7.0 Responses to Comments on Draft EIR

This section of the Final EIR contains comments and responses to written comments received during the 45-day public review period for the Draft EIR, which ended August 1, 2002. A list of persons and agencies that received either the Draft EIR or the Notice of Availability is included on the page following the list of commentors below.

The comments received are presented in chronological order by date of correspondence. (The acknowledgement of receipt of the Draft EIR by the State Clearinghouse is included as the last comment letter.) Each comment letter is designated a number, and topic specific comments within each comment are coded. For example, the first comment in Letter #1 is 1-1, the second 1-2, etc. Revisions made to the EIR in response to comments are identified by shading the revised text like this.

The following persons and/or agencies submitted written comments on the Draft EIR:


9. OCTA
8.0 Responses to Comments

Rancho Santa Margarita General Plan
NOP and DEIR Mailing List
City of Mission Viejo
25909 Pala, Ste. 230
Mission Viejo, CA 92691
Attn: Charles Wilson

City of Lake Forest
23161 Lake Center Dr., Ste. 100
Lake Forest, CA 92630
Attn: Kathy Graham

City of San Juan Capistrano
32400 Paseo Adelanto
San Juan Capistrano, CA 92675
Attn: Thomas Tomlinson

City of Laguna Niguel
27781 La Paz Road
Laguna Niguel, CA 92677
Attn: Planning Director

Cleveland National Forest
10845 Rancho Bernardo Road, Ste. 200
San Diego, CA 92127

County of Orange
Planning and Development Services Dpt
300 N. Flower Street, Third Floor
Santa Ana, CA 92702
Attn: George Britton

Trabuco Canyon Water District
32003 Dove Canyon Drive
Trabuco Canyon, CA 92679
Attn: Bruce Bonner

Santa Margarita Water District
26111 Antonio Parkway
Rancho Santa Margarita, CA 92691

USFWS – Carlsbad Office
2730 Loker Avenue West
Carlsbad, CA 92008
Attn: Jill Tep

Orange County Flood Control District
Program Development Division
300 N. Flower
Santa Ana, CA 92702

Orange County LAFCO
12 Civic Center Plaza, Room 235
Santa Ana, CA 92701

Department of Transportation, District 12
3347 Michelson Drive, Suite 100
Irvine, CA 92612-0661
Attn: Aileen Kennedy

SCAQMD
21865 E. Copley Drive
Diamond Bar, CA 91765
Attn: Steve Smith

Department of Conservation
California Geological Survey
801 K Street, MS 12-32
Sacramento, CA 95814-3531
Attn: Robert Sydnor

Department of Fish and Game
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123

Water Quality Control Board
San Diego Region 9
9174 Sky Park Court, Ste. 100
San Diego, CA 92123

Office of Planning and Research
State Clearinghouse
1400 10th Street
PO Box 3044
Sacramento, CA 95812

SCAG
818 West 7th Street, 12th Floor
Los Angeles, CA 90017

Capistrano Unified School District
32972 Calle Perfecto
San Juan Capistrano, CA 92675
Attn: Joe Dixon

California Geological Survey
801 K Street, MS 12-32
Sacramento, CA 95814-3531
Attn: Robert Sydnor

Orange County Fire Authority
180 South Water Street
Orange, CA 92866-2123
Attn: Nancy Foreman

Orange County Environmental Health
Division (CUPA)
2009 E. Edinger Avenue
Santa Ana, CA 92705

Orange County Sheriff's Department
Research and Development
431 The City Drive South
Orange, CA 92868
Attn: Kim Maturkanich

Municipal Water District of Orange County
10500 Ellis Avenue
P.O. Box 20895
Fountain Valley, CA 92728

County of Orange Integrated Waste
Management Dept.
320 North Flower Street
Santa Ana, CA 92703

Rancho Santa Margarita Branch Library
30902 La Promesa
Rancho Santa Margarita, CA 92688
### 8.0 Responses to Comments

<table>
<thead>
<tr>
<th>Organization</th>
<th>Address</th>
<th>Attn:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saddleback Valley Unified School District</td>
<td>25632 Diseno Drive, Mission Viejo, CA 92691</td>
<td>Randy Hutenberger</td>
</tr>
<tr>
<td>Orange County Sanitation District</td>
<td>10844 Ellis Avenue, Fountain Valley, CA 92708</td>
<td>Marla Hemmel</td>
</tr>
<tr>
<td>BHE Management Corporation</td>
<td>30011 Ivy Glenn #104, Laguna Niguel, CA 92677</td>
<td>Marla Hemmel</td>
</tr>
<tr>
<td>OCTA</td>
<td>550 S. Main Street, Orange, CA 92863</td>
<td>Lisa Mills</td>
</tr>
<tr>
<td>Orange County Harbors, Beaches and Parks</td>
<td>300 N. Flower Street, Santa Ana, CA 92702</td>
<td></td>
</tr>
<tr>
<td>Transportation Corridor Agencies</td>
<td>125 Pacifica, Suite 100, Irvine, CA 92618</td>
<td></td>
</tr>
<tr>
<td>County Clerk-Recorder</td>
<td>630 N. Broadway, Ste. 106, Santa Ana, CA 92701</td>
<td>EIR Desk</td>
</tr>
<tr>
<td>SAMLARC Association</td>
<td>25910 Acero St., 2nd Floor, Mission Viejo, CA 92691</td>
<td></td>
</tr>
<tr>
<td>Rinevol Company</td>
<td>23421 South Pointe Dr., Ste. 200, Laguna Hills, CA 92653</td>
<td>Nancy Schiff, Property Manager</td>
</tr>
<tr>
<td>Accell Property Management</td>
<td>23052-H Alicia Parkway #235, Mission Viejo, CA 92692</td>
<td></td>
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<tr>
<td>Progressive Community Management</td>
<td>27405 Puerta Real, Suite 300, Mission Viejo, CA 92691</td>
<td>Nancy Schiff, Property Manager</td>
</tr>
<tr>
<td>Villageway Property Management</td>
<td>22 Mauchly, Irvine, CA 92618</td>
<td>Property Manager</td>
</tr>
<tr>
<td>Total Property Management</td>
<td>2 Corporate Park, Suite 200, Irvine, CA 92606</td>
<td>Gretchen Quinlan, Property Manager</td>
</tr>
</tbody>
</table>
June 20, 2002

City of Rancho Santa Margarita
Environmental Planning Services Division
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92679

Attention: Kathleen Haton, Planning Director.

Subject: CEQA Review – Rancho Santa Margarita General Plan

This letter is not to be interpreted as a contractual commitment to serve the proposed project but only as an information service. Its intent is to notify you that the Southern California Gas Company has facilities in the area where the above named project is proposed. Gas service to the project could be served without any significant impact on the environment. Gas facility additions for the expansion would be in accordance with the company’s policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made.

The availability of natural gas service, as set forth in this letter, is based upon present conditions of gas supply and regulatory policies. As a public utility, the Southern California Gas Company is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of gas supply or the condition under which service is available, gas service will be provided in accordance with revised conditions.

Estimates of gas usage for non-residential and residential projects are developed on an individual basis and are obtained from the Commercial-Industrial/Residential Market Services Staff by calling (800) 427-2000. We have developed several programs, which are available upon request to provide assistance in selecting the most energy efficient appliances or systems for a particular project. If you desire further information on any of our energy conservation programs, please contact this office for assistance.

Sincerely,

Robert S. Warth
Technical Supervisor
Orange Coast Region

City of Rancho Santa Margarita
General Plan 198

Program EIR
8.0 Responses to Comments

RESPONSE TO COMMENT LETTER NO. 1
The Gas Company

1-1 The comment states that the provision of gas service to the project can be accomplished without any significant impact on the environment. The City acknowledges the comment. No further response is required.

1-2 The comment states that the availability of natural gas service is based on present conditions. The City acknowledges the comment. No further response is required.

1-3 The comment states that the Commercial-Industrial/Residential Market Services Staff can assist with usage projections and selection of energy efficient appliances. The City acknowledges the comment. No further response is required.
Comment Letter No. 2
Transportation Corridor Agencies

July 3, 2002

Kathleen Haton, Planning Director
City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

Subject: CEQA Review – Rancho Santa Margarita General Plan

Dear Ms. Haton:

The Transportation Corridor Agencies (TCA) wishes to thank you for the opportunity to review and comment on the above referenced subject. At this time the TCA has no comments on the draft General Plan EIR. The TCA would, however, request that your records be updated to reflect the following information:

Transportation Corridor Agencies
Macie Cleary-Milan, Deputy Director
Environmental and Planning
125 Pacifica, Suite 100
Irvine, CA 92618

Should you have any questions or comments regarding this letter, please contact me at 949/754-3475.

Sincerely,

Valerie McFall, Senior Environmental Analyst
Environmental and Planning

cc: Macie Cleary-Milan
8.0 Responses to Comments

RESPONSE TO COMMENT LETTER NO. 2
Transportation Corridor Agencies

2-1 The comment states that the TCA has no comment at this time regarding the Draft General Plan EIR. As requested, the mailing list has been updated. The City acknowledges the comment. No further response is required.
COMMENT LETTER NO. 3
Saddleback Valley Unified School District

July 24, 2002

Kathleen Heaton, Planning Director
City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

Kathleen,

As I indicated in my telephone message, District staff has found information that should be corrected in the City of Rancho Santa Margarita General Plan EIR draft. Please note:

Page 114—Robinson Elementary School is located inside (not 'outside') the City and serves the City. Trabuco Elementary School (in the canyon) is located outside your City limits.

Thank you for the opportunity to review the Plan.

Sincerely,

Thomas K. Tular
Director

SADDLEBACK VALLEY
UNIFIED SCHOOL DISTRICT
25831 PETER A. HARTMAN WAY
MISSION VIEJO, CALIFORNIA 92691
(949) 588-1234

JERRY C. GRASS, PH.D.
SUPERINTENDENT

BOARD OF EDUCATION
Nancy W. Kinzlerick, President
Suze P. Swartz, Vice President
Ginny Fay Altobello, Clerk
Dore J. Gilbert, M.D., Member
Don Sadwick, Member

City of Rancho Santa Margarita
General Plan
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8.0 Responses to Comments

RESPONSE TO COMMENT LETTER NO. 3
Saddleback Valley Unified School District

3-1 The text in section 3.12 Public Services has been revised to reflect that Robinson Elementary School is located inside the City and Trabuco Elementary School is located outside the City.
Kathleen Hatou, Planning Director
City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

SUBJECT: DPEIR for the Rancho Santa Margarita General Plan

Dear Ms. Hatou:

The above referenced item is a Draft Program Environmental Impact Report (DPEIR) for the City of Rancho Santa Margarita. The proposed General Plan is a comprehensive, long-term guide for the physical development of the incorporated City and its sphere of influence, as well as other surrounding land that relates to long-range policy planning by the City. The General Plan establishes a comprehensive community vision for Rancho Santa Margarita relative to land use, economic development, circulation, housing, conservation/open space, safety, and noise.

The County of Orange has reviewed the DPEIR and offers the following comments:

GENERAL

The sections on Hazards and Hazardous Materials discuss only fire hazards and do not contain any reference to other potential hazards or possible impacts from hazardous materials, nor do they contain any explanation why such analysis is not included.

While the DPEIR does discuss water supply and hydrology in general terms, the DPEIR, which includes consideration of possible impacts of an additional 627 dwelling units does not appear to include the detailed analysis of water supply matters required by newly effective Senate Bills 221 and 610, both of which apply to developments of over 500 dwelling units.
8.0 Responses to Comments

Comment Letter No. 4, continued

County of Orange

FLOOD

3. The DPWIR's Hydrology/Water Quality Section has not addressed our previous request for the inclusion of a Runoff Management Plan (RMP) in the General Plan for the Northeast Future Planned Community (NFPC). The RMP is required to ensure that the future intensification of land uses will not adversely impact Trabuco Creek, which is adjacent and runs parallel to the NFPC area. The RMP should be submitted to the County's Flood Control Division prior to any proposed development within the NFPC area.

The RMP should identify potential impacts and propose appropriate mitigation measures to be included at the time of development to alleviate resulting adverse conditions.

4. We recommend that the City of Rancho Santa Margarita require developers to mitigate increases in runoff resulting from General Plan development to Orange County Flood Control District's (OCFCD) facilities when development occurs.

5. The City should coordinate development adjacent to Trabuco Creek or Tijeras Creek with the County's Flood Control Division.

6. A 100-year floodplain and floodway have been delineated by the Federal Emergency Management Agency (FEMA) along the Trabuco Creek and Tijeras Creek. Letters of Map Revision (LOMR) should be processed via FEMA for development within floodplain areas.

OPEN SPACE/RECREATION

Section 1.0. Project Description:

7. Page 3, Figure 2, Rancho Santa Margarita Project Area:

Please depict/label portions of O'Neill Regional Park east of Antonio Parkway, portions of Caspers Wilderness Park sited along the eastern edge of the City, and Chiquita Canyon Conservation Area (see large map Attachments 1 and 2).

8. Page 7, Figure 3, Land Use Policy Map:

a. Please correct Figure 3 per comment 7, above.

b. Please revise and correct land use designations to reflect portions of O'Neill Regional Park east of Antonio Parkway, and Caspers Wilderness Park located along the eastern side of the City. These should be depicted within "Park" Category of the Legend for Figure 3.

9. Page 15, last paragraph, first sentence: please revise to read as follows:
Comment Letter No. 4, continued
County of Orange

"The Rancho Santa Margarita park and recreation system consists of neighborhood parks, community parks, portions of O'Neill Regional Park and Caspers Wilderness Park, joint use parks,..."  

Section 3.14. Recreation:

10. Page 145, third paragraph, sixth sentence; please change to read as follows:
    "Table 24 summarizes the existing parks and recreational facilities in the City excluding County of Orange Regional Parks".

11. Page 145, fourth paragraph, first sentence; please revise to read as follows:
    "3081 acre O'Neill Regional Park, owned and operated by the County of Orange, serves both..."

12. Page 146; add a Caspers Wilderness Discussion as follows:
    "Northern portions of 8,000 acre Caspers Wilderness Park, owned and operated by the County of Orange, are sited along the eastern side of the City. Ultimately these portions of the park will connect with the core of the park sited along the Orange Highway. The park core has campgrounds, restrooms and showers, picnic areas and an equestrian campground, riding and hiking trails and a visitor center".

13. Page 146, Figure 23, "Park Sites":
    Please revise to label portions of O'Neill Regional Park east of Antonio Parkway, as well Caspers Wilderness Park parcels contiguous the eastern boundary of the City.

14. Page 146, Figure 23 Note; please change to read as follows:
    "O'Neill Regional Park is a 3,081 acre park, portions of which are located along western and eastern sides of Antonio Parkway".

15. Page 146, Figure 23 Note; please add a note to read as follows:
    "Portions of 8,000 acre Caspers Wilderness Park are located on the eastern side of the City".

16. Page 148, second paragraph; please change to read as follows:
    "This does not include O'Neill Regional Park which is 3,081 acres in size, portions of which are located east and west of Antonio Parkway and includes segments of Trabuco and Tijeras Creeks. It also does not include portions of..."
8,000 acre Caspers Wilderness Park in the eastern side of the City. These regional parks are owned and operated by the County of Orange.

17. Pages 147 and 148, Table 23, "Existing Parks and Facilities in Rancho Santa Margarita", and Table 26, "Active and Passive Parkland in Rancho Santa Margarita": Please add to each table title the phrase "Excluding County Regional Parks".

4-18 Trails and Bikeways:

18. Page 33, second paragraph under Circulation:

In the second sentence, please change "Strategies Plan" to "Strategic Plan". Also, insert "regional" after "proposed".

4-19 In the third sentence, please change the sentence to read as follows: "The Strategic Plan includes the Trabuco Creek Bikeway, a regional Class I (paved off-road) bikeway, generally located along the eastern bluff of the Arroyo Trabuco and part of Santa Margarita Parkway. Class I bikeways accommodate both bicyclists and pedestrians."

4-20

19. Page 40, Figure 8:

The City's recommended roadway system for the Northeast Future Planned Community appears to follow the same route as a proposed section of the Trabuco Creek Bikeway and the Arroyo Trabuco Riding and Hiking Trail. The General Plan must ensure that the trail and off-road bikeway will be accommodated, as well as the roadway system.

4-20

20. Page 43, Mitigation Measures:

Bikeways can act as mitigation measures to help reduce air pollution, traffic congestion, parking congestion, and noise. Class I bikeways in particular, because they are off-road and suitable for bicyclists and pedestrians with a wide range of ages and abilities, serve to encourage bicycling and walking as alternative modes of transportation.

4-21 We recommend the following Mitigation Measure be added: "Bikeways: City will work with the County of Orange to implement the remaining segments of the Trabuco Creek Bikeway, within the Northeast Future Planned Community and south of Santa Margarita Parkway."

4-22

21. Page 145:

In the second paragraph, please include "trails" in the list of recreation system items.

4-22
In the fourth paragraph, please change "18 miles of riding trails" to "18 miles of riding and hiking trails". ("Riding and hiking trail" is the term used by the County to designate unpaved trails that accommodate equestrians, hikers, and mountain bicyclists.)

We suggest you include text addressing regional riding and hiking trails incorporating the following:

a. Arroyo Trabuco Trail – Proposed to generally parallel Trabuco Creek from Cleveland National Forest to San Juan Creek in San Juan Capistrano. This trail is existing (mostly within O'Neill Regional Park) from Trabuco Canyon Road downstream to the San Juan Capistrano City limits.

b. Bell View Trail – Proposed to connect the Tijeras Creek Trail in the north (at Plano Trabuco Road) to the Wagon Wheel Trail in Caspers Wilderness Park. This trail is almost all existing.

c. Live Oak Trail – Existing from O'Neill Regional Park to El Toro Road.

d. Tijeras Creek Trail – Generally parallels Tijeras Creek from Plano Trabuco Road downstream to Trabuco Creek. This trail is existing.

In addition, although the Trabuco Creek Bikeway is addressed in the Transportation section, it should also be mentioned as a recreational route as follows:

a. Trabuco Creek Bikeway – Proposed to generally parallel Trabuco Creek from Cleveland National Forest to San Juan Creek in San Juan Capistrano. Within the City, this bikeway exists on the bluff top east of the Arroyo Trabuco, between Antonio Parkway (at Avenida De Las Flores) and Santa Margarita Parkway.

22. Staging Areas: MHP suggests the General Plan propose additional staging areas for trails and Class I bikeways. The lack of staging areas is a common complaint among trail and bikeway users, throughout the county. (This could be included under Mitigation Measures.)

23. Trail Map: The General Plan should include a map (figure) depicting regional Class I bikeways and regional riding and hiking trails, both existing and proposed.

24. Page 147, Table 24:

Please incorporate regional riding and hiking trails listed above, and the regional Trabuco Creek Bikeway.
8.0 Responses to Comments

Comment Letter No. 4, continued
County of Orange

25. Page 152, first bullet point:

Please change the last phrase of the sentence as follows: "... the Intergenerational Community Center (IGCC), riding and hiking trails, and Class I bikeways". 

26. Page 152: Please add a bullet point as follows:

"Working with businesses, homeowners associations, churches, schools, and other property owners to ensure setbacks and landscaping are provided next to trails and bikeways."

(Note: recent examples where subject mitigation was needed:

a. Private school near the intersection of Via Sosiego and El Camino Montana was not conditioned to provide a landscaped buffer between its new access road and the Tresuco Creek Bikeway.

b. A portion of an auto mall on the west side of the Foothill Transportation Corridor wherein only about a 1-foot strip of landscaping separates asphalt and car bumpers from the bikeway.)

CULTURAL/HISTORICAL

27. We encourage the City of Rancho Santa Margarita to follow the Board of Supervisors example in requiring that cultural resource artifacts, which may be discovered during the site development, be donated to a suitable repository that will maintain the collection for future scientific study and exhibition "within Orange County." Prior to donation, the certified cultural resources consultant should prepare the collection "to the point of identification."

28. The project proponent should be prepared to pay "potential curtailment fees" to the County or other suitable repository for the long-term curation and maintenance of donated collections.

WASTE MANAGEMENT

28. While we acknowledge reference to AB 939 on page 136 (Section 3.13 Utilities/Service System, Solid Waste), the following language will be useful in clarifying the City’s mandated responsibility.

The City of Rancho Santa Margarita is responsible for meeting the Assembly Bill 939 (AB 939) mandate of 50 percent diversion and for preparing AB 939 solid waste planning documents. These documents include the Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE), and the Non-Disposal Facility Element (NDFE).
8.0 Responses to Comments

Comment Letter No. 4, continued
County of Orange

One strategy for meeting AB939 requirements could be the recycling of construction and demolition waste (C&D). C&D has been specifically targeted by the State of California for diversion from the Waste stream. C&D waste is heavy, inert material, and creates significant problems when disposed of in landfills because it does not decompose and takes up valuable landfill capacity. Additionally, since C&D debris is heavy when compared with paper and plastic, it is more difficult for the County and cities to reduce the tonnage of disposed waste. Projects, which will generate C&D waste, should emphasize deconstruction and diversion planning, rather than demolition. Deconstruction is the planned, organized dismantling of the prior construction project, which allows maximum use of the deconstructed materials for recycling in other construction projects and sends a minimum of the deconstruction material to landfills.

Thank you for the opportunity to respond to the DPEIR. If you have any questions, please contact Charlotte Haryman at (714) 834-2522.

Sincerely,

Timothy Neely, Manager
Environmental Planning Services Division

Attachments: 1. Orange County Regional Recreational Facilities and Other Owned Open Space Map, City of Rancho Santa Margarita, July 2002
2. Regional Recreation and Open Space Lands Map, Orange County, July 2002
RESPONSE TO COMMENT LETTER NO. 4
County of Orange

4-1 The comment is introductory in nature and does not refer to any environmental issue. The comment is acknowledged, and no further response is required.

4-2 Issues regarding transport, release, and handling of hazardous materials and implementation of an adopted emergency response plan were found to have a less-than-significant impact through the Initial Study process. A copy of the Initial Study is included as EIR Appendix A. As a result, they are addressed in the EIR.

4-3 As discussed on page 138 of the Draft EIR, the 2000 Urban Water Management Plan, prepared by Trabuco Canyon Water District, included water demand projections from development in the Northeast Future Planned Community area. The level of demand assumed in the 2000 Urban Water Management Plan is based on the number of units projected for the Northeast Future Planned Community by the County Specific Plan. The Rancho Santa Margarita General Plan is consistent with the number of units projected in County Specific Plan. Therefore, implementation of the TCWD 2000 Urban Water Management Plan will avoid the impact associated with the provision of domestic water service.

4-4 General Plan Implementation Program COS-11 addresses preparation of a Jurisdictional Urban Runoff Management Program (URMP) pursuant to the requirements of SDRWQCB Order No. R9-2002-0001. The program must include measures to:

- Identify major outfalls and pollutant loadings;
- Detect and eliminate all non-stormwater discharges to the system, except as specifically exempted;
- Prevent and reduce pollutants in runoff from industrial, commercial, and residential areas through the implementation of BMPs (Best Management Practices);
- Control stormwater discharges from new development and redevelopment;
- Inspect industrial, commercial, and construction activities;
- Provide pertinent education and promote public reporting of pollution; and
- Monitor discharges and impacts on receiving waters.

Rather than include the URMP within the General Plan, the City has chosen to prepare the URMP as an implementation action for the General Plan, to be completed no later than the end of 2003. Implementation Program COS-11 is listed as mitigation for potential water quality impacts in the EIR.

4-5 General Plan Implementation Program S-8 addresses the flood control system in and surrounding Rancho Santa Margarita. The program requires detention basins
for new development, where necessary, to mitigate increases in runoff and reduce flooding risks.

4-6 Although no future development is anticipated adjacent to either Trabuco Creek or Tijeras Creek on the Land Use Policy Map, Safety Element Goal 1 and related policies address coordination with other agencies to reduce flood impacts. The relevant goal and policies are as follows:

**Goal 1:** Reduce the risk to the community from hazards related to geologic conditions, seismic activity, wildfires, structural fires, and flooding.

**Policy 1.2:** Protect the community from flooding hazards by providing and maintaining flood control facilities and limiting development within the floodplain.

**Policy 1.5:** Participate in local, regional, state, and federal programs that educate residents and businesses about how to protect themselves and their property from hazards.

4-7 The comment is acknowledged, and is part of the standard development review process implemented by the City. No further response is required.

4-8 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-9 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-10 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-11 The text describing Table 24 has been modified as requested. The modification does not affect conclusions. No further response is required.

4-12 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space,
shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-13 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-14 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-15 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-16 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-17 The comment is inconsistent with City of Rancho Santa Margarita LAFCO Incorporation documents, which required that, upon the effective date of incorporation, all right, title, and interest of the county, including open space, shall vest in the City. As such, the City has determined that this Open Space property shall maintain its Open Space designation.

4-18 The tables have been modified as requested. The modification does not affect conclusions. No further response is required.

4-19 Text has been modified as requested. The modification does not affect conclusions. No further response is required.

4-20 As stated in the General Plan and the Draft EIR, the recommended roadway system for the Northeast Future Planned Community is purely conceptual. Figure 8 is not intended to show the actual alignment of the future roadway system, but rather to show that both primary and emergency access will be provided to the area. Development requirements for the Future Planned Community within the Land Use Element include preservation of bluffs located southeast of Trabuco
Creek and trail linkages to the existing trails network within the City. Compliance with these requirements will avoid impact.

4-21 Implementation Program C-11, which is a mitigation measure for long term air quality impacts by improving and maintaining trails, has been modified in the Draft General Plan as requested. The modification does not affect conclusions. No further response is required.

4-22 Text has been modified as requested. The modifications do not affect conclusions. No further response is required.

4-23 Implementation Program C-11, which is a mitigation measure for long term air quality impacts by improving and maintaining trails, has been modified in the Draft General Plan as requested. The modification does not affect conclusions. No further response is required.

4-24 Figure C-6 within the Circulation Element provides a map of existing and proposed bicycle and pedestrian facilities within the Planning Area.

4-25 As requested in Comment 4-18, the title of Table 24 has been modified to read “Existing Parks and Facilities in Rancho Santa Margarita Excluding Regional Parks.” In light of this directive, including regional riding and hiking trails in this table seems contradictory. Therefore, the title has been modified again to read “Existing Parks and Facilities in Rancho Santa Margarita Excluding Regional Parks and Riding and Hiking Trails.”

4-26 Text has been modified as requested. The modification does not affect conclusions. No further response is required.

4-27 Text has been modified in the Final EIR and Draft General Plan as requested. The modification does not affect conclusions. No further response is required.

4-28 Implementation Program COS-23, which is a mitigation measure cultural resources impacts by protecting important cultural resources, has been modified in the Draft General Plan as requested. The modification does not affect conclusions. No further response is required.

4-29 See response 4-28.

4-30 Text has been added as requested. The addition does not affect conclusions. No further response is required.
July 31, 2002

Ms. Kathleen Kasten
Planning Director
City of Rancho Santa Margarita
32211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

RE: Comments on the Draft Environmental Impact Report for the City of Rancho Santa Margarita General Plan - SCAG No. 1 20020322

Dear Ms. Kasten:

Thank you for submitting the Draft Environmental Impact Report for the City of Rancho Santa Margarita General Plan to SCAG for review and comment. As a statewide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans.

This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. If you have any questions regarding the attached comments, please contact me at (213) 236-1823. Thank you.

Sincerely,

[Signature]

Intergovernmental Review
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COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
CITY OF RANCHO SANTA MARGARITA
GENERAL PLAN
SCAG NO. 1 20020322

PROJECT DESCRIPTION
The proposed Project consists of a General Plan for the newly incorporated City of Rancho Santa Margarita in Orange County.

INTRODUCTION TO SCAG REVIEW PROCESS
The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 2001), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.
SUMMARY OF SCAG STAFF COMMENTS

1. The Draft EIR does not address the relationship of the proposed project to applicable regional plans as required by Section 15125 [d] of Guidelines for Implementation of the California Environmental Quality Act.

2. The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide, utilizing commentary from the following detailed SCAG staff comments. The response should also discuss any inconsistencies between the proposed project and applicable regional plans. We suggest that you identify the specific policies, by policy number, with a discussion of consistency or support with each policy.

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the City of Cathedral City Comprehensive General Plan Update / Zoning Amendment / Downtown Precise Plan.

Core Growth Management Policies

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

SCAG staff comments. The Draft EIR references the adopted 2001 RTP growth forecasts and the OCP 2000 population and housing projections. The OCP for Rancho Santa Margarita are consistent with SCAG's RTP projections. The Project is consistent with this core RCPG policy.

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend
less income on housing cost, that minimize public and private development costs, and that enable firms to be competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

3.05 Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.

SCAG staff comments. The Draft EIR in Sections 3.4 (Transportation/Traffic) and 3.13 (Utilities/Service Systems) acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. In addition, increases in demand for services will occur gradually as additional development takes place. Goals and policies outlined in the General Plan are supportive of this SCAG policy. Mitigation measures recommended in each section would address Project impacts. The Project is supportive of this ancillary RCPG policy.

3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

SCAG staff comments. See SCAG comments on policy 3.05. The Project is supportive of this ancillary RCPG policy.

3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

SCAG staff comments. The Draft EIR only addresses subjects that may have adverse environmental impacts. It is written in a concise manner, where all possible adverse impacts are mitigated this will help minimize red tape, and help maintain the economic vitality and competitiveness of the City of Rancho Santa Margarita. In addition, the Draft EIR includes a number of Project and General Plan goals, policies, and programs, which will also help to minimize red tape, and help maintain the economic vitality and competitiveness of the City of Rancho Santa Margarita. The Project is supportive of this ancillary RCPG policy.

THE GROWTH MANAGEMENT GOALS RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop
urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.12 **Encourage existing or proposed local jurisdictions’ programs aimed at designing**

land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

**SCAG staff comments.** The Draft EIR does not include a discussion on land uses that encourages the coordination and implementation of transit and transit facilities, and bikeways, pedestrian and/or equestrian trails. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is supportive of this ancillary RCPG policy.

3.17 **Support and encourage settlement patterns, which contain a range of urban densities.**

**SCAG staff comments.** The Draft EIR in Section 1.0 (Project Description) identifies ranges of urban densities. The Project is supportive of this ancillary RCPG policy.

3.18 **Encourage planned development in locations least likely to cause adverse environmental impact.**

**SCAG staff comments.** The Project is proposed in a manner, which will minimize adverse environmental impacts. Mitigation measures included in the Draft EIR have been developed to address Project impacts. The City of Rancho Santa Margarita should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

3.20 **Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.**

**SCAG staff comments.** The Draft EIR in Section 3.7 (Biological Resources) discusses the Projects’ impact on biological resources. The Draft EIR
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recommends mitigation measures to address impacts to natural communities, sensitive plant species, sensitive wildlife species and jurisdictional areas. The Project is supportive of this ancillary RCPG policy.

3.21 Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.

SCAG staff comments. The Draft EIR in Section 3.8 (Cultural Resources) identifies impacts related to cultural resources. Mitigation measures are recommended to address impacts to affected cultural resources. The Project is supportive of this ancillary RCPG policy.

5.14

5.15

3.22 Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.

SCAG staff comments. The Draft EIS in Section 3.9 (Geology and Soils) identifies potential impacts related to seismicity and groundshaking, geologic hazards from groundshaking, and other geologic hazards. Mitigation measures recommended include the implementation of building codes, geotechnical studies, specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

5.16

3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans

SCAG staff comments. The Draft EIR in Section 3.6 (Noise) acknowledges potential noise impacts related to vehicular, stationary and construction activities. Mitigation measures recommended in this Section have been developed to address identified impacts. The Project is supportive of this ancillary RCPG policy.

5.17

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

5.18
3.24 Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

SCAG staff comments. The Draft EIR, in Section 1.0 (Project Description) provides a discussion on residential land uses. The discussion suggests that there is the potential for up to 687 dwelling units over the long term. The Draft EIR, however, does not provide a discussion on programs that could increase the supply and quality of housing and the provision of affordable housing. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, the Project is partially supportive of this ancillary RCPG policy.

3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.

SCAG staff comments. The Draft EIR, in Section 3.12 (Public Services) acknowledges that the potential build out of the General Plan would have impacts on schools, libraries, police and fire protection, and parks. Mitigation measures are recommended to address impacts to public facilities and services. The Project is supportive of this ancillary RCPG policy.

REGIONAL TRANSPORTATION PLAN

The Regional Transportation Plan (RTP) also has goals, objectives, policies and actions pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant goals, objectives, policies and actions of the RTP are the following:

Core Regional Transportation Plan Policies

4.01 Transportation investments shall be based on SCAG's adopted Regional performance indicators.
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SCAG staff comments. The Draft EIR does not provide a discussion on Transportation investments based on the following SCAG adopted Regional Performance Indicators:

Mobility - Transportation Systems should meet the public need for improved access, and for safe, comfortable, convenient, faster and economical movements of people and goods.
- Average Work Trip Travel Time in Minutes – 25 minutes (Auto)
- PM Peak Freeway Travel Speed – 45 minutes (Transit)
- PM Peak Non-Freeway Travel Speed
- Percent of PM Peak Travel in Delay (Fwy)
- Percent of PM Peak Travel in Delay (Non-Fwy)

Accessibility - Transportation system should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.
- Work Opportunities within 45 Minutes door to door travel time (Mode Neutral)
- Average transit access time

Environment - Transportation system should sustain development and preservation of the existing system and the environment. (All Trips)
- CO, ROG, NOx, PM10, PM2.5 – Meet the applicable SIP Emission Budget and the Transportation Conformity requirements

Reliability – Transportation system should have reasonable and dependable levels of service by mode. (All Trips)
- Transit – 63%
- Highway – 76%

Safety - Transportation systems should provide minimal accident, death and injury. (All Trips)
- Fatalities Per Million Passenger Miles – 0
- Injury Accidents – 0

Equity/Environmental Justice - The benefits of transportation investments should be equitably distributed among all ethnic, age and income groups. (All trips)
- By Income Groups Share of Net Benefits – Equitable Distribution of Benefits among all Income Quintiles

Cost-Effectiveness - Maximize return on transportation investment (All Trips). Air Quality, Mobility, Accessibility and Safety
- Return on Total Investment – Optimize return on Transportation Investments
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The Final EIR should address the manner in which the Project is supportive of or detracts from the achievement of the seven core RTP objectives. Based on the information provided, we are unable to determine whether the Project is consistent with this core RCPG policy.

4.04 Transportation Control Measures shall be a priority.

SCAG staff comments. The Draft EIR does not include a discussion on the City’s development and implementation of Transportation Demand or System Management strategies, to extend or preserve capacity on existing roadways. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity

SCAG staff comments. The Draft EIR, in Section 3.4 (Transportation/Traffic) includes a discussion on the existing circulation system, and recommends measures to upgrade the existing circulation system. This should help to maintain and operate the existing transportation system. The Project is consistent with this core RTP policy.

AIR QUALITY CHAPTER CORE ACTIONS

The Air Quality Chapter (AQC) core actions that are generally applicable to the Project are as follows:

5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.

SCAG staff comments. The Draft EIR fails to adequately address the extent to which the Project considers the implementation of telecommunications, community based shuttle services, demand management based programs or vehicle-miles-traveled/emission fees. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts
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from the achievement of this policy. Based on the information provided in the Draft EIR, we are unable to determine if the Project is consistent with this core RCPG policy.

5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.

SCAG staff comments. The Draft EIR, in Section 3.5 (Air Quality) discusses the consistency of the proposed Project with regional and local air quality policies and includes mitigation measures for impacts to air quality related to short and long term construction and operation impacts. The Project is consistent with this core RCPG policy.

OPEN SPACE CHAPTER ANCILLARY GOALS

Outdoor Recreation

9.01 Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.

SCAG staff comments. The Draft EIR, in Section 3.14 (Recreation) acknowledges the of provision of parks and other recreational services, and the Project’s beneficial impact of providing additional facilities. The project is supportive of this ancillary RCPG goal.

9.02 Increase the accessibility to open space lands for outdoor recreation.

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

9.03 Promote self-sustaining regional recreation resources and facilities.

SCAG staff comments. See SCAG staff comments for goal 9.01. The Project is supportive of this ancillary RCPG goal.

Public Health and Safety

9.04 Maintain open space for adequate protection of lives and properties against natural and man-made hazards.
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SCAG staff comments. The Draft EIR does not discuss the subject of maintenance of open space for adequate protection of lives and properties against natural and man-made hazards. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, the Project is partially supportive of this ancillary RCPG policy.

9.05 Minimize potentially hazardous developments in hillside, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.

SCAG staff comments. The Draft EIR does not discuss the subject of potentially hazardous developments, and areas with limited access for emergency equipment. It would be helpful if the Final EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIR, the Project is partially supportive of this ancillary RCPG policy.

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

SCAG staff comments. The Draft EIR, in Section 3.13 (Utilities/Service Systems) includes a mitigation measure that encourages the production or recycled water by water districts. The Project is consistent with this core RCPG policy.

CONCLUSIONS

1. As noted in the staff comments, the Draft Environmental Impact Report for the City of Rancho Santa Margarita General Plan is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide.
Based on the information in the Draft EIR, we are unable to determine whether the Project is consistent with core policies 4.01, 4.04 and 5.07. Based on the information in the Draft EIR, we are unable to determine whether the Project is supportive of ancillary policies 3.12, 9.04 and 9.05. In addition, the Project is partially supportive of ancillary policy 3.24.

2. As noted in the Summary of SCAG Staff Comments, the Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG’s Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.

3. All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.
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Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG) is a Joint Powers Agency established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's Metropolitan Planning Organization and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. 134, 60 U.S.C. 3001 et seq., 23 C.F.R. 450, and 49 C.F.R. 913. SCAG is also the Designated Regional Transportation Planning Agency, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65060 and 65062 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan, pursuant to California Health and Safety Code Section 40460(b)(c). SCAG is also designated under 42 U.S.C. 7504(a) as a Co-Lead Agency for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining Conformity of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. 7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. 1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized Area-wide Waste Treatment Management Planning Agency.

SCAG is responsible for preparation of the Regional Housing Needs Assessment, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the Southern California Hazardous Waste Management Plan pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

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8.0 Responses to Comments

RESPONSE TO COMMENT LETTER NO. 5
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5-1 The comment is introductory in nature and does not refer to any environmental issue. The comment is acknowledged, and no further response is required.

5-2 The summary of the project description is acknowledged as accurate.

5-3 The comment is introductory in nature and does not refer to any environmental issue. The comment is acknowledged, and no further response is required.

5-4 As discussed in the Initial Study Checklist included as Appendix A of the Draft EIR, applicable land use plans, policies, and regulations of agencies with jurisdiction over the project include the following: County of Orange Zoning Ordinance, City of Rancho Santa Margarita Zoning Ordinance, Foothill/Trabuco Specific Plan, and SCAG Growth Management Plan. Following incorporation, the City elected to use the County of Orange Zoning Ordinance as an interim means of regulating land use. The County Zoning Ordinance was supplemented directly by City-adopted ordinances, which tailored the Ordinance to the City of Rancho Santa Margarita. The City will adopt its own Zoning Ordinance and related Zoning Map once the General Plan is adopted. The Zoning Ordinance will be the primary implementation tool for the Land Use Element. Together, the Zoning Ordinance and Zoning Map will identify specific types of land use, intensity of use, and development and performance standards applicable to specific areas and parcels of land within the City.

The Foothill/Trabuco Specific Plan was prepared by the County of Orange to address areas within Trabuco Canyon located north of the City. The Specific Plan consists largely of rural and open space designations to preserve the existing character of the canyon area. The Plano Trabuco sub-area described in the Specific Plan corresponds to the Northeast Future Planned Community described in the Land Use Plan within this Element. Development assumptions made in this Element for the Northeast FPC are consistent with those identified in the Specific Plan.

The Southern California Association of Governments (SCAG) Growth Management Plan recommends methods to redirect regional growth to minimize traffic congestion and better protect environmental quality. The goals of the Growth Management Plan include balancing jobs and housing. While SCAG has no authority to mandate implementation of its Growth Management Plan, principal goals have implications for the land use composition of the Rancho Santa Margarita Planning Area. The SCAG goals are reflected throughout all of the General Plan elements, including the Land Use Element.
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5-5 Please refer to responses 5-11, 5-18, 5-21, 5-22, 5-24, 5-27, and 5-28 which address the proposed project's consistency with core policies and support ancillary policies.

5-6 The comment regarding the project's consistency with core RCPG policy 3.01 is acknowledged. No further response is required.

5-7 The summary of Core Growth Management Policy 3.03 is acknowledged. No further response is required.

5-8 The comment is introductory in nature and does not refer to any specific environmental issue. The comment is acknowledged, and no further response is required.

5-9 The comment regarding the project's support of ancillary RCPG policies 3.05 and 3.09 is acknowledged. No further response is required.

5-10 The comment regarding the project's support of ancillary RCPG policy 3.10 is acknowledged. No further response is required.

5-11 Goals and policies of the Circulation Element of the Rancho Santa Margarita General Plan are supportive of RCPG policy 3.12. The applicable goal and policies are as follows:

**Goal 3: Promote the increased use of multi-modal transportation.**

**Policy 3.1** Encourage the increased use and expansion of public transportation opportunities.

**Policy 3.2** Monitor the effectiveness of regional alternative transportation programs, such as bus systems, providing service to the City.

**Policy 3.3** Encourage the provision of additional regional public transportation services and support facilities, such as park-and-ride lots.

**Policy 3.4** Collaborate with neighboring cities and regional transportation providers to encourage the provision of affordable transportation programs for elderly and youth to desirable locations in the region (e.g., malls, youth and senior program providers, the Intergenerational Community Center (IGCC), and other senior and community centers).

**Policy 3.5** Incorporate design features into public improvement projects that promote and support the use of public and alternative modes of transportation.
8.0 Responses to Comments

5-12 The comment regarding the project’s support of ancillary RCPG policy 3.17 is acknowledged. No further response is required.

5-13 The comment regarding the project’s support of ancillary RCPG policy 3.18 is acknowledged. No further response is required.

5-14 The comment regarding the project’s support of ancillary RCPG policy 3.20 is acknowledged. No further response is required.

5-15 The comment regarding the project’s support of ancillary RCPG policy 3.21 is acknowledged. No further response is required.

5-16 The comment regarding the project’s support of ancillary RCPG policy 3.22 is acknowledged. No further response is required.

5-17 The comment regarding the project’s support of ancillary RCPG policy 3.23 is acknowledged. No further response is required.

5-18 Goals and policies of the Housing Element of the Rancho Santa Margarita General Plan are supportive of ancillary RCPG policy 3.24. The applicable goal and policies are as follows:

Goal 1: Maintain a range of housing opportunities to adequately meet the existing and projected needs of the entire community.

Policy 1.1 Maintain a variety of housing types and prices throughout the City to increase housing choice and ensure that households of all types and income levels have the opportunity to find suitable housing.

Policy 1.2 Identify adequate sites (e.g., annexation areas within the Sphere of Influence, infill sites) with appropriate zoning and development standards to facilitate and encourage housing production commensurate with the projected housing needs of the City.

Policy 1.3 Maintain a geographic dispersal of units affordable to very-low, low- and moderate-income households throughout the City.

Policy 1.4 Ensure that new residential development and modifications to existing development are compatible with surrounding neighborhoods.

Policy 1.5 Reduce actual and potential governmental constraints to the development, maintenance, and improvement of housing.
8.0 Responses to Comments

Policy 1.6  Support the concept of “aging in place” by maintaining a range of housing that allows people to remain in the community as their housing needs change.

Policy 1.7  Ensure that new housing developments provide their share of adequate parks and recreational facilities to meet community needs.

5-19  The comment regarding the project’s support of ancillary RCPG policy 3.27 is acknowledged. No further response is required.

5-20  The comment is introductory in nature and does not refer to any environmental issue. The comment is acknowledged, and no further response is required.

5-21  The goals and policies of the Circulation Element of the Rancho Santa Margarita General Plan are supportive of the achievement of the seven core RTP objectives. The goals are as follows:

Goal 1:  Provide a circulation system that meets the needs of the community.

Goal 2:  Achieve a local circulation system that is integrated with the larger regional transportation system to ensure the economic well-being of the community.

Goal 3:  Promote the increased use of multi-modal transportation.

Goal 4:  Provide and maintain an extensive public bicycle and pedestrian trails network.

5-22  General Plan Implementation Programs pertaining to Transportation Demand Management and Transportation System Management are supportive of core RCPG policy 5.07. Relevant programs are summarized below:

COS-13  Transportation Demand Management
Adopt a Transportation Demand Management (TDM) ordinance that implements the provisions of the 1997 Air Quality Management Plan. The ordinance will specify various TDM methods to reduce trips and influence travel modes such as:

- Trip reduction programs for City staff;
- Van pool programs for private employers;
- Employee incentives for public transit use;
- Preferential parking for carpools;
- Trip reduction programs for major commercial centers; and
- Alternative transportation modes for major events.
COS-14  Transportation System Management
Implement the programs described in the Circulation and Land Use Elements related to transportation system management (TSM) to avoid traffic congestion and reduce related emissions levels.

5-23 The comment regarding the project’s consistency with core RCPG policy 4.16 is acknowledged. No further response is required.

5-24 General Plan Implementation Programs pertaining to air quality are supportive of core RCPG policy 5.07. Relevant programs (in addition to those mentioned in response 4-22 above) are summarized below:

COS-15  Improve Jobs-to-Housing Balance
Promote the development of job-generating land uses to improve the balance between jobs and housing to reduce air emissions.

COS-16  Minimize Impacts of New Development
Review development proposals for potential air quality impacts pursuant to the California Environmental Quality Act (CEQA) and the South Coast Air Quality Management District CEQA Air Quality Handbook. Construction impacts can be reduced by enforcing SCAQMD Rule 403. Reduce long-term impacts using available land use and transportation planning techniques such as:

- Incorporation of public transit stops;
- Pedestrian and bicycle linkage to commercial centers, employment centers, schools and parks;
- Preferential parking for carpools;
- Traffic flow improvements; and
- Employer trip reduction programs.

5-25 The comment regarding the project’s consistency with core RCPG policy 5.11 is acknowledged. No further response is required.

5-26 The comment regarding the project’s support of ancillary RCPG policies 9.01, 9.02, and 9.03 is acknowledged. No further response is required.

5-27 The goals and policies of the Safety Element of the Rancho Santa Margarita General Plan are supportive of ancillary RCPG policy 9.04. The applicable goal and policies are as follows:

Goal 1: Reduce the risk to the community from hazards related to geologic conditions, seismic activity, wildfires, structural fires, and flooding.
8.0 Responses to Comments

Policy 1.1: Reduce the risk of impacts from geologic and seismic hazards by applying and enforcing development standards and building construction codes.

Policy 1.2: Protect the community from flooding hazards by providing and maintaining flood control facilities and limiting development within the floodplain.

Policy 1.3: Reduce the risk of wildfire hazards by working with the Homeowner Associations, business park associations, and community foundations to maintain fire retardant landscaping and buffer zones in areas of high wildfire risk.

Policy 1.4: Reduce the risk of fire to the community by coordinating with the Orange County Fire Authority.

Policy 1.5: Participate in local, regional, state, and federal programs that educate residents and businesses about how to protect themselves and their property from hazards.

5-28 No specific development is proposed as part of the project. The General Plan does contain goals and policies describing the City's intent to minimize potentially hazardous developments (See response 4-27 above.) The comment regarding the project's partial support of ancillary RCPG policy 9.05 is acknowledged.

5-29 The comment regarding the project's consistency with core RCPG policy 11.07 is acknowledged. No further response is required.

5-30 The comment regarding the fact that the project supports many core RCPG policies and supports many ancillary RCPG policies is acknowledged. Please refer to responses 5-11, 5-18, 5-21, 5-22, 5-24, 5-27, and 5-28.

5-31 Please refer to responses 5-11, 5-18, 5-21, 5-22, 5-24, 5-27, and 5-28, which address consistency with core policies and support of ancillary policies.

5-32 A Mitigation Monitoring and Reporting Program has been prepared pursuant to Section 21081.6 of CEQA.

5-33 The comment does not refer to any specific environmental issue. The comment is acknowledged, and no further response is required.
August 1, 2002

City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688
ATTN: Kathleen Haton, Planning Director

Re: Draft EIR Rancho Santa Margarita General Plan

Dear Sir(s):

Thank you for the opportunity to comment on the Draft EIR for the Rancho Santa Margarita General Plan. In response to our review, we would like to offer the following:

In Section 3.4 Transportation/Traffic: Under Emergency Access, reference is made to an alternative access for the Northeast Future Planned Community at its northeastern most area adjacent to Trabuco Creek Road. Please note the emergency access roadways must be “all weather” surfaces, designed to hold the fire apparatus we use. They must conform to our adopted standards. Copies of these standards are available on our website or by contacting our Planning and Development staff.

In Section 3.12 Public Services: Under Fire Protection. While the OCFA has no current plans for new services within the City of Rancho Santa Margarita, the fire station located on Trabuco Canyon Road (OCFA Station 18) is functional and safe but of a substandard nature for increased protection. No specific plan to relocate or reconstruct the fire station exists at this time, however, the OCFA will be addressing deployment issues in the near future and may have a need at that time. OCFA would like to reserve the right to require secured fire protection agreements with future development that might generate new service demands. These agreements are intended to have each development pay a “fair share” of service delivery impacts generated by the projects themselves.

Also, please consider adding a Policy 9.4 which specifically addresses the city’s commitment to wildland interface mitigation measures that will make the community safer and easier for the OCFA to defend during wildland fires. With the large area of the city that is within the Extreme Fire Severity Zone, this action would be appropriate.
If you have any additional questions or concerns regarding this project, please contact my officer at (714) 746-0484 or at g neonbey@ocofa.org.

Sincerely,

Gena F. Bergdall
Battalion Chief, Strategic Services
RESPONSE TO COMMENT LETTER NO. 6
Orange County Fire Authority

6-1 The comment regarding conformance of access roads to the Northeast Future Planned Community with OCFA adopted standards is acknowledged. It is the intent of General Plan requirements to ensure such conformance. No further response is required.

6-2 The comment regarding OCFA reserving the right to require secured fire protection agreements with future development that might generate new service demands is acknowledged. This is consistent with Implementation Program LU-23 which requires the City and OCFA to evaluate the need for additional fire facilities to serve new development. No further response is required.

6-3 The comment regarding the need for City commitment to wildland interface mitigation to make the community safer and easier for the OCFA to defend during wildland fires is acknowledged. Implementation Program S-1 works to reduce natural hazards risks. The wording of this Implementation Program has been changed to replace the word ‘brush’ with ‘wildland’. Additionally, Implementation Program S-9 works to promote fire prevention. This includes working closely with OCFA to implement fire hazard education and fire prevention programs, including fuel modification programs, and adopting and implementing the Uniform Fire Code provisions to reflect the unique Rancho Santa Margarita topography, climate, vegetation, and urban form.

6-4 This comment does not refer to any specific environmental issue. The comment is acknowledged, and no further response is required.
Comment Letter No. 7
State of California Business, Transportation and Housing Agency – Department of Transportation

August 1, 2002

Ms. Kathleen Hatton
City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

Subject: Rancho Santa Margarita General Plan - DEIR

Dear Ms. Hatton,

Thank you for the opportunity to review and comment on the DEIR dated June 19, 2002, for the Rancho Santa Margarita General Plan. The project site is located in eastern Orange County and is bordered on the west by Mission Viejo, on the east by the Cleveland National Forest, and on the north and south by unincorporated areas. The project consists of adopting a General Plan for the City, which is a comprehensive long-term guide for both the physical development and the community vision relative to the selected elements. The nearest state route is SR-241, a tollroad, that bisects the city. Utilizing primary arterials, citizens can access non-toll facilities Interstate 5 and SR-74 Ortega Highway.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

1. Our previous comments (dated 03/26/02) with regard to guidelines for direct and cumulative impacts to State ROW with regards to storm water, other environmental concerns, and the project to widen and realign the Northbound Santa Margarita Parkway on-ramp on the SR-241 still stands. (See attached).

2. We applaud the City on its continued use of bus, pedestrian and bicycle modes as part of its overall transportation planning, and encourage them to consider Transit Oriented Development that incorporates these uses directly into new residential and commercial developments.

3. Also noted, the methodology used for traffic analysis does not comply with guidelines currently used by Caltrans. In particular, the referenced analysis must be based on Peak-Hour Volume, not ADTs. Any traffic impact to the State facilities should be analyzed in accordance with the attached "Guide for the Preparation of Traffic Impact Studies".

"Caltrans program mobility across California"

7-1
7-2
7-3
7-4
Comment Letter No. 7, continued
State of California Business, Transportation and Housing Agency – Department of Transportation

Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2056.

Sincerely,

Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Ron Helgeson, HQ IGR/CEQA
Praveen Gupta, Environmental Planning Branch A
Joe Harake, Toll Road Operations
Bill Bengston, Project Management- Toll Roads
RESPONSE TO COMMENT LETTER NO. 7
State of California Business, Transportation and Housing Agency – Department of Transportation

7-1 The summary of the project description and nearby state routes is acknowledged as accurate.

7-2 Adoption and implementation of the Rancho Santa Margarita General Plan does not include any projects that will impinge or be located within the Caltrans right of way. Therefore, stormwater, biological, and water quality issues raised in your letter dated 3/26/02 (included as Appendix B of the Draft EIR) do not apply. Caltrans’ project to widen and realign the northbound Santa Margarita Parkway on-ramp to SR-241 is acknowledged. Future development pursuant to the General Plan will benefit from this project.

7-3 The comment regarding alternative modes and Transit Oriented Development is acknowledged. No further response is required.

7-4 The Rancho Santa Margarita General Plan area is currently governed by a series of community plans and the Foothill/Trabuco Specific Plan, which was prepared by the County of Orange to address areas within Trabuco Canyon located north of the City. The vast majority of the community plan areas is built-out. The remaining development potential in these areas will be built-out in accordance with the community plans each of which has a certified final EIR under CEQA. The Plano Trabuco sub-area described in the Foothill/Trabuco Specific Plan corresponds to the Northeast Future Planned Community described in the Land Use Plan within the General Plan Land Use Element. This area is currently undeveloped. Development assumptions made in the Land Use Element for the Northeast FPC are consistent with those identified in the currently adopted Specific Plan. Therefore, the Rancho Santa Margarita General Plan does not increase or create additional traffic beyond what was planned for under the existing adopted plans. Furthermore, the roadways within the City were planned for and built to accommodate build-out of the Rancho Santa Margarita General Plan. Based on Caltrans criteria, no intensification will take place, and therefore a Traffic Impact Analysis per Caltrans guidelines is not needed.

7-5 This comment does not refer to any specific environmental issue. The comment is acknowledged, and no further response is required.
Comment Letter No. 8
Governor's Office of Planning and Research

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

DATE: July 11, 2002
TO: Kathleen Hatan
City of Rancho Santa Margarita
30211 Avenida De Las Banderas
Rancho Santa Margarita, CA 92688

RE: Rancho Santa Margarita General Plan
SC#: 2002021113

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: June 18, 2002
Review End Date: August 1, 2002

We have distributed your document to the following agencies and departments:

- California Highway Patrol
- Caltrans, District 12
- Department of Conservation
- Department of Fish and Game, Region 5
- Department of Housing and Community Development
- Department of Parks and Recreation
- Department of Water Resources
- Native American Heritage Commission
- Office of Emergency Services
- Office of Historic Preservation
- Other Agency(ies)
- Regional Water Quality Control Board, Region 9
- Resources Agency
- State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.
8.0 Responses to Comments

RESPONSE TO COMMENT LETTER NO. 8
Governor's Office of Planning and Research

8-1 The letter acknowledges receipt by the State Clearinghouse of the Draft EIR and states that the public review period extends from June 18 through August 1, 2002. No response is required.