

Executive Summary

Introduction

The City of Lake Forest is proposing to develop a new sports park and recreation center on approximately 90 gross acres of land in the northeastern portion of the City near the intersection of Portola Parkway and El Toro Road. The proposed project consists of active and passive recreational uses that will be phased as private property acquisitions are negotiated and funding is secured. The City of Lake Forest is the lead agency for the proposed project environmental impact report (EIR) pursuant to the State of California Environmental Quality Act (CEQA) Guidelines. This summary identifies the purpose of the EIR, provides an overview of the proposed project, summarizes the potential impacts and mitigation measures associated with the proposed project, provides a summary analysis of alternatives to the project, and includes the required contents set forth by CEQA Statutes and Guidelines.

Purpose of the EIR

CEQA requires all public agencies within the state to consider the environmental consequences of projects over which they have discretionary authority. CEQA also requires each public agency to mitigate or avoid significant environmental effects resulting from proposed projects and identify alternatives to the proposed project that could reduce or avoid those environmental effects.

Under CEQA, a project EIR analyzes the impacts of an individual activity or specific project and focuses primarily on changes in the environment that would result from that activity or project. The EIR must include the contents required by CEQA and the State CEQA Guidelines, and it must examine all phases of the project, including planning, construction, operation, and any reasonably foreseeable future phases.

Project Description and Location

The proposed project site encompasses approximately 90 gross acres located southwest of the intersection of Portola Parkway and El Toro Road and south of SR-241, in the northeastern portion of the City of Lake Forest. Figure ES-1 presents the regional location, and Figure ES-2 shows the local vicinity of the project site. The site includes:

- the 58.6-acre Glass Creek property received from County, of which 38 acres have been designated for active use and 20.6 acres have been placed in a passive use easement;
- the Rados property, which includes approximately 13 acres of land within the central portion of the project site; and
- the 18-acre Baker Ranch property, lying immediately north and adjacent to the Rados and Glass Creek properties.

The Glass Creek site was formerly part of County open space, and is undeveloped with varying topography and native and nonnative vegetation. The Rados property is also vacant with limited vegetation; a large part of the property has been disturbed by prior grading activities. The Baker Ranch property currently has an active sand mining operation and commercial nursery and is highly disturbed.

The City is proposing to develop a number of active and passive park facilities on the proposed project site, which would be developed in phases based on the acquisition of properties associated with the overall site. The conceptual design for the proposed sports park was created through a series of community workshops and design efforts by the City's master plan consultant. In August 2009, the City Council authorized moving forward with the analysis of the Consensus Master Plan for the proposed project. Figure ES-3 shows the Consensus Master Plan for the proposed sports park, which includes the following active and passive recreational amenities should all of the properties be available for full buildout:

- up to six baseball/softball fields;
- up to five soccer/multi-use fields and two fields with a soccer overlay;
- up to six hard courts for basketball and tennis;
- up to two playgrounds including tot lots with sand and play structures;
- a 30,000-square-foot recreation center, currently envisioned as a "youth recreation center," which would include a gymnasium as well as multipurpose/meeting rooms;
- a small amphitheater adjoining the recreation center;
- surface parking lots provided at a rate of roughly 50 spaces per field and 120 spaces for the recreation center for a total of approximately 800 spaces at buildout;
- seating for baseball fields that may be terraced into the areas between infields;
- restrooms and concession areas;
- trail connections to local and regional trails; and
- security lighting and lighting for all sports fields.

The park is envisioned to be open 7 days per week from 7:00 a.m. to 10:00 p.m. The Consensus Master Plan is intended to be conceptual in nature and was developed for planning and environmental analysis purposes. A final Park Master Plan will be developed based upon the input gathered through the environmental analysis and engineering studies.

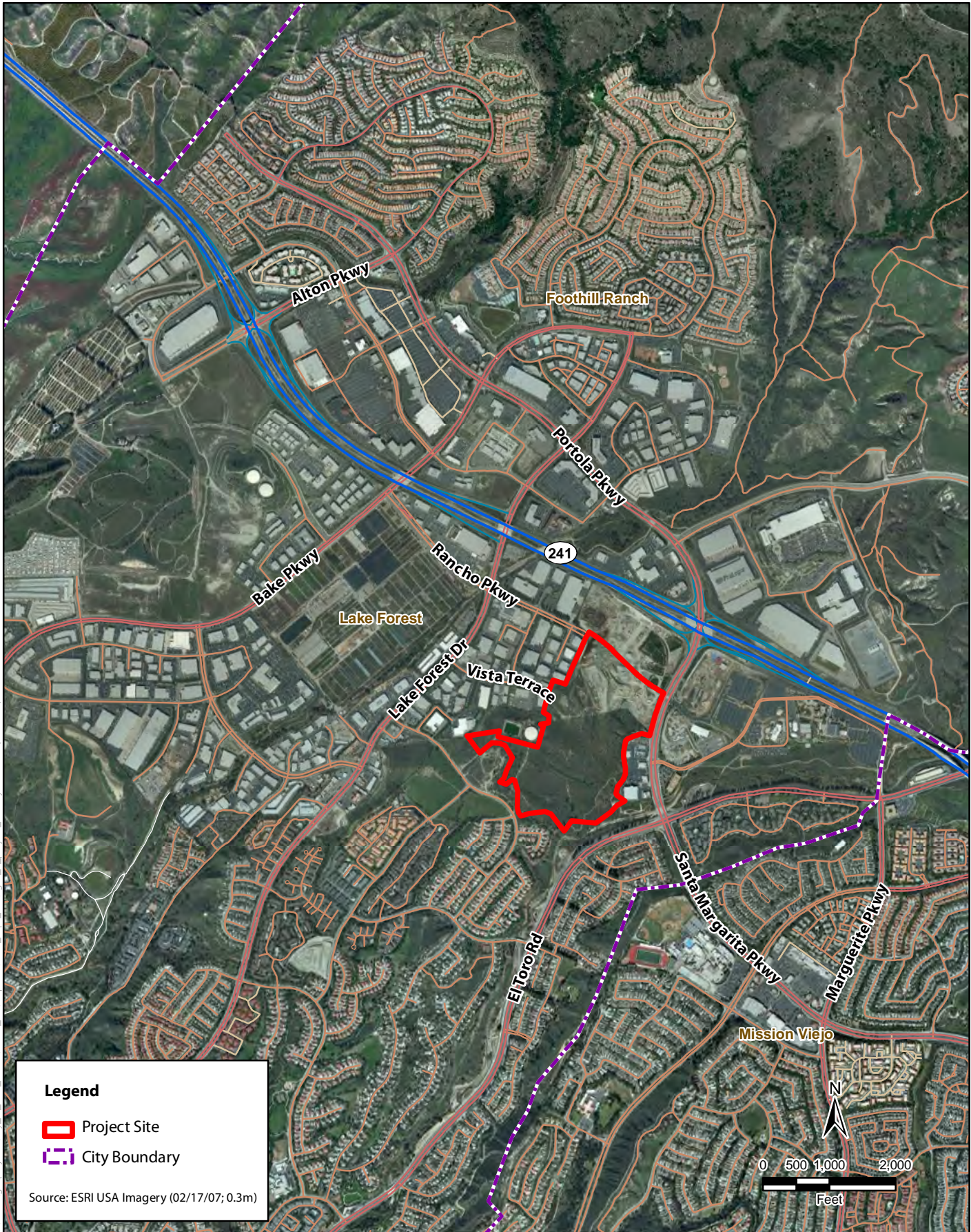
A number of potential access locations are currently under consideration and will depend on timing of property acquisition and phasing of the proposed project (phasing discussed below). Figure ES-4 shows potential access locations.

Rancho Parkway currently terminates 200 feet south of Hermana Circle. The proposed project includes the extension of Rancho Parkway between Portola Parkway and Lake Forest Drive as a four-lane divided highway pursuant to the County's Master Plan of Arterial Highways and the Lake Forest General Plan Circulation Element and the associated widening of Portola Parkway along the eastern boundary of the Baker property.

The project is anticipated to occur in two to three phases as property is acquired. For the purposes of this EIR, full buildout of the site is anticipated and is assumed to be the proposed project



**Figure ES-1
Regional Location Map**



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Figure ES-2
Project Vicinity Map

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Source: RJM (7/16/09)

Figure ES-3
Consensus Master Plan

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Figure ES-4
Proposed Access Locations

(Phases 1 through 3). However, should phasing be necessary, it is anticipated to occur as follows: Phase 1 would occur on the Glass Creek property; Rancho Parkway Phase 1 includes the extension of Rancho Parkway from Hermana Circle to Portola Parkway with associated widening of Portola Parkway; Phase 2 would occur on the Rados property; and, Phase 3 would occur on the Baker Ranch property.

Two grading options are being considered for the proposed project. Both options occur within a maximum study area developed through preliminary studies which identified environmentally sensitive areas that should be avoided. Each of these options is conceptual in nature, as final elevations will be determined at a later date based upon precise soil and engineering studies, and a final design plan. Grading Scenario 1 (Highest Pad Elevation, Balanced Grade) sets the pad elevation for the sports fields at the estimated elevation needed to achieve a balance of the grading on the Glass Creek parcel, and includes potential use of retaining wall systems, including a wall up to 45 feet in height along the eastern edge of the site. Proposed elevations at the site would range from approximately 765 feet above MSL in the southern portion of the study area to approximately 795 feet above MSL in the northern portion. Grading Scenario 2 (Lowest Pad Elevation, Grading Export) sets the proposed pad elevation for the sports fields at the estimated lowest elevation possible while preserving the environmentally sensitive areas and the edges of the study area. Proposed elevations at the site would range from approximately 750 feet above MSL in the southern portion of the study area to approximately 780 feet above MSL in the northern portion.

Development of the proposed sports park would require the extension of utilities to the site, including water, reclaimed water, sewer, electric, gas, and communications. The required utilities are available in surrounding streets such as Portola Parkway, Vista Terrace Drive, and Rancho Parkway and would include simple laterals to connect to existing facilities. Except for the extension of new utilities within Rancho Parkway, no new offsite infrastructure is required to be installed or expanded. A 16-inch reclaimed water pipeline owned and operated by IRWD which currently crosses the site would be relocated on site and would be temporarily taken out of service for short periods to connect to temporary and permanent improvements during the construction period.

The proposed project also includes a General Plan Amendment (GPA) to re-designate portions of the property to reflect the active and passive areas of the proposed Sports Park. The majority of the Glass Creek property is currently designated for Regional Park/Open Space in the City of Lake Forest General Plan. The proposed GPA would modify the land use designations on the site to reduce the 51.1 acres of Regional Park/Open Space to 20.6 acres, and increase the 7.5 acres of Community Park/Open Space to 38.0 acres. Figure ES-5 shows the proposed GPA.

A land exchange agreement approved by both the City and the County of Orange (County) in May 2009 provides for the City to acquire the Glass Creek property in exchange for 32 acres contiguous to existing permanent open space and Whiting Ranch Wilderness Park. The properties totaling approximately 38 acres that were exchanged included two parcels from Portola Center totaling 31.9 acres and approximately 6.1 acres from the Hernandez property (assessor's parcel number [APN] 606-161-10). The 38 acres of open space land was exchanged with the County for the 58.6-acre Glass Creek property. The terms of the land exchange agreement provided for 20.6 acres to be encumbered with a permanent open space/trail easement in favor of the County and the remaining 38 acres unencumbered for the intended use as an active use sports park.

The land exchange is not the subject of this EIR. This information is provided for background and indicates that the passive open space currently available on the Glass Creek property has been

replaced with permanently preserved open space adjacent to Whiting Ranch Wilderness Park. Additional discussion of the potential impacts related to conversion of passive open space to active open space is found in Sections 3.1, Aesthetics; 3.3, Biological Resources; and 3.9, Land Use and Planning.

Project Objectives

The State CEQA Guidelines (Section 15124[b]) require that the project description contain a statement of objectives that includes the underlying purpose of the project. The City is proposing to develop a new sports park to serve the existing and future recreational needs of Lake Forest's residents. The major project objectives are to:

- provide active sports recreation facilities to benefit the entire community of Lake Forest;
- develop an active recreational facility providing amenities identified by the community as most desirable including sports fields with lights, a recreation center/clubhouse, trails, picnic areas, restrooms, concessions, and playgrounds;
- develop a park plan that addresses the planning issues identified by the community by minimizing both environmental impacts and cost;
- develop a park plan which utilizes the benefits identified by the community during community workshops including the ample size of the property, views of natural open space and Saddleback Mountains, and convenient local access on major arterials;
- provide a sports park for use by a variety of user groups such as baseball, softball, soccer, and basketball teams;
- provide convenient access and sufficient parking to accommodate simultaneous use of multiple fields;
- facilitate completion of Rancho Parkway and the widening of Portola Parkway;
- preserve the sensitive riparian areas of the site and provide viewing and interpretive opportunities as part of the overall park plan; and
- develop a park plan which creates a large and continuous park space and distributes areas and amenities with related parking for safe and convenient access to all facilities.

Summary of Environmental Impacts

In June 2009, the City prepared a notice of preparation (NOP) (see Appendix A), and distributed an initial study to responsible and affected agencies and other interested parties for a 30-day public review. The public review period for the NOP began on June 3, 2009, and ended on July 6, 2009. The NOP was also posted in the Orange County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency participation in determining the scope of the EIR. A public scoping meeting was held at 5:30 p.m. on June 23, 2009, in the City of Lake Forest at the Community Room A-B, City Hall located at 25550 Commercentre Drive in Lake Forest, California. The contents of this draft EIR were established based on the findings in the NOP and public and agency input. In accordance with CEQA, issues

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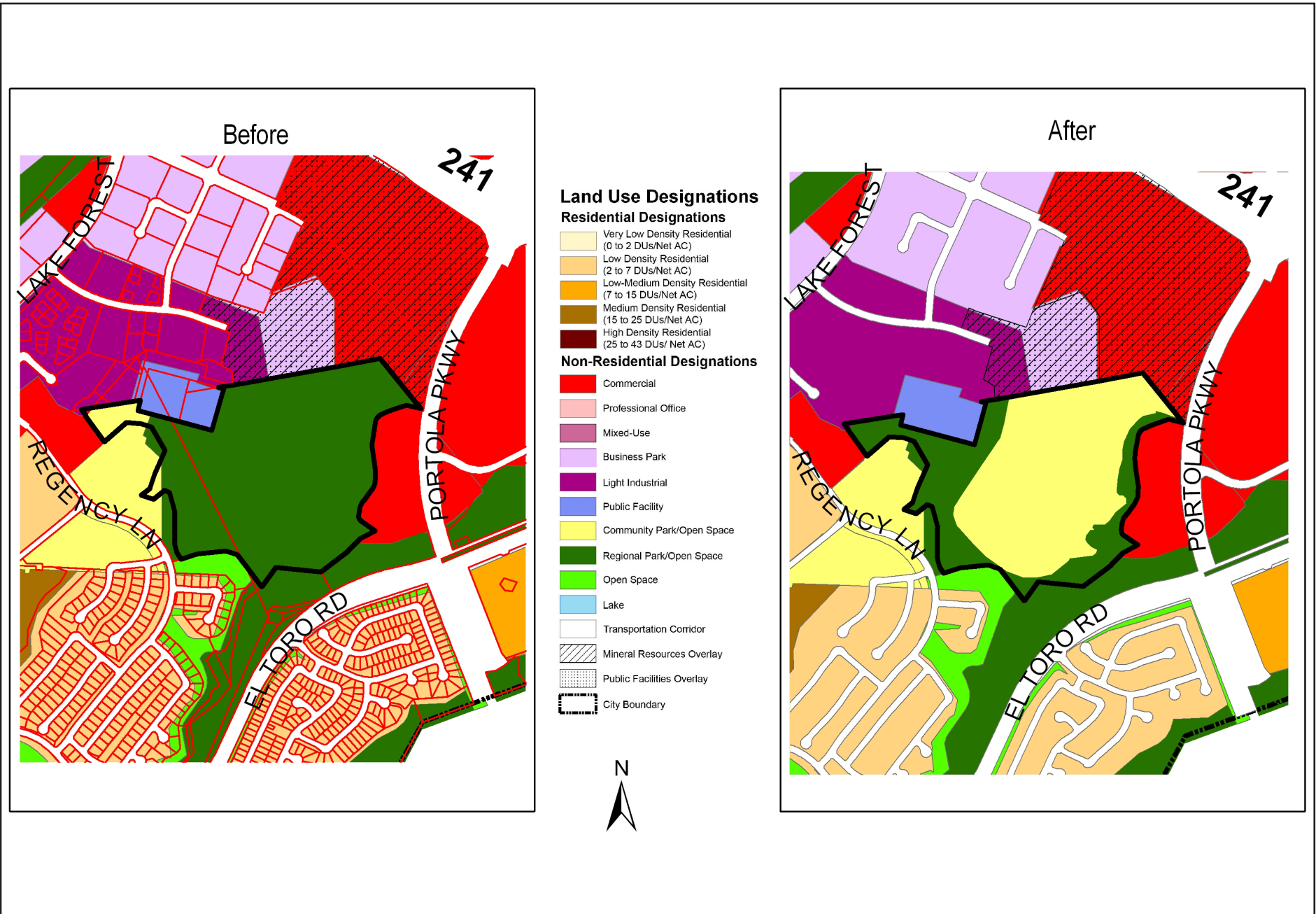


Figure ES-5
General Plan Amendment, Before and After
City of Lake Forest Sports Park and Recreation Center

found to have less-than-significant impacts or no impacts do not require further evaluation and are not addressed in this EIR.

Impacts Not Considered in This EIR

The City determined in the NOP that an analysis of the following environmental issues was not required in the EIR because it was determined through the environmental analysis conducted for the initial study that there would be either no impacts or impacts would be less than significant to the following resources:

- agricultural resources,
- population and housing.

Impacts of the Proposed Project

The NOP for this project and public and agency input identified the following environmental disciplines that would be evaluated in the EIR because they could generate potentially significant environmental impacts from the proposed project:¹

- aesthetics;
- air quality;
- biological resources;
- cultural resources;
- geology and soils;
- greenhouse gas emissions;
- hazards and hazardous materials;
- hydrology and water quality;
- land use and planning;
- mineral resources;
- noise;
- paleontological resources;
- public services and utilities; and
- transportation/traffic.

Chapter 3, Sections 3.1 through 3.14, provides a detailed discussion of the environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts to a less-than-significant level, where feasible. The impacts, mitigation measures, and residual impacts for the proposed project are summarized in Table ES-1 and discussed further below.

¹ Some of the criteria in the Initial Study Environmental Checklist for Hazards and Hazardous Materials and Public Services were determined to be less than significant in the NOP (See Appendix A); however are included for discussion in the this draft EIR.

Less-than-Significant Impacts

This draft EIR addresses all potentially significant environmental impacts that were identified by the City through the NOP and scoping process. After further study and environmental review, the following were determined in this EIR to be less than significant:

- hazards and hazardous materials;
- noise; and
- public services and utilities.

Significant Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

After further study and environmental review in this draft EIR, the following environmental impacts were determined to be less than significant with mitigation incorporated:

- biological resources;
- cultural resources;
- geology and soils;
- hydrology and water quality;
- land use and planning;
- paleontological resources; and
- transportation/traffic.

Unavoidable Significant Adverse Impacts

After further study and environmental review in the draft EIR, the following environmental impacts analyzed would be significant and unavoidable after the incorporation of appropriate mitigation measures:

- aesthetics;
- air quality;
- greenhouse gas emissions; and
- mineral resources.

Cumulative Impacts

A review of the proposed project relative to other projects within the respective area of potential effect from the proposed project site was conducted. The proposed project when combined with other past, present, and reasonably foreseeable future projects would contribute to cumulative aesthetic, air quality, greenhouse gas emissions, and mineral resources impacts.

Growth-Inducing Impacts

The proposed project would not result in direct growth-inducing impacts. The proposed project would not involve the development of new housing, nor would it change the general plan or zoning ordinance in a way that would encourage and facilitate offsite economic activities. The project

would accommodate recreation needs within existing and projected demands, therefore the project would not generate direct growth-inducing impacts.

The proposed project would also not result in indirect growth-inducing impacts. The capacity of existing infrastructure in the project area would not be expanded to accommodate the proposed project. The project would extend some infrastructure (water, reclaimed water, sewer, gas, and telecommunication) to the site; however, existing utilities connections are available in the surrounding streets. Rancho Parkway would be extended to connect to Portola Parkway; however, the expansion of this roadway has been anticipated within the City's Circulation Element and the County's Master Plan of Arterial Highways (MPAH). Because the project would not expand the capacity of existing infrastructure beyond that needed to meet the existing and projected demand, no indirect growth-inducing impacts would occur. In addition, the Portola Parkway Extension would not provide new access opportunities to properties that previously did not have access to adjacent roadways. All properties that would take access from the Rancho Parkway Extension currently have access to existing arterials and roadways.

Significant Irreversible Changes to the Environment

The proposed project would require the use of nonrenewable resources such as lumber, metal alloys, and aggregate resources for the physical construction components of the project. However, the project does not represent an uncommon construction project that would use an extraordinary amount of raw materials in comparison to other urban development projects of similar scope and magnitude.

The proposed project would result in significant unavoidable visual impacts from the permanent loss of open space and natural character of the site resulting in the degradation of the natural visual character and quality of the site. Significant impacts to mineral resources would also occur due to the loss of future mining opportunities at the Rados Parcel. In addition, development of the project would result in irreversible changes to the biological character of the site, due to the loss of natural vegetation, wildlife communities from the conversion of undeveloped open space to a sports park and recreation center. The proposed project would also result in additional traffic, with corresponding increases in air pollutants and noise emissions generated by traffic. Development of the proposed project would constitute a long-term commitment to urban use. It is unlikely that circumstances would arise that would justify the return of the land to its original condition.

Alternatives to the Proposed Project

CEQA states that the EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which are ostensibly feasible and could attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." During the preparation of the draft EIR, the City initially developed several alternatives to the proposed project for consideration. Table ES-2 provides a summary of each alternative considered for analysis, and Table ES-3 provides a comparison of the impacts of the alternative with those of the proposed project.

In total, the DEIR evaluates seven project alternatives. Most of the alternatives look at configurations of the Sports Park if the subject properties (Baker, Rados, and Glass Creek) are not developed per the proposed project. Additionally, Alternative 7 was developed as a refinement to the Consensus Master Plan and is intended to introduce efficiencies into the programming of the site.

As summarized in Table ES-3, Alternative 1a, the No-Project/No Build Alternative, would be environmentally superior to the proposed project on the basis of its minimization or avoidance of physical environmental impacts. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the No-Project Alternative is found to be environmentally superior, “the EIR shall also identify an environmentally superior alternative among the other alternatives.” Therefore, the environmentally superior alternative that is not the No Project/No Build Alternative would be Alternative 5, Sports Park Development on Rados and Expanded Baker Ranch Properties, Excludes Glass Creek Property. This alternative results in a park site which is bisected by Rancho Parkway and does not meet some of the project objectives. Additionally, Alternative 5 would not be economically viable as the City does not own the expanded Baker Ranch Property. The purchase of approximately 30 acres of additional land would be expected to cost in excess of \$30 million and would impact the City’s ability to fund and construct the recreational facilities.

While CEQA requires the Lead Agency to identify the environmentally superior alternative from among the range of alternatives presented in the EIR, the Lead Agency is not required to select that alternative. Each of the alternatives, including Alternative 5, are discussed in greater detail in Chapter 5 of the DEIR.

Table ES-1. Summary Table

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 3.1 Aesthetics			
<p>Impact AES-1. The project would substantially damage scenic resources, including scenic vistas from public parks and views from designated scenic highways or arterial roadways.</p>	<p>Significant</p>	<p>Mitigation Measure AES-1. Re-establish native vegetation along project ridgeline and associated slopes. During the final stages of construction as part of the landscape installation, ridgeline and sloped areas disturbed by grading and project construction will be replanted and seeded with species and in density patterns that naturally occur on site. If feasible, plant material that can be successfully replanted, and topsoil containing native seeds, will be stockpiled and used in the revegetation plan. Seed may be collected from plant material that has adapted to local conditions from the site prior to grading to be used in conjunction with container stock to obtain maximum coverage for aesthetics and erosion control. Weedy areas shall be mapped and avoided when topsoil is salvaged. Planting design will be conducted to accomplish at a minimum maintenance of the visual link connecting the ridgeline with the natural areas and open space within the viewshed.</p> <p>Supplemental temporary irrigation will be installed and maintained to promote the establishment of planted and transplanted seedlings and development of extensive root systems. Irrigation intensity and duration will be tapered seasonally to better mimic natural precipitation patterns and help to acclimate the revegetation areas to the natural environment. Irrigation systems will remain in place until revegetation is considered successful based on the established monitoring criteria for plant health and vigor.</p> <p>Monitoring may involve assessing individual species and/or annual aerial assessments. Individual re-plants will be</p>	<p>Significant and Unavoidable</p>

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>identified by location and may be considered to be on their own annual monitoring cycle that will continue for 5 years and be considered successful after meeting health and vigor criteria with no supplemental irrigation for a minimum of two growing seasons. Alternatively, the revegetation area will be monitored for a minimum of 5 years, and if after two growing seasons, plant density, aerial coverage, and health and vigor criteria are met without supplemental irrigation, the revegetation will be considered successful.</p> <p>Success criteria that may trigger replanting may involve a combination of survival and health and vigor and percent coverage. This may include the following criteria:</p> <ul style="list-style-type: none"> • 90% survival or 10% coverage of native species at the end of year 1, • 80% survival or 20% coverage of native species at the end of year 2, • 70% survival or 35% coverage of native species at the end of year 3, • 60% survival or 50% coverage of native species at the end of year 4, • 50% survival or 60% coverage of native species at the end of year 5. <p>If after year 5, success criteria is not met, the revegetation shall be compared to cover of adjacent areas. Remedial measures would involve re-planting and re-seeding and continued irrigation, or regrading the slopes to create terraces or pockets that would hold topsoil and re-plant. A detailed revegetation and monitoring plan will be prepared, which will identify the planting palette, methodology, irrigation requirements, monitoring frequency and duration, success criteria, and contingency measures.</p> <p>Mitigation Measure AES-2. Maintain open space riparian corridor as a visual buffer. During the final stages of construction as part of the landscape installation,</p>	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact AES-2. The project would create a new source of substantial night lighting that would result in “sky glow” (i.e., illumination of the night sky in urban areas) or “spill light” (i.e., light that falls outside of the area intended to be lighted) onto adjacent sensitive land uses.</p>	Significant	<p>riparian areas disturbed by grading and project construction will be replanted with riparian species and in density patterns that naturally occur on site. Planting design will be conducted with the following overall goals:</p> <ul style="list-style-type: none"> • Screen views into the site of the playing fields, parking lots, field lighting fixtures, and structures. • Maintain a visual and physical link to the Aliso Creek corridor. • Use of riparian vegetation such as sycamore trees for landscaped areas adjacent to the existing riparian corridors will help anchor and integrate the project with Aliso Creek and the riparian corridor that bounds the eastern edge of the site. <p>Mitigation Measure AES-3. Onsite verification of lighting installation. During the installation of the lighting system, the City will retain a registered lighting engineer or lighting professional with certification that indicates proficiency in outdoor lighting design to provide onsite verification that lighting installation conforms to submitted plans. Verification after the completion of construction will ensure that all specifications in the lighting plan, including mounting heights, horizontal angle of luminary shields, spill light foot candles, and lumens, have been met.</p> <p>Mitigation Measure AES-4. Sports facility lighting curfew. Throughout the operation of the proposed sports park complex, the City will impose a lighting curfew to limit nighttime operational hours for field use. The imposition of a lighting curfew will help protect nighttime views for sensitive receptors by reducing the duration of operations to provide a light-free sky above the project site during later evening hours. All events will be scheduled to conclude before the curfew, and illumination of the playing fields will be permitted after curfew only to conclude a scheduled event that exceeded curfew due to unusual circumstances. The lighting curfew will be imposed after 10:30 p.m.</p>	Significant and Unavoidable
<p>Impact AES-3. The project would not create a new source of substantial glare that would adversely affect</p>	Less Than	None	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>daytime visibility and/or views in the area.</p> <p>Impact AES-4. The project would substantially degrade the existing visual character or quality of the site and its surroundings.</p>	Significant	<p>Implement Mitigation Measure AES-1 and Mitigation Measure AES-2.</p> <p>Mitigation Measure AES-5. Reduce visibility of new structures. During the final design stages as part of the architectural finishing, perimeter landscaping and appropriate color treatment for buildings and concrete areas will be designed to include colors that complement and blend with the setting. This will reduce contrast and promote compositional harmony of architectural features. Perimeter landscaping will be designed and installed along the eastern edge of the parking lot to soften the edges, and blend with the natural riparian corridor in the foreground. New accessory structures (excluding the recreation center) will be painted with a shade that is 1 to 2 degrees darker than the general surrounding area. In addition, concrete structures, such as bench drains, will implement integral color, in the same manner, to reduce visibility. Because color selection will vary by location, the City will employ the use of color panels evaluated from KOPs during common lighting conditions (front vs. back lighting) to aid in the appropriate color selection. Color panels will be a minimum of 3 feet by 2 feet and will be evaluated from various distances to ensure the best possible color selection. Refer to http://www.blm.gov/bmp for more information on this technique</p> <p>Appropriate paint type will be selected for the finished structures to ensure long-term durability of the painted surfaces. These measures will be implemented during the finishing stages of construction, and will be maintained by the City of Lake Forest over the life of the project.</p> <p>Mitigation Measure AES-6. Develop landscape master plan. The City of Lake Forest will retain a landscape architect to develop a landscape master plan designed to provide both functional and aesthetic enhancements. Functionally, the landscaping will provide shade, help screen views to and from the site, reduce glare and</p>	Significant and Unavoidable

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>reflection from built surfaces, and where necessary, control erosion. Aesthetically, the landscaping will be designed to frame views, provide visual unity with the landscape, and minimize negative visual effects of the project by softening hard surfaces and reducing contrast and scale through the introduction of color, form, and textures that provide a visual linkage to the surrounding context. Landscaping will provide a thematic identity with Aliso Creek and the natural elements within the surrounding landscape.</p>			
<p>Section 3.2 – Air Quality</p>			
<p>Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality management plan.</p>	<p>Less Than Significant</p>	<p>None</p>	<p>Less Than Significant</p>
<p>Impact AQ-2: The proposed project would violate an air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p>Significant</p>	<p>Mitigation Measure AQ-1: Construction-period engine/equipment emissions. During project construction, all internal combustion engines/construction equipment operating on the project site will meet EPA-Certified Tier 2 emissions standards, or higher.</p> <p>Mitigation Measure AQ-2: Construction-period engine/equipment oxides catalyst. During project construction, all equipment operating on the project site will be fitted with an oxides catalyst.</p> <p>Mitigation Measure AQ-3: Use of low-NO_x diesel fuel. The City will require by contract specifications that all heavy-duty diesel-powered equipment operating and refueling at a project site within the project area will use low-NO_x diesel fuel to the extent that it is readily available and cost effective (up to 125 percent of the cost of California ARB diesel) in the South Coast Air Basin (this does not apply to diesel-powered trucks traveling to and from the project sites within the project area). Contract specification language will be reviewed prior to issuance of a grading permit (OSA Mitigation Measure 3.3-2).</p> <p>Mitigation Measure AQ-4: Use of alternative fuel and low-emission diesel equipment. The City will require by contract specifications that alternative fuel construction</p>	<p>Significant and Unavoidable</p>

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact AQ-3: The proposed project would expose sensitive receptors to substantial pollutant concentrations.</p>	Significant	<p>equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) and low-emission diesel construction equipment will be utilized to the extent that the equipment is readily available and cost effective in the South Coast Air Basin. Contract specification language will be reviewed prior to issuance of a grading permit (OSA Mitigation Measure 3.3-3).</p> <p>Mitigation Measure AQ-5: Turn off equipment when not in use. The City will require by contract specifications that construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes. Contract specification language will be reviewed prior to issuance of a grading permit (OSA Mitigation Measure 3.3-5)</p> <p>Mitigation Measure AQ-6: Use of existing electricity infrastructure. The City will require by contract specifications that construction operations will rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible. Contract specification language will be reviewed prior to issuance of a grading permit (OSA Mitigation Measure 3.3-6).</p>	Significant and Unavoidable
<p>Impact AQ-4: The proposed project would create objectionable odors affecting a substantial number of people.</p>	Less Than Significant	None	Less Than Significant
<p>Section 3.3 – Biological Resources</p>			
<p>Impact BIO-1: The project would have an adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	Significant	<p>Mitigation Measure BIO-1: Sensitive Species Surveys (OSA PEIR MM 3.4-1). Where future development projects have the potential to reduce or eliminate habitat for native plant and wildlife species or sensitive habitats, including, but not limited to, those listed in Appendix E of the OSA Program EIR (Sensitive Species Potentially Occurring within</p>	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>the Project Area), the project applicant shall conduct biological field surveys of the project area to characterize the extent and quality of habitat that would be affected by project development. Surveys shall be conducted in accordance with current CDFG or USFWS survey protocols for the target species by qualified biologists or botanists. If no sensitive species are observed and the regulatory agencies agree with those findings, then no further mitigation will be required for the species. Similarly, if no sensitive habitats are observed and the regulatory agencies agree with those findings, then no further mitigation will be required. (It should be noted that the sensitive species surveys described above satisfy this mitigation measure.)</p> <p>If sensitive species or habitats are documented on a specific site and the species or habitat is covered by the NCCP/HCP, the applicant shall conform and comply with the applicable requirements of the NCCP/HCP and proceed with BIO-2 (OSA PEIR MM 3.4-2).</p> <p>Mitigation Measure BIO-2: Loss of Coastal Sage Scrub Habitat and Plant and Animal Species Protected by the NCCP/HCP (OSA PEIR MM 3.4-2). Prior to recordation of a subdivision map or issuance of a grading permit, whichever comes first, the applicant shall retain a qualified, permitted biologist to confirm the presence and quantity of coastal sage scrub habitat located on the project site. If coastal sage scrub habitat is found to be located on the project site, the applicant shall submit proof to the director of development services that in-lieu fees have been paid to the County of Orange Central/Coastal Natural Communities Conservation Plan (NCCP) Reserve. Currently, these fees are assessed at \$65,000 per acre of coastal sage scrub habitat lost.</p> <p>The applicant shall also demonstrate to the satisfaction of the director of development services compliance with the following NCCP construction impact avoidance measures or such measure in effect at the time of construction:</p> <ul style="list-style-type: none"> To the maximum extent practicable, no grading of CSS habitat that is occupied by nesting gnatcatchers will occur during the breeding season (February 15 through 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>July 15). It is expressly understood that this provision and the remaining provisions of these “construction-related minimization measures” are subject to public health and safety considerations. These considerations include unexpected slope stabilization, erosion control measures, and emergency facility repairs. In the event of such public health and safety circumstances, landowners or public agencies/utilities will provide USFWS/CDFG with the maximum practicable notice (or such notice as is specified in the NCCP/HCP) to allow for capture of gnatcatchers, cactus wrens, and any other CSS identified species that are not otherwise flushed and will carry out the following measures only to the extent as practicable in the context of the public health and safety considerations.</p> <ul style="list-style-type: none"> • Prior to the commencement of grading operations or other activities involving significant soil disturbance, all areas of CSS habitat to be avoided under the provisions of the NCCP/HCP shall be identified with temporary fencing or other markers clearly visible to construction personnel. Additionally, prior to the commencement of grading operations or other activities involving disturbance of CSS, a survey will be conducted to locate gnatcatchers and cactus wrens within 100 feet of the outer extent of projected soil disturbance activities, and the locations of any such species shall be clearly marked and identified on the construction/grading plans. • A monitoring biologist, acceptable to USFWS/CDFG will be on site during any clearing of CSS. The landowner or relevant public agency/utility will advise USFWS/CDFG at least seven (7) calendar days (and preferably fourteen (14) calendar days) prior to the clearing of any habitat occupied by identified species to allow USFWS/CDFG to work with the monitoring biologist in connection with bird flushing/capture activities. The monitoring biologist will flush identified species (avian or other mobile identified species) from occupied habitat areas immediately prior to brush-clearing and earthmoving 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact BIO-2: The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	Significant	<p>activities. If birds cannot be flushed, they will be captured in mist nets, if feasible, and relocated to areas of the site to be protected or to the NCCP/HCP Reserve System. It will be the responsibility of the monitoring biologist to assure that Identified bird species will not be directly affected by brush-clearing and earthmoving equipment in a manner that also allows for construction activities on a timely basis.</p> <ul style="list-style-type: none"> • Following the completion of initial grading/earth movement activities, all areas of CSS habitat to be avoided by construction equipment and personnel will be marked with temporary fencing or other appropriate markers clearly visible to construction personnel. No construction access, parking, or storage of equipment or materials will be permitted within such marked areas. <p>Implement Mitigation Measure BIO-2.</p>	Less Than Significant
<p>Impact BIO-3: The project would have a substantial adverse effect on federally protected wetlands, as identified by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means.</p>	Significant	<p>Mitigation Measure BIO-3: Mitigation for Impacts on Wetlands and Aquatic Habitats. (OSA PEIR MM 3.4-4):</p> <ul style="list-style-type: none"> • Mitigation Measure BIO-3A Wetland Delineation. Prior to approval of Tentative Tract or Parcel Maps, a qualified wetland specialist shall conduct a wetland delineation in accordance with ACOE methodology of all jurisdictional waters, seeps and stream channels within a site. If appropriate, this specialist shall also submit a request for a streambed alteration agreement from CDFG because CDFG also has jurisdiction over lakes and streams under Section 1600 of the Fish and Game Code. The wetland specialist shall prepare and submit a request for a jurisdictional determination to the ACOE or CDFG as appropriate. Those waters not subject to the ACOE jurisdiction could fall under the regulatory control of the local RWQCB. The wetland specialist shall submit the delineation documents along with the ACOE 	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>jurisdictional determination to the RWQCB and request an assessment of jurisdiction. If the areas in question are subject to the ACOE or RWQCB jurisdiction then the following two measures shall be implemented as required. If the areas in question are not jurisdictional, then there is no impact on wetlands and no further action is required. (It should be noted that the wetland delineation referenced herein satisfies this mitigation measure.)</p> <ul style="list-style-type: none"> Mitigation Measure BIO-3B Permitting. The wetland specialist shall prepare an application for fill of waters subject to the ACOE jurisdiction as determined in BIO-3A. If appropriate, this specialist shall also submit a request for a streambed alteration agreement from CDFG because CDFG also has jurisdiction over lakes and streams under Section 1600 of the Fish and Game Code. The regulatory requirements of contained within the Clean Water Act and the Streambed Alteration Agreement would mandate minimal intrusion into jurisdictional areas and compensatory mitigation for permanent impacts on these areas. Mitigation Measure BIO-3C Restoration Plan. Once an approved wetland delineation is in place, the wetland specialist shall develop a comprehensive wetland restoration plan to offset impacts on these resources. Restoration could include on- or off-site construction of wetlands, contribution of funds to a local mitigation bank, or restoration of existing yet relatively poor quality wetlands. The ACOE goal is to permit no net loss of functions and values of wetland habitat. The replacement ratio of wetland acreage required to achieve this goal is a minimum of 1(new):1(old) <i>(It should be noted that the project has been designed to avoid the most significant wetland feature on the site, Glass Creek. Mitigation for impacts on unnamed tributaries is proposed at a ratio of 1:1).</i> 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact BIO-4: The project could interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.</p>	Significant	<p>Mitigation Measure BIO-4: If construction activities must occur during the nesting season (February 15 to September 1). All suitable habitat would be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of disturbance activities. If an active nest is detected, the vegetation containing the nest, along with a 200- to 300-foot buffer around it, would be flagged and avoided until the nest is no longer active, as determined by a qualified biologist.</p> <p>Mitigation Measure BIO-5: Mitigation for Fragmentation of Habitat and Wildlife Movement Corridors (OSA PEIR MM 3.4-5). In order to minimize the fragmentation of habitat and wildlife movement corridors the City shall require the applicant to include, to the extent feasible, specific design features to maintain connectivity between remaining open spaces. These features include greenbelts and other wildlife movement corridors through the proposed developments, creek setbacks and wildlife friendly stream crossings (bridges instead of culverts), and installation of wildlife-friendly landscaping (native vegetation). Any nighttime lighting shall be focused away from greenbelts and riparian corridors to preserve the nighttime integrity of these movement corridors. <i>(It should be noted that this mitigation measure has been satisfied as a component of the project design as discussed below.)</i></p>	Less Than Significant
<p>Impact BIO-5: The project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	Less Than Significant	<p>Through project design features and compliance with the City’s tree ordinance, no impacts would occur; therefore, no additional mitigation measures are required.</p>	Less Than Significant
<p>Impact BIO-6: The project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	Significant	<p>Implement Mitigation Measure BIO-2.</p>	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 3.4 – Cultural Resources			
Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of known archaeological or historical resources as defined in Section 15064.5 of the State CEQA Guidelines.	No Impact	None	No Impact
Impact CR-2: The proposed project has the potential to cause a substantial adverse change to the significance of previously unidentified archaeological or historical resources pursuant to Section 15064.5 of the State CEQA Guidelines.	Significant	<p data-bbox="993 505 1598 641">Mitigation Measure CR-1: Archaeological construction monitoring. Because there is the potential for significant subsurface deposits, a qualified archaeologist will monitor ground-disturbing activities during construction within the Glass Creek property.</p> <p data-bbox="993 654 1598 1068">In accordance with Public Resources Code Section 21083.2(i), should unidentified cultural resources be encountered during construction, work in the immediate vicinity of the find shall cease until a qualified archaeologist can evaluate the find for CRHR eligibility and determine whether it constitutes a unique archaeological resource for purposes of CEQA. Should the accidental discovery be identified as a significant historical resource, or a unique archaeological resource, appropriate treatment recommendations will be developed, which may include avoidance, data recovery excavation, or other mitigation. The following mitigation measures from the OSA PEIR would be applicable to archaeological construction monitoring (Mitigation Measure CR-1) for the proposed project:</p> <ul data-bbox="993 1081 1598 1421" style="list-style-type: none"> • Prior to issuance of a grading permit for any site within the project area, a qualified archaeologist shall be retained by the applicant for that grading permit to provide professional archaeological services. The archaeologists shall be present at the pre-grading conference to establish procedures for archaeological resources surveillance. Those procedures shall include provisions for temporarily halting or redirecting work to permit sampling, identification, and evaluation of resources deemed by the archaeologist to potentially be historical resources or unique archaeological resources under CEQA. If, before grading, any portions of the 	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>property subject to the grading permit have been identified as sites, which may have such resources present and may be impacted by development, the archaeologist shall conduct a site survey and records search and such further examination as may be needed to assess the significance of the resources. If the archaeological resource is determined to be a unique archaeological resource, options for avoidance or preservation in place shall be evaluated and implemented if feasible. In the event that avoidance or preservation in place is infeasible and the archaeologist determines that the potential for significant impacts to such resources exists, a data recovery program shall be expeditiously conducted. The archaeologists also shall conduct on-site archaeological monitoring for the grading operations. Should historical resources or unique archaeological resources be discovered during the grading operation, grading activities shall be modified to allow expeditious and proper analysis and/or salvage of the resources. Disposition of the resources shall be within the discretion of the City of Lake Forest (OSA Mitigation Measure 3.5-1).</p> <ul style="list-style-type: none"> • The qualified archaeologist retained shall prepare monthly progress reports to be filed with the City of Lake Forest (OSA Mitigation Measure 3.5-2). • Artifacts recovered shall be prepared, identified, and cataloged before donation to the accredited repository designated by the City of Lake Forest. State of California Guidelines for the Curation of Archaeological Collections shall be consulted regarding the treatment of recovered artifacts. Any artifacts determined to be insignificant shall be offered to local schools for use in education programs (OSA Mitigation Measure 3.5-3). • The qualified archaeologist retained shall prepare a final report to be filed with the City. The qualified archaeologist retained shall prepare a final report to be filed with the site developer(s), the City of Lake Forest, and the South Coast Central Information Center. The report shall include 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact CR-3: The proposed project has the potential to cause a disturbance to human remains, including those interred outside of formal cemeteries.</p>	Significant	<p>a list of specimens recovered, documentation of each locality, and interpretation of artifacts recovered as well as all specialists' reports as appendices (OSA Mitigation Measure 3.5-4).</p> <p>Mitigation Measure CR-2: Consultation with county coroner and notification of most likely descendant. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance can occur until the county coroner has made a determination of origin and disposition pursuant to California Public Resources Code Section 5097.98. The county coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify the most likely descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.</p>	Less Than Significant
Section 3.5 – Geology/Soils/Seismicity			
<p>Impact GEO-1: Implementation of the proposed project would not increase exposure of people or structures to hazards related to strong seismic ground shaking.</p>	No Impact	None	No Impact
<p>Impact GEO-2: Implementation of the proposed project would not increase exposure of people or structures to liquefaction.</p>	No Impact	None	No Impact
<p>Impact GEO-3: Implementation of the proposed project would increase exposure of people or structures to hazards related to landsliding.</p>	Significant	<p>Mitigation Measure GEO-1: Implement and enforce recommendations in the preliminary geotechnical investigation. During grading and site preparation, all onsite earthwork will be performed in accordance with the recommendations contained in Section 5.0, Preliminary Recommendations, of the preliminary geotechnical evaluation; the City grading requirements; and the General Earthwork and Grading Specifications for Rough Grading</p>	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>included in Appendix F of the preliminary geotechnical evaluation. In case of conflict, the recommendations contained in Section 5.0 shall supersede those included in Appendix F of the preliminary geotechnical evaluation. The recommendations, which are considered preliminary, may be revised based on actual conditions encountered during earthwork and grading. In addition, they will be revised if the site plan is modified. The final grading plans will specify the recommended geotechnical engineering measures to minimize effects from landslides. These recommendations will include the following:</p> <p>Prior to grading of areas to receive structural fill or engineered structures, the areas will be cleared of surface obstructions and potentially compressible material (such as stockpiled materials, undocumented fill, colluvium, desiccated older fill, weathered bedrock, and vegetation), and holes resulting from the removal of buried obstructions, which extend below proposed finish grades, will be replaced with suitable compacted fill material;</p> <ul style="list-style-type: none"> • All potentially compressible/collapsible materials not removed by the planned design cuts will be excavated to competent material and replaced with appropriate compacted fill soils to at least 90% relative compaction (based on American Society for Testing and Materials [ASTM] Test Method D1557), in a manner approved by geotechnical monitors in the field; • All excavations will be made in accordance with California Occupational Safety and Health Administration (Cal/OSHA) requirements to minimize hazards associated with remedial grading and temporary slopes during construction; • The cut portion of cut/fill transitions will be overexcavated a minimum of 5 feet vertically and to at least one half the maximum fill thickness under the building envelope, not exceeding 15 feet vertically, and extending at least 5 horizontal feet outside of the proposed building footprints; 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • The bottom of the overexcavation will be graded to flow towards deeper fill areas, and the overexcavated material will be replaced by compacted fill material to design grade; • All design cut pads will be undercut a minimum of 2 feet below ultimate finish pad grade, and the overexcavation bottom will be graded with a minimum 2% tilt toward deeper fill areas to reduce the potential for ponding water (this will necessitate some areas being over excavated more than 2 feet); • Future streets and parking lot areas will be undercut a minimum of 2 feet below finished asphalt elevation, and all overexcavated material will be replaced with compacted fill materials free of oversize material (material larger than 8 inches in maximum dimension); • If cut slopes are to be overexcavated and replaced with fill, they will be constructed as replacement fill slopes in accordance with the recommendations provided on the Stabilization Fill detail provided in Appendix F of the preliminary geotechnical evaluation; • Properly outletted back drains will be constructed along stabilization fill backcuts; • To reduce the potential for backcut failures, the keyway backcuts will be planned to minimize the time the backcut is left exposed, and the backcuts will not be initiated prior to forecasted rain or where they will be left open for extended periods; • Fill slope faces will be compacted to minimum project specifications, which may require overbuilding of the slope face and trimming back to design grades; • To improve surficial stability, vegetation specified by the landscape architect will be established on the slope face as soon as it is practical; • Although top-of-slope improvements including fences, walls, sidewalks, etc., are generally not considered structural, it is recommend that these improvements and other landscaping features be constructed with 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact GEO-4: The proposed project would result in substantial soil erosion or the loss of topsoil.	Significant	<p>flexibility to accommodate the effects of slope creep. Typical remediation methods include construction joints, separation joints, flexible pavers, flexible structures, or additional reinforcement to limit cracking (Refer to Section 5.9, Nonstructural Concrete Flatwork, in the preliminary geotechnical evaluation).</p> <p>MM GEO-2: Reduce topsoil erosion through minimization of grading and re-use of stockpiled soils. During construction grading and site preparation, to reduce the loss of topsoil, the City will:</p> <ul style="list-style-type: none"> • limit the extent of disturbance to the minimum needed for construction, staging, and access, and • stockpile topsoil removed during grading for onsite reuse during site landscaping. Topsoil stockpiles will be kept separate from other excavated materials to facilitate effective reuse. 	Less Than Significant
Impact GEO-5: Implementation of the proposed project would locate structures on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.	Significant	Implement Mitigation Measure GEO-1.	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact GEO-6: Implementation of the proposed project could locate structures on expansive soil, as defined in Table 18-1 A of the California Building Code (2001), creating substantial risks to life or property.</p>	Significant	Implement Mitigation Measure GEO-1.	Less Than Significant
Section 3.6 – Greenhouse Gas Emissions			
<p>Impact GHG-1: The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	Significant	<p>MM GHG-1 (OSA PEIR Mitigation Measure GCC1): The City shall comply with the future requirements for implementation of AB 32 and SB 97 once those implementation requirements are developed.</p> <p>MM GHG-2 (OSA PEIR Mitigation Measure GCC2): During final design, the City shall ensure the project complies with the requirements of Title 24 of the California Code of Regulations.</p> <p>MM GHG-3 (OSA PEIR Mitigation Measure GCC3): During final design, site plans shall include prioritized parking for electric vehicles, hybrid vehicles, and alternative fuel vehicles.</p> <p>MM GHG-4 (OSA PEIR Mitigation Measure GCC4): The City shall identify energy efficient street lights and water and wastewater pumps and treatment systems which are currently available and which when installed will provide for a 10 percent reduction beyond the 2007 baseline energy use for this infrastructure, and shall require the use of this technology in all new development. All new traffic lights installed within the City shall use LED technology.</p> <p>MM GHG-5 (OSA PEIR Mitigation Measure GCC5): The City shall recycle and/or salvage at least 25 percent of nonhazardous construction and demolition debris. To implement this requirement, the City shall submit a construction waste management plan for review and approval of the Development Services Director prior to issuance of a Building Permit. The construction waste management plan shall identify materials to be diverted from disposal and whether the materials will be stored on-site or commingled. Excavated soil and land-clearing debris do not contribute to this credit. Calculation can be done by weight or volume but must be documented. The</p>	Significant and Unavoidable

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>construction waste management plan shall be part of the plans and specifications given to the construction contractor who will be responsible for implementing the plan during construction.</p> <p>MM GHG-6 (OSA PEIR Mitigation Measure GCC6): During final design, the City shall demonstrate use of reclaimed water for public and common area landscaping where available; install 50 percent native/drought-tolerant plant species; and utilize “smart” advanced capability controllers (e.g., Weather-Trac) to reduce water and energy consumption.</p> <p>MM GHG-7 (OSA PEIR Mitigation Measure GCC7): During final design, the site plans must incorporate any combination of the following strategies to reduce heat gain created by impervious areas:</p> <ul style="list-style-type: none"> • Utilizing shade trees in common area landscaping; • Reducing the street widths to minimize impervious areas and reduce the use of asphalt; • Utilizing light-colored and reflective roofing materials and paint; • Incorporating bioswales where feasible in development areas to capture urban runoff and increase the amount of pervious surfaces. <p>MM GHG-8 (OSA PEIR Mitigation Measure GCC8): All development in the Opportunities Study Area shall be required to post signs and limit idling time for commercial vehicles, including delivery trucks to no more than 5 minutes.</p> <p>MM GHG-9: Reduce onsite energy consumption by a minimum of 10 percent. The City will incorporate energy conservation measures in Title 24’s 2008 Building Energy Efficiency Standards that go above mandatory requirements into the design of the proposed project, and may include, but will not be limited to, the following:</p> <ul style="list-style-type: none"> • building form and orientation will maximize use of natural lighting; 	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact GHG-2: The proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.</p>	No Impact	<ul style="list-style-type: none"> • indoor/outdoor lighting will apply energy efficient technologies; • insulation and window glazing will minimize heat transfers to regulate internal temperatures; • building envelope and internal layout will be designed for efficient insulation, heating, and cooling of space; • hot water systems will incorporate the latest technologies; and • installation of efficient heating, ventilation, and air conditioning (HVAC) units will minimize energy demands. <p>MM GHG-10: Reduce onsite water consumption by a minimum of 20 percent. The City will incorporate water conservation measures into the design of the proposed project, and may include, but will not be limited to, the following:</p> <ul style="list-style-type: none"> • use water-efficient landscaping, including drought tolerant, native, and appropriate climate zone species; • incorporate efficient irrigation systems, including drip, micromisters, and smart irrigation controls; • use recycled wastewater for irrigation, and potentially non-potable purposes, available to the site from IRWD; • minimize the use of turf grass, and limit it to the athletic fields and smaller portions of the passive park areas; and • reduce potable water demands by installing water-conserving fixtures (low-flow faucets, toilets, urinals, etc.). 	No Impact
<p>Section 3.7 – Hazardous Materials</p>			
<p>Impact HAZ-1: The proposed project is not located on a site which is included on a list of hazardous materials</p>	No Impact	None	No Impact

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.			
Section 3.8- Hydrology and Water Quality			
Impact HWQ-1: The proposed project has the potential to substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff above pre-development condition in a manner which would result in flooding on or off site.	Significant	Mitigation Measure HWQ-1: Prepare Hydrology and Hydraulics Study (OSA Mitigation Measure MM 3.8-5). Prior to issuance of a grading permit, the City shall conduct a hydrology and hydraulics study to determine potential stormwater runoff rates and peak flows for the City of Lake Forest and County of Orange design storms, as well as the 100-year storm for both existing and Proposed Project conditions. Sufficient detail shall be provided to develop the existing conditions and Proposed Project conditions potential hydrograph and timing of peak flows. Studies shall be completed by a qualified professional and be consistent with standard engineering practices for the region, including the use of the criteria of the Orange County Hydrology Manual. The studies shall demonstrate that the effect of stormwater discharge to any City, County, or Other Agency-owned drainage or flood control facility as mitigated shall be designed and implemented to prevent post-construction stormflows from exceeding pre-construction volumes and rates.	Less Than Significant
Impact HWQ-2: The project has the potential to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage.	Significant	Implement Mitigation Measure HWQ-1.	Less Than Significant
Impact HWQ-3: The project has the potential to deposit sediment and debris materials within existing channels obstructing flows.	Significant	Implement Mitigation Measures HWQ-1, and BIO-3A, BIO-3B, and BIO-3C.	Less Than Significant
Impact HWQ-4: The project has the potential to exceed the capacity of a channel and cause overflow during design storm conditions.	Significant	Implement Mitigation Measure HWQ-1.	Less Than Significant
Impact HWQ-5: The project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Significant	Implement Mitigation Measure HWQ-1.	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact HWQ-6: The project has the potential to violate any water quality standards or waste discharge requirements.</p>	<p>Significant</p>	<p>Implement Mitigation Measure HWQ-1.</p> <p>Mitigation Measure HWQ-2: Implement Turbidity Monitoring During Construction. To avoid turbidity levels from exceeding thresholds identified in the Basin Plan, the City will retain a qualified water quality specialist to monitor turbidity levels 50 feet upstream and 300 feet downstream of grading activities occurring within 500 feet of Aliso Creek and Glass Creek when flow is present. To determine turbidity level compliance, the difference between the upstream turbidity data and downstream data is compared. The increase in turbidity is then evaluated against the Water Quality Objectives, identified in the San Diego Basin Plan. A negative increase indicates that water from the site is cleaner than the water upstream, and no correction is necessary. If turbidity levels reach within 2 percent of the Water Quality Objectives, grading will be stopped, construction control measures will be installed to further prevent or control erosion, and construction will not resume until turbidity returns to an acceptable level. Monitoring will be required on a daily/weekly basis throughout the grading and construction phases until the drainage and landscaping improvements are installed that would minimize erosion from the site. When Glass Creek and Aliso Creek are dry, sampling will not be required.</p> <p>Mitigation Measure HWQ-3: Landscaping Requirements (OSA Mitigation Measure MM 3.8-2). The City will prepare a landscape design plan including the following elements:</p> <ul style="list-style-type: none"> • Maximize use of native plant species with minimum water and fertilizer requirements • Watering shall be kept to the minimum necessary to maintain new landscaping • Drip irrigation shall be used only until the native landscaping is established • Minimal use of fertilizers and pesticides <p>Mitigation Measure HWQ-4: Develop a Nutrient Management Program (OSA Mitigation Measure MM</p>	<p>Less Than Significant</p>

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact HWQ-7: The project has the potential to cause a significant alteration of receiving water quality during or following construction.	Significant	3.8-4). Prior to the issuance of a grading permit, the City shall develop and implement appropriate best management practices such as a nutrient management and monitoring program, to reduce the amount of nutrients entering the watershed. Water quality monitoring for nutrients (phosphate and nitrate) shall be conducted biannually for 7 years after the site is operational. One monitoring event will occur immediately following a large rain event, and one will be completed during the summer months (the dry season). As each phase becomes operational, monitoring for water receiving runoff will continue for 7 years past when that phase is completed. Following each monitoring event and based on the information collected during monitoring, fertilizer application methods and amounts will be re-evaluated and modified as necessary to ensure water quality thresholds are not negatively affected by the project. If monitoring identifies water quality thresholds for phosphates and nitrates are being exceeded by the project, the City will immediately reduce the use of fertilizers on site and determine the cause of the threshold exceedance by examining records for fertilizer application, conducting discussions internally, and consulting with other Orange County cities as needed.	Less Than Significant
Impact HWQ-8: The project does not have the potential to substantially degrade groundwater quality.	Significant	Implement Mitigation Measures HWQ-1 through HWQ-4 .	Less Than Significant
Impact HWQ-9: The project has the potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in the substantial erosion or siltation on-or off-site.	Significant	Implement Mitigation Measures HWQ-1 through HWQ-4 .	Less Than Significant
Impact HWQ-10: The project does not have the potential to create or contribute runoff water that would generate substantial additional sources of	Significant	Implement Mitigation Measures HWQ-1 through HWQ-4 .	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
polluted runoff.			
Impact HWQ-11: The project has the potential to substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving or downstream waters.	Significant	Implement Mitigation Measures HWQ-1 through HWQ-4	Less Than Significant
Impact HWQ-12: The project has the potential to increase in any pollutant for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list.	Significant	Implement Mitigation Measures HWQ-1 through HWQ-4 .	Less Than Significant
Impact HWQ-13: The project does not have the potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).	Less Than Significant	None	Less Than Significant
Impact HWQ-14: The project would not adversely change the rate, direction, or flow of groundwater.	Less Than Significant	None	Less Than Significant
Impact HWQ-15: The project would not have an impact on groundwater that is inconsistent with a groundwater management plan prepared by the water agencies with the responsibility for groundwater management.	Less Than Significant	None	Less Than Significant
Section 3.9 – Land Use and Planning			
Impact LU-1: The proposed project would not substantially conflict with existing onsite or adjacent land use due to project-related significant, unavoidable indirect effects that preclude use of the land as it was intended by the General Plan.	Less Than Significant	None	Less Than Significant
Impact LU-2: The proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan.	Significant	Implement Mitigation Measures BIO-2 .	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact LU-3: The proposed project would conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Significant	Implement Mitigation Measures BIO-1 through BIO-5, GEO-1, and GEO-2.	Less Than Significant
Section 3.10 – Mineral Resources			
Impact MR-1: Implementation of the proposed project could cause the loss of a known mineral resource of regional or local importance.	Significant	None.	Significant and Unavoidable
Section 3.11 – Noise			
Impact NOI-1: Project traffic would not cause a noise-level increase of 3 dB or more on a roadway segment adjacent to a noise-sensitive land use.	Less Than Significant	None	Less Than Significant
Impact NOI-2: The resulting Future with Project noise levels would not exceed the noise standard for sensitive land uses as identified in the City of Lake Forest General Plan.	Less Than Significant	None	Less Than Significant
Impact NOI-3: The proposed project would not exceed the stationary noise criteria for the City of Lake Forest as specified by the exterior noise standards set forth in the Noise Control chapter of the Lake Forest Municipal Code.	Less Than Significant	None	Less Than Significant
Section 3.12 – Paleontological Resources			
Impact PALEO-1: The proposed project would result in the destruction of significant paleontological resources as a result of construction activities.	Significant	Mitigation Measure Paleo-1: Conduct Preconstruction Survey, Salvage, and Protection in all Paleontologically Sensitive Areas. Before site preparation (including vegetation clearing) and project earthwork begin, the City will retain an Orange County–certified professional paleontologist to conduct a surface survey and salvage operation in all parts of the project site where paleontologically sensitive materials are exposed at the surface. The goal of the operation will be to ensure that	Less Than Significant

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>exposed paleontological materials are recovered and properly prepared and curated, or protected from damage using exclusion fencing or other appropriate means. Protection measures will be designed and installed in consultation with the City and the project engineering consultant to ensure that it is appropriate and effective but does not unduly impede construction activities. The work will be conducted in conformance with the Orange County guidelines as defined in Eisentraut and Cooper (2002) and meet the requirements for surface prospecting and surface collection.</p> <p>Mitigation Measure Paleo-2: Educate Construction Personnel in Recognizing Fossil Material. The City will ensure that all construction personnel receive training provided by an Orange County-certified professional paleontologist experienced in teaching non-specialists to ensure that they can recognize fossil materials in the event any are discovered during construction.</p> <p>Mitigation Measure Paleo-3 (OSA MM 3.5-5): Retain a Qualified Professional Paleontologist to Monitor Ground-Disturbing Activities. Prior to issuance of a grading permit, a qualified paleontologist shall be retained by the City to provide professional paleontological services. Specifically, during grading activities, the qualified paleontologist shall conduct onsite paleontological monitoring for the project site. Monitoring shall include inspection of exposed surfaces and microscopic examination of matrix to determine if fossils are present. The monitor shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. Cooperation and assistance from onsite personnel will greatly assist timely resumption of work in the area of the fossil discovery.</p> <p>Mitigation Measure Paleo-4: Stop Work if Fossil Remains Are Encountered During Construction; Conduct Treatment as Appropriate. If fossil remains are discovered during project-related activities, activities in the vicinity of the find will stop immediately until a qualified</p>	

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>professional paleontologist can assess the nature and importance of the find and a qualified professional paleontologist can recommend appropriate treatment. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The City will be responsible for ensuring that recommendations regarding treatment and reporting are implemented. The work will be conducted in conformance with the Orange County guidelines as defined in Eisentraut and Cooper (2002) and meet the requirements for recovery, salvage, laboratory preparation, preparation to the point of taxonomic identification, transferral, and preparation and submittal.</p> <p>Mitigation Measure Paleo-5 (OSA MM 3.5-6): Prepare Monthly Progress Reports. The qualified paleontologists retained shall prepare monthly progress reports to be filed with the City.</p> <p>Mitigation Measure Paleo-6 (OSA MM 3.5-7): Prepare, Identify and Catalog Recovered Fossils. Fossils recovered shall be prepared, identified, and catalogued before donation to the accredited repository designated by the City of Lake Forest.</p> <p>Mitigation Measure Paleo-7 (OSA MM 3.5-8): Prepare Final Paleontological Monitoring Report. The retained qualified paleontologist shall prepare a final report to be filed with the City. The report shall include a list of specimens recovered, documentation of each locality, interpretation of fossils recovered and shall include all specialists' reports as appendices.</p>	

Section 3.13 – Public Services and Utilities

<p>Impact PSU-1: The proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to</p>	<p>Less Than Significant</p>	<p>None</p>	<p>Less Than Significant</p>
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Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
maintain acceptable service ratios, response times, or other performance objectives.			
Impact PSU-2: The proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources.	Less Than Significant	None	Less Than Significant
Impact PSU-3: The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.	Less Than Significant	None	Less Than Significant

Section 3.14 – Transportation and Circulation

Impact TC-1. ICU Values at Intersections, With the Proposed Project Do Not Exceed the City of Lake Forest Performance Criteria.	Significant	<p>Mitigation Measure TC-1. Prepare and Implement a Construction Traffic Management Plan. Prior to initiating construction, the City will prepare a construction traffic management plan to be approved by the City Engineer. The traffic management plan will include, but will not be limited to:</p> <ul style="list-style-type: none"> • a street and site layout showing the location of construction activity and surrounding streets to be used as detour routes, including special signage, • a tentative start date and construction duration period for each phase of construction • the name, address, and emergency contact number for those responsible for maintaining the traffic control devices during the course of construction, • provisions for maintaining access for emergency vehicles at all times, • requirements for contractors to avoid intersections currently operating at congested conditions, either by choosing routes that avoid these locations or by receiving deliveries during nonpeak times of day, • provision of traffic controls within the site that may include flag persons wearing Occupational Safety and Health Administration–approved vests and using a 	Less Than Significant
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Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>Impact TC-2. The Proposed Project Does Not Include Design Features or Uses That May Cause Traffic Hazards.</p>	Significant	<p>“Stop/Slow” paddle to warn motorists of construction activity, and</p> <ul style="list-style-type: none"> standard construction warning signs in advance of the construction area and at any intersection that provides access to the construction area. <p>Mitigation Measure TC-2. Construct Second Eastbound Through Lane on Rancho Parkway at Lake Forest Drive by 2015. The City will construct the second eastbound through lane on Rancho Parkway at Lake Forest Drive to be operational no later than the year 2015.</p> <p>Implement Mitigation Measure TC-1.</p>	Less Than Significant
<p>Impact TC-3. The project provides adequate parking, applying the standards found in the City of Lake Forest Municipal Code.</p>	Significant	<p>Mitigation Measure TC-3. Make Arrangements with Surrounding Businesses for Overflow. The City will arrange for overflow parking at local businesses to accommodate parking during special large-scale events, or provision of “temporary” allocated parking areas on adjacent arterial roadways to ensure that adjacent residential, industrial, and commercial areas do not experience overflow parking impacts.</p>	Less Than Significant

Table ES-2. Summary of Alternatives Considered

Alternative	Description	Acres	Summary of Conclusions
1a—No Project/No Build	Glass Creek would remain a regional park/open space; Rados property would remain vacant and undeveloped land; Baker Ranch property would be mined until sand aggregate is exhausted, and would be closed per the reclamation plan.	89.6	Required by CEQA; eliminates General Plan Amendment; avoids/reduces all impacts associated with development of the proposed project.
1b—No Project/Reasonably Foreseeable Development	168,000 square feet of business park uses on Rados property; 246,600 square feet of commercial use on Baker Ranch property; existing regional park passive open space of Glass Creek property.	89.6	Required by CEQA; eliminates General Plan Amendment; provides point of comparison of impacts associated with buildout of the project in accordance with existing plans and entitlements, reduces/eliminates significant and unavoidable aesthetic impacts related to nighttime lighting and changes in visual character.
2—Sports Park Development on Glass Creek and Baker Ranch Properties; Elimination of Rados Property	Sports park on the Glass Creek and Baker Ranch Properties; Rados property would remain vacant.	76.6	Eliminate/reduce impacts related to development of Rados property, including aesthetics, air quality, geology and soils, hydrology and water quality, noise, and traffic; eliminates significant and unavoidable impact related to loss of availability of mineral resources; provides reduced site analysis. Generally, reduced impacts related to reduced facilities. Results in park facilities separated by Rados property.
3— Sports Park Development on Glass Creek and Rados Properties; Elimination of Baker Ranch Property	Sports park on the Glass Creek and Rados Properties; Baker Ranch property would remain vacant.	71.6	Eliminate/reduce impacts related to development of Baker Ranch property, including aesthetics, air quality, hydrology and water quality, noise, and traffic; provides reduced site analysis. Generally, reduced impacts related to reduced facilities.
4—Sports Park Development on Glass Creek Property Only; Elimination of Rados and Baker Ranch Properties	Development of only the Glass Creek property with sports park facilities.	58.6	Eliminate/reduce impacts related to development of Baker Ranch and Rados properties, including aesthetics, air quality, geology and soils, hydrology and water quality, noise, and traffic; eliminates significant and unavoidable impact related to loss of availability of mineral resources; provides reduced site analysis. Generally, reduced impacts related to reduced facilities.
5—Sports Park Development on Rados and Expanded Baker Ranch Properties; Excludes Glass Creek Property	Rados property and expanded Baker Ranch property would be developed with sports park facilities; Glass Creek would remain a passive regional open space.	63	Eliminates General Plan Amendment, avoids/reduces impacts associated with development of Glass Creek property, including aesthetics, air quality, biology, cultural resources, geology and soils, hydrology and water quality, and noise, and traffic; provides reduced site analysis. Generally, reduced impacts related to reduced facilities. Results in a park bisected by Rancho Parkway. Would require additional property purchase.
6—Proposed Project Without Nighttime Field Lighting	Development of the proposed project amenities without lighting for any of the sports fields.	89.6	Eliminates/reduces significant and unavoidable aesthetic impact related to nighttime lighting; eliminates nighttime use of the park and associated traffic and noise impacts after dusk.
7 – Reconfiguration of Fields and Facilities	Reconfigure the site to flip the baseball and soccer fields in the southern portion of the site	89.6	Introduce efficiencies in the programming of the site; allow the field layout to fit better within the site; reduces potential retaining wall height, and preserves additional riparian areas along and within Glass Creek.

Table ES-3. Comparison of Alternatives (after Mitigation)

Environmental Resource	Proposed Project	1a—No-Project/No-Build	1b—No-Project/Reasonably Foreseeable Development	2—Sports Park on Glass Creek and Baker Ranch, No Rados	3— Sports Park on Glass Creek and Rados, No Baker Ranch	4—Sports Park on Glass Creek, No Baker Ranch or Rados	5—Sports Park on Rados and Expanded Baker Ranch, No Glass Creek	6—No Field Lighting	7—Reconfiguration of Fields and Facilities
Aesthetics	Significant and Unavoidable	Fewer; No Impact	Fewer; Less Than Significant	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Less Than Significant	Similar; Significant and Unavoidable
Air Quality	Significant and Unavoidable	Fewer; No Impact	Fewer; Less Than Significant	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Similar; Significant and Unavoidable
Biological Resources	Less Than Significant	Fewer; No Impact	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant
Cultural Resources	Less Than Significant	Fewer; No Impact	Fewer; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant
Geology and Soils	Less Than Significant	Fewer; No Impact	Fewer; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant
Greenhouse Gas Emissions	Less Than Significant	Fewer; No Impact	<u>Construction:</u> Fewer; Less Than Significant <u>Operations:</u> Greater; Less Than Significant	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Fewer; Significant and Unavoidable	Similar; Significant and Unavoidable
Hazards and Hazardous Materials	Less Than Significant	Fewer; No Impact	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant

Environmental Resource	Proposed Project	1a—No-Project/No-Build	1b—No-Project/Reasonably Foreseeable Development	2—Sports Park on Glass Creek and Baker Ranch, No Rados	3— Sports Park on Glass Creek and Rados, No Baker Ranch	4—Sports Park on Glass Creek, No Baker Ranch or Rados	5—Sports Park on Rados and Expanded Baker Ranch, No Glass Creek	6—No Field Lighting	7— Reconfiguration of Fields and Facilities
Hydrology and Water Quality	Less Than Significant	Fewer; No Impact	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant
Land Use and Planning	Less Than Significant	Fewer; No Impact	Fewer; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant
Mineral Resources	Significant and Unavoidable	Fewer; No Impact	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Significant and Unavoidable	Fewer; Less Than Significant	Similar; Significant and Unavoidable	Similar; Significant and Unavoidable	Similar; Significant and Unavoidable
Noise	Less Than Significant	Fewer; No Impact	Greater; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant
Paleontological Resources	Less Than Significant	Fewer; No Impact	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant	Similar; Less Than Significant
Public Services & Utilities	Less Than Significant	Fewer; No Impact	Greater; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant
Transportation and Circulation	Less Than Significant	Fewer; No Impact	Greater; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Fewer; Less Than Significant	Similar; Less Than Significant

Areas of Controversy

CEQA requires that an EIR identify areas of controversy. The following issues were identified in public comments received during the NOP comment period, and each is addressed in the EIR in the section noted:

- transformation of natural open space to developed open space and associated impacts (addressed in Sections 3.1, Aesthetics; 3.3, Biological Resources; and 3.9, Land Use and Planning);
- potential impacts to archaeological sites and prehistoric human remains and recommended preservation methods (addressed in Section 3.4, Cultural Resources);
- impacts to waters of the United States (addressed in Sections 3.3, Biological Resources and 3.8, Hydrology and Water Quality);
- parking and traffic impacts to surrounding communities (addressed in Section 3.14, Transportation and Circulation); and
- potential air impacts from all phases of the project and all air pollutant sources related to the project (addressed in Section 3.2, Air Quality).

Issues to Be Resolved

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain issues to be resolved; this includes the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved within the proposed project include decisions by the lead agency as to whether:

- this draft EIR adequately describes the environmental impacts of the project,
- the recommended mitigation measures should be adopted or modified,
- additional mitigation measures should be applied to the project, and
- the project should or should not be approved for construction.

