reduction in residential units and associated impacts as compared to the Modified Project (266 Units). Environmental effects associated with implementation of the Modified Project (266 Units) have been evaluated in RSEIR 566 and RSEIR 566Addendum No. 1, and mitigation measures imposed, which will be applicable to the Proposed Project (181 Units). The Proposed Project (Units) will result in either no change or reduced impacts to all environmental impact areas as compared to the Modified Project (266 Units).

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Proposed Project (181 Units) represents a reduction in residential units and associated impacts as compared to the Modified Project (266 Units). Environmental effects associated with implementation of the Modified Project (266 Units) have been evaluated in RSEIR 566 and RSEIR 566 Addendum No. 1, and mitigation measures imposed, which will be applicable to the Proposed Project (181 Units). The Proposed Project (181 Units) will result in either no change or reduced impacts to all environmental impact areas as compared to the Modified Project (266 Units).

As with the Approved Project (283 Units) and the Modified Project (266 Units), the Proposed Project (181 Units) will have a significant and adverse impact with respect to cumulative air quality. As required by CEQA, the Board of Supervisors adopted a Statement of Overriding Considerations to override this significant and adverse impact when it certified RSEIR 566 in 2002, However, this impact will be reduced as compared to what was disclosed in the RSEIR 566 and RSEIR 566 Addendum No. 1 as the project emissions from the Proposed Project (181 Units), will be substantially less as compared to the Approved Project (283 Units) and the Modified Project (266 Units) due to the reduced grading and reduced number of residential units.

Based on this RSEIR 566 Addendum No. 2, the Proposed Project (181 Units) will not have any additional significant adverse effects on the environment that have not been analyzed in RSEIR 566 and RSEIR 566 Addendum No. 1.

This page intentionally left blank.

6 ANALYSIS OF IMPACTS AND MITIGATION MEASURES

RSEIR 566 Addendum No. 2, prepared pursuant to Section 15063 and Section 15164 of the CEQA Guidelines, determines whether the revisions to the Modified Project (266 Units) reflected in the Proposed Project (181 Units) may have a potentially significant adverse impact on the environment not previously analyzed and mitigated in connection with the Modified Project (266 Units). RSEIR 566 Addendum No. 2 discusses only changes in impacts of the Proposed Project (181 Units), if any, from those impacts documented in RSEIR 566 Addendum No. 1 prepared for the Modified Project (266 Units). If no project changes or changes in the circumstances under which the project is undertaken have occurred, or no new information of substantial importance has been identified since the approval of RSEIR566 Addendum No. 1 for the Modified Project (266 Units), which would result in severely worsened or new significant impacts, no further analysis is required herein or warranted.

Although the Proposed Project (181 Units) has fewer units and a smaller development footprint, and consequently an incremental reduction in impacts and mitigation requirements than the Modified Project (266 Units), the adopted mitigation measures contained in RSEIR 566 and conditions of approval for the previously approved Modified Project (266 Units) will remain applicable to the Proposed Project (181 Units). These mitigation measures have been referenced throughout Section 6.

The landscape/restoration plan approved for Area Plan 98-2 for the Modified Project (266 Units) has been revised to reflect the Proposed Project (181 Units), while at the same time maintaining the Modified Project's (266 Units) restoration requirements. The reduced development footprint of the Proposed Project (181 Units) may entail modification of existing resource agency permits to reflect the Proposed Project (181 Units). These changes, if made in the future, are considered part of the Proposed Project (181 Units) and are not considered a substantial change because they would not alter the effectiveness of the mitigation, and will be incorporated into the resource agency permits at a future time.

Each of the following environmental factors has been evaluated in this RSEIR Addendum No.2 to determine whether the Proposed Project (181 Units) results in any additional impacts or mitigation measures which are required as a result of the implementation of the Proposed Project (181 Units). A tabular summary is included for each environmental factor to document any change that with respect to impact thresholds, mitigation required, and insignificant/significant impacts. All mitigation measures adopted in RSEIR 566 in connection with the Approved Project (283 Units) and carried forward to Modified Project (266 Units) through RSEIR Addendum No. 1, remain in effect, and will be implemented by the Proposed Project (181 Units).

This Initial Study/Addendum No. 2 to RSEIR 566 evaluates the following environmental factors:

- 6.1 Land Use & Planning
- 6.2 Agriculture
- 6.3 Population & Housing
- 6.4 Geophysical
- 6.5 Hydrology and Drainage
- 6.6 Water Quality
- 6.7 Transportation/Traffic
- 6.8 Air Quality/Greenhouse Gas
- 6.9 Noise
- 6.10 Biological Resources
- 6.11 Aesthetics/Visual
- 6.12 Cultural/Scientific Resources
- 6.13 Recreation
- 6.14 Mineral Resources
- 6.15 Hazards
- 6.16 Public Services
- 6.17 Utilities & Service Systems

The following discussion provides information for each environmental category addressing, including: (1) existing setting; (2) potential impacts if any; and (3) RSEIR 566 Addendum No. 2 findings.

6.1 LAND USE AND PLANNING

6.1.1 Existing Setting

The project site is situated within the Bridlewood Residential District of the Foothill/Trabuco Specific Plan (F/TSP) planning area. The 6,500 acres of the F/TSP area are situated within the foothills of the Santa Ana Mountains and are characterized by abundant natural and scenic resources, and primarily low-density residential and open space land uses. The Orange County General Plan Land Use Element designates the project site as 1B (Suburban Residential–0.5 to 18.0 du/ac). The project site is vacant and undeveloped. On November 5, 2002, Area Plan 98-2 was approved by the Board of Supervisors in connection with the Approved Project (283 Units). These approvals were subsequently modified, and Area Plan 98-2 (266 Units) and Revised VTTM 15230 were approved in connection with the Modified Project (266 Units) on August 11, 2004. Once approved, Area Plan 98-2 (181 Units) which reflects the revisions in Proposed Project (181 Units) to the Modified Project (266 Units) will be the governing land use document for the project site.

The Proposed Project (181 Units) remains compatible with the surrounding land uses that include: (1) St. Michael's Abbey (now owned by OC Rescue Mission), Cook's Corner, dedicated open space, the approved Saddle Crest Homes project, Cleveland National Forest, Santiago Canyon Estates, and low density residential to the north; (2) Hidden Hills/Hidden Ridge developments, O'Neill Regional Park, and the Ramakrishna Monastery to the south; (3) low density residential, a church, and natural open space to the east; and (4) Portola Hills and Foothill Ranch communities, and Aliso Creek to the west.

6.1.2 Potential Impacts

Project-specific and cumulative land use impacts were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The Proposed Project (181 Units) is consistent with the goals, objectives, policies, and land use designations contained within the Orange County General Plan, the Foothill Trabuco Specific Plan (F/TSP), the Aliso Creek Corridor Specific Plan, and the Orange County Zoning Code. The approved project (283 units) was approved in 2002 with an amendment to the F/TSP (Zone Change 98-3) that adopted a density cap, development regulations and made a finding that AP 98-2, as conditioned, was consistent with the F/TSP. County of Orange Board Resolution 02-346, App. A, Nos. 1., 2., 3., 4., 5., 6., 7., 8 includes a series of findings that the project was consistent with various provisions of the F/TSP. The project, based upon approved AP 98-2, as conditioned, has been found to be consistent with the F/TSP.

The decrease in the number of dwelling units from 266 to 181 for the overall development area is consistent with the applicable land use plans for the project site. The impacts of the Proposed Project (181 Units) on land use will be reduced from the Modified Project (266 Units) due to the elimination of 85 residential units and associated infrastructure. Proposed Project (181 Units) residential lot sizes range from 4,000 SF to 14,313 SF. The minimum lot size for the Proposed Project (181 Units) lot size as compared to the Modified Project (266 Units) is reduced from 4,500 SF to 4,000 SF. The reduced minimum lot size as compared to the previously approved project is intended to accommodate the reduced grading footprint of the overall project, the statewide demand for greater energy efficiency to reduce domestic greenhouse gas (GHG) emissions and housing affordability, and respond to changing market demands. The 4,000 square foot lots are primarily located within the interior of the project site with larger lots located along the project edges, thereby not affecting land use compatibility with existing surrounding land uses to the west and south. This minimum lot size is also compatible with recently approved and under construction projects in the vicinity, including single family residential lots as small as 3,200 SF (Portola Center). No additional impacts or adverse project impacts on land use are expected to result with implementation of the proposed project.

RSEIR 566 did not include any mitigation measures for land use.

6.1.3 Findings

Reduced Impact – No Additional Significant Impacts. No adverse changes in project impacts to land use and/or planning occur as a result of the Proposed Project (181 Units), due to the 32 percent reduction in the number of units and reduction in associated infrastructure. In addition, the Proposed Project (181 Units) increases the open space preserved for habitat value from 73 percent to approximately 84 percent. No further impact analysis or additional mitigation measures are required. The potential impact of the Proposed Project (181 Units) is determined to be less than significant.

Table 6-1 Land Use and Planning Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.2 AGRICULTURE

6.2.1 Existing Setting

Historically, Orange County was a rural community supported by an agricultural economy. During the 1960s and 1970s, the County experienced a sharp decline in agriculture production as urban development increased. Growth projections through 2030 indicate a continued urbanization and redevelopment of Orange County. The project site is largely undeveloped, and portions of the site have historically been used for cattle grazing. The project site is not located in an area identified as important farmland as classified by the Department of Conservation, Farmland Mapping and Monitoring Program. The project site is designated as "other lands," which is defined as "land which does not meet the criteria of any other category including low-density rural developments, wetlands, dense brush and timberlands…"

6.2.2 Potential Impacts

Project-specific and cumulative impacts to agriculture were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The impacts of the Proposed Project (181 Units) on agricultural resources will be unchanged from the approved Modified Project (266 Units). No additional impacts or adverse project impacts on agriculture would occur with implementation of the Proposed Project (181 Units).

RSEIR 566 did not include any mitigation measures for agriculture.

6.2.3 Findings

No Change. No changes in project impacts on agriculture would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-2. The potential impact of the Proposed Project (181 Units) on agricultural resources is determined to be less than significant.

Table 6-2 Agriculture Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.3 POPULATION AND HOUSING

6.3.1 Existing Setting

Because this project involves a vesting tentative tract map, this analysis is based upon the Orange County General Plan in effect at the time the map application was deemed complete. The County of Orange General Plan Housing Element, adopted September 14, 1993, outlines specific goals, policies, and programs to facilitate development of housing in unincorporated areas. For analytical purposes, the region has been broken into units called regional statistical areas. The total 2020 population for Orange County is 3,195,000. The eastern and southern areas of the County, including RSA C-43, are expected to realize the largest population gains. Subsequently, new development reflects this trend and approximately 57 percent of residential construction will be in southern areas of the County. The County is currently behind schedule on meeting its 5th cycle Regional Housing Needs Assessment (RHNA) projected housing needs.

6.3.2 Potential Impacts

Project-specific and cumulative impacts to population and housing were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The Proposed Project (181 Units) will add 181 single family residential housing units to the County's housing supply, a decrease of 85 units from the Modified Project (266 Units). The impacts of the Proposed Project (181 Units) on housing and population will otherwise be reduced from the Modified Project (266 Units), and no additional impacts or adverse project impacts will result from implementation of the Proposed Project (181 Units).

RSEIR 566 did not include any mitigation measures for population and housing.

6.3.3 Findings

No Change. No changes in project impacts on population and housing would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-3. The potential impact of the modifications to the Proposed Project (181 Units) on population and housing is determined to be less than significant.

Table 6-3 Population & Housing Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.4 GEOPHYSICAL

6.4.1 Existing Setting

The project site is located within the Canada De Los Alisos in the low coastal foothills of the Santa Ana Mountains. These hills are part of the Peninsular Ranges Geomorphic Province and are generally underlain by sedimentary bedrock of Tertiary age. Ridges, ravines, and gullies form the dominant physiographic features, providing moderate to high topographic relief. Elevations within the project site range from approximately 1,000 to 1,550 feet above mean sea level. Natural slope gradients range from nearly level along some ridge crests and valley bottoms to 1:1 (horizontal: vertical) within deeply incised gullies. The site drains generally toward the west and southwest into Aliso Creek and the Oso Creek tributaries of San Juan Creek. Leighton and Associates has updated the Proposed Project (181 Units) slope stability analysis (May 2020), and have determined the remedial grading limit boundary for the Proposed Project (181 Units), as shown in Figure 2-2. As shown in Figure 2-2, the Proposed Project (181 Units) grading limits have been reduced to 83 acres from 134 acres that were identified for the larger Modified Project (266 Units).

6.4.2 Potential Impacts

Project-specific and cumulative impacts to geophysical resources were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The Proposed Project (181 Units) has a substantially reduced grading footprint as compared to the Modified Project (266 units), resulting in substantially less remedial and conventional grading. An updated geotechnical investigation has been prepared by Leighton and Associates to evaluate the current onsite geologic condition and 2nd Revised VTTM 15230. The Proposed Project (181 Units) does not alter any of the conclusions regarding the potential geophysical resource impacts that were made in conjunction with the Modified Project (266 Units). The impact of the Proposed Project (181 Units) with respect to the exposure of people to geophysical conditions such as known earthquake faults, ground shaking, landslides, and erosion are the same as the Modified Project (266 Units), and remain less than significant.

PDF 2-1 and MM 2-2 in the RSEIR 566 established that a preliminary remedial grading mitigation plan had been designed to stabilize the Modified Project (266 Units) and the proposed slopes in accordance with County requirements. The anticipated volume of remedial grading is substantially reduced as compared with the conceptual contour grading plan originally approved with the Approved Project (283 Units) and retained for the Modified Project (266 Units). The remedial grading mitigation plan has been revised to reflect an updated geotechnical report that is to be submitted concurrently with this RSEIR 566 Addendum No. 2. and reviewed by County staff pursuant to SC 2-1, and which has been based upon the updated geotechnical investigations, reflects the Proposed Project (181 Units), and reflects the smaller footprint of development.

The combined remedial grading (6,235,710 cubic yards) and conventional grading (1,226,540 cubic yards) volumes for the Proposed Area Plan (181 Units) (total grading – 7,462,250 cubic yards) are reduced (approximate 2,000,000 cubic yard decrease) as compared to the Modified Project (266 Units) grading quantities (2,450,000 cubic yards

conventional grading/6,800,000 cubic yards remedial grading - 9,250,000 cubic yards total) evaluated in RSEIR 566 Addendum No. 1. The proposed overall footprint of conventional grading is reduced for the Proposed Project (181 Units) as result of the reduced development envelope and associated reduced volumes of conventional and remedial grading. The volume of remedial grading originally estimated was based on preliminary geotechnical investigations and analysis for preparation of the project environmental impact report for the original 299-unit Project. As described previously, the Board of Supervisors selected and approved the 283-unit alternative (Alternative 8) analyzed in the Draft Revised SEIR in 2002 (and referenced herein as the Approved Project (283 Units)). After approval of the Modified Project (266 Units) in 2004, the site-specific geotechnical investigations and analyses were performed to supplement the earlier work as recommended in the prior studies. Based on preliminary analyses from these investigations, the estimated volume of remedial grading ensures full remediation and stability of El Toro Road, accounts for revising previous assumptions that existing fault lines interrupt landslide slip planes, and incorporates changes in County geotechnical requirements since the initial approval. This will remediate landslides and geophysical resource impacts will remain less than significant.

As with the Modified Project (266 Units), the earthwork for the Proposed Project (181 Units) will be balanced on-site, and there will be no import or export of soil. The proposed back cut slope along the southern portion of the project will be constructed from on-site soil as part of the Proposed Project's (181 Units) conventional grading. No additional adverse project impacts will result from implementation of the Proposed Project (181 Units)3.

RSEIR 566 Mitigation Measures M 2-1 through M 2-36, are incorporated herein by reference and remain applicable to the Proposed Project (181 Units).

6.4.3 Findings

No changes – No Additional Significant Impacts. Project-specific and cumulative impacts to geophysical resources remain less than significant for the Proposed Project (181 Units). Grading operations will affect a smaller area of the project site than the Modified Project (266 Units), as described in this section and the project description (Section 2). Conventional grading will be reduced. The amount of remedial grading is reduced and the Proposed Project (181 Units) maintains potential impacts from geology and soils at a level of insignificance; soil will still be balanced on site (see Table 6-4). No further impact analysis or additional mitigation measures are required. The potential impact of the Proposed Project (181 Units) on geophysical resources remains less than significant.

Table 6-4 Geophysical Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.5 HYDROLOGY AND DRAINAGE

6.5.1 Existing Setting

There are three major drainage areas within the F/TSP area: Aliso Creek Drainage, Oso Creek Drainage, and Trabuco Creek Drainage. The project site is within the Aliso Creek and Oso Creek Drainage areas. Approximately 75 percent of

3 The project is subject to a Settlement Agreement with Vedanta. See Section 1.2

the property drains westerly into Aliso Creek, with the remaining 25 percent draining southerly into Oso Creek which drains into San Juan Creek. The onsite drainage was modified by historical activity on the property. Seven minor tributary drainages were dammed to create ephemeral ponds for agricultural purposes and realignment of El Toro Road resulted in some improvements to sections of Aliso Creek, adjacent to the site, including a major manmade drainage channel. This channel passes from adjacent to the proposed site to the westerly side of El Toro Road. Nine ephemeral ponds are located on the site, although one pond has breached and one pond is full of silt. Five (5) ephemeral ponds will be preserved in the Natural Resource Protection Area. This area of Aliso Creek is classified as Floodplain FP-2 by the Federal Emergency Management Agency.

6.5.2 Potential Impacts

Project-specific and cumulative hydrology and drainage impacts were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

An updated hydrology evaluation and storm water quality management plan (WQMP) has been prepared for the proposed project (181 Units) by Hunsaker & Associates and Fuscoe Engineering (approved April 2021), and are included in Appendix A. The major change reflected in the Proposed Project (181 Units) is the elimination of 85 residential units and associated streets in the northern portion of the project and the elimination of the offsite reservoir and access road. As compared to the Modified Project (266 Units), the volume and rate of stormwater runoff from the Proposed Project (181 Units) will be reduced because of the reduced development area and number of homes, and the corresponding reduction in impervious surfaces, as well as the proposed stormwater retention and water quality basins. Because the Proposed Project (181 Units) will impose the same best management practices (BMPs) as the Modified Project (266 Units), the velocity of runoff would also be controlled at non-erosive levels. As with the Modified Project (266 Units), runoff from the project site will be routed to the water quality and storm drain system along the spine road of the Proposed Project (181 Units).

Energy dissipaters at storm drain outlets will reduce runoff velocities to non-erosive levels. The Proposed Project (181 Units) will not substantially change the existing patterns of runoff as compared to the Modified Project (266 Units), and will result in a decrease in the quantity and rate of runoff as compared to the Modified Project (266 Units) due to elimination of the northerly and easterly development area and onsite water quality and retention basins. As discussed above, the BMPs will control runoff velocities and ensure that there is no increase in erosion impacts.

The Proposed Project (181 Units) eliminates the residential development area north and east of I Street (Revised VTTM 15230) (266 Units), maintains the same general street alignment as the Modified Project (266 Units) for the balance of the development area, and reduces the number of residential lots on H and I Streets (as shown on 2nd Revised VTTM 15230) (181 Units). These changes result in a decrease of 85 residential units as compared to the Modified Project (266 Units).

The Proposed Project (181 Units) includes an enhanced onsite water quality and drainage system, as compared to the Modified Project (266 Units), so that post-development peak project flows do not exceed existing peak flows and stormwater quality requirements are met. The proposed water quality/drainage system is located within the reduced Proposed Project (181 Units) grading limits. The Proposed Project (181 Units) basins are more effective for water quality and hydromodification than the riverine water quality system in the Modified Project (266 Units) and implement current water quality regulations. Because the expanded onsite water quality and drainage system (including the basins) are located within areas that were already proposed to be disturbed by project grading, there are no new impacts associated with the Proposed Project (181 Units) water quality and drainage features.

The proposed storm drain system for the Proposed Project (181 Units) preserves the current drainage patterns. The development area will drain to Aliso Creek, with a minor portion of the site in the southernly open space area naturally draining to Oso Creek. No project-related urban runoff will drain towards Oso Creek. This proposed system is similar to the proposed storm drain system for the Modified Project (266 Units) except modified for the reduced site plan (181 Units) and the provision for hydromodification.

The main system collects stormwater through catch basins and routes flows to a main line in the Spine Road. Diversion structures are incorporated into the main-line high-flow storm drain system to divert low flows to water

quality biotreatment basins along with sufficient flows to accommodate the hydromodification requirements. The decrease in acreage of streets (17.3 acres to 10.5 acres) will result in a decrease of the percentage of impervious surfaces. Five (5) existing onsite ponds will be preserved, three (3) engineered ponds will be created, and five (5) small hand-constructed ponds will be created for hydrology and habitat purposes. A total of thirteen (13) ponds will be located onsite.

As part of the flood control requirements, peak flows associated with the 10, 25, and 100-year storm events were analyzed for existing and proposed conditions for all discharge points to receiving waters. The flood control analysis incorporated the hydromodification volumes and determined how it impacts peak flow mitigation for large flood control events. Preliminary analysis confirms that the water quality basins described in the conceptual WQMP have sufficient capacity to accommodate these major storm events.

Specifically, the hydrology analysis for the 10, 25, and 100-year storm events concluded the following:

1. All potential hydrologic impacts (runoff, scour, erosion, flood, debris, etc.) due to the project, especially on the outlets to the downstream drainage facilities and natural watercourses (Aliso Creek and Oso Creek) are less than significant.
2. Basin and ephemeral pond outlet structures have been designed to mitigate to non-erosive stormwater velocities.
3. Confirmed no increase in peak flows from the existing and proposed conditions at the points of discharge (POC #A, #B, and #C as shown on the Water Quality Management Plan (WQMP) Report).
4. Confirmed that the hydrological impacts are mitigated to a level of insignificance. The velocity and erosion potential at all outlets can be reduced to be less than or equal to the existing condition.
5. Confirmed there is no change in the hydrology analysis contained in the appendix to the 2002 RSEIR 566 except to reflect current standards and the smaller project footprint. The adopted mitigation measures can be used for the proposed project, and are effective to mitigate hydrology impacts to less than significant.

RSEIR 566 did not include any mitigation measures for hydrology.

6.5.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts on hydrology and drainage would occur as a result of the Proposed Project (181 Units), due to the reduced amount of impervious surface. No further impact analysis or additional mitigation measures are required (see Table 6-5). The potential impact of the Proposed Project (181 Units) on hydrology and drainage is determined to be less than significant.

Table 6-5 Hydrology Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.6 WATER QUALITY

6.6.1 Existing Setting

Surface water pollution control is regulated in California by the State Water Resources Control Board (SWRCB) and nine California Regional Water Quality Control Boards (RWQCBs). Each of the nine regional boards is required to adopt a Water Quality Control Plan or Basin Plan, which recognizes and reflects regional differences in existing water quality, the beneficial uses of the Region's ground and surface waters, and local water quality conditions and problems. The project site is located within the San Diego Basin and subject to the policies in the Water Quality Control Plan for that basin.

6.6.2 Potential Impacts

Project-specific and cumulative impacts to water quality were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

Since certification of RSEIR 566, the County has prepared and is implementing its Jurisdictional Urban Runoff Management Plan, entitled Drainage Area Management Plan/Local Implementation Plan, and its model Water Quality Management Plan - all pursuant to the San Diego Regional Water Quality Control Board Order No. R9-2002-0001 (Order). RSEIR 566 anticipated the Order's requirements and analyzed project impacts consistent with them. The Proposed Project (181 Units) is consistent with that and all subsequent RWQCB orders.

An updated WQMP has been prepared by Fuscoe Engineering and approved for the Proposed Project (181 Units). The Proposed Project's (181 Units) development footprint for conventional and remedial grading is reduced as compared to the Modified Project (266 Units). As with the Modified Project (266 Units), the earthwork for the Proposed Project (181 Units) will be balanced on-site as there will be no import or export of soil. The proposed berm and back cut slope will be constructed as part of the Proposed Project's (181 Units) conventional grading. Required mitigation measures and compliance with required BMPs during grading will ensure the Proposed Project (181 Units) has the same or lesser impacts on water quality as compared to the Modified Project (266 units).

The Proposed Project (181 Units) provides for a minor decrease in the average lot size from 6,843 SF to 6,062 SF as compared to the Modified Project (266 Units). The decrease in the number of lots (266 to 181) and the decrease in acreage of streets (17.3 acres to 10.5 acres) will result in a decrease of the percentage of impervious surfaces.

The Conceptual Water Quality Management Plan (WQMP) prepared for the Modified Project (266 Units) has been revised to reflect the Proposed Project (181 Units). The Conceptual WQMP retains all of the Project Design Features and Standard County Conditions identified for the Modified Project (266 Units).

The planned basins are located within the project footprint and replaces the riverine water quality system for the Modified Project (266 Units) described in detail in the RSEIR 566 and RSEIR 566 Addendum No. 1. To comply with stricter water quality standards imposed since the Modified Project (266 Units) was approved in 2004, the Proposed Project (181 Units) has been updated to meet the current requirements of the RWQCB.

Mitigation measures and conditions of approval for the Modified Project (266 Units) include mandating that the project applicant comply with applicable permits by, among other things, providing evidence of existing coverage under the General NPDES Construction Permit before grading permits are issued, complying with a project Water Quality Management Plan to be developed consistent with applicable agency standards, and implementing BMPs that include, without limitation, the riverine system, catch basins, storm water receptors, structural BMPs, non-structural BMPs, and a Runoff Management and Water Quality Plan. The impact of the Proposed Project (181 Units) on water quality is reduced as compared to the Modified Project (266 Units). No additional impacts or adverse project impacts will result from implementation of the Proposed Project (181 Units).

RSEIR 566 included Mitigation Measures M 4-1 is incorporated herein by reference and remain applicable to the Proposed Project (181 Units).

6.6.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts to water quality would occur as a result of the Proposed Project (181 Units) due to the reduced project footprint and compliance with more stringent water quality requirements. No further impact analysis or additional mitigation measures are required (see Table 6-6). The potential impact of the Proposed Project (181 Units) on water quality is determined to be less than significant.

Table 6-6 Water Quality Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.7 TRANSPORTATION/TRAFFIC

6.7.1 Existing Setting

The Proposed Project's (181 Units) primary access will be provided by a vehicular gated/controlled access spine road, via existing El Toro Road. Valley Vista Way, located along the project's southerly boundary, will provide an emergency-only gate-controlled access from Meadow Ridge Drive for the Proposed Project (181 Units). The site's interior is undeveloped and has no road access.

El Toro Road is classified as a Major Arterial highway along the project's westerly frontage as described in the Orange County's Master Plan of Arterial Highways (MPAH).

6.7.2 Potential Impacts

Project-specific and cumulative impacts to transportation and traffic were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1. A traffic memorandum prepared by Urban Crossroads (February 26, 2020) is contained in Appendix B.

The impact of the Proposed Project (181 Units) on transportation/circulation and traffic will substantially decrease as a result of the decrease in density from 266 units to 181 units. Utilizing the Institute of Transportation Engineers (ITE), Trip Generation Manual, 9th Edition (2012) and 10th Edition (2017), it was determined that the Proposed Project (181 Units) will generate 823 fewer daily trips than the Modified Project (266 Units), and therefore reduce the number of daily trips on the surrounding circulation system by 823 trips.

Data from the Orange County Transportation Analysis Model (OCTAM) was reviewed to determine future (2040) daily traffic volume forecasts. The daily traffic volume estimates for 2040 conditions with the proposed projects on El Toro Road range from 12,800 average daily trips (ADT) south of Live Oak Canyon Road to 16,700 ADT north of Glenn Ranch Road for 2040 with Project conditions. Because the current 2040 with Project forecast volumes are lower than previous forecast volumes, cumulative impacts of the Proposed Project (181 Units) are not cumulatively considerable. No additional impacts or adverse project impacts will result with implementation of the Proposed Project (181 Units).

RSEIR 566 included Mitigation Measures M 5-1 through M 5-5 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units).

6.7.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts on transportation/circulation would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-7. The impact of the Proposed Project (181 Units) on transportation/circulation is determined to be less than significant.

Table 6-7 Transportation/Traffic Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.8 AIR QUALITY/GREENHOUSE GAS

6.8.1 Existing Setting

The project site is located within the South Coast Air Basin (SCAB), which is generally characterized by poor air quality. SCAB falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with the Southern California Association of Governments, SCAQMD is responsible for formulating and implementing air pollution controls. In 1997, SCAQMD's Air Quality Management Plan (AQMP) was adopted, establishing a comprehensive air pollution control program leading to attainment of state and federal air quality standards. The current AQMP has been in effect since 2012 and the 2016 AQMP was finalized in March 2017. State and federal air quality standards are often exceeded within SCAB, and the area is considered a non-attainment basin.

The Modified Project's (266 Units) project level construction and operational air quality impacts were found to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1 with the implementation of Standard County Conditions 6-1 and 6-2. Additional mitigation measures (6-1 through 6-12) were included in RSEIR 566, including measures to control the maximum allowable area under active grading at any given time (15 acres) where feasible, and enhanced dust control measures. SCAQMD construction and operational air quality significance thresholds have not changed from 2004 to present with the exception of the addition of the PM 2.5 threshold. The cumulative impact to air quality was identified as a significant unmitigable impact in RSEIR 566 and was overridden by the Board of Supervisors through adoption of a Statement of Overriding Considerations at the time of project approval.

6.8.2 Potential Impacts

Project-specific air quality impacts were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1. Cumulative air quality impacts were determined to be significant and unavoidable for criteria pollutants because the project is located in a non-attainment basin.

The Proposed Project (181 Units) analyzed in this RSEIR 566 Addendum No. 2 will result in a reduction in project emissions as compared to the Modified Project (266 Units), and the significance conclusion remains unchanged. The impacts of the Proposed Project (181 Units) on air quality will be reduced from the impacts of the Modified Project (266 Units), and no additional adverse air quality impacts will result with implementation of the Proposed Project (181 Units). Total grading required for the Proposed Project (181 Units) will decrease (2,200,000 cubic yards) over the

estimated grading for the Modified Project (266 Units). Total Proposed Project (181 Units) construction and operational emissions will also be reduced due to the following factors:

Construction Emissions

1) Mitigation Measure MM 6-1 limits the daily disturbance area for grading, to the extent feasible, 15 acres or less, so that no daily threshold of significance will be exceeded and there is no change in air quality impacts due to grading.

2) Compliance with SCAQMD Rule 403 to control construction fugitive dust ensures that significant impacts for PM_{10} and $PM_{2.5}$ will remain less than significant.

3) A substantial reduction in construction emissions generation factors as compared to those in use in 2002 that were the basis for the emissions modeling used in the RSEIR 566 air quality analysis. The Proposed Project (181 Units) will utilize the cleanest commercially available construction equipment when it commences grading - likely to be Tier 4 equipment. This will result in reduced emissions from grading operations as compared to the emissions calculated in the RSEIR 566 which was based upon 2002 construction equipment.

Operational Emissions

4) A reduction in the number of proposed dwelling units, associated personal and service vehicle operational emissions.

5) A substantial reduction in operational vehicle emissions criteria pollutants due to the substantially newer vehicle fleet mix as compared to the RSEIR 566 vehicle fleet mix.

Greenhouse gasses (GHG) are not evaluated in this RSEIR 566 Addendum No. 2. The potential environmental impact of greenhouse gas emissions has been known since the 1970's when the Federal Government began devoting attention to the possibility that carbon dioxide emissions associated with human activity could contribute to or cause climate change. In 1978, Congress enacted the National Climate Program Act, 92 Stat. 601 requiring the President to establish a program to "assist the Nation and the world to understand and respond to natural and man-induced climate processes and their implications." Massachusetts v. Environmental Protection Agency (2007) 549 U.S. 497, 507–508.

Information about the potential impacts of GHG was widely known in 2002 when the EIR was certified. In 1992, the United Nations Framework Convention on Climate Change was established. The regulation of GHG emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s resulting in adoption of the adoption of the Kyoto Protocol in 1997. In 2000, SB 1771 established the California Climate Action Registry to record GHG emissions to provide information about potential environmental impacts. Therefore, information about the potential environmental impact of GHG emissions either was known or could have been known at the time the 2002 EIR was certified.

GHG is not "new information, which was not known and could not have been known at the time the EIR was certified as complete, which has become available." CEQA required analysis of environmental impacts of GHG effective in March 2010 when Guidelines section 15064.4 was added to address GHG. Thus, the Guidelines did not require analysis of greenhouse gas emissions at the time the 2002 EIR was certified. (See Citizens Against Airport Pollution v. City of San Jose (2014) 227 Cal. App. 4th 788, 808; Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (2011) 197 Cal.App.4th 327, 336.) Because the potential environmental impacts of GHG emissions were known and could have been addressed when RSEIR 566 was certified in 2002, this impact does not constitute new information under Public Resources Code Section 21166(c), and this Addendum is not required to analyze GHG. Citizens for Responsible Equitable Environmental Development vs. City of San Diego (2011)196 Cal.App.4th 515.

RSEIR 566 included Mitigation Measures M 6-1 through M 6-12 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units).

6.8.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts on air quality would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. The potential impact of the Proposed Project (181 Units) on air quality is determined to be less than significant. See Table 6-8. Cumulative air quality impacts remain significant.

Table 6-8 Air Quality Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.9 NOISE

6.9.1 Existing Setting

The project area is located in a relatively remote portion of eastern Orange County which is developed with single family and multi-family communities to the south and west and partially developed with low-density single-family residences to the north and east. The project site is primarily in its natural state and noise generated by the adjacent circulation system's vehicular trips is minor. Existing noise levels are primarily associated with traffic noise generated along El Toro Road. The F/TSP stipulates a noise standard for the area that is more stringent than the more urban areas of the County. Mitigation measures for the F/TSP require that residential units and dwellings be attenuated so as not to exceed an exterior standard of 60-decibels (dB) community noise equivalent (CNEL) (compared to the 65-dB County standards) and interior standard of 45 dB CNEL. The project is adjacent to El Toro Road, a major access road to O'Neill Regional Park.

6.9.2 Potential Impacts

Project-specific and cumulative noise impacts were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

Noise impacts associated with the Proposed Project (181 Units) would be reduced as compared to the Modified Project (266 Units), and no additional impacts or adverse project impacts will result with implementation of the Proposed Project (181 Units). Short-term construction noise impacts would occur associated with project grading operations and infrastructure/unit construction. Short-term construction noise impacts would conform with the Orange County Noise Ordinance requirements for construction and are considered less than significant. In addition, the amount off grading (cubic yards) for the Proposed Project (181 Units) is less than the Modified Project (266 Units) which should result in an incremental reduction in construction noise as well. Operational noise impacts would be reduced due to the reduced 181-unit count.

RSEIR 566 included Mitigation Measures M 7-1 through M 7-5 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units)

6.9.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in noise impacts would occur as a result of the Proposed Project (181 Units) as compared to the Modified Project (266 Units). Fewer homes would be constructed and fewer vehicle trips which contribute to traffic noise would result from the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-9. The noise impact of the Proposed Project (181 Units) is determined to be less than significant.

Table 6-9 Noise Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant imp?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.10 BIOLOGICAL RESOURCES

6.10.1 Existing Setting

The project site is largely undeveloped, and includes onsite unimproved roads. Cattle and horses have grazed intensively on the property for many years resulting in habitat disturbance and degradation so that non-native grasslands now cover over 50 percent of the site. On site vegetation communities include: Venturan-Diegan coastal sage scrub, coast live oak woodland, southern sycamore riparian woodland, mulefat scrub, and southern mixed chaparral. Portions of the Venturan-Diegan coastal sage scrub are disturbed. Annual grassland, agricultural land and ephemeral ponds also occur on the site. Sensitive or endangered animal species observed on site include the Riverside fairy shrimp for which mitigation is provided, and an informal siting of two coastal California gnatcatchers in 1998 (RSDEIR, 4.8-14).

The project is located within the County's proposed Southern Subregion Natural Community Conservation Program (NCCP) Subarea 2, adopted by the County in January 2007 (but not finalized by the California Department of Fish and Wildlife) which establishes a conservation program to minimize and mitigate the expected loss of habitat values and incidental take for 32 species. Permittees of the proposed Southern Subregion Orange County NCCP include the County, Rancho Mission Viejo, and the Santa Margarita Water District. The current project configuration, with development concentrated in the southern section, has been designed to avoid as much of the riverine, coast live oak woodland, and wetland habitat on-site as possible and to provide for an east-west wildlife corridor through the property to off-site open space areas located to the west and undeveloped lands/sparsely developed lands to the east as this east-west corridor is a critical component to provide a link to the County's Central Coastal Subregion NCCP. These blocks of habitat would maintain connectivity between the Aliso Creek Greenway and Cleveland National Forest as well as between the Aliso Creek Greenbelt and the open space located to the east of the property. On-site open space also connects directly with what currently is O'Neill Regional Park to the south and the Saddle Creek conservation parcels to the north. Biological surveys of the Saddleback Meadows project site were conducted by several consulting firms between 1989 and 2002, and are summarized in the Biological Technical Report for Saddleback Meadows prepared by HELIX Environmental Planning, Inc. (HELIX 2002). HELIX reviewed the existing vegetation mapping against current 2020 aerial photography and did not find any substantial differences between the 2002 and current onsite vegetation/habitat. The updated Biological Resource Technical Report evaluates impacts associated with the Proposed Project (181 Units) and is included in Appendix C.

The project site supports nine vegetation communities: mule fat scrub, southern sycamore riparian woodland, coast live oak woodland, ephemeral ponds, Venturan-Diegan transition coastal sage scrub (including disturbed), southern mixed chaparral, annual grassland, agriculture, and ornamental (Figure 6-1). Both upland and wetland vegetation on site has been degraded by many years of grazing and heavy soil erosion.

The project site supports a number of drainages and wetland communities under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW). A total of 5.56 acres of USACE jurisdictional areas occur on site, including 1.98 acres of wetlands and 3.58 acres of non-wetland Waters of the U.S. A total of 6.41 acres of CDFW jurisdictional areas occur on site, including 4.88 acres of wetlands and 1.53 acres of drainages. Five (5) of the existing ephemeral ponds will be preserved in the 142.8 acre Biological Resource Mitigation Area located within the 143.9 acre area designated Natural Resource Protection Area in Area Plan 98-2.

Three sensitive plant species occur on site, none of which are federally or state-listed threatened or endangered: Catalina mariposa lily (*Calochortus catalinae*), intermediate mariposa lily (*C. weedii* var. *intermedius*), and small-flowered microseris (*Microseris douglasii* var. *platycarpha*).

Five sensitive animal species were observed during the surveys (February 2002) of the project site: Riverside fairy shrimp (*Streptocephalus woottoni*), western spadefoot toad (*Spea hammondii*), orange-throated whiptail (*Cnemidophorus hyperythrus*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and Cooper's hawk (*Accipiter cooperii*). No coastal California gnatcatchers (*Polioptila californica californica*) were detected during protocol surveys of the site.

The baseline biological resource analysis and mitigation measures contained in the previous CEQA documents remain valid, The previous 2004 aerial photographs were compared against current 2022 aerial photographs to reach this conclusion.

6.10.2 Potential Impacts

Project-specific and cumulative impacts to biological resources were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1. The biological resource assessment (HELIX 2021) has been updated to reflect the Proposed Project (181 Units), and is contained in Appendix C.

The Proposed Project (181 Units) would result in additional undisturbed open space and an associated reduction in impacts to onsite habitat, and a substantial widening of the northerly biological open space areas, as compared to the Modified Project (266 Units). The Proposed Project (181 Units) would also increase the minimum width of the east-west wildlife corridor. Permanent biological open space that is the subject of the existing Resource Agency permits will be protected under the 142.8 acre Biological Resource Mitigation Area discussed in Area Plan 98-2. Thirteen (13) ephemeral ponds are proposed to be preserved or constructed to provide biological resource mitigation areas. A 15-foot open space buffer is proposed during construction around the perimeter of the development area. Temporary construction fencing will be installed along the entire 15-foot buffer line and temporary Best Management Practices will installed during construction. The impacts of the Proposed Project (181 Units) would be reduced as compared to the Modified Project (266 Units). No additional impacts or adverse project impacts will result with implementation of the Proposed Project (181 Units).

The Proposed Project (181 Units) footprint substantially reduces impacts to biological resources by eliminating development from the northern portions of the site, with overall impacts reduced by 36 percent from 157.38 acres to 78.32 acres. Table 6-10 provides a breakdown of current impacts and the reduction of impacts for each habitat type.

Impacts to resources considered jurisdictional wetlands and non-wetland waters of the U.S. by the USACE, and to resources considered jurisdictional by CDFW will also be reduced by the Proposed Project (181 Units) because resources in the northern area previously identified for development in the Modified Project (266 Units) now will remain in their current condition except for portions where biological resources will be enhanced or restored and where eight (8) ephemeral ponds will be constructed. As shown in Tables 6-12 and 6-13 the USACE impacts (waters of

the U.S.) are reduced by 54 percent while CDFW impacts (waters of the State) are reduced by 64 percent as shown in Tables 6-14 and 6-15.

The Modified Project (266 Units) footprint reduces impacts to biological resources by eliminating 85 residential home sites; thus reducing the development impact area from 157.38 acres to 78.3 acres, an approximately 50 percent reduction. Table 6-10, *Vegetation Impacts and Impacts Reduction*, provides a breakdown of current impacts and the reduction of impacts for each habitat type. Table 6-11, *Proposed Project (181 Units) Vegetation Impact Reduction*, provides a comparison of the previous development footprints with the current impacts and the reduction of impacts for each habitat type.

As detailed below, the Proposed Project (181 Units) results in no new impacts or increases in the severity of impacts as compared to the Modified Project (266 Units) and the analysis set forth in RSEIR 566 Addendum No. 1.

Table 6-10 Proposed Project (181 units) Vegetation Impacts and Impact Reduction

Habitat Type	Existing	Impacted[1]	Avoided	Impact Reduction[2]
Mule fat scrub	2.99	0.65	2.34	0.66 (50%)
Southern sycamore riparian woodland	0.33	0.14	0.19	0
Coast live oak woodland	12.42	0.35	12.07	4.74 (93%)
Ephemeral ponds	0.49	0.13	0.36	0.11 (46%)
Venturan-Diegan transition coastal sage scrub[3]	70.86	19.67	51.19	22.23 (53%)
Southern mixed chaparral	6.02	0.42	5.60	4.98 (92%)
Annual grassland	123.12	62.67	60457	40.13 (39%)
Agriculture	5.44	0.58	4.86	-0.08
Ornamental	0.54	0	0.54	>0.1 (100%)
TOTAL	222.2	84.61	137.60	72.77 (46%)

*Existing and impact numbers provided in acres.

Include 3.2 acres of off-site impacts (2.9 acres of annual grassland, 0.1 acre of mulefat scrub and 0.2 acre of coastal sage scrub.

Represents impact reduction from the Modified Project (266 Units).

Includes disturbed.

Table 6-11 Proposed Project (181 Units) Vegetation Impact Reduction Comparison with Modified Project (266 Units)

Habitat Type	Existing[3]	Modified Project (266 Units) Impacts[1]	Proposed Project (181 Units) Impacts[2]	Impact Reduction[2]
Mule fat scrub	2.99	1.31	065	0.66 (50%)
Southern sycamore riparian woodland	0.33	0.14	0.14	0
Coast live oak woodland	12.42	5.09	0.35	4.74 93%)
Ephemeral ponds	0.49	0.24	0.13	0.11 (46%)
Venturan-Diegan transition coastal sage scrub[3]	70.86	41.9	19.67	22.23 (53%)
Southern mixed chaparral	6.02	5.4	0.42	4.98 (92%)
Annual grassland	123.12	102.8	62.67	40.13 (39%)
Agriculture	5.44	0.5	0.58	-0.08 (28%)
Ornamental	0.54	>0.1	0	>0 .1 (100%)
TOTAL	222.2	157.38	84.61	72.77 (46%)

*Existing and impact numbers provided in acres.

[1] Includes 3.2 acres of off-site impacts.

[2] Represents impact reduction from the Modified Project (266 Units).

[3] Does not include 3.2 acres of offsite area – see Table 6-10.

Impacts to resources considered jurisdictional wetlands and non-wetland Waters of the U.S. by the USACE, and to resources considered jurisdictional by CDFW, will be further reduced by the Proposed Project (181 Units). The USACE impacts are reduced by 55 percent (Tables 6-12 and 6-13 *Waters of the U.S. Impacts*; *USACE Impacts*), while CDFW impacts are reduced by 64 percent (Tables 6-14 and 6-15, *Waters of the State Impacts*; *CDFW Impacts*).

Table 6-12 Proposed Project (181 Units) Waters of the U.S. Impacts*

Jurisdictional Feature	Existing	Impacts[1]	Avoided	Impact Reduction[2]
Ephemeral Pond	0.49	0.13	0.36	0.11 (46%)
Mule fat Scrub	1.47	0.27	1.20	0.42 (61%)
Oak Woodland	0.02	0	0.02	0
Streambed	3.58	0.60	2.98	0.65 (52%)
TOTAL	**5.56**	**1.0**	**4.56**	**1.18 (54%)**

*Existing and impact numbers provided in acres.

[1] Includes 0.03 acre of off-site impacts.

[2] Represents impact reduction from Modified Project (266 Units).

Table 6-13 Proposed Project (181 Units) Waters of the U.S. Impacts Reduction Compared to Modified Project (266 Units)

Jurisdictional Feature	Existing	Modified Project (266 Units) Impacts[1]	Proposed Project (181 Units) Impacts[1]	Impact Reduction[2]
Ephemeral Pond	0.49	0.24	0.13	0.11 (46%)
Mule fat Scrub	1.47	0.69	0.27	0.42 (61%)
Oak Woodland	0.02	0	0	0
Streambed	3.58	1.25	0.60	0.65 (53%)
TOTAL	**5.56**	**2.18**	**1.0**	**1.18 (54%)**

*Existing and impact numbers provided in acres.

[1] Includes 0.03 acre of off-site impacts.

[2] Represents impact reduction from Modified Project.

Table 6-14 Proposed Project (181 Units) Waters of the State Impacts Reduction*

Jurisdictional Feature	Existing	Impacts[1]	Avoided	Impact Reduction[2]
Ephemeral Pond	0.34	0.10	0.24	0.01 (9%)
Sycamore Woodland	0.30	0.14	0.16	-0.04[3]
Mule fat Scrub	3.00	0.53	2.47	0.98 (65%)
Oak Woodland	1.02	0.06	0.42	0.55 (90%)
Streambed	3.58	0.55	3.03	0.90 (63%)
TOTAL	**8.24**	**1.38**	**6.32**	**2.40 (63%)**

*Existing and impact numbers provided in acres.

[1] Includes 0.03 acre of off-site impacts.

[2] Represents impact reduction from the Modified Project (266 Units)

[3] Change result of rounding rather than increase in impacts.

Table 6-15 Proposed Project (181 Units) Waters of the State Impacts Reduction Compared to Modified Project (266 Units)*

Jurisdictional Feature	Existing	Modified Project (266 Units) Impacts[1]	Proposed Project (181 Units) Impacts[1]	Impact Reduction[2]
Ephemeral Pond	0.34	0.11	0.10	0.01 (9%)
Sycamore Woodland	0.30	0.10	0.14	-0.04[3]
Mule fat Scrub	3.00	1.51	0.53	0.98 (65%)
Oak Woodland	1.02	0.61	0.06	0.55 (90%)
Streambed	3.58	1.45	0.55	0.90 (63%)
TOTAL	**8.24**	**3.78**	**1.38**	**2.40 (63%)**

*Existing and impact numbers provided in acres.

[1] Includes 0.03 acre of off-site impacts.

[2] Represents impact reduction from the Modified Project (266 Units).

[3] Change result of rounding rather than increase in impacts.

Coast live oak (*Quercus agrifolia);* oak tree impacts were decreased from 181 individuals in the Modified Project (266 Units) to 40 oak trees in the Proposed Project (181 Units), which is a 78 percent reduction from impacts approved in 2004.

Although the impacts have been reduced significantly, impacts to sensitive habitats will be mitigated based on the approved mitigation measures adopted in the certified Environmental Impact Report and 2004 Addendum No.1 for the project. The mitigation areas, however, have been reconfigured and relocated to conform to the Resource Agencies' permits. The revised mitigation areas are depicted on Figure 6-1, Biological Resource Mitigation Plan. The only exception is the oak woodland mitigation, previously required for impacts to 2.87 acres of oak woodland, has been largely eliminated. Oak woodland impacts totaling 0.35 acre with the Modified Project (266 Units) are being mitigated through oak woodland restoration, and will be accomplished consistent with CDFW requirements. No additional impacts have occurred resulting from compliance with these requirements. All biological resource mitigation will occur within the onsite 142.8 acre Biological Resource Mitigation Area located within the 143.9 acre Natural Resource Protection Area designated in Area Plan 98-2.

The applicant will dedicate to CDFW the perpetual conservation easement deed for wildlife and habitat conservation purposes over 142.8 acres of the Biological Resource Mitigation Area located within the 143.9 acres of the Natural Resource Protection Area. The applicant will record an executed irrevocable offer of dedication of the perpetual conservation easement deed for wildlife and habitat conservation purposes to CDFW. The form of the perpetual conservation easement ("Conservation Easement") deed shall be approved by the U.S. Army Corps of Engineers, the U.S. Fish & Wildlife Service, and CDFW. The long term management of the Conservation Easement area will be provided by the San Diego Habitat Conservancy or other land management organization acceptable to the Resource Agencies.

RSEIR 566 included Mitigation Measures M 8-1 through M 8-3 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units).

Source: Helix Environmental Planning

Figure 6-1 Biological Resource Mitigation Plan

6.10.3 Findings

Reduced Impact – No Additional Significant Impacts. The Proposed Project (181 Units) will result in reduced impacts to biological resources as compared to the Modified Project (266 Units), including an increase in undisturbed open space. See Table 6-16. The Proposed Project (181 Units) increases the area and the minimum width of the biological open space in the northern and eastern portions of the site, thereby improving the opportunity for wildlife movement. No further impact analysis or additional mitigation measures are required. The potential impact of the Proposed Project (181 Units) is determined to be less than significant.

Table 6-16 Biological Resource Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.11 AESTHETICS/VISUAL

6.11.1 Existing Setting

The F/TSP area is characterized by visual resources unique to the County. Features that significantly contribute to the visual character of the area identified in the F/TSP are topography, natural vegetation, natural watercourses, and vistas and viewscape corridors. The F/TSP identifies public viewpoints based on relative visibility, significance, or view corridors and/or important vistas. Pursuant to the County's Master Plan of Arterial Highways, El Toro Road is designated as a Scenic Highway. The project site is primarily in a natural, although degraded state, due to the long history of cattle grazing.

6.11.2 Potential Impacts

Project-specific and cumulative impacts to aesthetics were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The Modified Project's (266 Units) impacts on viewshed were found to be less than significant in the previous CEQA documentation (RSEIR 566 Addendum No. 1). Design features contained in the Modified Project (266 Units) that remain as part of the Proposed Project (181 Units) provide for substantial viewshed buffering, including extended berming and back cut slopes, unit count reduction and increases in overall open space, buffer area acreage and setback distances. The Proposed Project (181 Units) incorporates all of these project design features and substantially increases undisturbed open space, resulting in reduced impacts to aesthetics as compared to the Modified Project (266 Units). In addition, the proposed water tank location has been eliminated from a higher offsite elevation on the ridgeline. By eliminating the water tank and associated access road, visual and aesthetic impacts associated with the water tank are eliminated and remain less than significant. The riding and hiking trail has also been shortened onsite, further reducing aesthetic impacts.

Based on the birds eye view visual simulations provided in RSEIR 566, visual simulations for the Proposed Project (181 Units) and the Modified Project (266 Units) are shown in **Figures 6-2, Figure 6-3, and Figure 6-4**. The visual simulations depict the proposed project grading, residential unit location and onsite circulation system, including the gated/controlled vehicular access. The visual simulations do not depict actual project architecture, landscaping, or

habitat restoration. As shown, the aesthetic impact to drivers along El Toro Road and surrounding areas have been reduced, with fewer development areas visible4.

RSEIR 566 did not include any mitigation measures for aesthetics.

6.11.3 Findings

Reduced Impact – No Additional Significant Impacts. The Proposed Project (181 Units) would result in reduced impacts to aesthetics/visual resources as compared to the Modified Project (266 Units). The number of residential units in the project has been reduced by 85 units, and all of the previously approved project design features have been incorporated into the Proposed Project (181 Units).

With implementation of the Proposed Project (181 Units), the existing northerly views from the Ramakrishna Monastery would be further improved compared to those associated with the Modified Project (266 Units). Reduced project impacts on aesthetics/visual would occur as a result of the Proposed Project's (181 Units) reduction in development area and associated residential unit reduction, as well as elimination of the water tank and associated access road. See Table 6-17. No further impact analysis or additional mitigation measures are required. The aesthetics impacts of the Proposed Project (181 Units) are determined to be less than significant.

Table 6-17 Aesthetic Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No.1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

[4] The project is subject to a Settlement Agreement with Vedanta. See Section 1.2



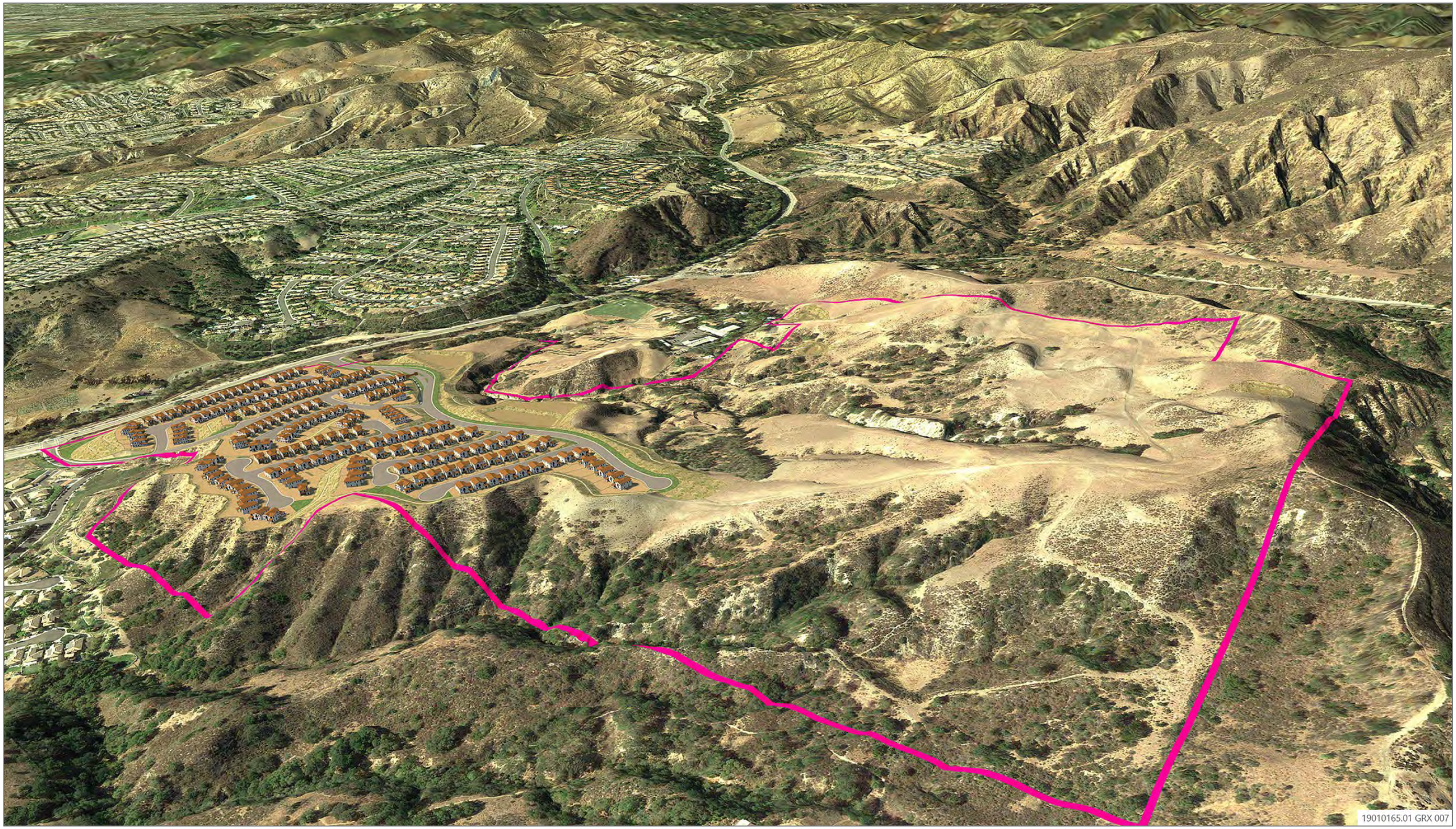
Source: Hunsaker & Associates

Figure 6-2 Visual Simulation A



Source: Hunsaker & Associates

Figure 6-3 Visual Simulation B



Source: Hunsaker & Associates

Figure 6-4 Visual Simulation C

6.12 CULTURAL/SCIENTIFIC RESOURCES

6.12.1 Existing Setting

The project site is located within an area that is considered sensitive for cultural resources. Cultural resources reports and subsurface evaluations previously prepared for the Modified Project (266 Units) indicate that there are prehistoric and historic sites recorded within the project boundary. In addition, the project site is also located within an area with high potential to produce significant paleontological resources.

6.12.2 Potential Impacts

Project-specific and cumulative impacts to cultural/scientific resources were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The impacts of the Proposed Project (181 Units) on cultural/scientific resources will be reduced from the Modified Project (266 Units) because the reduction in development area associated with the Proposed Project (181 Units) would result in an incremental reduction potential to impact cultural and paleontological resources. No additional impacts or adverse project impacts on cultural/scientific resources are expected to result with implementation of the Proposed Project (181 Units). All mitigation measures contained in RSEIR 566 remain valid.

RSEIR 566 included Mitigation Measures M 10-1 through M 10-10 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units)

6.12.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts on cultural/scientific resources would occur as a result of the Proposed Project (181 Units), as compared to the Modified Project (266 Units). No further impact analysis or additional mitigation measures are required. See Table 6-18. The potential impact of the Proposed Project (181 Units) on cultural and scientific resources is determined to be less than significant.

Table 6-18 Cultural/Scientific Resource Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.13 RECREATION

6.13.1 Existing Setting

There are no existing recreational or public open space uses located on the project site. However, the project site is located near to O'Neill and Whiting Ranch/Limestone Regional Parks. Trails are designated in the vicinity of the project site by the Orange County General Plan Recreation Element Master Plan of Regional Riding and Hiking Trails.

Construction of an onsite riding and hiking trail from the project entry easterly to the project's easterly boundary and the trail rest stop atop the ridge at the project's easterly boundary was identified as a mitigation measure in the RSEIR 566, and was carried forward in the RSEIR 566 Addendum No. 1 approved by the County on August 11, 2004. With the elimination of the residential units in the northeastern portion of the project site, the local riding and hiking trail was shortened to align with the residential development area. The Proposed Project (181 Units) eliminates the ridgetop rest area and proposes an onsite trail that parallels the spine road and will provide a rest area adjacent to the spine road cul-de-sac. Barriers (e.g., both vegetation and fencing and signage will be installed at the trail rest area to prohibit public access into the open space areas east of the trail terminus. Signage will be posted limiting the use of the trail from dawn to dusk.

The riding and hiking trail easement for the shortened trail will be offered to the County of Orange, with fee ownership retained by the project HOA. Maintenance of the trail and rest area will be the responsibility of the HOA or its assignee. Alternatively, the applicant will offer to dedicate the riding and hiking trail as a private local park under County ordinance subject to a covenant with the County to maintain public access as described in the Area Plan. The County will determine the form of dedication.

Since the adoption of RSEIR 566 and RSEIR 566 Addendum No. 1, the proposed project has been modified to reduce the total number of residential units that will be developed on site. Consequently, the recreation demand impact of the proposed project will also be proportionately reduced as a result of 84 fewer residential units and associated occupants.

6.13.2 Potential Impacts

Project-specific and cumulative impacts to recreation were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The impacts of the Proposed Project (181 Units) on recreation will be reduced from the Modified Project (266 Units), as fewer residents will be seeking recreational opportunities in the vicinity, and no additional adverse project impacts on recreation are expected to result with implementation of the Proposed Project (181 Units). The Proposed Project (181 Units) will provide for a riding and hiking trail and rest area that was proposed in the Modified Project (266 Units) but which has been reconfigured to reflect the reduced footprint of development and that parallels the spine road and terminates adjacent to the spine road cul-de-sac. See Figure 6-2.

RSEIR 566 included Mitigation Measures M 11-1 through M 11-5 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units)

6.13.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts to recreation would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-19. The potential impact of the Proposed Project (181 Units) on recreation is determined to be less than significant.

Table 6-19 Recreation Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	Yes – See above	RSEIR 566 & Addendum No. 1 MMs 11-2, 11-3 and 11-4 deleted
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.14 MINERAL RESOURCES

6.14.1 Existing Setting

No known mineral resources exist on the project site. The project site is not designated as a known or potential mineral deposit by the state (mineral resource mapping as required under the Surface Mining and Reclamation Act) or the County of Orange.

6.14.2 Potential Impacts

Project-specific and cumulative impacts to mineral resources were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The impacts of the Proposed Project (181 Units) on mineral resources will be unchanged from the approved Modified Project (266 Units), and no additional impacts or adverse project impacts on mineral resources will result with implementation of the Proposed Project (181 Units).

RSEIR 566 did not contain any mitigation measures for mineral resources.

6.14.3 Findings

No Changes – No Additional Significant Impacts. No changes in project impacts to mineral resources would occur as a result of the Proposed Project (181 Units). No further impact analysis or additional mitigation measures are required. See Table 6-20. The potential impact of the Proposed Project (181 Units) on mineral resources is determined to be less than significant.

Table 6-20 Mineral Resources Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.15 HAZARDS

6.15.1 Existing Setting

The project site is located close to the Cleveland National Forest, an area that is subject to high wildland fire hazards. The site may also have been subject to hazards related to the flight operations at the El Toro Marine Corp Air Station (MCAS) when it was in operation. The MCAS has been closed since 1999, and the facilities are currently being redeveloped for non-aviation uses. No other sources of hazards are known to exist within the project area.

6.15.2 Potential Impacts

Project-specific and cumulative impacts to hazards were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1.

The Proposed Project (181 Units) eliminates the 1.4-million gallon above-ground potable water tank proposed for the Modified Project (266 Units) project, as the water tank is no longer necessary. The Trabuco Canyon Water District (TCWD) has indicated that the project's water and wastewater requirements can be met by existing and future district facilities in other locations.

The impacts of the Proposed Project (181 Units) on hazards will be reduced from the Modified Project (266 Units), as fewer residents will be exposed to potential wildfire hazards and no additional impacts or adverse project impacts will result with implementation of the Proposed Project (181 Units). The Proposed Project (181 Units) will continue to meet the access and design requirements of the Orange County Fire Authority (OCFA) and TCWD. Nine (9) common area/slope, mid-block access points have been added to provide additional access for OCFA. The Fire Protection and Fuel Modification Plan is contained in Appendix D.

RSEIR 566 did not contain any mitigation measures for hazards. Geotechnical hazard mitigation measures are included in Section 6.4.

6.15.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts to hazards would occur as a result of the Proposed Project (181 Units), as compared to the Modified Project (266 Units). No further impact analysis or additional mitigation measures are required. See Table 6-21. The impact of the Proposed Project (181 Units) on hazards is determined to be less than significant.

Table 6-21 Hazards Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

6.16 PUBLIC SERVICES

6.16.1 Existing Setting

The project site is vacant undeveloped open space. The project site is served by the following major public services:

- Fire and emergency services are provided by the Orange County Fire Authority. Station No. 42 located at 19150 Ridgeline Road, is approximately ½ mile from the project site and provides primary response.
- Police protection is provided by the Orange County Sheriff-Coroner's Department. The Department's headquarters is located at 550 N. Flower Street in Santa Ana. Patrol cars patrol the area in the vicinity of the project site on a regular basis, rather than being dispatched from a particular substation.
- Saddleback Unified School District serving grades K-12 provides school services for the project area.
- Orange County Public Library serves the project site and vicinity. The closest library to the site is the Rancho Santa Margarita Branch Library located at 30902 La Promesa in Rancho Santa Margarita.

6.16.2 Potential Impacts

Project-specific and cumulative impacts to public services were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1. Nine (9) common area/slope, mid-block access points have been added to provide additional access for OCFA. The Fire Protection and Fuel Modification Plan is included in Appendix D.

The impacts of the Proposed Project (181 Units) on public services would be reduced, as compared to the Modified Project (266 Units) due to the decrease in dwelling units and residents requiring public services. No additional impacts or adverse project impacts will result with implementation of the Proposed Project (181 Units).

RSEIR 566 included Mitigation Measure M 12 is incorporated herein by reference and remain applicable to the Proposed Project (181 Units)

6.16.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts to public services for police, fire, schools, or library would occur as a result of the Proposed Project (181 Units), as compared to the Modified Project (266 Units). No further impact analysis or additional mitigation measures are required. See Table 6-22. The impact of the Proposed Project (181 Units) on public services is determined to be less than significant.

Table 6-22 Public Service Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	R SEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	R SEIR 566 & Addendum No. 1 remains valid

6.17 UTILITIES AND SERVICE SYSTEMS

6.17.1 Existing Setting

The project site is currently vacant undeveloped open space. The project site is served by the following major public utilities and service systems:

- Southern California Edison (SCE) – electrical service
- Southern California Gas (SCG) Company – natural gas
- Trabuco Canyon Water District (TCWD) – sewer and water service
- Waste Management of Orange County – solid waste

6.17.2 Potential Impacts

Project-specific and cumulative impacts to land use were determined to be less than significant in RSEIR 566 and RSEIR 566 Addendum No. 1. TCWD issued a conditional water and sewer service will serve letter in August 2020. The TCWD letter is contained in Appendix E.

The impacts of the Proposed Project (181 Units) on utilities and service systems would be reduced as compared to the Modified Project (266 Units) due to the decrease in the number of dwelling units and project residents. No additional adverse project impacts will result with implementation of the Proposed Project (181 Units).

RSEIR 566 included Mitigation Measures M 16-1 and 17-1 are incorporated herein by reference and remain applicable to the Proposed Project (181 Units)

6.17.3 Findings

Reduced Impact – No Additional Significant Impacts. A reduction in project impacts to utilities and service systems would occur as a result of the Proposed Project (181 Units) as compared to the Modified Project (266 Units). No further impact analysis or additional mitigation measures are required. See Table 6-23. The potential impact of the Proposed Project (181 Units) on utilities and service systems is determined to be less than significant.

Table 6-23 Utilities and Service Systems Impacts

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in insignificant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Changes in significant impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
New significant adverse impacts?	No	RSEIR 566 & Addendum No. 1 remains valid
Additional mitigation required?	No	RSEIR 566 & Addendum No. 1 remains valid

7 FINDINGS AND DETERMINATION

All impacts associated with implementation of the Proposed Project (181 Units) would be equal to or less than those associated with the Modified Project (266 Units) evaluated in the RSEIR 566 and RSEIR 566 Addendum No. 1. No new significant adverse effects would occur as a result of implementation of the Proposed Project (181 Units). None of the previously identified significant impacts would be substantially increased as a result of the Proposed Project (181 Units), and no new information of substantial importance regarding new significant impacts or a substantial increase in previously analyzed impacts has been identified.

This page intentionally left blank.

8 REFERENCES

The following references were used in compiling this Initial Study and RSEIR 566 Addendum No. 2.

California Department of Conservation. 1999. Farmland Mapping and Monitoring Program. *Orange County Important Farmland 1998*.

California Department of Finance. 2001. Demographic Research Unit. *City/County Population and Housing Estimates*. Available: http://www.dof.ca.gov.

County of Orange. 1984 (April 18). *County of Orange General Plan Resources Element*.

———. 1991a. Environmental Management Agency. *Foothill/Trabuco Specific Plan*. Adopted December 1991.

———. 1991b (July). *Foothill/Trabuco Specific Plan Draft Environmental Impact Report*.

———. 1993. Environmental Management Agency. *County of Orange General Plan Housing Element*. Adopted September 14, 1993.

———. 2002 November. Planning and Development Services Department. *Final Revised Subsequent Environmental Impact Report No. 566 Saddleback Meadows*.

———. 2004 (July). Planning and Development Services Department. *Final Revised Subsequent Environmental Impact Report* No. 566 (2002) and Saddleback Meadows Addendum No. 1.

Fuscoe Engineering. 2020. Saddleback Meadows Water Quality Management Plan.

Helix Environmental Planning, Inc. 2000 (August). *Saddleback Meadows Conceptual Mitigation and Monitoring Plan for CDFG Jurisdictional Areas*.

Helix Environmental Planning, Inc. December 7, 2016. *Saddleback Meadows Revised Biological Resource Assessment*.

———. 2000 (December). *2000 Annual Report*, U.S. Fish and Wildlife Service Dry Stream Survey for San Diego and Riverside Fairy Shrimp, Saddleback Meadows Project.

———. *Saddleback Meadows Conceptual Mitigation and Monitoring Plan*.

———. 2000 (October). *California Gnatcatcher Surveys*.

Leighton & Associate. 2020. Saddleback Meadows Geotechnical Investigation.

SCAG. *See* Southern California Association of Governments.

Southern California Association of Governments. 1999 (September 16). *County Population and Household Projections*.

This page intentionally left blank.

9 PERSONS AND ORGANIZATIONS CONTACTED

Lead Agency
County of Orange, OC Public Works
Planning and Development Services Department
601 North Ross Street
Santa Ana, CA 92701
Phone: (714) 834-2166
FAX: (714) 834-4652

Applicant
California Quartet
c/o Recupero & Associates
31877 Del Obispo, Suite 204
San Juan Capistrano, CA 92675
Michael Recupero

Environmental Analysis
Ascent Environmental
1230 Columbia Street, Suite 440
San Diego, CA 92101
Eric J. Ruby

Legal
Manatt, Phelps, Phillips, LLP
695 Town Center Drive, 14th Floor
Costa Mesa, CA 92626
Susan Hori

Land Planning/Civil Engineering/Hydrology
Hunsaker & Associates Irvine, Inc.
Three Hughes
Irvine, CA 92618-2082
Fred Graylee

Water Quality
Fuscoe Engineering
16795 Von Karman, Suite 100
Irvine, CA 92606
Ian Adam

Biological Resource Assessment
HELIX Environmental, Inc.
7578 El Cajon Boulevard, Suite 200
La Mesa, CA 91942
Beth Martinez

Geotechnical
Leighton & Associates
17781 Cowan
Irvine, CA 92614
Joe Roe

Traffic Engineer
Urban Crossroads
1133 Camelback Street, #8329
Newport Beach, CA 92658
John Kain

Appendix A

Hydrology Study and WQMP

Submitted Under Separate Cover

Appendix B

Traffic Memorandum

URBAN CROSSROADS

Ofc: 1001 Dove St. | Suite 260 | Newport Beach, CA 92660
Main: 260 E. Baker St. | Suite 200 | Costa Mesa, CA 92626
urbanxroads.com

February 26, 2020

Mr. Mike Recupero
RECUPERO AND ASSOCIATES, INC.
31877 Del Obispo Street, Suite 204
San Juan Capistrano, CA 92675-3228

SUBJECT: SADDLEBACK MEADOWS TRAFFIC ASSESSMENT

Dear Mr. Mike Recupero:

The purpose of this traffic assessment is to evaluate changes to the approved Saddleback Meadows residential development ("Project"), which is located in the County of Orange, and determine if new information or substantial changes to the project, or substantial changes with respect to the surrounding circumstances under which the project is being undertaken have occurred which require major revisions to the previous CEQA analysis, and whether project conditions and mitigation measures for the previous project remain adequate to address project impacts.

The project was approved in 2002 for the development of 283 single family homes over 155 of the 222 acre site, **but subsequently was reduced in 2004 to 266 single family homes. The project is proposed to be reduced to 181 single family homes.**

To make this assessment, we reviewed existing environmental documents for the project – the 2002 Final Revised Subsequent EIR (FRSEIR) and 2004 Addendum, and evaluated the potential changes of the reduced project.

CHANGES DUE TO REDUCED PROJECT

The current proposed project of 181 single family dwelling units is approximately 68% of the previously approved 266 dwelling units (i.e. a 32% reduction). Compared to the 283 dwelling units approved in 2002, the proposed project decreases dwelling units by 36%.

Trip generation rates, along with a comparison of the proposed Project trip generation to the 2004 and 2002 approved project trip generation are shown on Table 1. The revised project generates approximately 823 fewer daily trips than the approved (2004) project. In comparison to the previously approved (2002) project of 283 dwelling units, the proposed project generates approximately 985 fewer daily trips.

TABLE 1: PROJECT TRIP GENERATION SUMMARY

Trip Generation Rates									
			AM Peak Hour			PM Peak Hour			
Land Use	ITE LU Code	Units [3]	In	Out	Total	In	Out	Total	Daily
Single Family Detached [1]	210	DU	0.19	0.56	0.75	0.63	0.37	1.00	9.52
Single Family Detached [2]	210	DU	0.19	0.55	0.74	0.62	0.37	0.99	9.44

Trip Generation Total									
			AM Peak Hour			PM Peak Hour			
Land Use	ITE LU Code	Quantity[2]	In	Out	Total	In	Out	Total	Daily
Approved (2002) Project [1]	210	283 DU	54	158	212	178	105	283	2,694
Approved (2004) Project [1]	210	266 DU	51	149	200	168	98	266	2,532
Proposed (2020) Project [2]	210	181 DU	34	100	134	112	67	179	1,709
Difference (2020 - 2002)			**-20**	**-58**	**-78**	**-66**	**-38**	**-104**	**-985**
Difference (2020 - 2004)			**-17**	**-49**	**-66**	**-56**	**-31**	**-87**	**-823**

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 9th Edition (2012).
ITE 9th Edition trip generation rates were utilized for Approved (2002) Project and Approved (2004) Project.

[2] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition (2017).
ITE 10th Edition trip generation rates were utilized for Approved (2020) Project.

[3] DU = Dwelling Unit

CHANGES IN EXISTING AND FUTURE CUMULATIVE TRAFFIC

Estimates of Project only daily traffic volumes are shown on Exhibit 1. Exhibit 1 also provides previous Project only daily traffic volumes for comparison purposes. The proposed Project is anticipated to contribute approximately 800 fewer vpd to the study area, with 600 fewer vpd traveling south of the access point on El Toro Road and 200 fewer vpd traveling north on El Toro Road.

Data from the Orange County Transportation Analysis Model (OCTAM) was reviewed to determine future (2040) daily traffic volume forecasts. The OCTAM is a four step model which includes trip generation, trip distribution, mode choice, and traffic assignment. After the four step modeling process, post model refinements occur. It should be noted that volumes presented on Exhibit 2 have been reviewed and adjusted to account for current information on local travel and to preserve reasonable relationships between traffic patterns at nearby locations.

Daily traffic volume estimates for 2040 conditions with the proposed Project are shown on Exhibit 2. As indicated on Exhibit 2, daily volumes on El Toro Road range from 12,800 vpd south of Live Oak Canyon Road to 16,700 vpd north of Glenn Ranch Road for 2040 With Project conditions. The previous forecast volumes were higher in the study area than the current 2040 with Project daily traffic volume projections.

The current 2040 with Project forecast volumes are lower than previous forecast volumes, so impacts of the proposed Project are not cumulatively considerable. Based upon the most current projections available, the cumulative needs have not increased in the study area.

FINDINGS AND CONCLUSIONS

The currently proposed project generates a total of 1,709 trip-ends per day (823 less than the 2,532 trip-ends per day for the 2004 approval). Project trips are now 134 vehicles in the AM peak hour and 179 vehicles in the PM peak hour.

The proposed modified Project would not result in any new significant impacts or substantially increase the severity of previously analyzed traffic impacts which were less than significant with mitigation. The County found that the original 283 unit project, with standard County conditions, project design features and mitigation, had no significant impact on traffic/circulation. The reduced 266 unit project likewise had no significant impact on traffic/circulation. The proposed modifications to the project do not alter these conclusions.

As with the 266 unit project approved in 2004, construction impacts are still anticipated to be short term and not significant. Santiago Canyon Road impacts are unchanged from the previous analysis. There is no change to cumulative Environmental Impacts of the Project, which remain less than significant.

Application of the previously adopted mitigation measures (FRSEIR Mitigation and Monitoring Plan) and the conditions of approval (Rezone, Area Plan, and Vesting Tentative Tract Map) for the approved 283 unit project would address any potential impacts of the proposed 181 unit project, and would result in no significant impacts.

Respectfully submitted,

URBAN CROSSROADS, INC.

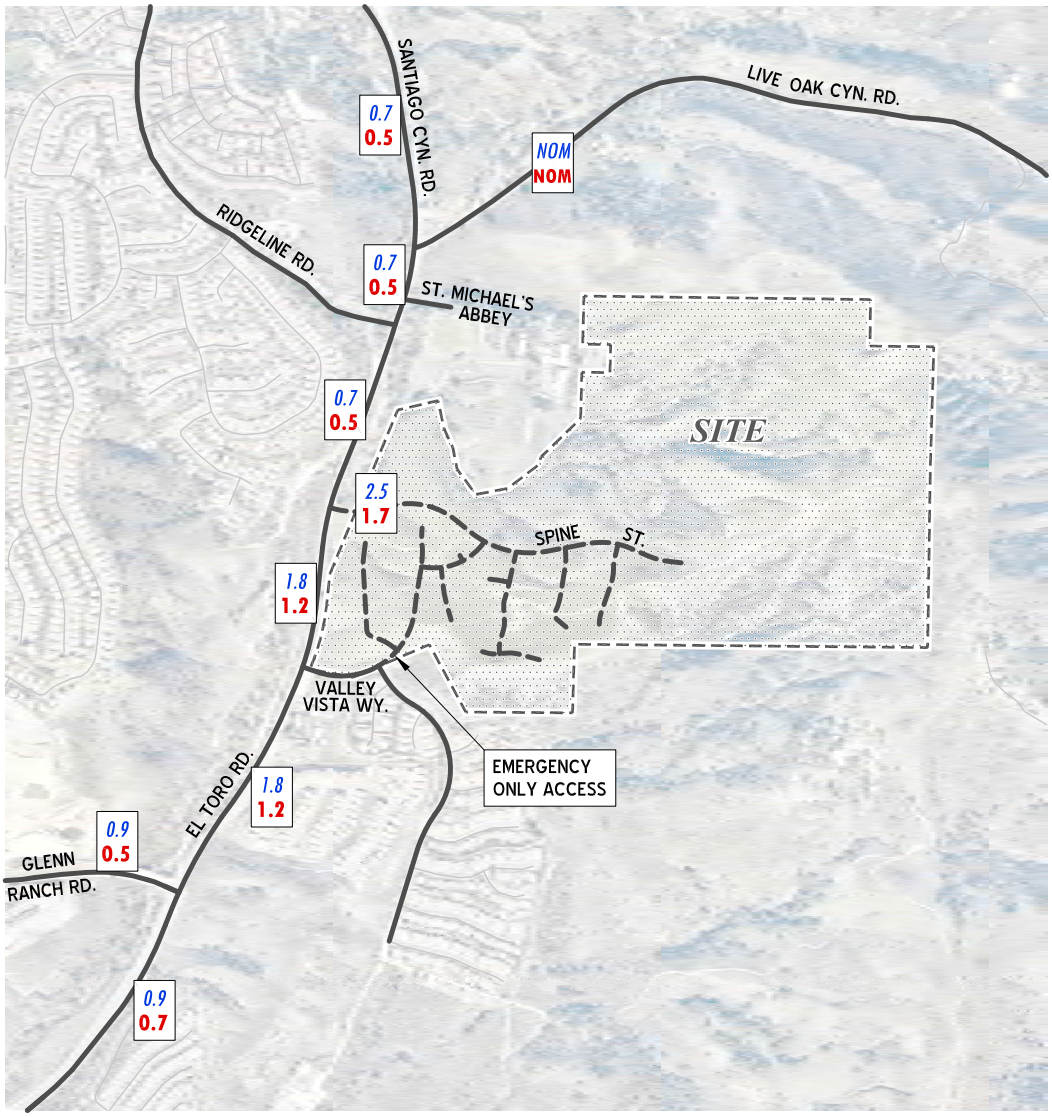
John Kain
John Kain, AICP
Principal

Marlie Whiteman
Marlie Whiteman, P.E.
Senior Associate

Attachments

XC: Mr. Amer Hammour

EXHIBIT 1: PROJECT ONLY DAILY VOLUME ESTIMATES
PREVIOUSLY APPROVED (2004) AND CURRENTLY PROPOSED (2020)



LEGEND:

2.5 = PREVIOUSLY APPROVED (2004) VEHICLES PER DAY (1000'S)

1.7 = CURRENTLY PROPOSED (2020) VEHICLES PER DAY (1000'S)

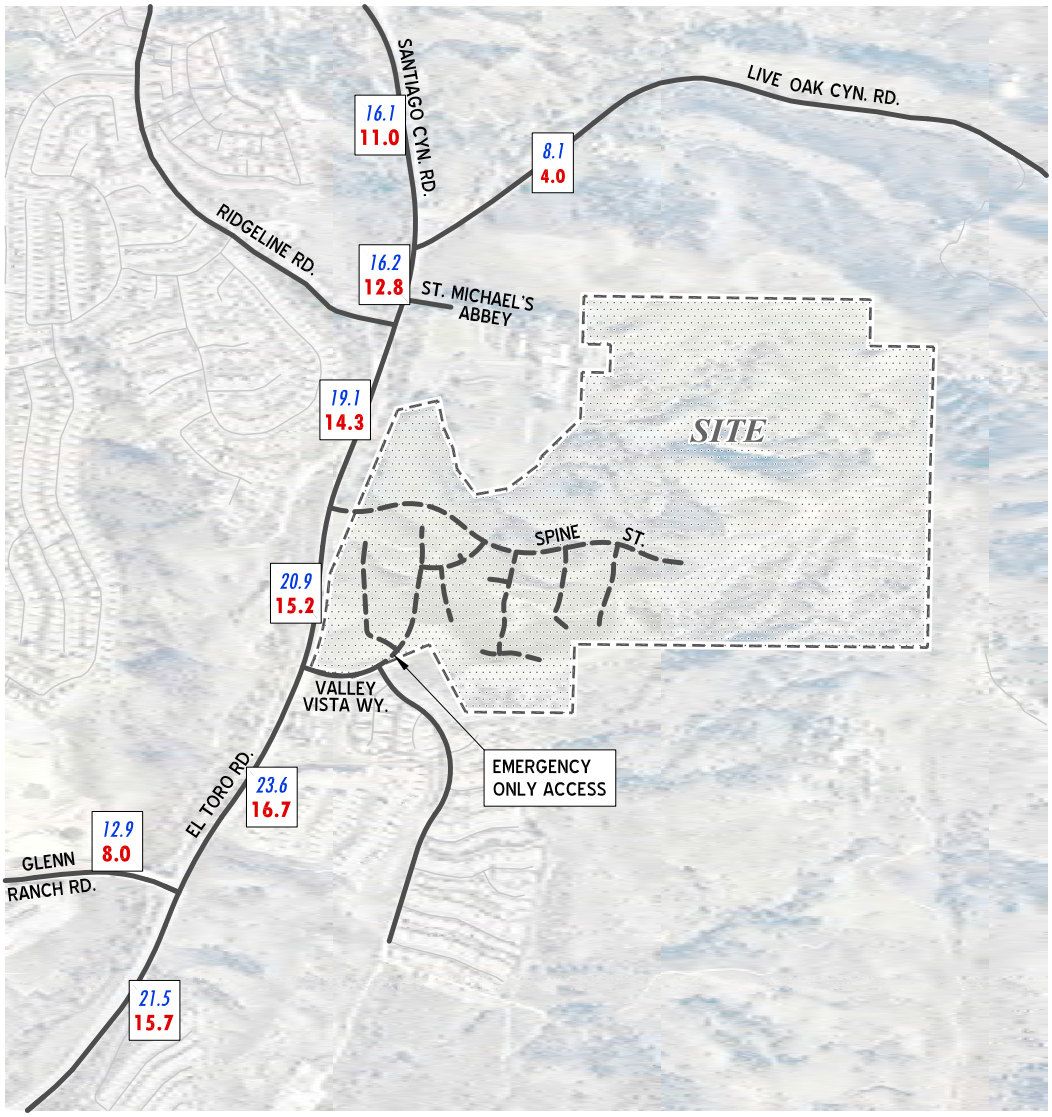
NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY

N

10396 - 01 - study area.dwg

URBAN CROSSROADS

EXHIBIT 2: CUMULATIVE FUTURE TRAFFIC PROJECTIONS
DAILY VOLUME ESTIMATES



LEGEND:

20.9 = PREVIOUS 2025 DAILY VOLUME PROJECTIONS WITH APPROVED PROJECT (1000'S)

16.7 = OCTAM 2040 DAILY VOLUME PROJECTIONS WITH MODIFIED PROJECT (1000'S)

N

Appendix C

Biological Resource Memorandum

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942
619.462.1515 **tel**
619.462.0552 **fax**
www.**helixepi**.com

May 22, 2020

Mr. Eric Ruby
Ascent Environmental, Inc.
1230 Columbia Street, Suite 440
San Diego, CA 92101

Subject: Biological Resources Addendum No. 3 for Saddleback Meadows Project (TTM 15230), located in an Unincorporated area of Southeastern Orange County, California

Dear Mr. Ruby:

The Saddleback Meadows project (project) was approved in 2002 to construct 283 homes over approximately 155 acres of the 222-acre site. An Addendum was approved in 2004 reducing the number of homes to 266 ("Approved Project"). Subsequently, the project has been modified to further reduce the development area and residential home count to 181 homes ("Modified Project").

This memorandum provides an analysis of the Modified Project's impacts to sensitive biological resources, and mitigation to ensure consistency of the Modified Project with the California Environmental Quality Act (CEQA) and previous environmental documentation.[1]

PROJECT DESCRIPTION

The Modified Project removes an additional 85 single family residential homes sites, decreases grading and impact footprint by roughly 45 percent, as compared to the Approved Project, and includes a 15-foot construction buffer in compliance with the project's U.S. Army Corps of Engineers Section 404 permit Special Condition 12.[2] The Modified Project consists of 181 single family detached units, private roads, enhancement of locally and regionally important biological resources, expansion of on-site wildlife corridors, an increase in open space, and incorporation of a bio-retention storm water quality management system to comply with current storm water quality regulations. Additionally, a trail will extend to the eastern terminus of the property and an offer of dedication of a trail easement will be made to the County. The average residential lot size for the Modified Project is approximately 6,062 square feet (sf), with a minimum lot size of 4,000 sf. The area per unit (APU) for the project is

[1] A FRSEIR [Final Revised Subsequent EIR] was certified by the County in 2002 in connection with the approval of the 283-unit project. An Addendum to that FRSEIR was approved by the County in 2004 in connection with the 266-unit project.
[2] U.S. Army Corps of Engineers Section 404 Individual Permit (199915117-YJC) issued on November 11, 2002.

approximately 53,475 sf per unit. The portion of the project that has been eliminated from development (Lot X2) will be comprised of a combination of undisturbed open space and habitat mitigation areas.[3] The Modified Project has been designed to minimize impacts on the existing landform. The residential lots have been located on the more gently sloping areas along the southwestern portion of the project site, while the steep terrain of the central canyon area and the northern section of the site have been left as open space. Development will lie below the eastern and northern major ridgelines bordering the property, which creates a natural ridgeline backdrop.

BIOLOGICAL RESOURCES

Several biological surveys of the Saddleback Meadows project site were conducted by various consulting firms and are summarized in the Biological Technical Report for Saddleback Meadows prepared by HELIX Environmental Planning, Inc. (HELIX; 2002). The vegetation mapping has been confirmed by HELIX as accurate against current aerial photography.

The project site supports ten vegetation communities: mule fat scrub, southern sycamore riparian woodland, coast live oak woodland, ephemeral ponds, Venturan-Diegan transition coastal sage scrub (including disturbed), southern mixed chaparral, annual grassland, ornamental, and agriculture (Figure 1, *Vegetation*). Both upland and wetland vegetation on-site has been degraded by many years of grazing and heavy soil erosion.

The project site supports a number of drainages and wetland communities considered U.S. Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) jurisdictional. A total of 5.56 acres of USACE jurisdictional areas occur on-site, including 1.98 acres of wetlands and 3.58 acres of non-wetland Waters of the U.S. (Figure 2, *USACE Jurisdiction*). A total of 6.41 acres of CDFW jurisdictional areas occur on-site, including 4.88 acres of wetlands and 1.53 acres of streambed (Figure 3, *CDFW Jurisdiction*).

Three sensitive plant species occur on-site (Figure 1), none of which are federally or state listed threatened or endangered: Catalina mariposa lily (*Calochortus catalinae*), intermediate mariposa lily (*C. weedii* var*. intermedius*), and small-flowered microseris (*Microseris douglasii* var. *platycarpha*).

Five sensitive animal species were observed during the surveys of the project site (Figure 1): Riverside fairy shrimp (*Streptocephalus woottoni*), western spadefoot toad (*Spea hammondii*), orange-throated whiptail (*Cnemidophorus hyperythrus*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and Cooper's hawk (*Accipiter cooperii*). No coastal California gnatcatchers (*Polioptila californica californica*) were detected during protocol surveys of the project site.

PROJECT IMPACTS

The Modified Project footprint reduces impacts to biological resources by eliminating 85 residential home sites; thus reducing the development impact area from 157.38 acres to 86.81 acres, an approximately 45 percent reduction (Figure 4, *Vegetation Impacts*). Table 1, *Vegetation Impacts and Impacts Reduction,* provides a breakdown of current impacts and the reduction of impacts for each habitat type. Table 2, *Vegetation Impact Reduction*, provides a comparison of the previous development footprints with the current impacts and the reduction of impacts for each habitat type.

[3] Lot X as defined pursuant to 3rd Revised VTTM 15230.

As detailed below, the Modified Project results in no new impacts or increases in the severity of impacts.

Table 1
VEGETATION IMPACTS AND IMPACT REDUCTION*

Habitat Type	Existing	Impacted[1]	Avoided	Impact Reduction[2]
Mule fat scrub	2.99	0.65	2.34	0.66 (50%)
Southern sycamore riparian woodland	0.33	0.14	0.19	0
Coast live oak woodland	12.42	0.73	11.69	4.36 (86%)
Ephemeral ponds	0.49	0.13	0.36	0.11 (46%)
Venturan-Diegan transition coastal sage scrub[3]	70.86	20.16	50.7	21.74(52%)
Southern mixed chaparral	6.02	0.15	5.87	5.25 (97%)
Annual grassland	123.12	64.27	58.85	38.53(37%)
Agriculture	5.44	0.58	4.86	-0.08
Ornamental	0.54	0	0.54	>0.1 (100%)
TOTAL	**222.2**	**86.81**	**135.4**	**70.57 (45%)**

*Existing and impact numbers provided in acres.
[1]Includes 3.2 acres of off-site impacts.
[2]Represents impact reduction from the Approved Project.
[3]Includes disturbed.

Table 2
VEGETATION IMPACT REDUCTION

Habitat Type	Existing	Approved Project Impacts[1]	Modified Project Impacts[2]	Impact Reduction[2]
Mule fat scrub	2.99	1.31	0.65	0.66 (50%)
Southern sycamore riparian woodland	0.33	0.14	0.14	0
Coast live oak woodland	12.42	5.09	0.73	4.36 (86%)
Ephemeral ponds	0.49	0.24	0.13	0.11 (46%)
Venturan-Diegan transition coastal sage scrub[3]	70.86	41.9	20.16	21.74 (52%)
Southern mixed chaparral	6.02	5.4	0.15	5.25 (97%)
Annual grassland	123.12	102.8	64.27	38.53 (37%)
Agriculture	5.44	0.5	0.58	-0.08
Ornamental	0.54	>0.1	0	>0.1 (100%)
TOTAL	**222.2**	**157.38**	**86.81**	**70.57 (45%)**

*Existing and impact numbers provided in acres.
[1]Includes 3.2 acres of off-site impacts.
[2]Represents impact reduction from the Approved Project.
[3]Includes disturbed.

Impacts to resources considered jurisdictional wetlands and non-wetland Waters of the U.S. by the USACE, and to resources considered jurisdictional by CDFW, will be further reduced by the Modified Project. The USACE impacts are reduced by 55 percent (Tables 3 and 4, *Waters of the U.S. Impacts*;

Figure 5, *USACE Impacts*), while CDFW impacts are reduced by 64 percent (Tables 5 and 6, *Waters of the State Impacts*; Figure 6, *CDFW Impacts*).

Table 3
WATERS OF THE U.S. IMPACTS*

Jurisdictional Feature	Existing	Proposed Impacts[1]	Avoided	Impact Reduction[2]
Ephemeral Pond	0.49	0.13	0.36	0.11 (46%)
Mule fat Scrub	1.47	0.27	1.20	0.42 (61%)
Oak Woodland	0.02	0	0.02	0
Streambed	3.58	0.59	2.99	0.66 (53%)
TOTAL	**5.56**	**0.99**	**4.57**	**1.19 (55%)**

*Existing and impact numbers provided in acres.
[1]Includes 0.03 acre of off-site impacts.
[2]Represents impact reduction from Approved Project.

Table 4
WATERS OF THE U.S. IMPACTS*

Jurisdictional Feature	Existing	Approved Project Impacts[1]	Modified Project Impacts[1]	Impact Reduction[2]
Ephemeral Pond	0.49	0.24	0.13	0.11 (46%)
Mule fat Scrub	1.47	0.69	0.27	0.42 (61%)
Oak Woodland	0.02	0	0	0
Streambed	3.58	1.25	0.59	0.66 (53%)
TOTAL	**5.56**	**2.18**	**0.99**	**1.19 (55%)**

*Existing and impact numbers provided in acres.
[1]Includes 0.03 acre of off-site impacts.
[2]Represents impact reduction from Approved Project.

Table 5
WATERS OF THE STATE IMPACTS*

Jurisdictional Feature	Existing	Proposed Impacts[1]	Avoided	Impact Reduction[2]
Ephemeral Pond	0.34	0.10	0.24	0.01 (9%)
Sycamore Woodland	0.30	0.14	0.16	-0.04[3]
Mule fat Scrub	3.00	0.53	2.47	0.98 (65%)
Oak Woodland	1.02	0.06	0.42	0.55 (90%)
Streambed	3.58	0.54	3.04	0.91 (63%)
TOTAL	**8.24**	**1.37**	**6.33**	**2.41 (64%)**

*Existing and impact numbers provided in acres.
[1]Includes 0.03 acre of off-site impacts.
[2]Represents impact reduction from the Approved Project.
[3]Change result of rounding rather than increase in impacts.

Table 6
WATERS OF THE STATE IMPACTS*

Jurisdictional Feature	Existing	Approved Project Impacts[1]	Modified Project Impacts[1]	Impact Reduction[2]
Ephemeral Pond	0.34	0.11	0.10	0.01 (9%)
Sycamore Woodland	0.30	0.10	0.14	-0.04[3]
Mule fat Scrub	3.00	1.51	0.53	0.98 (65%)
Oak Woodland	1.02	0.61	0.06	0.55 (90%)
Streambed	3.58	1.45	0.54	0.91 (63%)
TOTAL	**8.24**	**3.78**	**1.37**	**2.41 (64%)**

*Existing and impact numbers provided in acres.
[1]Includes 0.03 acre of off-site impacts.
[2]Represents impact reduction from the Approved Project.
[3]Change result of rounding rather than increase in impacts.

Coast live oak (*Quercus agrifolia;* oak) tree impacts were decreased from 181 individuals to three oak trees in the Modified Project, which is a 98 percent reduction from impacts approved in 2004 (Figure 4).

Although the impacts have been reduced significantly, impacts to sensitive habitats will be mitigated based on the approved mitigation measures adopted in the certified Environmental Impact Report and 2004 Addendum for the project. The mitigation areas, however, have been reconfigured and relocated to conform to resource agency permits. The revised mitigation areas are depicted on Figure 7, *Restoration Areas*. The only exception is the oak woodland mitigation, previously required for impacts to 2.87 acres of oak woodland, have been largely eliminated; oak woodland impacts totaling 0.73 acre with the Modified project are being mitigated through oak woodland restoration, and have been accomplished consistent with CDFW impacts. No additional impacts have occurred resulting from compliance with these requirements.

CONCLUSIONS

The Modified Project will reduce impacts from 157.38 acres to 86.81 acres, which represents an approximately 45 percent reduction from the Approved Project. The percentage of the project biological open space has increased from 30 to 56 percent. No additional impacts or adverse project impacts will result with implementation of the Modified Project.

Beneficial Change. The Modified Project will result in beneficial changes to biological resources from the Approved Project. No further impact analysis or additional mitigation measures are required.

Table 7
BIOLOGICAL IMPACT SUMMARY

Parameter	Yes/No?	Status and Comments
Changes in impact threshold?	No	FRSEIR 566 and 2004 Addendum remains valid
Changes in mitigation required?	No	FRSEIR 566 and 2004 Addendum remains valid

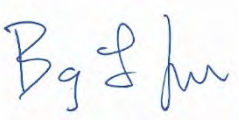
Table 7 (cont.)
BIOLOGICAL IMPACT SUMMARY

Parameter	Yes/No?	Status and Comments
Substantial changes in the severity of previously-identified significant impacts?	No	FRSEIR 566 and 2004 Addendum remains valid
New significant adverse impacts?	No	FRSEIR 566 and 2004 Addendum remains valid
New information that identifies new significant adverse impacts or changes the intensity of previously-identified impacts?	No	FRSEIR 566 and 2004 Addendum remains valid
Additional mitigation required?	No	FRSEIR 566 and 2004 Addendum remains valid

The Modified Project results in no new impacts or increases in the severity of impacts. There are no changes in the circumstances under which the Modified Project is being undertaken, and no new information of substantial importance regarding biological impacts has been identified that would alter the conclusions of the prior analysis in the previous environmental documentation.

Please call me if you have any questions regarding this report.

Sincerely,



Barry L. Jones

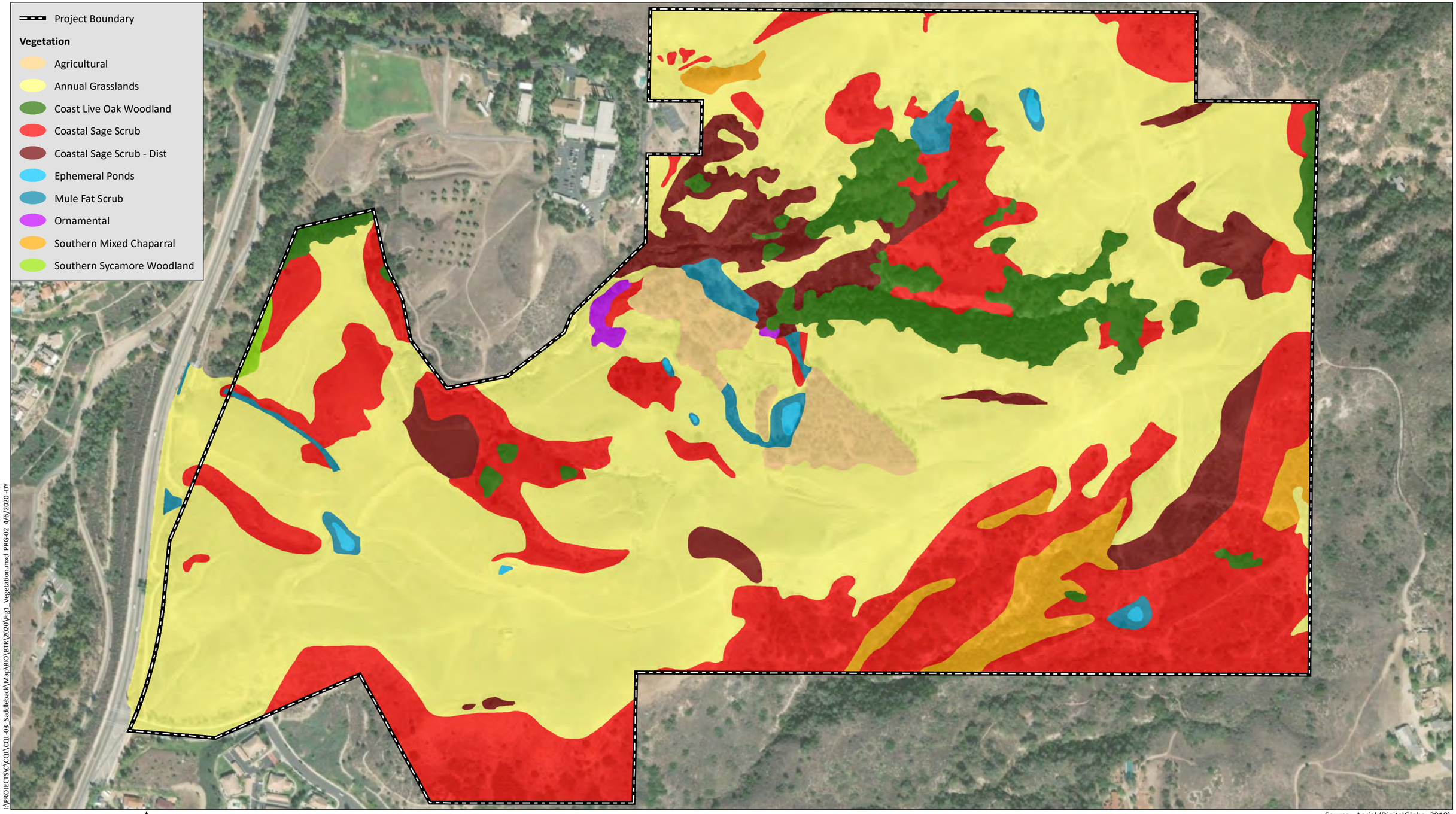
Senior Consulting Biologist

Enclosures:

Figure 1: Vegetation
Figure 2: USACE Jurisdiction
Figure 3: CDFW Jurisdiction
Figure 4: Vegetation Impacts
Figure 5: USACE Impacts
Figure 6: CDFW Impacts
Figure 7: Restoration Areas

REFERENCES

Helix Environmental Planning, Inc. 2002. Saddleback Meadows Biological Technical Report. Prepared for California Quartet. February 19.

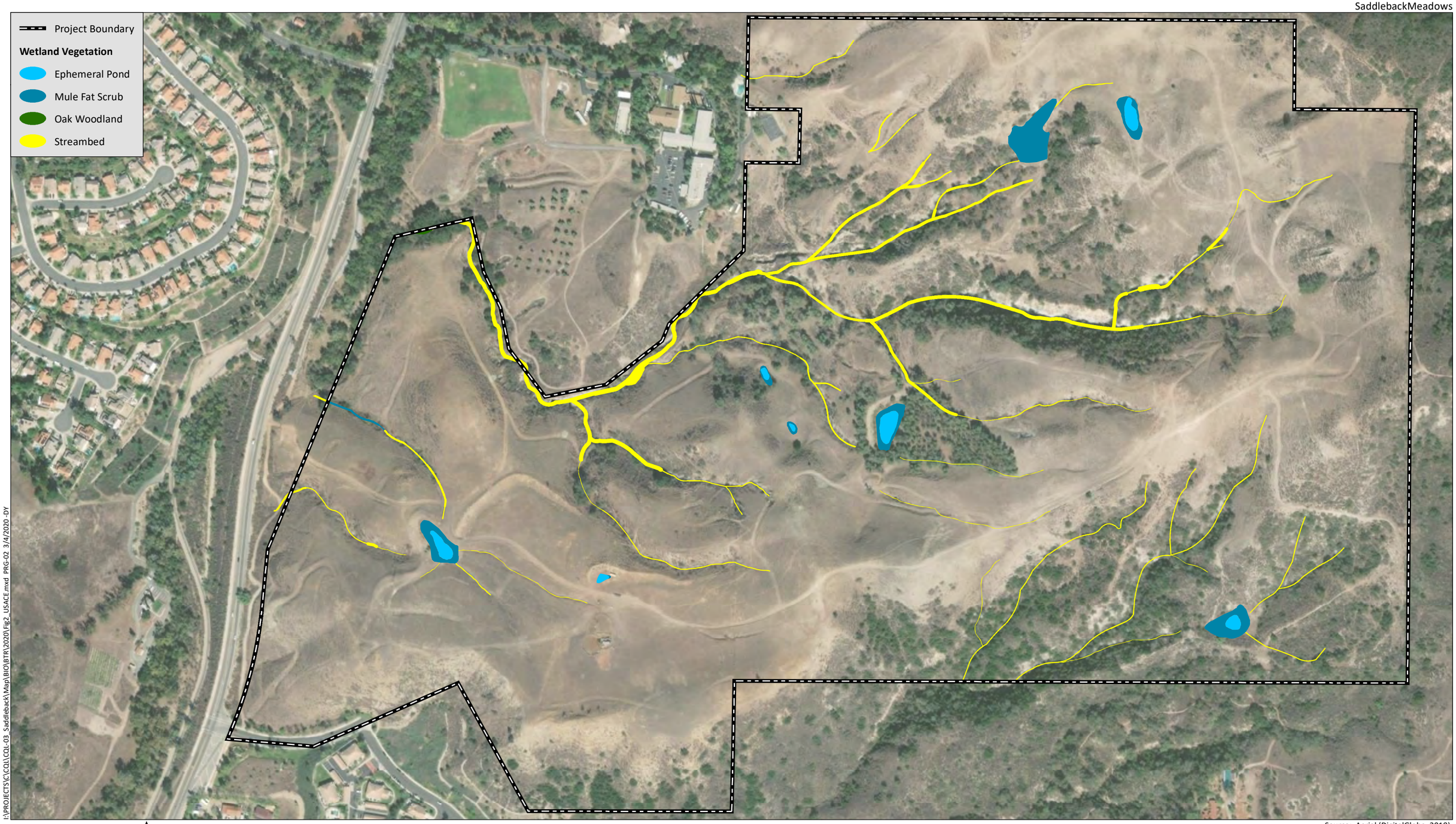


Source: Aerial (DigitalGlobe, 2018).

HELIX Environmental Planning

Vegetation

Figure 1

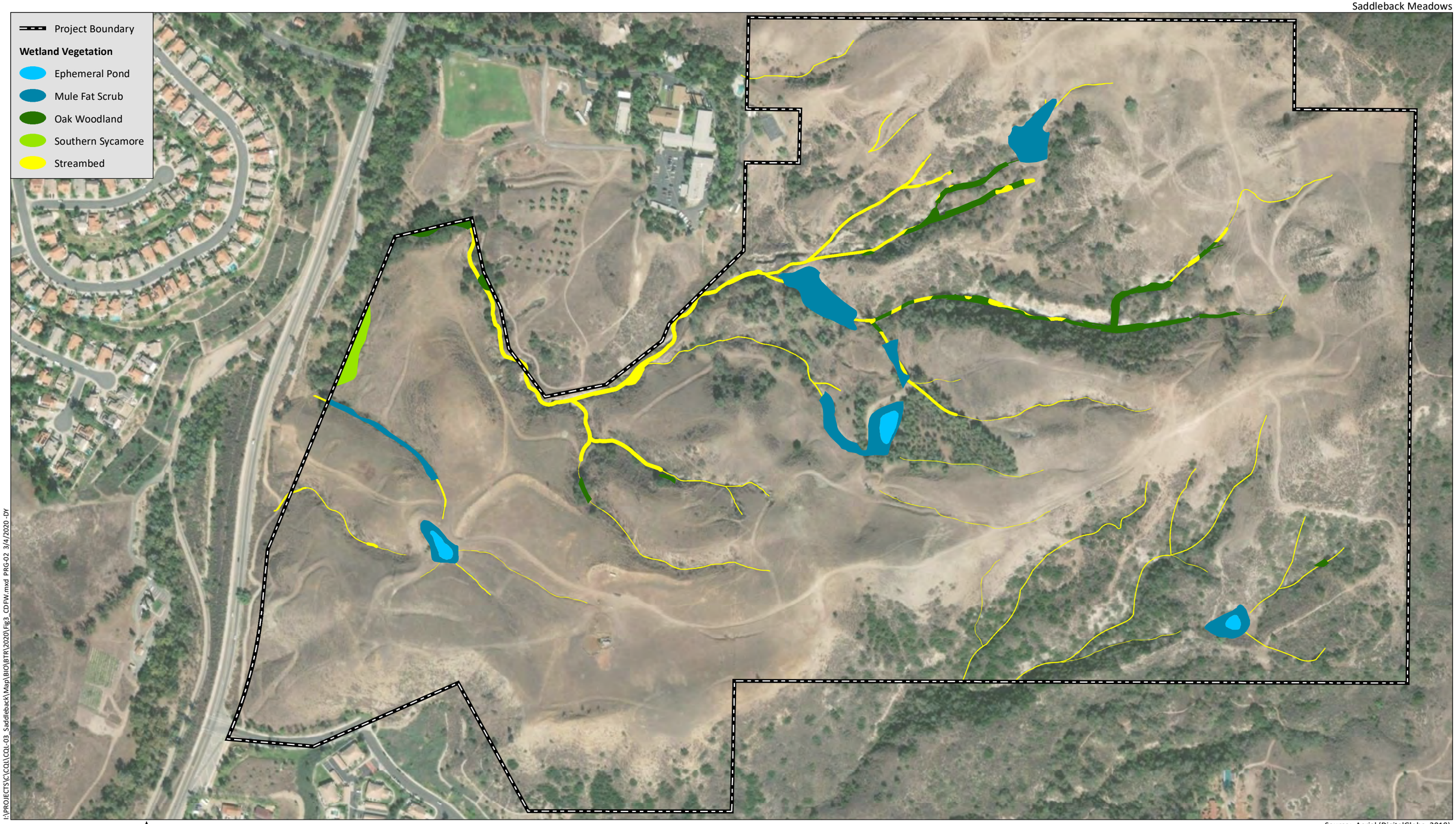


Source: Aerial (DigitalGlobe, 2018).

HELIX Environmental Planning

USACE Jurisdiction

Figure 2

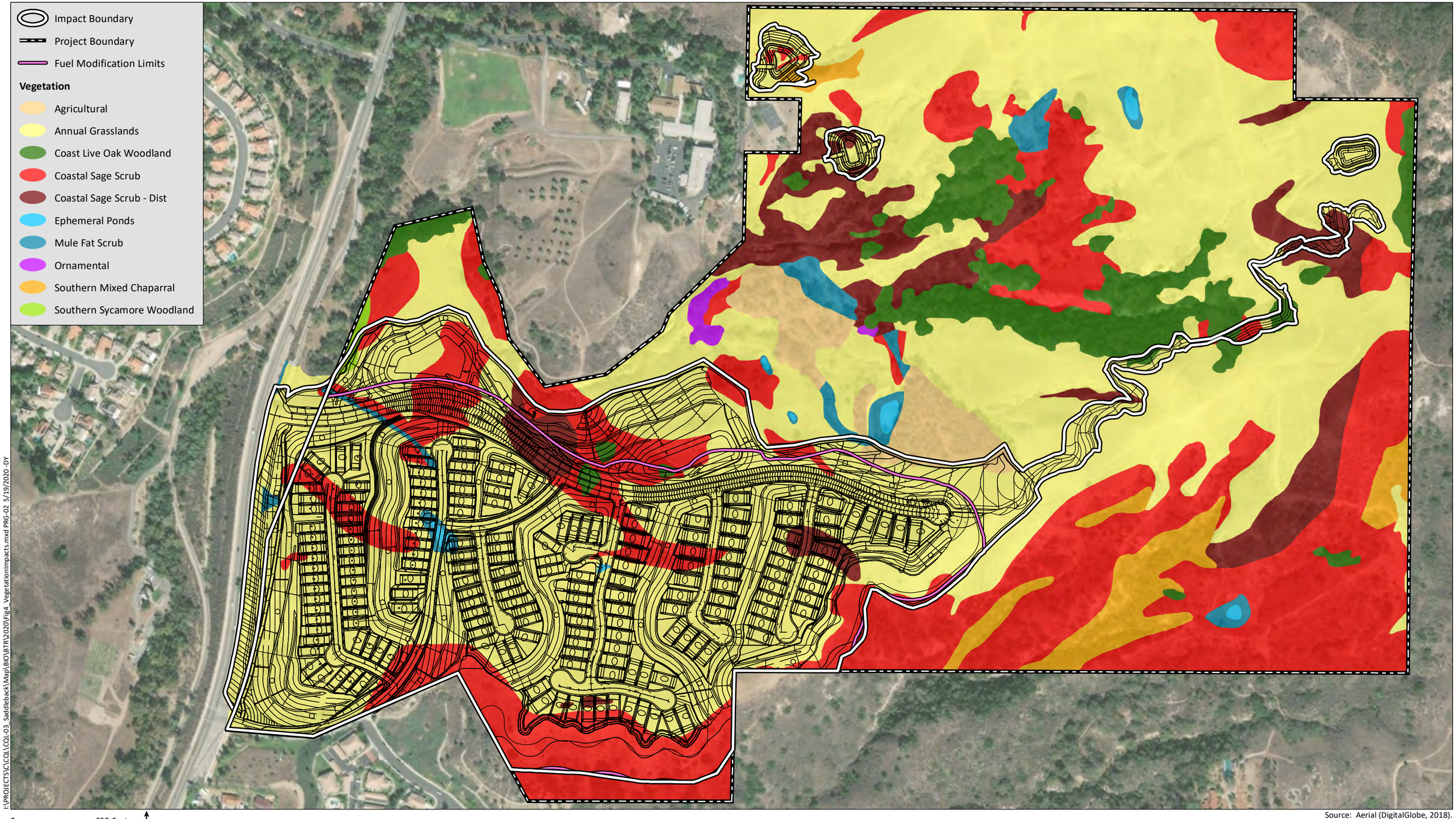


Source: Aerial (DigitalGlobe, 2018).

HELIX Environmental Planning

CDFW Jurisdiction

Figure 3

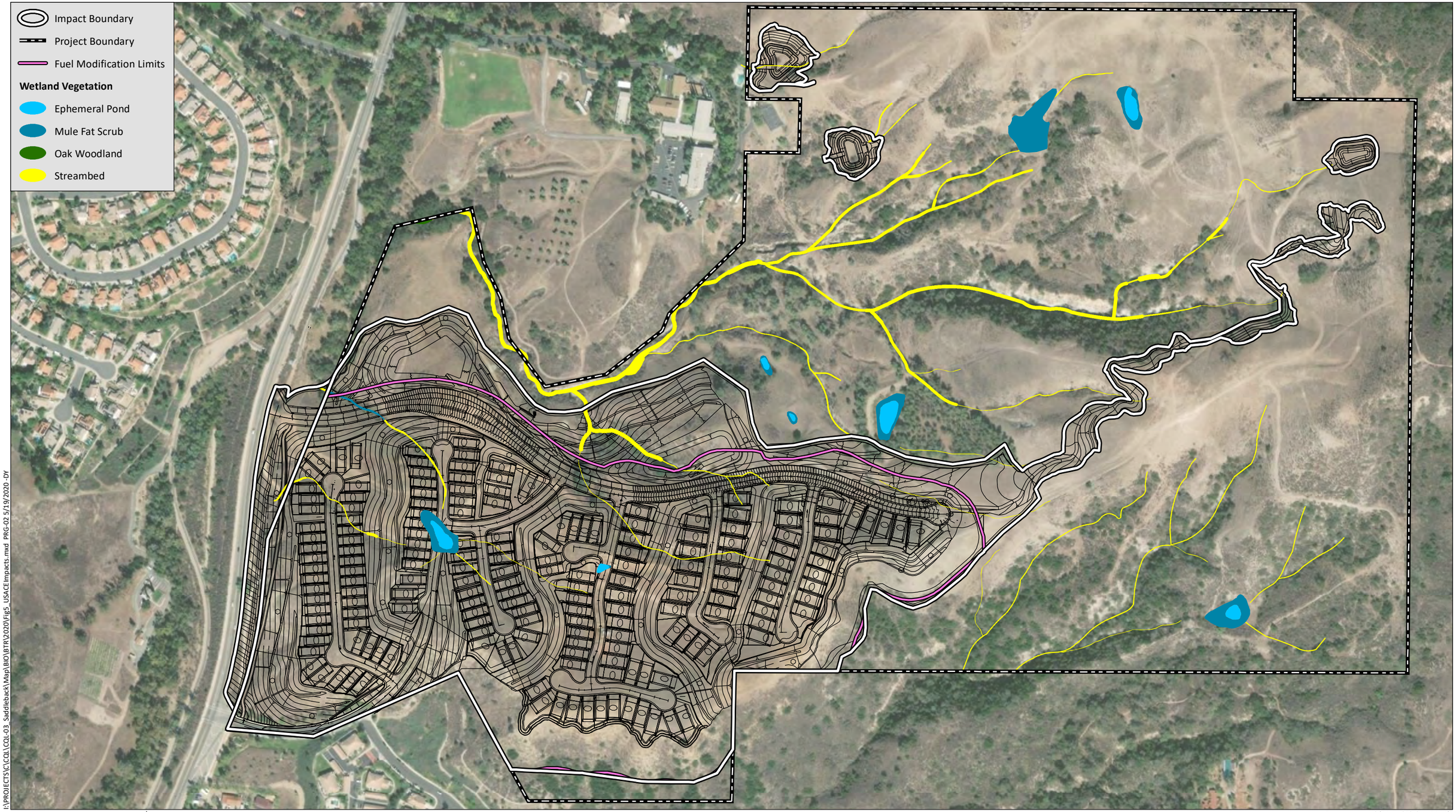


Source: Aerial (DigitalGlobe, 2018).

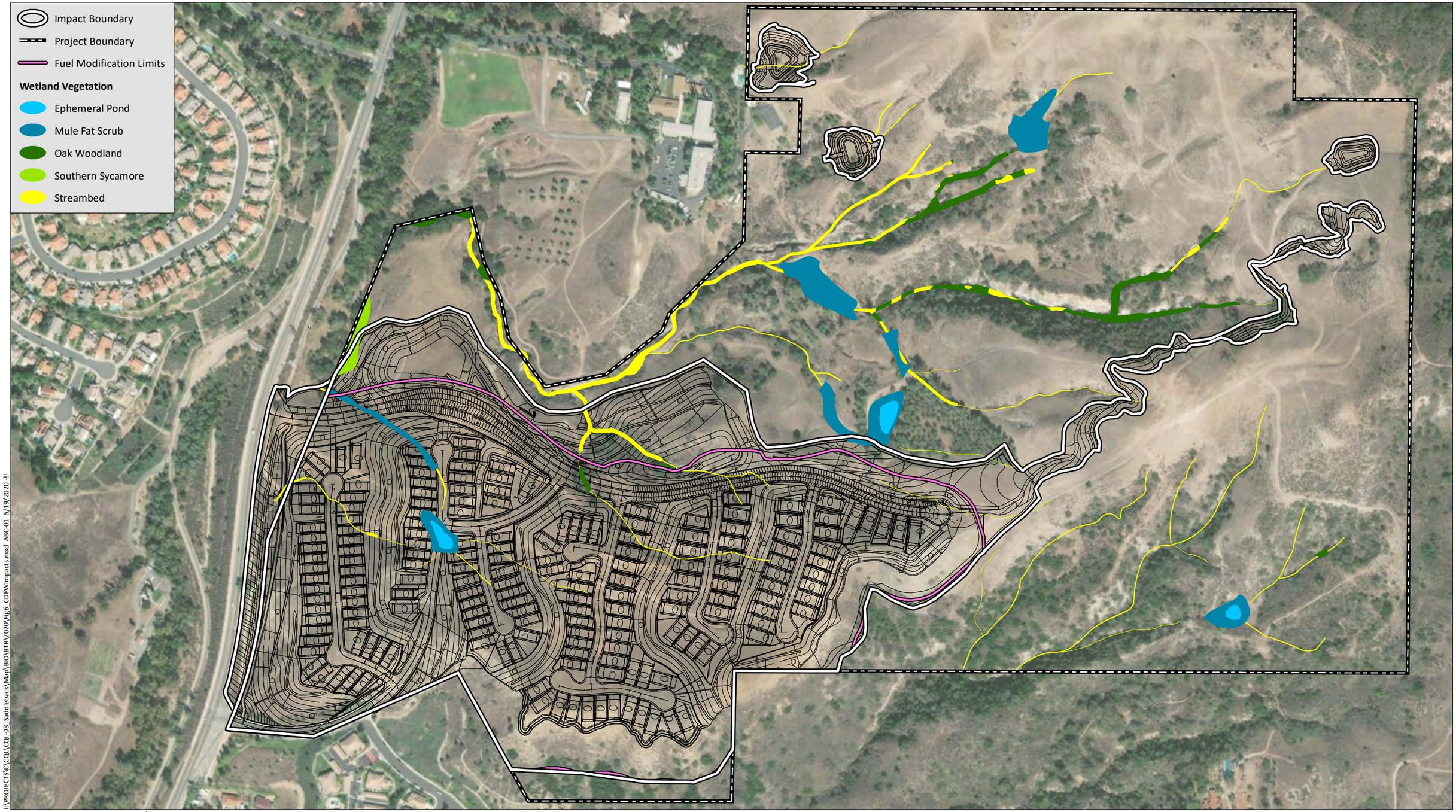
HELIX Environmental Planning

Vegetation Impacts

Figure 4



Source: Aerial (DigitalGlobe, 2018).

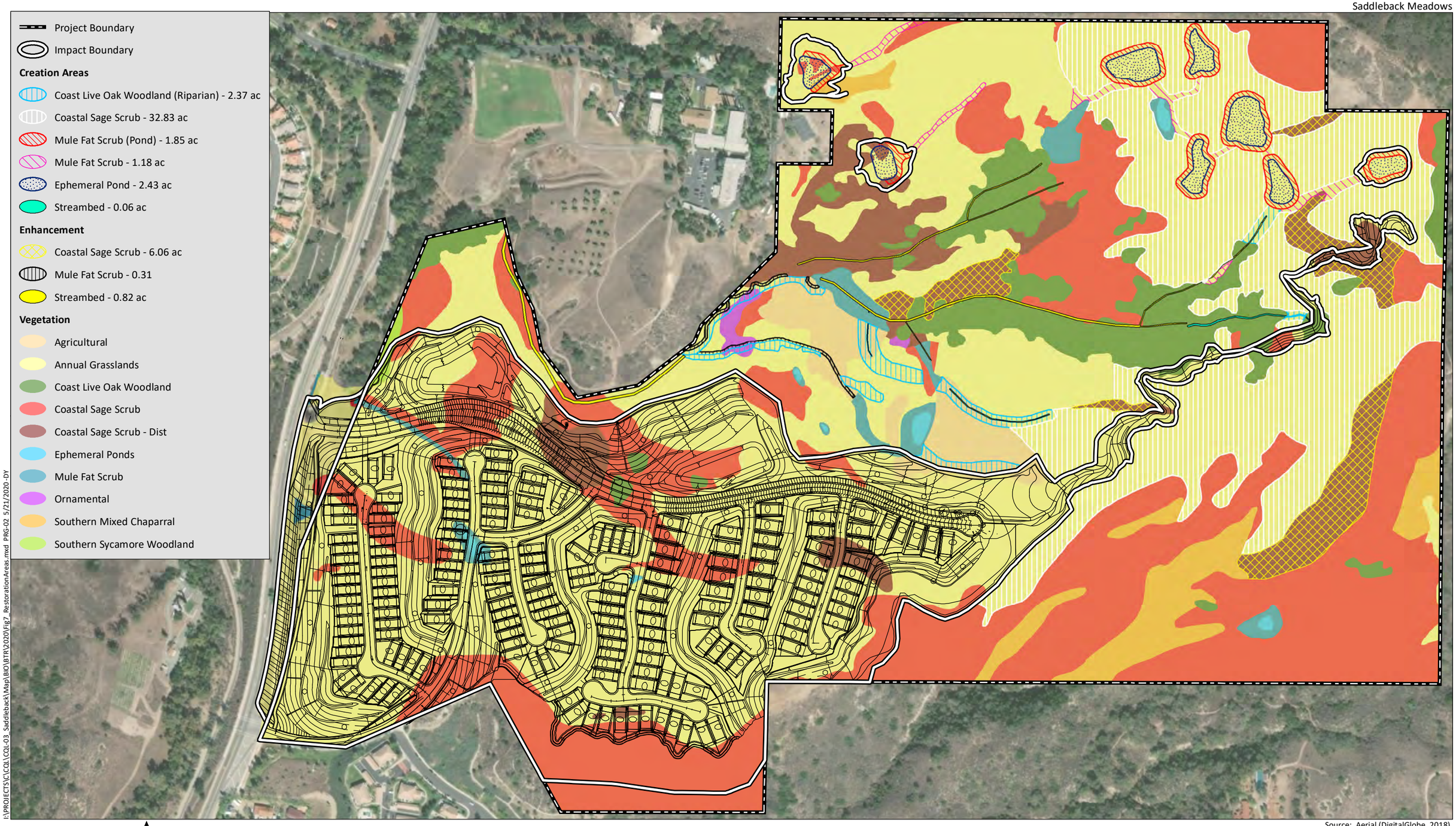


Source: Aerial (DigitalGlobe, 2018).

HELIX Environmental Planning

CDFW Impacts

Figure 6



Source: Aerial (DigitalGlobe, 2018).

HELIX Environmental Planning

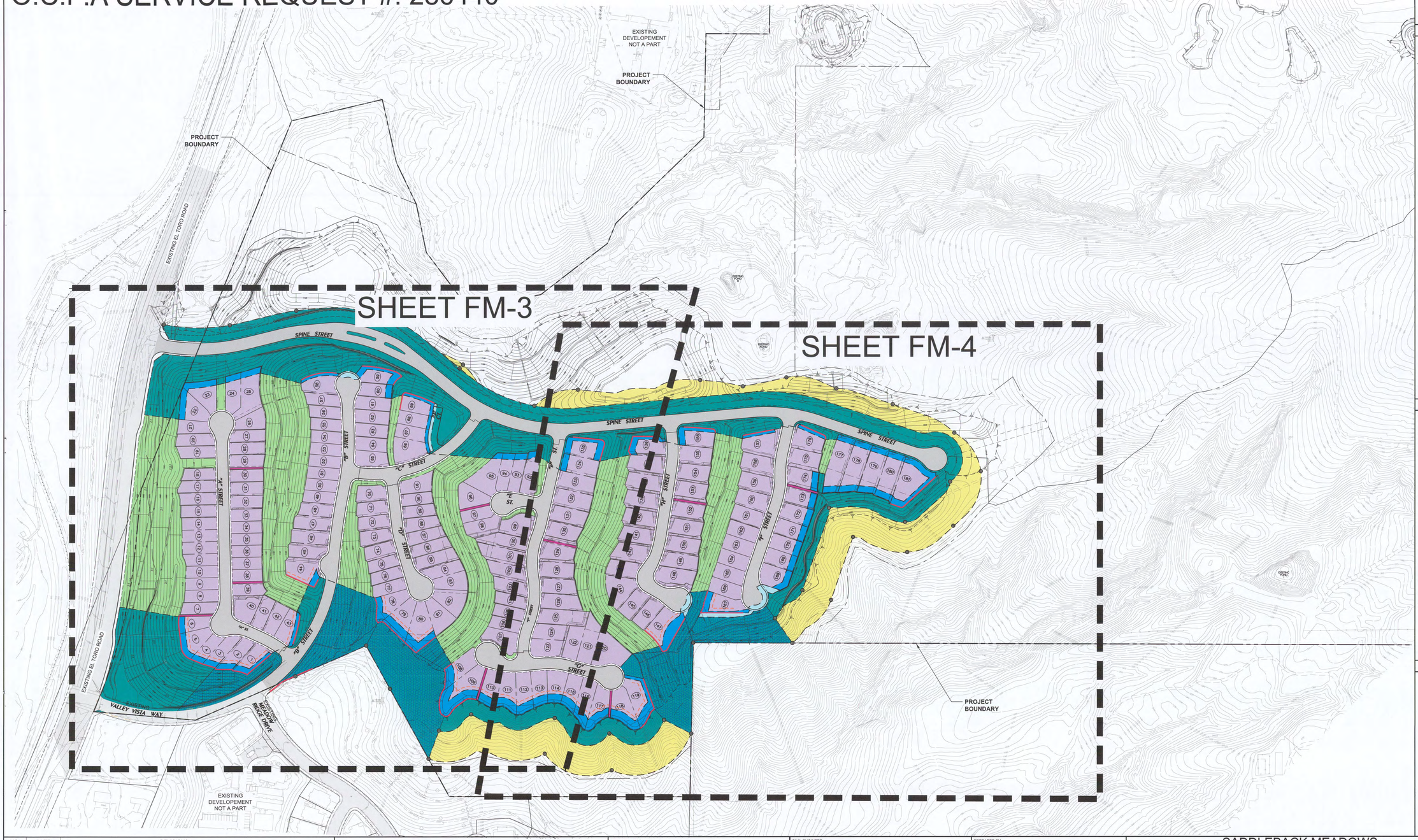
Restoration Areas

Figure 7

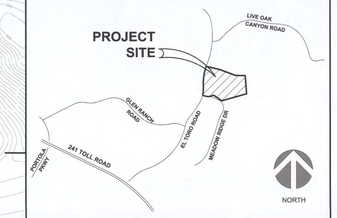
Appendix D

Fuel Modification and Fire Management Plan

SADDLEBACK MEADOWS
CONCEPTUAL FUEL MODIFICATION PLAN
TENTATIVE TRACT MAP 15230, UNINCORPORATED ORANGE COUNTY, CA
O.C.F.A SERVICE REQUEST #: 286440



VICINITY MAP



SHEET INDEX

NO. IN SET	SHEET TITLE
FM-1	TITLE SHEET
FM-2	FUEL MODIFICATION DETAILS & NOTES
FM-3	FUEL MODIFICATION LAYOUT
FM-4	FUEL MODIFICATION LAYOUT

ADDITIONAL NOTES

- THERE IS NO EXISTING FEDERALLY PROTECTED ANIMAL OR BIRD HABITAT WITHIN THE FUEL MODIFICATION AREAS WE ARE PROPOSING.
- THERE IS NO RESTRICTION REGARDING THE DATES OF PLANT DENSITY THINNING THROUGHOUT THE YEAR.
- MAINTENANCE IS REQUIRED IN THE LATE SPRING AND EARLY FALL EACH YEAR.
- THE PROJECT LANDSCAPE ARCHITECT HAS RESEARCHED THE SOIL AND STEEPNESS OF THE SLOPES AND THERE ARE NO GEOLOGICAL ISSUES PREVENTING THE REQUIRED MAINTENANCE TO BE PERFORMED.
- A 20' WIDE, 13'-6" VERTICAL CLEARANCE SHALL BE MAINTAINED AT ALL TIMES ON FIRE ACCESS ROADS. REFER TO THE APPROVED FIRE MASTER PLAN.
- THE CC & R'S SHALL BE SUBMITTED AND APPROVED BY OCFA PRIOR TO RECORDING THEM AND IT IS THE RESPONSIBILITY OF THE LANDSCAPE ARCHITECT OR CIVIL ENGINEER TO INFORM THE DEVELOPER OF THIS. THE CC & R'S SHALL HAVE A STATEMENT THAT THE VEGETATION MANAGEMENT PROGRAM SHALL BE MAINTAINED PER THE LATEST APPROVED PRECISE FUEL MODIFICATION PLANS, ATTACHMENT 5 AND ADDENDUM "1" LANGUAGE PROVIDED ON THIS PLAN SHALL BE INCLUDED WITHIN THE CC & R'S. THE CC & R'S SHALL ALSO DEMONSTRATE THAT THE SPECIAL MAINTENANCE AREAS ARE REQUIRED TO BE MAINTAINED PER THE APPROVED FUEL MODIFICATION PLANS, AND THE REQUIRED CONSTRUCTION FEATURES PER THE FIRE PROTECTION PLAN..
- WITHIN THE FUEL MODIFICATION ZONES, THE PLANT SPECIES FOR THE PRECISE FUEL MODIFICATION PLAN SHALL BE SELECTED FROM THE OCFA APPROVED PLANT PALETTE ATTACHMENT 8.
- THIS PROJECT IS WITHIN THE STATE RESPONSIBILITY AREA, VERY HIGH FIRE HAZARD SEVERITY ZONE.
- THIS PROJECT SHALL COMPLY WITH OCFA GUIDELINE B-09A FOR STATE RESPONSIBILITY AREAS
- ALL HOMEOWNER LOTS SHALL BE DEVOID OF PLANT SPECIES FROM ATTACHMENT 7 OF OCFA GUIDELINE C-05, UNDESIRABLE PLANT LIST. THIS RESTRICTION SHALL BE INCLUDED WITHIN THE RECORDED CC&R'S

OCFA APPROVAL

ORANGE COUNTY FIRE AUTHORITY
Reviewed by Planning & Development
Service Request Expires After 6 Months of Inactivity
Approval subject to field inspection and required test, notations hereon, conditions in correspondence and conformance with applicable regulations. The stamping of these plans shall not be held to permit or approve the violation of any law.
OCFA SR #: 286440
Fee Codes: 12.0
Plan Type: Conversion From Residential
By: Jim Hinerts
Emp #: 6350 Date: 8 / 12 / 2022
ONLY STAMPED SHEETS REVIEWED BY ORANGE COUNTY FIRE AUTHORITY
Call at least 48 hours in advance to schedule inspections: (714) 573-6150
Notes:

NO.	DATE	REVISIONS
1		
2		
3		
4		

SCALE: 1" =100'-0"
0 100' 200' 300' 400'
NORTH

SADDLEBACK MEADOWS - FUEL MOD PLAN	PLAN SET: "E"
PLAN CONTROL	DATE: 07/27/2022

PREPARED FOR:
CALIFORNIA QUARTET, L.P.
672 WATER STREET SW
WASHINGTON, D.C. 20024

CIVIL ENGINEER
HUNSAKER & ASSOCIATES
THREE HUGHES
IRVINE, CA 92618

PREPARED BY:
firesafe PLANNING SOLUTIONS
28486 AIROSO STREET
RANCHO MISSION VIEJO, CA 92694

SADDLEBACK MEADOWS
CONCEPTUAL FUEL MODIFICATION PLAN
TITLE SHEET
TENTATIVE TRACT MAP 15230 - UNINCORPORATED ORANGE COUNTY
OCFA SERVICE REQUEST NO. 286440
ORANGE COUNTY FIRE AUTHORITY

SHEET
FM-1
OF 4

S.R. 286440 SADDLEBACK MEADOWS - CONCEPTUAL FUEL MODIFICATION PLAN

ATTACHMENT 1 - NEW CONSTRUCTION INSEPCTION REQUIREMENTS

THE BUILDER OR DEVELOPER SHALL CALL OCFA INSPECTION SCHEDULING AT 714-573-6150 FOR THESE 3 NEW CONSTRUCTION INSPECTIONS:

1. PRIOR TO DROPPING OF LUMBER; SCHEDULE A "VEGETATION CLEARANCE" INSPECTION: PRIOR TO DROPPING LUMBER, THE DEVELOPER/BUILDER SHALL PROVIDE A SEPARATION OF COMBUSTIBLE VEGETATION FOR A MINIMUM DISTANCE OF 100 FEET FROM THE LOCATION OF THE STRUCTURES AND LUMBER STOCK-PILE. AN INSPECTION SIGN-OFF AND/OR RELEASE LETTER TO THE BUILDING DEPARTMENT IS REQUIRED.
2. PRIOR TO OCCUPANCY OF THE BUILDING: SCHEDULE A "FINAL FUEL MODIFICATION" INSPECTION: THE FMZ, SMA, AND RPZ ADJACENT TO STRUCTURES MUST BE INSTALLED, IRRIGATED, AND INSPECTED. THIS INCLUDES PHYSICAL INSTALLATION OF FEATURES IDENTIFIED IN THE APPROVED PRECISE FUEL MODIFICATION PLANS (INCLUDING, BUT NOT LIMITED TO, PLANT ESTABLISHMENT, THINNING, IRRIGATION, ZONE MARKERS, ACCESS EASEMENTS, ETC.). AN OCFA INSPECTOR WILL PROVIDE WRITTEN APPROVAL OF COMPLETION AT THE TIME OF THIS FINAL INSPECTION ON THE BUILDING CARD. A WRITTEN DISCLOSURE WILL BE REQUESTED BY THE OCFA INSPECTOR INDICATING THAT THE LANDOWNER IS AWARE OF THE FMZ ON THEIR LAND.
3. PRIOR TO HOMEOWNER ASSOCIATION (HOA) OR LANDOWNER MAINTENANCE ACCEPTANCE FROM DEVELOPER OR BUILDER: SCHEDULE A "OWNER TURNOVER" INSPECTION: THIS INSPECTION / MEETING MUST HAPPEN WITH OCFA STAFF PRIOR TO ACCEPTING THE MAINTENANCE RESPONSIBILITY FROM THE DEVELOPER OR BUILDER:
   A. THE INSPECTION / MEETING MUST INCLUDE THE FOLLOWING REPRESENTATIVES:
      1. LANDSCAPE ARCHITECT
      2. PROPERTY MANAGER OR HOMEOWNER
      3. HOA BOARD MEMBER
      4. INSTALLING LANDSCAPE COMPANY
      5. HOA LANDSCAPE COMPANY
   B. AT THE TIME OF TURNOVER, THE FUEL MODIFICATION AREAS SHALL BE MAINTAINED BY THE DEVELOPER OR BUILDER AS ORIGINALLY INSTALLED AND APPROVED.
   C. THE ACCEPTING LANDOWNER IS RESPONSIBLE FOR ENSURING THE DEVELOPER OR BUILDER SUFFICIENTLY CALCULATED THE AMOUNT OF REVENUE NEEDED TO PERFORM THE ON-GOING MAINTENANCE OF THE FMZS AND ANY SMAS PER THE APPROVED PLANS.
   D. A COPY OF THE APPROVED PLANS MUST BE PROVIDED TO THE HOA REPRESENTATIVES OR HOMEOWNER AT THIS TIME.
   E. LANDSCAPE ARCHITECT MUST CONVEY ONGOING MAINTENANCE REQUIREMENTS TO HOA REPRESENTATIVES OR HOMEOWNER.
   F. AN OCFA WRITTEN DISCLOSURE WILL BE REQUIRED TO BE SIGNED BY THE HOA REPRESENTATIVES OR HOMEOWNER INDICATING THAT THE HOA OR HOMEOWNER IS AWARE OF THE FMZ ON THEIR LAND AND THAT THEY ARE AWARE OF THE IMPORTANCE OF THE RETAINING THE PLANS AND THE ON-GOING MAINTENANCE.
   G. THE RESPONSIBILITY AND NECESSARY LANGUAGE FOR MAINTENANCE MUST ALSO BE STATED WITHIN THE CC AND R'S (REFER TO ATTACHMENT 5).
   H. AN OCFA WRITTEN DISCLOSURE WILL BE REQUIRED TO BE SIGNED BY THE HOA REPRESENTATIVES OR HOMEOWNER INDICATING THAT THE HOA OR HOMEOWNER IS AWARE OF THE FMZ ON THEIR LAND AND THAT THEY ARE AWARE OF THE IMPORTANCE OF THE RETAINING THE PLANS AND THE ON-GOING MAINTENANCE.
   I. THE RESPONSIBILITY AND NECESSARY LANGUAGE FOR MAINTENANCE MUST ALSO BE STATED WITHIN THE CC AND R'S (REFER TO ATTACHMENT 5).

ATTACHMENT 2 - INTRODUCTORY MAINTENANCE INFORMATION

THE FMZ, SMA, RPZ SHALL BE MAINTAINED IN PERPETUITY FOR FIRE SAFETY PURPOSES, AND SHALL CAUSE A COVENANT TO BE RECORDED AND REFERENCED IN THE CC AND R'S OR ON THE PROPERTY TITLE WHEN THERE IS NO HOA INVOLVEMENT.

EMERGENCY ACCESS COVENANTS SHALL BE IDENTIFIED ON THE TRACT MAP INDICATING THE RESERVATION AND RESTRICTION FOR PERMANENT ENTRY BY THE HOA OR FIRE AUTHORITY.

SELECT EITHER OPTION #1 OR #2 BELOW

OPTION #1 MAINTENANCE METHOD

A. ON-GOING MAINTENANCE SHALL OCCUR AS TO PRESERVE THE ORIGINALLY APPROVED DESIGN AS FOUND ON THE APPROVED PLANS. ATTACHMENT 6 SPACING IS REQUIRED AND ONLY APPROVED PLANTING SPECIES AND ARRANGEMENTS ON THE PLANS ARE PERPETUALLY PRESERVED.
B. THE PROPERTY OWNER IS RESPONSIBLE FOR ALL MAINTENANCE OF FMZ, SMA, AND RPZ.
C. THIS INCLUDES A MINIMUM OF TWO MAINTENANCE ACTIVITIES EACH YEAR.
D. PERFORM MAINTENANCE SOMETIME WITHIN TIME PERIODS OF MIDDLE TO LATE SPRING AND ONCE AGAIN IN EARLY TO MIDDLE FALL.
E. OTHER ACTIVITIES INCLUDE; GRASSES ARE CUT TO 4 INCHES AFTER ANNUAL SEEDING, ATTACHED DEAD AND DYING, ALL VEGETATION LITTER, AND ATTACHMENT 7 SPECIES REMOVED FROM THE ZONES, MAINTENANCE OF IRRIGATION SYSTEMS, REPLACEMENT OF DEAD OR DYING VEGETATION WITH APPROVED SPECIES, REMOVAL OF TREES AND SHRUBS NOT ON THE APPROVED PLANS.
F. IF MAINTAINED BY AN HOA, THE LANDSCAPE MAINTENANCE COMPANY AND/OR PROPERTY MANAGER SHALL INSPECT THE FMZS THROUGHOUT THE YEAR TO IDENTIFY WHERE SPECIFIC MAINTENANCE ACTIVITIES NEED TO TAKE PLACE.
G. THE OCFA MAY CONDUCT INSPECTIONS OF ESTABLISHED FUEL MODIFICATION AREAS. ONGOING MAINTENANCE SHALL BE CONDUCTED A MINIMUM OF TWICE EACH YEAR REGARDLESS OF THE DATES OF THESE INSPECTIONS.
H. THE PROPERTY OWNER SHALL RETAIN ALL APPROVED FUEL MODIFICATION PLANS. THE PLANS SHALL BE USED TO PERFORM THE MAINTENANCE.

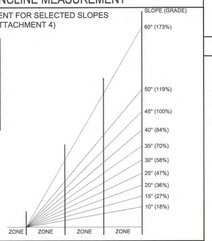
OPTION #2 MAINTENANCE METHOD

ON-GOING MAINTENANCE SHALL OCCUR PER THE CURRENT POSTED OCFA VEGETATION MODIFICATION MAINTENANCE GUIDELINES AT OCFA.ORG". DISTANCES OF FMZ, SMA, AND RPZ WILL ALWAYS REMAIN REQUIRED AND WILL BE SPECIFIC TO APPROVED FUEL MODIFICATION PLAN

ATTACHMENT 3 - INCLINE MEASUREMENT

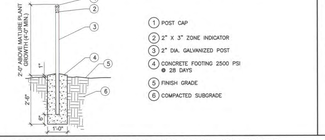
INCLINE MEASUREMENT FOR SELECTED SLOPES
(SEE ATTACHMENT 4)

SLOPE	ZONE WIDTH A	B	C	D
0°	20'	50'	50'	50'
10°	20'	51'	51'	51'
15°	20'	52'	52'	52'
20°	20'	53'	53'	53'
25°	20'	55'	55'	55'
30°	20'	58'	58'	58'
35°	20'	61'	61'	61'
40°	20'	65'	65'	65'
45°	20'	71'	71'	71'
50°	20'	78'	78'	78'
60°	20'	100'	100'	100'



ATTACHMENT 4 - IDENTIFICATION MARKER DETAIL

ZONE MARKER DETAILS
(MARKER DISTANCE SHALL BE INCREASED ON SLOPES TO ACCOMMODATE INCLINE MEASUREMENTS IN ACCORDANCE WITH ATTACHMENT 3)



1. POST CAP
2. 2" X 3" ZONE INDICATOR
3. 2" DIA. GALVANIZED POST
4. CONCRETE FOOTING 2500 PSI @ 28 DAYS
5. FINISH GRADE
6. COMPACTED SUBGRADE

OCFA GUIDELINE C-05 - FUEL MODIFICATION ZONES

A. FUEL MODIFICATION ZONE 'A'
1. FLAT LEVEL GROUND REQUIREMENT
2. 20-FOOT MINIMUM WIDTH
3. BUILDING FOUNDATION SETBACK (NO DESIGN ALTERNATIVES ALLOWED)
   A. ZONE "A" (20 FEET WIDE)
   B. SETBACK FROM THE SLOPE NEAREST THE FOUNDATION.
   C. NO COMBUSTIBLE CONSTRUCTION ALLOWED IN SETBACK.
   D. AUTOMATIC IRRIGATION SYSTEMS TO MAINTAIN HEALTHY VEGETATION WITH HIGH MOISTURE CONTENT AND BE REGULARLY IRRIGATED.
   E. PLANTS IN THIS ZONE SHALL BE HIGHLY FIRE RESISTANT AND SELECTED FROM ATTACHMENT 8 (REFER TO ATTACHMENT 8 AND SECTION 3).
   F. IF ALL ZONES A-D ARE TO BE MAINTAINED BY THE STRUCTURE OWNER, THEN ZONE A SHALL BEGIN AT THE WALL OF THE STRUCTURE

B. FUEL MODIFICATION ZONE 'B'
1. REQUIRED AT THE NEAREST SLOPE ADJOINING ZONE A.
2. IRRIGATED AND PLANTED PER ATTACHMENT 8.
3. COULD REPLACE ZONES C/D WHEN GRADING PLANS REQUIRE LARGER REPLANTED AREAS.
4. ALL PLANT SPECIES DESIGNED FOR ZONE B SHALL BE SELECTED FROM ATTACHMENT 8, EXISTING FUEL MODIFICATION MAINTENANCE PROGRAMS ARE LIMITED TO THE PLANTS LISTED ON THE APPROVED PLANS UNLESS A REVISION IS REQUESTED. PLANTING AND MAINTENANCE SHALL BE IN ACCORDANCE WITH PLANTING RESTRICTIONS FROM ATTACHMENTS 6, 7, AND 8.
5. NO COMBUSTIBLE CONSTRUCTION IS ALLOWED WITHIN ZONE B.

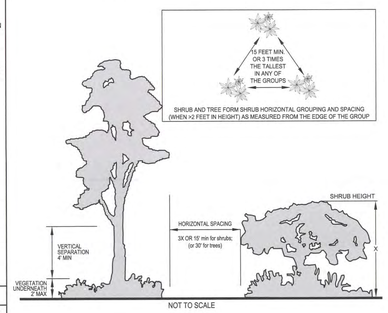
C. ON-SLOPE ZONE "C/D" (0-100 FEET WIDE)
1. ONE NATURAL VEGETATION THINNING (ZONE C) OR TWO THINNING ZONES (ZONE C/D).
2. PLANTING INSTALLATION PER ATTACHMENT 6, IF INSTALLING PLANTS.
3. SEE SECTION 4 ALTERNATIVES.
4. PLANTS SPECIES INTRODUCED INTO ZONE C AND D SHALL BE SELECTED FROM ATTACHMENT 8. MAINTENANCE SHALL BE IN ACCORDANCE WITH ATTACHMENTS 6 AND 7. (SEE SECTION 3)
5. NO COMBUSTIBLE CONSTRUCTION IS ALLOWED WITHIN ZONE C AND D.

OCFA GUIDELINE C-05 - SECTION 1.S

1. THE DEVELOPER WILL OBTAIN PLANTING PLAN APPROVAL FROM OCFA PRIOR TO RECEIVING FINAL APPROVAL FROM ALL OTHER PERMITTING AGENCIES; WITHIN FMZS FMZ, INTERIOR SLOPES / COMMON AREA LANDSCAPING SMA, AND RPZ.
2. FMZ, SMA AND RPZ LAND AREAS WERE PURCHASED AND DEDICATED FOR THE PURPOSES OF WILDFIRE MAINTENANCE ACTIVITIES, BEAUTIFICATION, AND EROSION CONTROL. PROTECTED PLANTS AND HABITAT IDENTIFIED AFTER FUEL MODIFICATION PLAN APPROVAL THROUGH SURVEYS OR OTHER BIOLOGICAL PROGRAMS CANNOT BE RETROFITTED BACK WITHIN THE LIMITS OF THESE AREAS.
3. THE DEVELOPER IS RESPONSIBLE TO ENSURE THE CALCULATED REVENUE FROM HOMEOWNERS DUES, IS SUFFICIENT TO COVER THE COST OF FUTURE MAINTENANCE, BASED ON THE ORIGINALLY APPROVED DESIGN. CHANGES TO THE FUEL MODIFICATION AREAS OR INTERRUPTED MAINTENANCE ACTIVITIES BY THE FINAL LANDOWNER, AFTER THE FINAL LANDOWNER HAS ACCEPTED THE LONG-TERM MAINTENANCE RESPONSIBILITY, BECOME THE RESPONSIBILITY OF THE FINAL LANDOWNER.
4. WHEN A REQUIRED MAINTENANCE AREA IS LOCATED ON COMMONLY OWNED LAND, WHILE THE REQUIRED ZONE "A" IS LOCATED ON HOMEOWNERS LAND, A WRITTEN DISCLOSURE REGARDING THE ZONE "A" AND VEGETATION REQUIREMENT IS REQUIRED TO BE SIGNED BY THE HOMEOWNER AND THE LOT NUMBER REFERENCED IN THE CC AND R'S.
5. THE FMZ, SMA AND RPZ SHALL BE MAINTAINED IN PERPETUITY FOR FIRE SAFETY PURPOSES, IN ACCORDANCE WITH RECORDED COVENANTS AND CC AND R'S, AND PROPERTY TITLE RESTRICTIONS.
6. PRIOR TO DROPPING OF LUMBER, CALL FOR A VEGETATION CLEARANCE INSPECTION: PRIOR TO DROPPING LUMBER, THE DEVELOPER/BUILDER SHALL PROVIDE A SEPARATION OF COMBUSTIBLE VEGETATION FOR A MINIMUM DISTANCE OF 100 FEET FROM THE LOCATION OF THE STRUCTURES AND LUMBER STOCK-PILE. AN INSPECTION SIGN-OFF AND/OR RELEASE LETTER TO THE BUILDING DEPARTMENT IS REQUIRED.

ATTACHMENT 6 - PLANT SPACING REQUIREMENTS

REQUIREMENTS FOR PLANTING INSTALLATION IN FUEL MODIFICATION ZONES
(FOR ON-GOING REQUIREMENTS, SEE ATTACHMENT 2, AND THE OCFA VEGETATION MODIFICATION MAINTENANCE GUIDELINES)



HORIZONTAL SPACING

VEGETATION LESS THAN 2 FEET IN HEIGHT:
- NO HORIZONTAL SPACING OR VERTICAL SEPARATION IS REQUIRED IN ALL ZONES. GROUND COVER IN ZONE B SHOULD COVER THE ENTIRE GROUND BETWEEN GROUPS OF SHRUBS, TREES OR GRASSES. GROUND COVER SHALL NOT EXCEED 2 FEET IN HEIGHT.

SHRUBS AND TREES 2 FEET IN HEIGHT OR GREATER:

SHRUB AND TREE GROUP SIZE:
- ALL SHRUBS AND TREES CAN BE IN GROUPS OF 3 SPECIMENS OR LESS. NO HORIZONTAL SPACING IS REQUIRED INSIDE THE GROUP.

SHRUB / TREE-FORM SHRUB GROUP SPACING:
- GROUPS OF SHRUBS SHALL BE SPACED BY THE GREATER OF THE FOLLOWING TWO MEASUREMENTS: A DISTANCE OF 15 FEET MINIMUM OR) 3 TIMES THE HEIGHT OF THE TALLEST SPECIMEN IN ANY OF THE GROUPS.
- NO VEGETATION OVER 2 FEET IN HEIGHT IS ALLOWED WITHIN 15 FEET FROM THE EDGE OF TREE CANOPY(S).

TREE GROUP SPACING:
- GROUPS OF TREES SHALL BE SPACED BY A DISTANCE OF 30 FEET MINIMUM REGARDLESS OF HEIGHT.

VERTICAL SEPARATION

SHRUBS AND TREES LESS THAN 10 FEET IN HEIGHT:
- WHEN THE FUEL MODIFICATION ZONE IS WITHIN 30 FEET OF THE STRUCTURE, A VERTICAL SEPARATION OF 2 FEET MINIMUM IS REQUIRED FROM THE VEGETATION BELOW. (NOT REQUIRED IS SHRUBS ARE FURTHER THAN 30 FEET FROM THE STRUCTURE).

SHRUBS AND TREES 10 FEET IN HEIGHT OR GREATER:
- A VERTICAL SEPARATION OF 4 FEET MINIMUM IS REQUIRED TO BE MAINTAINED FROM THE VEGETATION BELOW.
- TREES ONLY: ALL VEGETATION LOCATED UNDERNEATH TREES, SHALL BE A MAXIMUM OF 2 FEET IN HEIGHT.

ATTACHMENT 7 - UNDESIRABLE & INVASIVE PLANT SPECIES

CERTAIN PLANTS ARE CONSIDERED TO BE UNDESIRABLE AND INVASIVE DUE TO THEIR CHARACTERISTICS. THESE CHARACTERISTICS CAN BE EITHER PHYSICAL OR CHEMICAL. PHYSICAL PROPERTIES THAT WOULD CONTRIBUTE TO HIGH FLAMMABILITY INCLUDE LARGE AMOUNTS OF DEAD MATERIAL RETAINED WITHIN THE PLANT, ROUGH OR PEELING BARK, AND THE PRODUCTION OF COPIOUS AMOUNTS OF LITTER. CHEMICAL PROPERTIES INCLUDE THE PRESENCE OF VOLATILE SUBSTANCES SUCH AS OILS, RESINS, WAX, AND PITCH. CERTAIN NATIVE PLANTS ARE NOTORIOUS FOR CONTAINING THESE VOLATILE SUBSTANCES.

PLANTS WITH THESE CHARACTERISTICS SHALL NOT BE PLANTED IN ANY FUEL MODIFICATION ZONES OR ANYWHERE WITH ALTERNATE METHODS & MATERIALS AGREEMENTS (SEE SECTION 4). SHOULD THESE SPECIES ALREADY EXIST WITHIN THESE AREAS, THEY SHALL BE REMOVED BECAUSE OF THEIR INVASIVENESS OR POTENTIAL THREAT THEY POSE TO ANY STRUCTURES.

PLANT SPECIES (MANDATORY REMOVAL)

BOTANICAL NAME	COMMON NAME
CYNARA CARDUNCULUS	ARTICHOKE THISTLE
RICINUS COMMUNIS	CASTOR BEAN PLANT
CIRSIUM VULGARE	WILD ARTICHOKE
BRASSICA NIGRA	BLACK MUSTARD
SILYBUM MARIANUM	MILK THISTLE
SACSOLA AUSTALIS	RUSSIAN THISTLE/TUMBLEWOOD
NICOTIANA BIGELEVIL	INDIAN TOBACCO
NICOTIANA GLAUCA	TREE TOBACCO
LACTUCA SERRIOLA	PRICKLY LETTUCE
CONYZA CANADENSIS	HORSEWEED
HETEROTHACA GRANDIFLORA	TELEGRAPH PLANT
ANTHEMIX COTULA	MAYWEED
URTICA URENS	BURNING NETTLE
CORONOPUS DIDYMA	NOARY CRESS, PERENNIAL PEPPERGRASS
BRASSICA RAPA	WILD TURNIP; YELLOW MUSTARD, FIELD MUSTARD
ADENOSTOMA FASCICULATUM	CHAMISE
ADENOSTOMA SPARSIFOLIUM	RED SHANKS
CORTADERIA SELLOANA	PAMPAS GRASS
ARTEMISIA CALIFORNICA	CALIFORNIA SAGEBRUSH
ERIODONUM FASCICULATUM	COMMON BUCKWHEAT
SALVIA MELLIFERA	BLACK SAGE
NASSELLA / STIPA TENUISSIMA	MEXICAN FEATHERGRASS
ORNAMENTAL:	
CORTADERIA	PAMPAS GRASS
CUPRESSUS SP	CYPRESS
EUCALYPTUS SP	EUCALYPTUS
JUNIPERUS SP	JUNIPER
PINUS SP	PINE
ARECACEAE (ALL PALM SP)	PALMS

ATTACHMENT 5 - SAMPLE CC&R MAINTENANCE LANGUAGE

IT IS RECOMMENDED THAT THE FOLLOWING LANGUAGE BE INCLUDED IN THE CC&RS RECORDED FOR A COMMON INTEREST DEVELOPMENT:

"THE DUTY OF THE HOMEOWNERS' ASSOCIATION TO PERFORM "FIRE PREVENTION MAINTENANCE" (AS DEFINED BELOW) FOR ALL FMZS AND MANUFACTURED INTERIOR SLOPES WITHIN THE DEVELOPMENT SHALL BE INCLUDED AS AN EXPRESS OBLIGATION IN THE RECORDED CC&RS FOR THE DEVELOPMENT. SIMILARLY, EACH OWNER WHOSE LOT (OR CONDOMINIUM) IS SUBJECT TO FMZ RESTRICTIONS (E.G., NON-COMBUSTIBLE STRUCTURE SETBACK, ETC.) SHALL BE OBLIGATED TO COMPLY WITH SUCH RESTRICTIONS."

1. THE OCFA WILL BE DESIGNATED AS A THIRD PARTY BENEFICIARY OF A HOMEOWNER ASSOCIATION'S DUTY TO PERFORM "FIRE PREVENTION MAINTENANCE" (AS DEFINED BELOW) FOR ALL PORTIONS OF THE ASSOCIATION PROPERTY OR COMMON AREA THAT CONSTITUTE FMZS AND DESIGNATED INTERIOR/MANUFACTURED SLOPES TO BE MAINTAINED BY THE HOMEOWNERS' ASSOCIATION, AND OF ANY OWNER'S DUTY TO COMPLY WITH ANY FMZ RESTRICTIONS APPLICABLE TO THEIR LOT OR CONDOMINIUM. ADDITIONALLY, OCFA SHALL HAVE THE RIGHT, BUT NOT THE OBLIGATION, TO ENFORCE THE HOMEOWNERS' ASSOCIATION'S DUTY TO PERFORM SUCH FIRE PREVENTION MAINTENANCE, AND TO ENFORCE COMPLIANCE BY ANY OWNER WITH ANY FMZ RESTRICTIONS APPLICABLE TO THEIR LOT OR CONDOMINIUM. IN FURTHERANCE OF SUCH RIGHT THE OCFA SHALL BE ENTITLED TO RECOVER ITS COSTS OF SUIT, INCLUDING ITS ACTUAL ATTORNEYS' FEES, IF IT PREVAILS IN AN ENFORCEMENT ACTION AGAINST A HOMEOWNERS' ASSOCIATION AND/OR AN INDIVIDUAL OWNER. (A SAMPLE THIRD PARTY BENEFICIARY PROVISION TO BE INCORPORATED INTO THE CC&RS IS ATTACHED HERETO AS ADDENDUM "1").

2. AS USED HEREIN, "FIRE PREVENTION MAINTENANCE" SHALL MEAN THE FOLLOWING:
   A. ALL PORTIONS OF THE ASSOCIATION PROPERTY OR COMMON AREA THAT CONSTITUTE FMZS OR DESIGNATED INTERIOR/MANUFACTURED SLOPES SHALL BE REGULARLY MAINTAINED BY THE HOMEOWNERS ASSOCIATION ON A YEAR-ROUND BASIS IN ACCORDANCE WITH THE FUEL MODIFICATION PLAN ON FILE WITH THE PROPERTY MANAGER FOR THE DEVELOPMENT.
   B. THE IRRIGATION SYSTEM FOR FMZS OR DESIGNATED INTERIOR/MANUFACTURED SLOPES SHALL BE KEPT IN GOOD CONDITION AND PROPER WORKING ORDER AT ALL TIMES. THE IRRIGATION SYSTEM SHALL NOT BE TURNED OFF EXCEPT FOR NECESSARY REPAIRS AND MAINTENANCE.

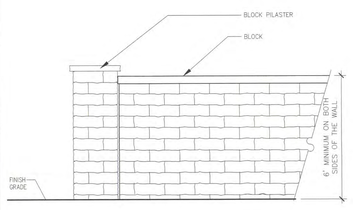
ADDENDUM "1"

ENFORCEMENT BY THE OCFA: THE OCFA IS HEREBY DESIGNATED AS AN INTENDED THIRD PARTY BENEFICIARY OF THE ASSOCIATION'S DUTIES TO PERFORM "FIRE PREVENTION MAINTENANCE" FOR ALL PORTIONS OF THE ASSOCIATION PROPERTY OR COMMON AREAS CONSISTING OF FMZS OR DESIGNATED INTERIOR/MANUFACTURED SLOPES IN ACCORDANCE WITH THE FUEL MODIFICATION PLAN, AND OF EACH OWNER'S DUTY TO COMPLY WITH ANY FMZ OR DESIGNATED INTERIOR/MANUFACTURED SLOPES RESTRICTIONS APPLICABLE TO THEIR LOT OR CONDOMINIUM AS SET FORTH IN THE FUEL MODIFICATION PLAN. IN FURTHERANCE THEREOF, THE OCFA SHALL HAVE THE RIGHT, BUT NOT THE OBLIGATION, TO ENFORCE THE PERFORMANCE BY THE ASSOCIATION OF ITS DUTIES AND ANY OTHER FIRE PREVENTION REQUIREMENTS WHICH WERE IMPOSED BY THE OCFA OR OTHER PUBLIC AGENCY AS A CONDITION OF APPROVAL FOR THE DEVELOPMENT (E.G. , PROHIBITION OF PARKING IN FIRE LANES, MAINTENANCE OF THE BLUE REFLECTIVE MARKERS INDICATING THE LOCATION OF FIRE HYDRANTS, ETC.) AND SHALL ALSO HAVE THE RIGHT, BUT NOT THE OBLIGATION, TO ENFORCE COMPLIANCE BY ANY OWNER WITH ANY FMZ OR DESIGNATED INTERIOR/MANUFACTURED SLOPES RESTRICTIONS APPLICABLE TO THEIR LOT OR CONDOMINIUM AS SET FORTH IN THE FUEL MODIFICATION PLAN. IF IN ITS SOLE DISCRETION, THE OCFA SHALL DEEM IT NECESSARY TO TAKE LEGAL ACTION AGAINST THE ASSOCIATION OR ANY OWNER TO ENFORCE SUCH DUTIES OR OTHER REQUIREMENTS, AND PREVAILS IN SUCH ACTION, THE OCFA SHALL BE ENTITLED TO RECOVER THE FULL COSTS OF SAID ACTION INCLUDING ITS ACTUAL ATTORNEYS' FEES, AND TO IMPOSE A LIEN AGAINST THE ASSOCIATION PROPERTY, OR AN OWNER'S LOT OR CONDOMINIUM, AS THE CASE MAY BE, UNTIL SAID COSTS ARE PAID IN FULL.

SPECIFIC PRIVATE HOMEOWNER LOTS WITH FUEL MODIFICATION ZONE 'A' SHALL BE RESTRICTED THE USE OF PLANT SPECIES FROM ATTACHMENT 7 OF OCFA GUIDELINE C-05, UNDESIRABLE PLANT LIST. THIS RESTRICTION SHALL BE INCLUDED WITHIN THE RECORDED CC&R'S

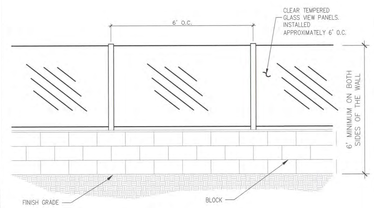
SOLID FENCING - BLOCK WALL

ALL FOOTING, REBAR AND INSTALLATION SPECIFICATIONS PER STRUCTURAL ENGINEER. FINAL DESIGN BY LANDSCAPE ARCHITECT AND/OR CIVIL ENGINEER

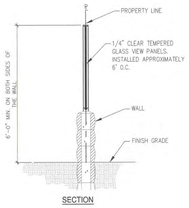


SOLID FENCING - TEMPERED GLASS (OR EQUAL) AND BLOCK

ALL FOOTING, REBAR AND INSTALLATION SPECIFICATIONS PER STRUCTURAL ENGINEER. FINAL DESIGN BY LANDSCAPE ARCHITECT AND/OR CIVIL ENGINEER



ELEVATION



SECTION

SAMPLE LOTS WITH A PRIVATE HOMOWNER SETBACK AREA (PHSA) TYPICAL DISCLOSURE EXHIBIT

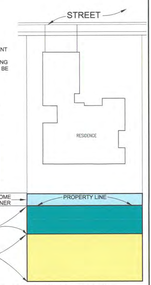
LEGEND

ZONE "A" NON - COMBUSTIBLE CONSTRUCTION
0'-0" TO 33'-00" SETBACK ZONE FOR NON-COMBUSTIBLE CONSTRUCTION ONLY.
ZONE "A" SHOULD BE MAINTENANCE BY HOMEOWNER'S ASSOCIATION

ZONE "B"
FULLY IRRIGATED WET ZONE
(100% REMOVAL OF UNDESIRABLE PLANT SPECIES)
HOMEOWNERS ASSOCIATION MAINTAINED PER OCFA MAINTENANCE GUIDELINES, AREA PLANTED WITH APPROVED PLANT PALETTE ONLY.

ZONE "C" THINNING ZONE (50%THINING NATIVE SHRUBS):
MAXIMUM 100' OUT FROM ZONE B. ZONE C SHALL BE NON-IRRIGATED AND REQUIRES HORIZONTAL AND VERTICAL SPACING OF PLANT GROUPS IN ACCORDANCE WITH ATTACHMENT 6 AND REMOVAL OF ALL DEAD AND DYING VEGETATION AND UNDESIRABLE SPECIES FROM ATTACHMENT 7. MINIMUM THINNING PERCENTAGE OF PLANT REMOVAL IS 50%. ZONE C AREA SHALL BE MAINTAINED BY THE HOMEOWNERS ASSOCIATION.

RADIANT HEAT ZONE
ALL RESIDENTIAL STRUCTURES AS INDICATED ON THE FIRE PROTECTION PLAN AND FUEL MODIFICATION PLAN SHALL COMPLY WITH ALL PORTIONS OF THE 2016 CALIFORNIA BUILDING CODE CHAPTER 7A AND/OR THE 2019 CALIFORNIA RESIDENTIAL CODE SECTION R337.



NOTES:
1. HOMEOWNER / PROPERTY OWNER IS RESPONSIBLE TO MAINTAIN THE ZONE "A" BACK PER APPROVED FUEL MODIFICATION PLAN GUIDELINES.
2. LOT NUMBERS ON LOT SHALL BE RESTRICTED TO THE USE OF (DEVOID OF) PLANT SPECIES FROM THE UNDESIRABLE PLANT LIST, ATTACHMENT 7 OF OCFA GUIDELINE C-05. THIS RESTRICTION SHALL BE INCLUDED WITHIN THE RECORDED CC&RS.

I UNDERSTAND AND AGREE TO COMPLY WITH ALL PRIVATE HOMEOWNER SETBACK AREA REQUIREMENTS AND RADIANT HEAT CONSTRUCTION REQUIREMENTS FROM THE APPROVED FUEL MODIFICATION PLAN WHICH APPLY TO THIS PROPERTY:

BUYER SIGNATURE _____ BUYER SIGNATURE _____

DATE _____ DATE _____

OCFA ALTERNATE MATERIALS AND METHODS REQUEST

July 27, 2022

Juan Huerta
Senior Fire Prevention Specialist
Planning and Development Services Section
Orange County Fire Authority
1 Fire Authority Road
Irvine, CA 92656-0086

Subject: Saddleback Meadows
Alternate Means and Methods for Fuel Modification
Unincorporated Orange County, CA 92602
OCFA SR# 286440

On behalf of the California Quartet, L.P., we hereby submit a request for use of Alternate Means and Methods (AM&M), per the 2019 California Fire Code. Our request relates to Fuel Modification Zone distances.

The following information is being provided to assist in your evaluation of this proposed AM&M.

A. Project Information:

- Project Name: Saddleback Meadows
- Contact Person: David Oatis, Firesafe Planning Solutions, (949) 240-5911
- 28486 Airoso Street, Rancho Mission Viejo, CA 92694
- Current Landowner/Developer: California Quartet, L.P.
- Development Type: Single Family Home

B. Code Sections for which the modification is requested:

- 2019 California Fire Code (CFC) Section 104.9 Alternate Materials and Methods.

C. General Description:

The Saddleback Meadows project is a new development within Unincorporated Orange County near the City of Mission Viejo and City of Lake Forest. The project site is east of El Toro Road, just north of Glenn Ranch Way and south of Ridgeline Road. To the west the project site it is adjoined by El Toro Road, to the southwest, the project is adjoined by existing residential communities along Meadow Ridge Lane. To north, the project boundary is adjoined by the existing Double R Ranch. The project is located within a State Responsibility Area Very High Fire Hazard Severity Zone, with continuous open space along the north, east and southeast of the project.

D. Fuel Modification Plan

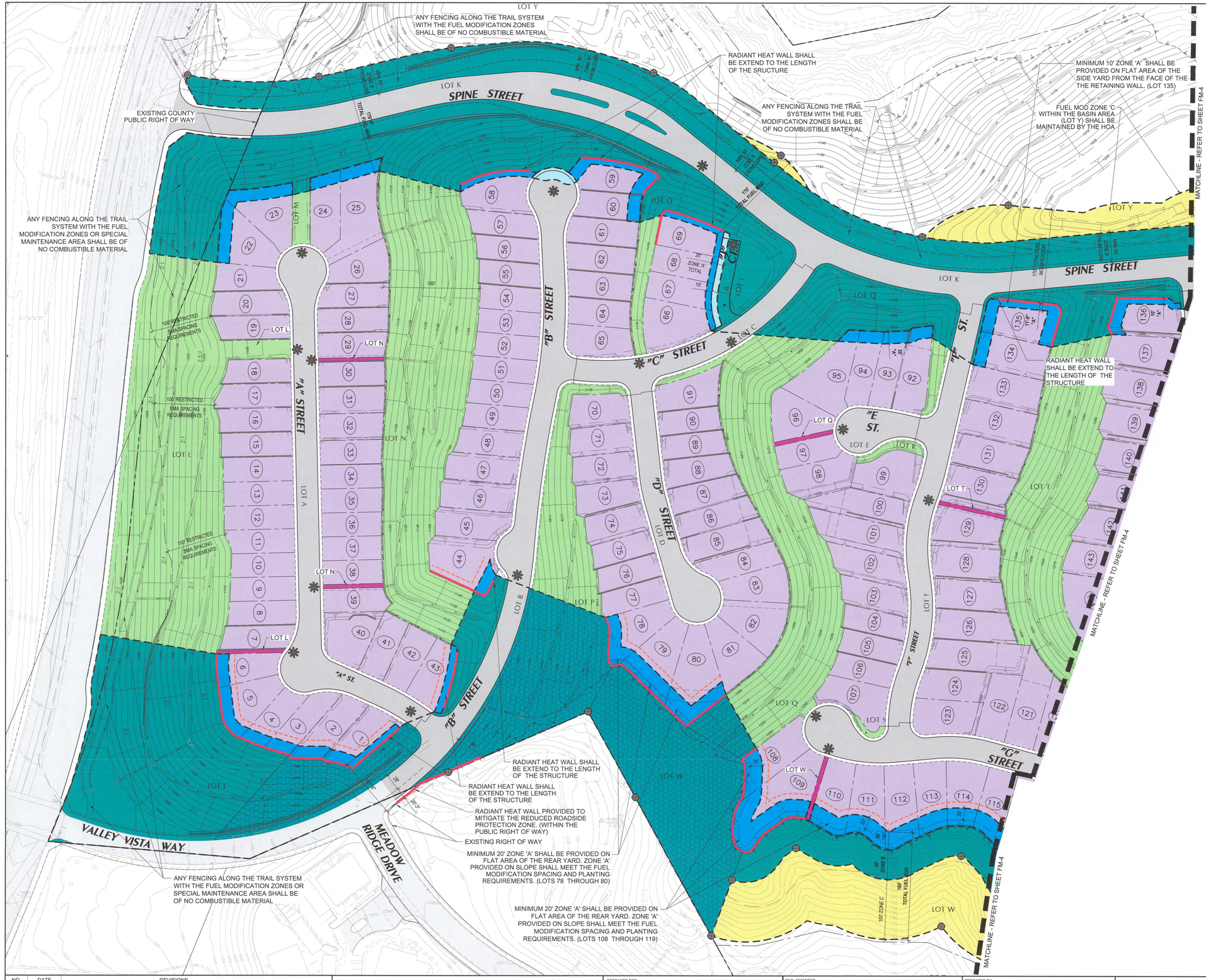
The Fuel Modification program for Saddleback Meadows consist of a minimum of 170-feet along the northern and eastern edge, as well as the majority of the southern edge. Along the southern edge where the fuel modification does not meet the 170-feet, the fuel modification is reduced to no less than 100-feet.

E. Hardship:

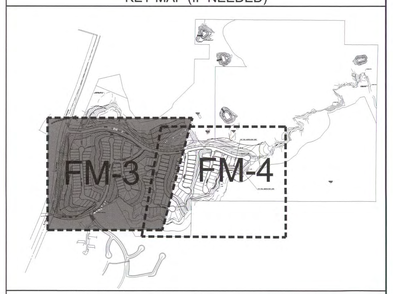
Our Hardship is: To meet the minimum open space totals and the grading constraints the minimum 170-feet of fuel modification cannot be met in all cases. Additionally, the side yard conditions adjoining the fuel modification do not allow for the minimum 20-foot flat Zone A in some cases.

F. Proposed Alternative Fire Protection Measures:

1. Lots 1 - 6, 43, 44, 58, 59, 69, 78 - 80, 108 - 119, 135, 136, 147, 156, 157, 167, 176 and 181 shall be provided with a Radiant Heat Wall along the Rear and/or Sideyard property line adjoining the fuel modification for the reduced total fuel modification distances; or for a reduced flat Zone 'A' from the minimum 20-feet to a minimum 10-feet on the flat pad. Refer to detail(s) provided on the Fuel Modification Plan for the minimum requirements. Any slope area within the Private Homeowner lot that is to be maintained by the Homeowner (not the HOA) between the flat 10-foot sideyard Zone 'A' and the HOA Zone 'B', shall be maintained to meet the Zone 'A' requirements by the Homeowner. A Radiant Heat Wall shall also be provided along "B" Street at the intersection of existing Valley Vista Way to mitigate the reduced Roadside Protection Zone.
2. Venting for passive attic ventilation shall not be permitted on structures on lots 1 - 6, 43, 44, 78 - 80, 108 - 119, 147 and 167 on the side facing the fuel modification as indicated on the Fuel Modification Plan for the reduced total fuel modification distances.
3. In areas where the fuel modification is less than 170-feet, the Zone 'B' has been increased out from the Zone 'A' to complete the minimum 100' of total fuel modification. The reduced fuel modification areas shall not have any dry thinning zones.
4. Along Lots 1, 2, 78 - 80, 108, 109, 119, 120, 147 & 167 the Zone 'B' shall consist of a minimum of 25% succulent material (such as cactus and agaves) and a minimum of 25% rock material. Groundc



KEY MAP (IF NEEDED)



FUEL MODIFICATION LEGEND

ZONE A - NON-COMBUSTIBLE CONSTRUCTION:
5'-00" TO 33'-0" Setback zone for non-combustible construction only. Zone A shall be maintained by the Private Homeowner.

ZONE A - NON-COMBUSTIBLE CONSTRUCTION:
15'-0" TO 20'-0" Setback zone for non-combustible construction only. Zone A shall be maintained by the Homeowner's Association.

ZONE B - WET ZONE (100% REMOVAL UNDESIRABLE SHRUBS):
Minimum 50' from Zone A. Zone B shall be permanently irrigated, fully landscaped with approved drought tolerant, deep rooted, moisture retentive material. If any new plant material is added this zone shall be planted with container shrub material. Zone B area shall be maintained by the Homeowners Association.

ZONE C - THINNING ZONE (50% THINNING NATIVE SHRUBS):
Minimum 100' out from Zone B. Zone C shall be non-irrigated and requires horizontal and vertical spacing of plant groups in accordance with Attachment 6 and removal of all dead and dying vegetation and undesirable species from Attachment 7. Minimum thinning percentage of plant removal is 50%. Zone C area shall be maintained by the Homeowners Association.

ZONE B PLANTING OR DEFICIENT FUEL MODIFICATION:
Planting within the Zone B as indicated in this plan, shall be designed and installed with a minimum of 25% succulent material (such as cactus and agaves) and a minimum of 25 % of rock material. Rock material shall be a minimum of 8-inches in diameter. Groundcover in planted areas between the succulent and rock groupings shall naturally grow to no more than 2-feet in height and only single specimen trees are permitted (no groups of trees). This shall be maintained as such in perpetuity.

SPECIAL MAINTENANCE AREA (SMA)- WET ZONE:
The Special Maintenance Areas have maintenance requirements to reduce the chances of ignition from wildfires. They need maintenance just as fuel modification zones do and shall be maintained on a year round basis, with removal of all dead and dying plant material, replacement of dead or diseased species with plant material with the same growth characteristics from the approved landscape plans. Irrigation shall be verified on a regular basis to ensure it is in a working a condition and the plants shall be irrigated as necessary to keep them healthy with their appropriate moisture content. A copy of the approved Landscape Plans shall be provided to the HOA by the developer and remain on record indefinitely with the HOA. Copies of plans shall be provided to the contracted maintenance company. It is the responsibility of the HOA to forward a copy of the approved plans to the HOA's contracted maintenance company. The HOA shall inspect the special maintenance areas twice a year to ensure the special maintenance areas retain the original design of the areas. The following are further Special Maintenance Area (SMA) requirements:

- Directly underneath Trees and tree canopies, ground cover that naturally grows no taller than 2 feet in height shall be installed.
- The areas are completely irrigated and have plants that need irrigation to retain healthy fuel moisture.
- Any dead and dying specimens and branches shall be removed.
- Leaf litter on top of vegetative cover shall be removed.
- Landscape design Plans shall be retained by the HOA indefinitely and the slopes shall always remain as they were designed.
- As plants migrate or new plants seed-in, those shall be removed to retain the original design.
- Future changes to slope designs shall be approved by OCFA.
- The maintenance requirements of the special maintenance areas shall be factored into the building with the fuel modification zones.
- Special Maintenance Areas shall be designed and also maintained as to not provide direct flame or an excessive amount of radiant heat on structures.
- Special Maintenance Areas will have a limited use of native grasses as approved by OCFA.
- All Special Maintenance Areas shall be devoid of Plant Material from the Undesirable Plan List, Attachment 7 of the OCFA's Guideline C-05.
- Special Maintenance Areas within 100' of the Private Homeowner Lots shall comply with Attachment 2 and Attachment 6 of the OCFA's Guideline C-05.

SYMBOL LEGEND

ACCESS POINT
Location of emergency and maintenance access easements within every 500 lineal feet of the fuel modification area. Access easements shall have a minimum 7-foot clear width and a dedicated path. Any gates installed into the fuel modification area and shall be a minimum of 36 inches wide. Covenants for Fuel Modification Zones and Special Maintenance Area access and maintenance are to be recorded concurrently with all planning maps and reference in CC and R's.

IDENTIFICATION MARKER
Permanent identification markers shall be constructed to identify the limits of applicable Fuel Modification zones. marker design shall be 2" dia. x 8'-0" long galvanized pipe embed minimum 2'-6" into solid ground. 1" reflector tape 1 tape band at top for Zone B and 2 tape bands at top for Zone C. Expose pipe 2'-0" above vegetation minimum.

SOLID BLOCK AND/OR GLASS FENCING (RADIANT HEAT WALL)
Final location and design by the project Landscape Architect and Civil Engineer. 6' Min. High on both sides of the wall

INDICATES NO VENTING:
Structures adjoining the open space areas shall no venting for passive attic ventilation on the side(s) of the structure where indicated on this plan.

RADIANT HEAT ZONE:
Lots indicated on this plan shall comply with all portions of the 2019 California Residential Code Section R337, as indicated on the Saddleback Meadows Fire Protection Plan SR 286439

MAINTENANCE ACCESS LOT
Indicates 7' wide HOA maintained lettered lot for maintenance and emergency access. Solid block wall to be provide at radiant walls. Maintenance access shall not be permitted over Private Homeowner Lots; permitted only over HOA lettered lots.

FIRE ORANGE COUNTY REVIEWED

286440

NO.	DATE	REVISIONS
1		
2		
3		
4		

SCALE: 1" = 50'-0"
0 50' 100' 150' 200'
NORTH

SADDLEBACK MEADOWS - FUEL MOD PLAN	PLAN SET: "E"
PLAN CONTROL	DATE: 07/27/2022

PREPARED FOR:
CALIFORNIA QUARTET, L.P.
672 WATER STREET SW
WASHINGTON, D.C. 20024

CIVIL ENGINEER
HUNSAKER & ASSOCIATES
THREE HUGHES
IRVINE, CA 92618

PREPARED BY:
firesafe PLANNING SOLUTIONS
28486 AIROSO STREET
RANCHO MISSION VIEJO, CA 92694

SADDLEBACK MEADOWS
CONCEPTUAL FUEL MODIFICATION PLAN
FUEL MODIFICATION LAY OUT
TENTATIVE TRACT MAP 15230 - UNINCORPORATED ORANGE COUNTY
OCFA SERVICE REQUEST NO. 286440
ORANGE COUNTY FIRE AUTHORITY

SHEET
FM-3
OF 4

S.R. 286440 SADDLEBACK MEADOWS - CONCEPTUAL FUEL MODIFICATION PLAN

Appendix E

TCWD -Water and Sewer Service Letter

STAFF MEMBERS

Fernando Paludi, General Manager
Michael Perea, District Secretary
Cindy Byerrum, District Treasurer
Atkinson, Andelson, Loya, Ruud & Romo
District General Legal Counsel

BOARD OF DIRECTORS

Michael Safranski, President
Don Chadd, Vice President
Glenn Acosta, Director
Stephen Dopudja, Director
Edward Mandich, Director

TRABUCO CANYON WATER DISTRICT

Date: August 31, 2020
Expires: August 31, 2021

Domestic Water and Sewer Service Letter

Property Owner/Applicant: California Quartet, LP

Property Description: Tract No. 10692 in the unincorporated territory of the County of Orange, State of California as recorded in Book 621, pages 9-26 on November 16, 1988.

Location of Property: North of the intersection of El Toro Road and Valley Vista Way, Orange County, CA

Location of Water and Sewer:
☐ _____
☒ Pending further design and development by owner.

The Trabuco Canyon Water District is a county water district organized and operating pursuant to Section 30000, and following, of the Water Code of the State of California.

This service letter is for information only noting this District's ability to provide water and sewer service at the above referenced parcels, and is not a "Will-Serve Letter" nor an approval to connect to the Trabuco Canyon Water District's (District) facilities or infrastructure. This letter supersedes any previous service letters. The purpose of this service letter is to provide information to the County of Orange that the above referenced property is within the District's service area and can be served by the District subject to District required agreements for sewer and water allocation and reallocation, approved design and construction of any necessary on-site and off-site improvements, and subject to the District's Rules and Regulations, and the issuance of a separate Will-Serve Letter.

Lorrie Lausten, P.E.
District Engineer

32003 Dove Canyon Drive, Trabuco Canyon, CA 92679 • 949/858-0277 • Fax: 949/858-3025
www.tcwd.ca.gov