ENVIRONMENTAL (CEQA) CONSULTING SERVICES
RICHARD T. STEED MEMORIAL PARK/BARON VON WILLARD DOG PARK MASTER PLAN UPDATE

Addendum to the Initial Study and Mitigated Negative Declaration (IS/MND)

Prepared for:

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City of San Clemente
Beaches, Parks & Recreation Department
100 N. Calle Seville
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Project No. 7259

April 2024

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PROJECT INFORMATION SHEET

1. Project Title	Richard T. Steed Memorial Park and Baron Von Willard Dog Park – Master Plan Update
2. CEQA Lead Agency	City of San Clemente Beaches, Parks & Recreation Department
3. Project Applicant	Samantha Wylie, Beaches, Parks & Recreation Director **City of San Clemente** Beaches, Parks & Recreation Department 100 N. Calle Seville San Clemente, CA 92672 E: wylies@san-clemente.org
4. Project Location	247 Avenida La Pata, San Clemente, CA 92673
5. Assessor's Parcel Number (APN)	690-552-06
6. Project Site General Plan Designation(s)	OS1- Open Space, Publicly Owned
7. Project Site Zoning Designation(s)	Rancho San Clemente Specific Plan OS (Open Space)
8. Surrounding Land Uses and Setting	The park is located adjacent to the San Onofre State Beach and Marine Corps Base Camp Pendleton to the south and east. Located to the northwest of the project site is the Bella Collina Golf Club, San Clemente's only private golf club. Rancho San Clemente Business Park is located to the west on a bluff above Richard T. Steed Memorial Park.
9. Description of Project	The Original Master Plan for the Richard T. Steed Memorial Park was approved by City Council in April 2003. At that time, the existing uses included the following: four-field softball complex; skate park; play areas; parking and internal circulation; and vegetation. Since the opening, additional features added have included: improvements to the softball complex; food concession building; enclosed tot lot; picnic area with tables; and two dog parks (large and small breed).

The Master Plan Update (approved project) includes:

- Mountain Bike Hub Enlargement
- Activity Meadows/ Large Soccer Field
- 18 Pickleball Courts
- Two Pump Track Facilities
- Large Dog Park and Shade Structure
- Small Dog Park and Shade Structure
- Skateboard Hub
- Flex Space/Volleyball Courts or Open Space
- Scenic Overlook and Trellis
- Added Parking Lot Space
- Improvements to existing park facilities

This addendum addresses the construction of six additional pickleball courts (to a total of 24 courts), a ticket booth, reduction in size of the planned soccer field, relocation of certain other project components, and an additional 65 parking spaces.

Refer to **Section 3.0** of this document for additional information.

10. Selected Agencies whose Approval is Required

City of San Clemente

11. Other Public Agencies

Agencies that will review the proposed project include the following:

- California Regional Water Quality Control Board – San Diego
- South Coast Air Quality Management District
- Orange County Fire Authority

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Term
AAQS	ambient air quality standards
AB 32	California Global Warming Solutions Act of 2006 (Assembly Bill 32)
AB 52	Assembly Bill 52 regarding tribal cultural resources
ACM(s)	Asbestos-Containing Material(s)
ADA	Americans with Disabilities Act
AFY	Acre-feet per year
AIA	Airport Influence Area
amsl	above mean sea level
APE	Area of Potential Effect
APN	Assessor's Parcel Number
AQA	Air Quality Analysis
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BIOS	Biogeographic Information and Observation System
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CAL Green	California Green Building Standards
Caltrans	California Department of Transportation
CAO(s)	Cleanup and Abatement Order(s)
CAPCOA	California Air Pollution Control Officers Association
CASGEM	California Statewide Groundwater Elevation Monitoring
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDO(s)	Cease and Desist Order(s)
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
cfs	cubic feet per second
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historic Resources Inventory System
City	City of San Clemente
CMP	Congestion Management Program
CMP	corrugated metal pipe
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide

Acronym/Abbreviation	Term
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRC	California Residential Code
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
dB	decibel
dBA	A-weighted decibel scale
DOC	California Department of Conservation
DOSH	California Division of Safety and Health
DTSC	Department of Toxic Substances Control
du/ac	Dwellling units per acre
DWR	Department of Water Resources
EIR	Environmental Impact Report
EMS	Emergency Medical Services
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESRL	Earth System Research Laboratory
EV	electric vehicle
EVCS	electric vehicle charging station
°F	degrees Fahrenheit
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gases
GIS	Geographic Information System
GPCD	gallons per capita per day
gpd	gallons per day
GWP	global warming potential
HABS	Historic American Building Survey
HCP	Habitat Conservation Plan
HFCs	hydroflourocarbons
HU	Hydrologic Unit
HVAC	heating, ventiliation and air conditioning
IPCC	Intergovernmental Panel on Climate Change
ISA	International Society of Arboriculture
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
L_{90}	noise level that is exceeded 90% of the time
L_{eq}	equivalent noise level
LBP	Lead-Based Paint
LID	Low Impact Development
L_{max}	root mean square maximum noise level

Acronym/Abbreviation	Term
LRA	Local Responsibility Area
LSTs	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	Most Likely Descendant
MM(s)	mitigation measure(s)
MMRP	Mitigation Monitoring and Reporting Program
$MMTCO_2e$	million metric tons of CO2e
MND	Mitigated Negative Declaration
MPAH	Master Plan of Arterial Highways
MRZ	Mineral Resource Zone
MS4	Municiple Separate Storm Sewer System permit
MT	Metric tons
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCCP	Natural Communities Conservation Plan
ND	Negative Declaration
NO	nitric oxide
NO_x	nitrogen oxides
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OCFA	Orange County Fire Authority
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyl
PFCs	perfluorocarbons
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
RECs	Recognized Environmental Condition(s)
RHNA	Regional Housing Needs Allocation
RMS	root mean square
ROG	Reactive organic gases
ROW	Right-of-way
RPS	Renewables Portfolio Standard
RWQCB	Regional Water Quality Control Board

Acronym/Abbreviation	Term
§	section
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SDG&E	San Diego Gas & Electric
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SRA	State Responsibility Area
SRAs	source receptor areas
SRRE	Source Reduction and Recycling Element
STIP	Statewide Transportation Improvement Program
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCRs	Tribal Cultural Resources
TMP	Traffic Management Plan
UFPO	Urban Forest Protection Ordinance
UEI	Ultrasystems Environmental, Inc.
U.S.	United States
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
VdB	vibration decibels
VCP	vitrified clay pipe
VHFHSZ(s)	very high fire hazard severity zone(s)
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	Water Quality Management Plan
WRI	World Resources Institute
ybp	years before present

1.0 INTRODUCTION

1.1 Proposed Project

The proposed project involves amending the Richard T. Steel Memorial Park/Baron Von Willard Dog Park Master Plan Update Initial Study/Mitigated Negative Declaration (previously approved project) to add additional pickleball courts, parking spaces, a ticket booth at the pickleball courts, a size reduction of the soccer field and a relocation of the dog parks and volleyball courts within San Clemente's Richard T. Steel Memorial Park. The original plan included 16 pickleball courts and 333 parking spaces. With this amendment, the totals would increase to 24 pickleball courts and 398 parking spaces.

1.1.1 Existing Conditions

The project site, the Richard T. Steed Memorial Park and Baron Von Willard Dog Park, is located at 247 Avenida La Pata in the City of San Clemente, California on an approximately 43.4-acre site. The project site currently consists of four baseball fields, a skatepark, parking lots, and undeveloped land (Google Earth Pro, 2024).

1.2 Project Applicant for this Project

Samantha Wylie, Beaches, Parks and Recreation Director
City of San Clemente – Beaches, Parks and Recreation Department
100 North Calle Seville
San Clemente, CA 92672

1.3 Lead Agencies – Environmental Review Implementation

The City of San Clemente is the Lead Agency for this project pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations.[1] The Lead Agency has the principal responsibility for approving and implementing a project that may have a significant effect on the environment.

1.4 CEQA Overview

1.4.1 Purpose of CEQA

All discretionary projects in California are required to undergo environmental review under CEQA. A Project is defined in CEQA Guidelines § 15378 as the whole of the action having the potential to result in a direct physical change or a reasonably foreseeable indirect change to the environment and is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities, clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements.

[1] Public Resources Code §§ 21000 - 21177 and California Code of Regulations Title 14, Division 6, Chapter 3.

- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

CEQA Guidelines § 15002 lists the basic purposes of CEQA as follows:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.

- Identify the ways that environmental damage can be avoided or significantly reduced.

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.4.2 Authority to Mitigate under CEQA

CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. Under CEQA Guidelines § 15041 a Lead Agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus"[2] and "rough proportionality"[3] standards.

CEQA allows a Lead Agency to approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that there is no feasible way to lessen or avoid the significant effect. In such cases, the Lead Agency must specifically identify expected benefits and other overriding considerations from the project that outweigh the policy of reducing or avoiding significant environmental impacts of the project.

1.5 Purpose of an Addendum

The CEQA process begins with a public agency making a determination as to whether the project is subject to CEQA at all. If the project is exempt, the process does not need to proceed any farther. If the project is not exempt, the Lead Agency takes the second step and conducts an Initial Study to determine whether the project may have a significant effect on the environment.

In cases where no potentially significant impacts are identified, the Lead Agency may issue a negative declaration (ND), and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare a mitigated

[2] A nexus (i.e., connection) must be established between the mitigation measure and a legitimate governmental interest.

[3] The mitigation measure must be "roughly proportional" to the impacts of the project.

negative declaration (MND) for the proposed project. If the Lead Agency determines that individual or cumulative effects of the project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an environmental impact report (EIR) to further analyze these impacts.

This project proposes an addendum to the Richard T. Steel Memorial Park/Baron Von Willard Dog Park Master Plan Update Initial Study/Mitigated Negative Declaration in compliance with CEQA.

Section 15164 of the State CEQA Guidelines states:

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

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Refer to **Section 2.0** of this document for a discussion of the rationale for preparing an addendum for the proposed project.

1.6 Review and Comment by Other Agencies

Other public agencies are provided the opportunity to review and comment on the Addendum. Each of these agencies is described briefly below.

- A Responsible Agency (14 CCR § 15381) is a public agency, other than the Lead Agency, that has discretionary approval power over the project, such as permit issuance or plan approval authority.

- A Trustee Agency[4] (14 CCR § 15386) is a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California.

- Agencies with Jurisdiction by Law (14 CCR § 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the project. Furthermore, a city or county will have jurisdiction by law with respect to a project

[4] The four Trustee Agencies in California listed in CEQA Guidelines § 15386 are California Department of Fish and Wildlife, State Lands Commission, State Department of Parks and Recreation, and University of California.

when the city or county having primary jurisdiction over the area involved is (1) the site of the project; (2) the area which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

1.7 Organization of the Addendum

This document is organized to satisfy CEQA Guidelines § 15164, and includes the following sections:

Section 1.0 - Introduction, which identifies the purpose and scope of the Addendum.

Section 2.0 – Rationale for Preparing an Addendum, which describes why an addendum is being prepared for the proposed project.

Section 3.0 - Project Description, which provides an overview of the project objectives, a description of the proposed development, project phasing during construction, and other project details.

Section 4.0 - Environmental Analysis Checklist, which presents checklist responses for each resource topic to identify and assess impacts associated with the proposed project, and proposes mitigation measures, where needed, to render potential environmental impacts less than significant, as applicable.

Section 5.0 - References, which includes a list of documents cited in the addendum.

Section 6.0 - List of Preparers, which identifies the primary authors and technical experts that prepared the addendum.

Technical studies and other documents, which include supporting information or analyses used to prepare this addendum, are included in the following appendices:

- Appendix A Air Quality and Greenhouse Gas Emissions Calculations
- Appendix B Noise and Vibration Calculations
- Appendix C Energy

1.8 Findings from the Addendum

1.8.1 Less than Significant Impacts/No Changes or New Information Requiring the Preparation of an MND or EIR

Based on the findings of this addendum, the project would have either less than significant impacts, or no changes or new information requiring the preparation of an MND or EIR for the following environmental categories:

- Aesthetics.
- Air Quality.
- Biological Resources.
- Cultural Resources.
- Geology and Soils.
- Greenhouse Gases.

- Noise.
- Hazards and Hazardous Materials.
- Hydrology and Water Quality.
- Population and Housing.
- Public Services.
- Recreation.
- Transportation and Traffic.
- Utilities and Service Systems.

1.8.2 No Impacts

Based on the findings of this addendum, the project would have no impact on the following environmental categories:

- Agriculture and Forestry Resources.
- Land Use.
- Mineral Resources.

1.9 Incorporation by Reference

The Initial Study and Mitigated Negative Declaration for the Richard T. Steel Memorial Park/Baron Von Willard Dog Park Master Plan Update project, completed by UltraSystems Environmental in March 2023 and adopted by the City of San Clemente in May 2023, is hereby incorporated by reference into this Addendum.

2.0 RATIONALE FOR PREPARING AN ADDENDUM

2.1 CEQA Standards

Section 15164 of the State CEQA Guidelines provides the authority for preparing an Addendum to a previously certified Environmental Impact Report or adopted Negative Declaration. Specifically, § 15164 states:

> *(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in § 15162 calling for preparation of a subsequent EIR have occurred.*
>
> *(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in § 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
>
> *(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
>
> *(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
>
> *(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to § 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

As required in subsection (e), above, substantial evidence supporting the lead agency's decision not to prepare a Subsequent Negative Declaration pursuant to CEQA Guidelines § 15162 is provided in **Section 4.0**, Environmental Analysis Determination, of this Addendum. The environmental analysis presented in **Section 4.0** evaluates new potential impacts relating to the Richard T. Steed Memorial Park/Pickleball Courts - Addendum Project in relation to the current environmental conditions.

Section 15162 of the State CEQA Guidelines provides that, after certification of an EIR or adoption of a MND for a project, "no subsequent [environmental review] shall be prepared for that project" unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, that certain criteria are met. Those criteria include the following:

> *(a) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(b) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
>
> *(c) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

(1) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(2) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

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

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

The above standards represent a shift in applicable policy considerations under CEQA. The low threshold for requiring the preparation of an EIR in the first instance no longer applies; instead, agencies are "prohibited" from requiring further environmental review unless the § 15162 criteria are met (*Fund for Environmental Defense v. County of Orange* (1988) 204 Cal. App.3d 1538, 1544.) In addition, the "interests of finality are favored over the policy of favoring public comment, and the rule applies even if the initial review is discovered to have been inaccurate and misleading in the description of a significant effect or the severity of its consequences." (*Friends of Davis v. City of Davis* (2000) 83 Cal. App. 4th 1004, 1018; see Laurel Heights Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th at p. 1130.)

2.2 Modified Project Compared to Approved Project

The Approved Project originally included: four-field softball complex; skate park; play areas; parking and internal circulation; and vegetation. Since the opening, additional features added have included: improvements to the softball complex; food concession building; enclosed tot lot; picnic area with tables; and two dog parks (large and small breed). The Master Plan Update, approved by the City of San Clemente in May 2023, includes: 18 pickleball courts; mountain bike hub enlargement; new, relocated dog parks; skateboard hub; flex space; scenic overlook and trellis; and added parking.

The Modified Project would expand the number of pickleball courts; add a ticket booth in the pickleball area; reduce the size of the soccer field; relocate the dog parks and volleyball courts to the southeastern portion of the project site; and add additional parking.

2.3 Summary of Environmental Findings

As summarized in **Section 3.0,** Project Description, and further analyzed in greater detail in **Section 4.0,** Environmental Impact Analysis, the project would not result in any <u>new</u> significant environmental impacts beyond those identified in the previously adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND. The analysis contained herein demonstrates that the project is consistent with the prior Approved Project and many of the impact issues previously examined in the Approved Project would remain unchanged with the proposed project.

The proposed project would result in little change with respect to each of the environmental issue areas analyzed in this Addendum (see **Table 2.2-1** below). Therefore, as described in further detail

in **Section 4.0**, the CEQA analysis supports the determination that the project would not involve new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects which would call for the preparation of a subsequent EIR, as provided in § 15162 of the State CEQA Guidelines. Therefore, an Addendum to the previously certified project serves as the appropriate form of documentation to meet the statutory requirements of CEQA.

Table 2.2-1
COMPARISON OF ENVIRONMENTAL FINDINGS BETWEEN THE MODIFIED PROJECT AND THE PREVIOUS APPROVED PROJECT

Environmental Issue	Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND[1]	Addendum Conclusions for Modified Project	Modified Project Impacts in Comparison to Conclusions of the Approved Project
Aesthetics	Less Than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Agriculture and Forestry Resources	No Impact	No Impact	Equal Impact
Air Quality	Less Than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Biological Resources	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Change or New Information	Equal impact
Cultural Resources	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Change or New Information	Equal impact
Geology and Soils	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Changes or New Information	Equal impact
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Hazardous Materials	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Hydrology/Water Quality	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Land Use & Planning	No Impact	No Impact	Equal impact
Mineral Resources	No Impact	No Impact	Equal impact
Noise	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Changes or New Information	Equal impact
Population and Housing	No Impact	No Impact	Equal impact
Public Services	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact

Environmental Issue	Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND[1]	Addendum Conclusions for Modified Project	Modified Project Impacts in Comparison to Conclusions of the Approved Project
Recreation	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Traffic/Transportation	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Changes or New Information	Equal impact
Utilities	Less than Significant	Less Than Significant Impact/No Changes or New Information	Equal impact
Mandatory Findings of Significance	Less than Significant with Mitigation Incorporated	Less than Significant Impacts/No Changes or New Information	Equal impact

[1]Source**:** UltraSystems, 2023. Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND.

3.0 PROJECT DESCRIPTION

3.1 Approved Project and Modified Project Locations and Settings

3.1.1 Approved Project Location

Richard T. Steed Memorial Park is at 247 Avenida La Pata in the City of San Clemente, California, on an approximately 43.44-acre site. Refer to **Figure 3.1-1**, which shows the project's location in a regional context. Local surface streets adjacent to the site include Avenida La Pata to the north and Calle Extremo to the east. The park is only accessible by vehicle from the north, off Avenida La Pata. **Figure 3.1-2** shows a vicinity map of the project site, and **Figure 3.1-3** depicts an aerial photo of the project site and the surrounding land.

3.1.2 Modified Project Location

The modified project site consists of the sites of the proposed pickleball courts and the southern half of the site of the proposed soccer field in the Master Plan Update approved by the City of San Clemente in May 2023.

3.2 Existing Land Use and Zoning

The modified project site is currently vacant and vegetated with non-native annual grass and forb species, including dead grapevines remaining from past agricultural use.

- **General Plan Land Use Designation**: Open Space Public (OS1) (San Clemente, 2022a, p. LU-10). Refer to **Figure 3.2-1**.
- **Zoning Designation**: Rancho San Clemente Specific Plan see **Figure 3.2-2**.

Figure 3.1-1
REGIONAL LOCATION MAP

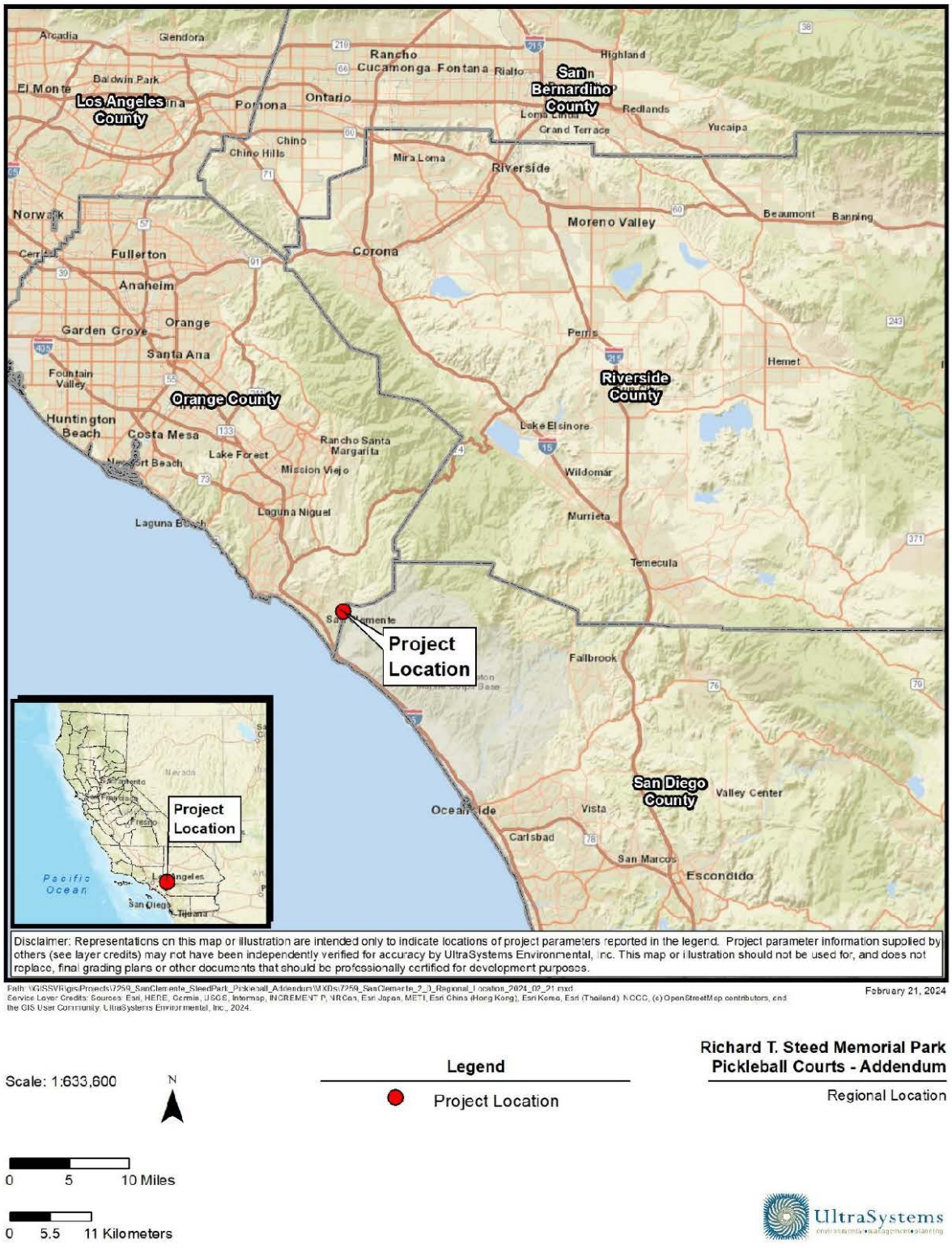


Figure 3.1-2
PROJECT SITE VICINITY

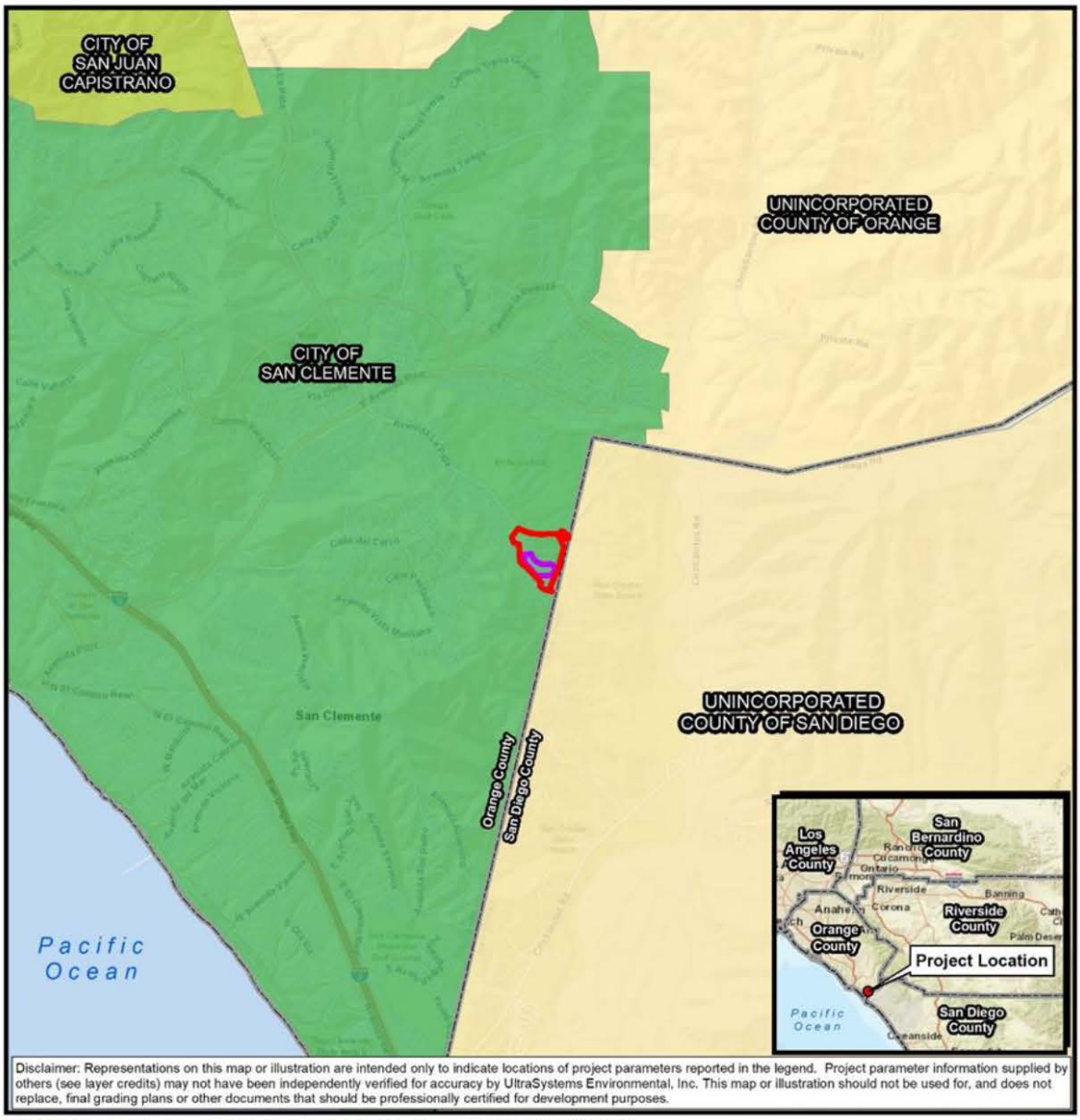


Figure 3.1-3
PROJECT LOCATION MAP

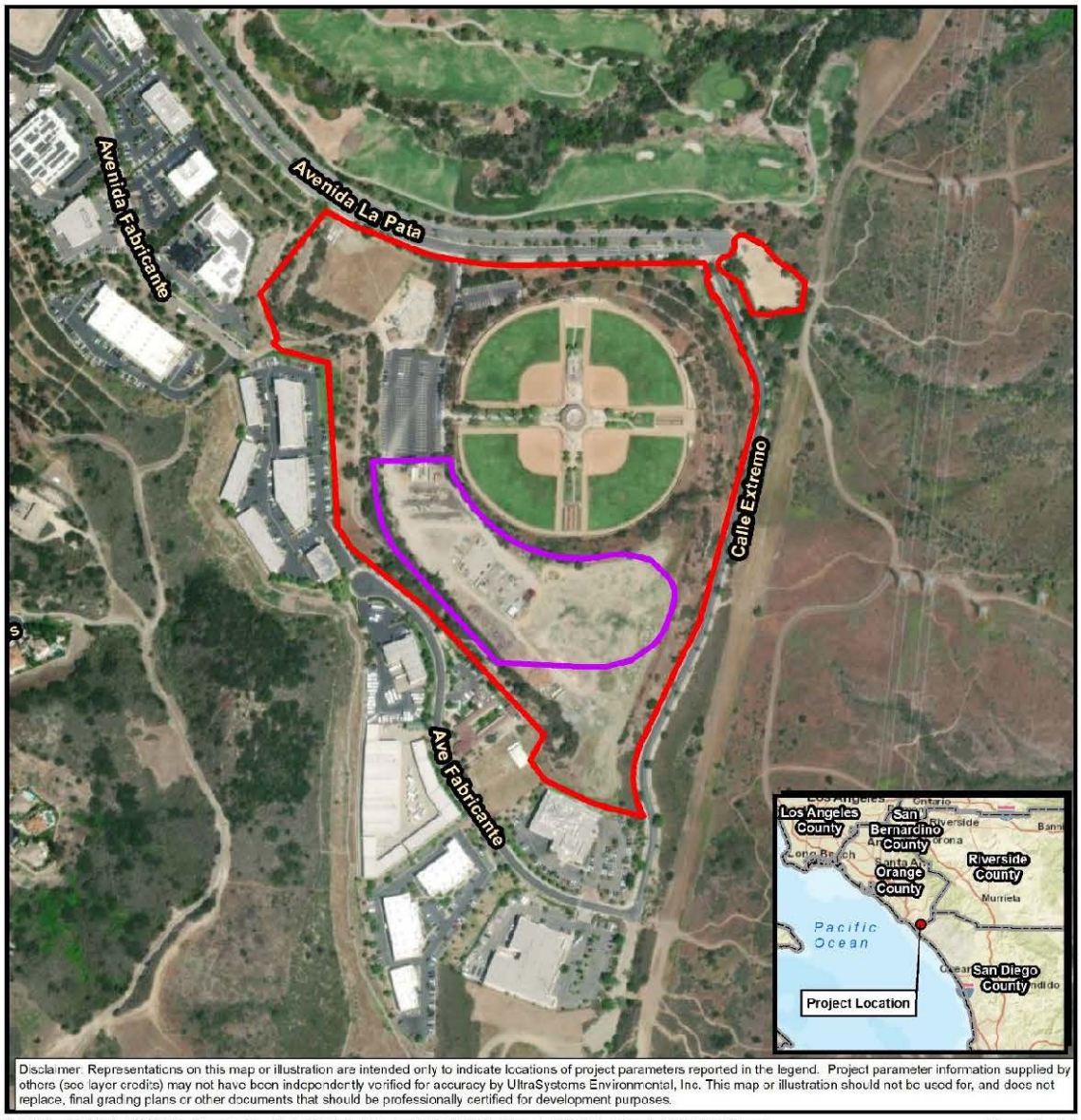
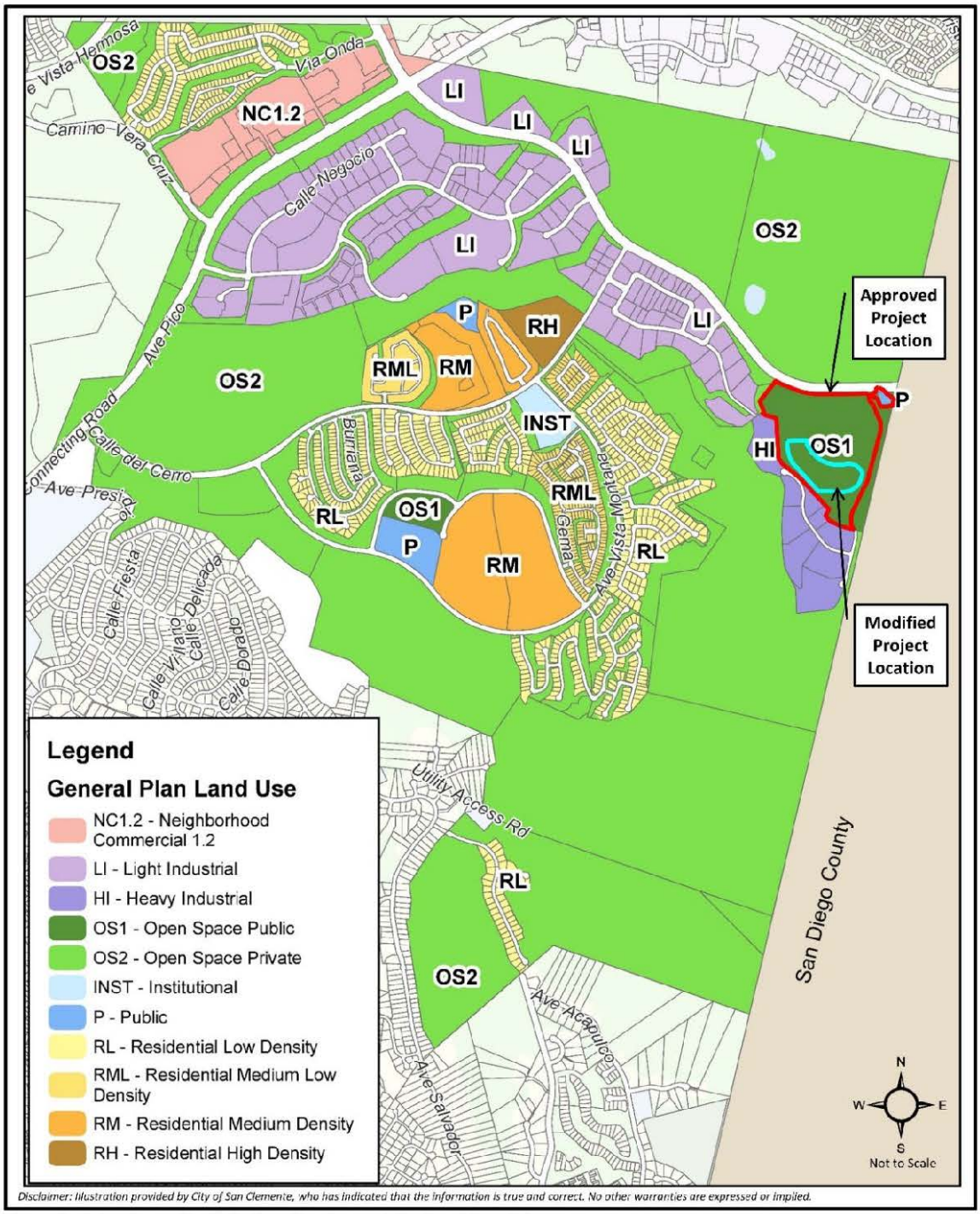


Figure 3.2-1
GENERAL PLAN LAND USE DESIGNATION



Source: Rancho San Clemente Specific Plan (City of San Clemente, 2022b, Figure 1-9, pg. 1-9).

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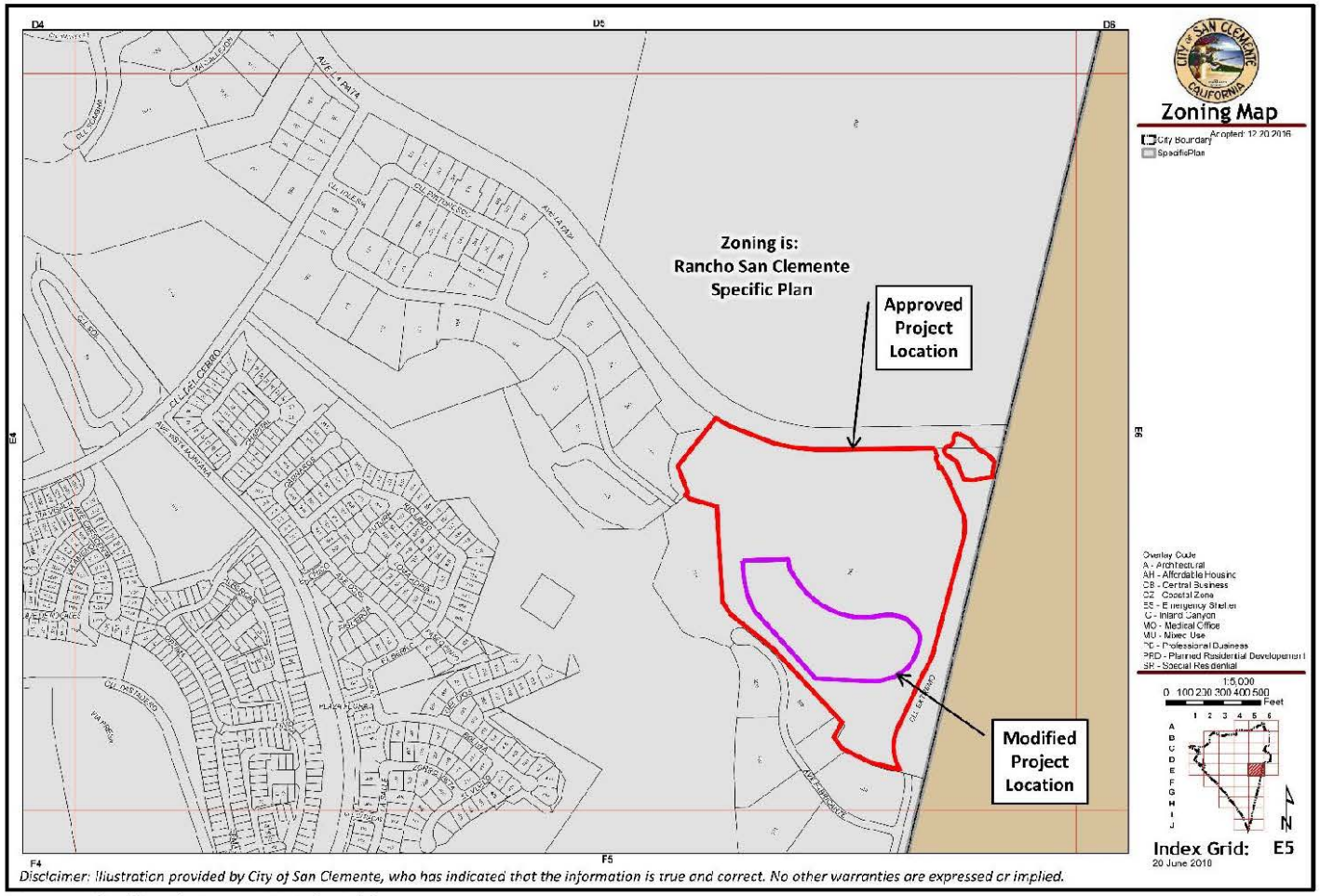
Richard T. Steed Memorial Park
Pickleball Courts - Addendum
General Plan
Land Use Designations

Figure 3.2-2
ZONING DISTRICT



Sources: City of San Clemente, 2018, Index Grid E5.

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Richard T. Steed Memorial Park
Pickleball Courts - Addendum
Zoning Designations

3.3 Background and Purpose

2003 Master Plan

The Original Master Plan for the Richard T. Steed Memorial Park was approved by City Council in April 2003. At that time, the existing uses included: four-field softball complex; skate park; play areas; parking and internal circulation; and vegetation. Since the opening, features added have included improvements to the softball complex; food concession building; enclosed tot lot; picnic area with tables; and two dog parks (large and small breed).

Approved Project (2023 Master Plan Update)

The Master Plan Update, approved by the City of San Clemente in May 2023, includes mountain bike hub enlargement; new, relocated dog parks; skateboard hub; flex space; scenic overlook and trellis; and added parking; see **Figure 3.3-1**. In addition, there are improvements to existing park facilities.

3.4 Project Overview

The Modified Project consists of the following components:

- Expansion of proposed pickleball courts in the southwest part of the park from 18 to 24 courts. One court would have grandstand seating installed. A shaded seating area and a picnic shelter would be installed in the pickleball court area.

- A ticket booth would be built in the pickleball area.

- The proposed soccer field, in the south part of the park, would be reduced in size and changed to east-west orientation from north-south in the Approved Project.

- Certain project components, including the two dog parks and four volleyball courts, would be relocated to the south end of the park (where pickleball courts were situated in the Approved Project plan). Both components were placed in the southeast part of the park in the Approved Project plan – that is, where the pickleball courts have been set in the Modified Project plan.

- Approximately 65 parking spaces would be added, for a total of approximately 160 spaces. The new parking spaces would be to the northeast of the parking lot proposed in the Approved Project and in the west part of the park. **Figure 3.4-1** shows the modified project site plan for the entire park; **Figure 3.4-2** is an enlargement showing the proposed pickleball courts.

FIGURE 3.3-1
APPROVED PROJECT SITE PLAN

Existing Elements to Remain

- (A) Existing Parking
- (B) Baseball & Softball Fields (New Turf)
- (C) Baseball & Softball Hub

Proposed Concept Elements

1. Skateboard Hub
2. Mountain Bike Hub
3. Scenic Overlook and Trellis
4. Activity Meadows
5. Pickleball Court Plaza
6. Restroom Structure
7. Pickleball Shade Structure
8. (16) Pickleball Courts
9. Stair Connection to Possible Future Parking Lot
10. Accessible Ramp to Possible Future Parking Lot
11. Possible Future Parking Lot
12. Proposed Trees, Typical
13. (4) Volleyball Courts
14. Outdoor Classroom
15. Fenced Large Dog Park
16. Fenced Small Dog Park
17. Dog Park Entrance with Double Gate
18. Dog Park Shade Structure
19. Parking Lot
    - *233 Existing Parking Spaces*
    - ***333 Proposed Parking Spaces***
20. Add Alternative: Provide Solar Shade Structures at Parking Lot
21. Updated Field Lighting
22. Foul Ball Netting
23. Baseball Scoreboards
24. Proposed Shade Tree, Typical (To Shade Bleachers)

Disclaimer: Illustration provided by the City of San Clemente, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: City of San Clemente, June 3, 2022.

Richard T. Steed Memorial Park
Pickleball Courts - Addendum
Approved Project Site Plan

Figure 3.4-1
SITE PLAN, MODIFIED PROJECT, ENTIRE PARK

Existing Elements to Remain

- (A) Existing Parking
- (B) Baseball & Softball Fields (New Turf)
- (C) Baseball & Softball Hub

Proposed Concept Elements

1. Skateboard Hub
2. Mountain Bike Hub
3. Scenic Overlook and Trellis
4. Activity Meadows
5. Pickleball Court Operations Facility
6. Restroom Structure
7. Pickleball Shade Structure
8. (24) Pickleball Courts
9. Stair Connection to Possible Future Parking Lot
10. Accessible Ramp to Possible Future Parking Lot
11. Possible Future Parking Lot
12. Proposed Trees, Typical
13. (4) Volleyball Courts
14. Outdoor Classroom
15. Fenced Large Dog Park
16. Fenced Small Dog Park
17. Dog Park Entrance with Double Gate
18. Dog Park Shade Structure
19. Parking Lot
    - 233 Existing Parking Spaces
    - 398 Proposed Parking Spaces
20. Add Alternative: Provide Solar Shade Structures at Parking Lot
21. Updated Field Lighting
22. Foul Ball Netting
23. Baseball Scoreboards
24. Proposed Shade Tree, Typical (To Shade Bleachers)

Disclaimer: Illustration provided by the City of San Clemente, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: City of San Clemente, August 17, 2023.

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Richard T. Steed Memorial Park
Pickleball Courts - Addendum
Conceptual Site Plan

Figure 3.4-2
SITE PLAN, MODIFIED PROJECT, PROPOSED PICKLEBALL COURTS

Disclaimer: Illustration provided by the RJM Design Group, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: RJM Design Group, June 26, 2023.

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Richard T. Steed Memorial Park
Pickleball Courts - Addendum
24-Court Conceptual Plan C

3.4 Construction Activities

The construction phasing, duration per phase, and overall duration are expected to be the same as for the Approved Project. The schedule below in **Table 3.4-1** includes a conceptual duration based on the Approved Project construction schedule, with an arbitrary construction start date of January 2025.

Table 3.4-1
ESTIMATED CONSTRUCTION SCHEDULE

Phase	Start (month)	End (month)	Duration
Site Preparation	January 2025	February 2025	1.5 Months
Grading	February 2025	May 2025	3.5 Months
Building Construction	May 2025	March 2028	2 Years 10 Months
Paving	April 2028	June 2028	2.5 Months
Architectural Coating	June 2028	September 2028	2.5 Months

Source: UltraSystems 2024.

However, the construction schedule for the modified project is to be determined, based on availability of funding. Construction would be carried out in several phases and is expected to start in 2025 or 2026.

3.5 Standard Requirements and Conditions of Approval

The proposed project would be reviewed in detail by all City of San Clemente departments and divisions responsible for reviewing land use applications' compliance with City codes and regulations. City staff is also responsible for reviewing this Addendum to ensure that it is technically accurate and is in full compliance with CEQA. The departments and divisions responsible for technical review include:

- Community Development Department Building and Safety Division;
- Community Development Department Planning Division;
- Public Works Department;
- Orange County Fire Authority.

3.6 Discretionary Actions

- Modified Master Plan Update approval

Permits and Approvals

The following permits and approvals would be required prior to construction.

Table 3.6-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Discretionary Approvals by City of San Clemente	
City of San Clemente Building & Safety Division	Site plan review and approval, building plan check & permit approvals.
City of San Clemente Planning Division	Modified Master Plan Update approval Architectural review with approval of a Development Permit by the City Zoning Administrator pursuant to City of San Clemente Municipal Code sections 17.28.230, 17.16.100, and 17.12.060.
Third-party approvals	
Orange County Fire Authority	Building plan check and approval. Review for compliance with the 2022 California Fire Code, 2022 California Building Code, California Health & Safety Code and San Clemente Municipal Code. Plans for fire detection and alarm systems, and automatic sprinklers.

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The checked topics below indicate that a "Potentially Significant Impact" or a "Less than Significant Impact with Mitigation Required" are likely with project implementation. In the following pages, these impacts will be identified.

☐ Aesthetics	☐ Agricultural and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

Determination (To Be Completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

☒ I find that the amended project has previously been analyzed as part of an earlier CEQA document. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project which are documented in this ADDENDUM to the earlier CEQA document (CEQA § 15164).

Signature

5/15/2024
Date

Samantha Wiley
Printed Name

City of San Clemente

Evaluation of Environmental Impacts

(1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(3) Once the lead agency has determined that a particular physical impact may occur then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

(4) "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to less than significant level.

(5) Earlier analyses may be use where, pursuant to the tiering, Program EIR, or other CEQA process, an affect has been adequately analyzed in an earlier EIR or negative declaration. (See Section 15063(c)(3)(D) of the CEQA Guidelines. In this case, a brief discussion should identify the following:

(a) Earlier Analyses Used. Identify and state where the earlier analysis available for review.

(b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

(c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached and other sources used or individuals contacted should be cited in the discussion.

(7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

(8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(9) The explanation of each issue should identify:

(a) The significance criteria or threshold, if any, used to evaluate each question; and

(b) The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 Aesthetics

4.1.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Have a substantial adverse effect on a scenic vista?

Scenic vistas are visible from the project site and surroundings of Bella Collina San Clemente, a private golf course, to the north, and San Onofre State Beach Park and Marine Corps Base Camp Pendleton to the east and south. The view to the west, of industrial-style buildings in Rancho San Clemente Business Park on a bluff above the project site, is not considered to be a scenic vista. None of the views of the surrounding area would be impeded by completion of the project (UltraSystems, 2023, p. 4.1-2).

- ***Approved Project Determination: Less Than Significant Impact.***

Mitigation Measure: None Required.

Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?

There are no officially designated state scenic highways within 30 miles of the project site, although Coast Highway through San Clemente (about three miles from the project) is noted as Eligible for designation. Due to the great distance between the project site and the nearest Designated highway (State Route 91 near Anaheim), construction and operation of the project would have no impacts on state scenic highways (UltraSystems, 2023, p. 4.1-2).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Construction

Construction of the proposed project would result in views of construction activities, construction staging areas, grading, excavation, construction equipment, material storage areas, construction debris, and exposed trenches on the project site. During project construction, there would be certain elements on the project site that are not compatible with the project vicinity. These may include construction equipment, stockpiled materials, and construction-area barriers and fencing. While these elements would be removed following construction, they would nonetheless result in a temporary impact. However, during project construction, work areas would be screened from public view by temporary barriers/fencing. Project construction could temporarily degrade the existing visual character of the project area and its immediate surroundings. This impact would be short-term and thus would be less than significant.

Operation

The completed project would include a number of additional activity areas within the established park boundaries, including some that will incorporate small, single-story structures as part of their designs. The proposed improvements would not be out of character with the surrounding area or other facilities within the park. The proposed project would not degrade the existing visual character of the site because the new structures would be consistent with the general character of the surrounding park area in terms of architectural style and setbacks.

The overall site plan design incorporates numerous landscaped areas onsite. The project would improve existing underutilized portions of the park, thereby resulting in a beneficial change to existing site conditions and would not adversely affect the existing visual character of the site and its surroundings.

- ***Approved Project Determination: Less than Significant Impact.***

Mitigation Measure: None Required.

Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction

During project construction there would be additional sources of light that would be used to provide security lighting for the construction staging area(s) on the project site. Project construction would not generate substantial glare that would adversely affect daytime or nighttime views in the area. Construction equipment consists of low-glare materials. Construction would occur between the hours of 7:00 a.m. to 7:00 p.m., and so would not involve long durations of nighttime work. Construction glare impacts would be less than significant, and no mitigation is required.

Operation

The project proposes new exterior lighting in certain areas of the site. Installation of exterior lighting would be necessary for safety and nighttime visibility throughout the project. The new project lighting would be visible from the surrounding area during park operating hours. Therefore, the project's proposed exterior lighting is expected to contribute to ambient nighttime illumination in the project vicinity. The project site is located at the edge of an urban area, which is characterized by low to medium nighttime ambient light levels. Streetlights, traffic on local streets, and exterior lighting in surrounding developments are the primary ambient light sources near the project site. Other than the project itself, there are no light-sensitive uses in the project area. Thus, the proposed project would have a less than significant impact regarding new sources of light.

Sky Glow

Sky Glow is the brightening of the sky that occurs as a result of outdoor lighting fixtures emitting a portion of their light directly into the sky. Project lighting will be directed downward to illuminate the activity areas within the project, and no portion of their light would be directed into the sky. Sky glow impacts would be less than significant.

Glare

Glare is the objectionable brightness caused by over-illumination, as well as poorly shielded or poorly aimed light fixtures. The proposed project would introduce new outdoor artificial lighting elements, which have the potential to result in glare if the main beams of proposed lighting elements (i.e., the portion of the lamp with the greatest illuminance) are visible from offsite locations, resulting in excessive, uncontrolled brightness. However, design of the proposed project will incorporate lighting that does not create adverse glare. Thus, glare impacts would be less than significant (UltraSystems, 2023, p. 4.1-8 and 4.1-9).

- ***Approved Project Determination: Less than Significant Impact***

Mitigation Measure: None Required.

4.1.2 Summary of Approved Project Versus the Modified Project Impacts

The modified project's potential impacts on aesthetics and visual resources have been evaluated in light of the present environmental regulatory setting. The modified project would be similar to the previous Approved Project because it would be consistent with the requirements of the City's General Plan and Municipal Code. The project is not located in the vicinity of a designated State or County scenic highway and therefore would not impact scenic resources associated with a designated scenic highway. As with the Approved Project, the modified project would not introduce any tall structures that would significantly block views of scenic vistas from the project site. The proposed project would develop attractive, well-landscaped and well-maintained components that have a positive effect on the existing visual character of the site and its surroundings. New lighting installed as a result of project implementation would conform to the requirements of the City's Municipal Code to reduce the potential for light and/or glare effects to occur. Therefore, impacts associated with implementation of the project would be similar to those of the previously Approved Project and no additional significant impacts beyond those identified for the previously Approved Project would occur.

4.1.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted Master Plan Update IS/MND with the modified project as described in this document and analyze the potential impacts resulting from its implementation.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Have a substantial adverse effect on a scenic vista?			**X**	
b) Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				**X**
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			**X**	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			**X**	

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact/No Changes or New Information

The proposed project would include additional pickleball courts, parking spaces, reduce the size of the soccer field, relocate the dog parks and volleyball courts, and include a ticket booth at the pickleball courts. All of these components, excluding the ticket booth, were evaluated in the Approved Project to not significantly impact scenic vistas. The ticket booth would not be tall enough to significantly impact scenic views from the project site. Therefore, impacts would be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact

There are no officially designated state scenic highways within 30 miles of the project site, although Coast Highway through San Clemente (about three miles from the project) is noted as Eligible for designation. Due to the great distance between the project site and the nearest Designated highway (State Route 91 near Anaheim), construction and implementation of the project would have no impacts on state scenic highways (UltraSystems, 2023, p. 4.1-2).

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact/No Changes or New Information

Construction

Similar to the Approved Project, the proposed project's construction would cause a change in the scenic environment of the site with construction activities and equipment. However, during project construction, work areas would be screened from public view by temporary barriers/fencing. Additionally, construction would be temporary. Therefore, impacts would be less than significant.

Operation

The proposed project would introduce project components that have been analyzed in the Approved Project. Additionally, all components would be developed to adhere to the City's Municipal Code and improve the aesthetics of the project site, which consists of underutilized land within the park. Therefore, impacts would be less than significant.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact/No Changes or New Information

Similar to the Approved Project, the proposed project would adhere to the City's construction hours and light and glare regulations to ensure impacts would be less than significant.

4.2 Agriculture and Forestry Resources

4.2.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site and surrounding uses are designated by the Division of Land Resource Protection (DLRP) as "Urban and Built-Up Land" and "Other Lands" which is land not included in any other mapping category; the nearest Unique Farmland is 3.4 miles northeast of the project site. Other Land includes: low density rural developments; brush, timber, wetland and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Therefore, no farmland would be converted to non-agricultural use and no impacts would occur (UltraSystems, 2023, p. 4.2-1).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site has a General Plan land use designation of OS1 (Open Space Public) which is intended for publicly owned existing and dedicated parklands, passive open space areas, recreational facilities, and golf courses. Also, the project site is zoned RSCSP OS1(Open Space) within the Rancho San Clemente Specific Plan and is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. Williamson Act contracts are made only on land within agricultural reserves; the project site is not within an agricultural reserve. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur (UltraSystems, 2023, p. 4.2-3).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

The project site is zoned Open Space within the Rancho San Clemente Specific Plan (RSCSP OS1). The site is not zoned for forest, timberland, or timberland production use. Therefore, project development would not conflict with zoning for forest land or timberland, and no impact would occur (UltraSystems, 2023, p. 4.2-3).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

Result in the loss of forest land or conversion of forest land to non-forest use?

The project site and surroundings do not support and are not cultivated for forest resources. Therefore, project development would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur (UltraSystems, 2023, p. 4.2-3).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The project site is open space and is surrounded by the Bella Collina San Clemente private golf club to the north, San Onofre State Beach Park to the east, and various commercial and industrial uses to the south and west. No important farmland is near the project site; the nearest such farmland is Unique Farmland approximately 3.4 miles to the northeast. No forest land is present on or near the project site. Therefore, project development would not indirectly cause conversion of farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts would occur (UltraSystems, 2023, p. 4.2-3).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

4.2.2 Summary of Approved Project versus the Modified Project Impacts

The modified project's potential impacts on agriculture and forestry resources have been evaluated in light of the present environmental regulatory setting. As discussed in **Section 4.2.1** above, the Approved Project site does not contain farmland, forest land, or timberland, nor is it zoned for agriculture. The modified project would not expand the Approved Project site's boundary and would result in no impacts.

4.2.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted Master Plan Update IS/MND with the modified project as described in this document and analyze the potential impacts resulting from its implementation.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the

Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

The proposed project site would not expand compared to the Approved Project. Therefore, the project site and surrounding area would still be classified as Urban and Built-Up Land. No impacts would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

The proposed project site would not expand compared to the Approved Project. Therefore, the project site would still be zoned as Open Space Public (OS1) within the Rancho San Clemente Specific Plan (RSCSP) and would not contain any agricultural land. No impacts would occur.

c) Would the project (c) conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

No Impact

The proposed project site would not expand compared to the Approved Project. The project site is zoned OS1, and not zoned for forest, timberland, or timberland production use. No impacts would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

The proposed project site would not expand compared to the Approved Project. Therefore, the project site does not support forest lands. No impacts would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

As detailed above, the modified project would not impact farmland or forest land. No impacts would occur.

4.3 Air Quality

4.3.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park and Baron Von Willard Dog Park Project) Analysis and Conclusions

a) Conflict with or obstruct implementation of the applicable air quality plan?

The South Coast Air Quality Management District (SCAQMD) 2016 Air Quality Management Plan (AQMP), the latest AQMP at the time of the previously approved IS/MND, incorporates land use assumptions from local general plans and regional growth projections developed by the Southern California Association of Governments (SCAG) to estimate stationary and mobile source air emissions associated with projected population and planned land uses. If the proposed land use is consistent with the local general plan, then the impact of the project is presumed to have been accounted for in the AQMP. This is because the land use and transportation control sections of the AQMP are based on the SCAG regional growth forecasts, which incorporate projections from local general plans. The City's General Plan Land Use designation for the site is OS1- Open Space, Publicly Owned. The park is currently zoned Rancho San Clemente Specific Plan – OS (Open Space). The proposed project is in compliance with the City's General Plan and Zoning designations Therefore, no General Plan amendment or Zone Change is required. The land use would continue to be consistent with the local plans and the impacts of the project are still accounted for in the AQMP.

Another measurement tool in evaluating consistency with the AQMP is to determine whether a project would generate population and employment growth and, if so, whether that growth would exceed the growth rates forecasted in the AQMP and how the project would accommodate the expected increase in population or employment. The project would create minimal increase in population and overall vehicle miles traveled (VMT) which would be included in the growth rates forecasted in the AQMP.

Additionally, to assist the implementation of the AQMP, projects must not create regionally significant emissions of regulated pollutants from either short-term construction or long-term operations. The SCAQMD (2019) has developed criteria in the form of emissions thresholds for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the national ambient air quality standards (NAAQS) and/or whether the project is in conformity with plans to achieve attainment. SCAQMD's significance thresholds for criteria pollutant emissions during construction activities and project operation are summarized in **Table 4.3-1**. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed the corresponding SCAQMD significance thresholds.

Table 4.3-1
SCAQMD THRESHOLDS OF SIGNIFICANCE

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO_x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO_x)	150	150
Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55

Note: lbs = pounds.
Source: SCAQMD, 2019.

Regional Construction Emissions

Construction activities for the project would have had five construction phases:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Table 4.3-2 shows the project schedule used for the air quality, GHG emissions, and noise analyses.

Table 4.3-2
CONSTRUCTION SCHEDULE FOR PREVIOUS APPROVED PROJECT

Construction Phase	Start	End
Site Preparation	July 1, 2023	July 14, 2023
Grading	July 15, 2023	August 25, 2023
Building Construction	August 26, 2023	October 18, 2024
Paving	October 19, 2024	November 15, 2024
Architectural Coating	November 16, 2024	December 13, 2024

Source: Calculated by UltraSystems with CalEEMod (Version 2020.4.0) (CAPCOA, 2021).

California Emissions Estimator Model (CalEEMod) is a planning tool for estimating emissions related to land use projects. Model-predicted project emissions are compared with applicable thresholds to assess regional air quality impacts. Estimated criteria pollutant emissions from the project's onsite

and offsite project construction activities were calculated using CalEEMod, Version 2020.4.0[5] (CAPCOA, 2021). CalEEMod defaults were used for off-road and onroad construction traffic inputs.

As shown in **Table 4.3-3**, construction emissions would not exceed SCAQMD regional thresholds. Therefore, the project's short-term regional air quality impacts would be less than significant.

Table 4.3-3
MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS FOR PREVIOUS APPROVED PROJECT

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum Emissions, 2023	3.38	34.55	28.66	10.31	5.77
Maximum Emissions, 2024	4.26	16.45	22.90	3.34	1.33
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*55*
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2020.4.0) (CAPCOA, 2021).

Regional Operational Emissions

The previously approved project proposes: (1) improvements to existing park features; (2) construction of various new park structures and features, including the relocation onsite of various park features (i.e., dog park); (3) utilities improvements; and (4) project site amenities (including structures, trellis, stairs) and onsite landscaping. Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the project. Trip rates were adjusted to match data supplied by the Trip Generation Assessment Memorandum (CWE, 2022). The results of these calculations are presented in **Table 4.3-4**. As seen in the table, for each criteria pollutant, operational emissions would be below the pollutant's SCAQMD significance threshold. Therefore, regional operational emissions would be less than significant**.**

[5] The air quality analysis was performed on October 17, 2022, prior to the full launch of CalEEMod Version 2022.1.1.3.

Table 4.3-4
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS FOR PREVIOUS APPROVED PROJECT

Emission Source	Pollutant (lbs/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Area Source Emissions	0.13	0.00	0.02	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00
Mobile Source Emissions	0.37	0.41	8.11	3.80	1.02
Total Operational Emissions	0.50	0.41	8.13	3.80	1.02
SCAQMD Significance Thresholds	*55*	*55*	*550*	*150*	*55*
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2020.4.0) (CAPCOA, 2021).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Steed Memorial Park IS/MND Mitigation Measures: None are required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Since the South Coast Air Basin (SCAB) is currently in nonattainment for ozone, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. The SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects, nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the District recommends that a project's potential contribution to cumulative impacts be assessed by utilizing the same significance criteria as those for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction and operational emissions generated by the project would not exceed any of the SCAQMD's significance thresholds. Also, as discussed below, localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the project would not contribute a cumulatively considerable increase in emissions for the pollutants which the SCAB is in nonattainment, and thus, cumulative air quality impacts associated with the project would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Steed Memorial Park IS/MND Mitigation Measures: None are required.

a) Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction of the project would generate short-term and intermittent emissions. Following the SCAQMD's *Final Localized Significance Threshold Methodology* (Chico and Koizumi, 2008), only onsite construction emissions were considered in the localized significance analysis. A residence located 1,000 feet southwest of the project site is the nearest sensitive receptor. Localized significance thresholds (LSTs) for projects in Source Receptor Area 21 (Capistrano Valley) were obtained from tables in Appendix C of the aforementioned methodology. **Table 4.3-5** shows the results of the localized significance analysis for the project. Localized short-term air quality impacts from construction of the project would be less than significant.

Table 4.3-5
RESULTS OF UNMITIGATED LOCALIZED SIGNIFICANCE ANALYSIS FOR PREVIOUS APPROVED PROJECT

Nearest Sensitive Receptor	Maximum Onsite Construction Emissions (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum daily unmitigated emissions	34.5	28.1	10.1	5.7
SCAQMD LST for 5 acres @ 304.8 meters	*242*	*6,525*	*100*	*51*
Significant (Yes or No)	**No**	**No**	**No**	**No**

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Steed Memorial Park IS/MND Mitigation Measures: None are required.

b) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD *CEQA Air Quality Handbook* (SCAQMD, 1993), land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

The project would not create substantial objectionable odors and this impact would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Steed Memorial Park IS/MND Mitigation Measures: None are required.

4.3.1 Summary of Previous Approved versus Modified Project Impacts

Modified project impacts on air quality have been evaluated in light of the present environmental regulatory setting as well as existing and known planned baseline conditions in the field. The modified project would be similar to the previously approved Initial Study although it would increase the number of parking spaces and pickleball courts constructed, and decrease the size of the soccer field. The modified project is for the development of an additional eight pickleball courts (from 16 to 24) and 65 additional parking spaces, and the soccer field will change from 137,432 square feet to 68,432 square feet. Impacts associated with implementation of the modified project would be similar to those of the previous Approved Project and no additional significant impacts would occur.

4.3.2 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted IS/MND with the project as described in this document and analyze the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			**X**	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			**X**	

c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Background and Introduction

Pollutants of Concern

Criteria pollutants are air pollutants for which acceptable levels of exposure can be determined and an ambient air quality standard has been established by the U.S. Environmental Protection Agency (USEPA) and/or the California Air Resources Board (ARB). The criteria air pollutants of concern are nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), lead (Pb), and ozone, and their precursors, such as reactive organic gases (ROG) (which are ozone precursors). Since the proposed Richard T. Steed Memorial/Baron Von Willard Dog Park Project (proposed project or Project) would not generate appreciable SO_2 or Pb emissions,[6] it is not necessary for the analysis to include those two pollutants. Presented below is a description of the remaining air pollutants of concern and their known health effects.

Table 4.3-6 shows the attainment status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS).

Table 4.3-6
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification
Ozone (O_3) – 1-hour standard	Nonattainment (Extreme)	Nonattainment
Ozone (O_3) – 8-hour standard	Nonattainment (Extreme)	
Particulate Matter (PM_{10})	Maintenance (Serious)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment
Nitrogen Dioxide (NO_2)	Maintenance (Primary)	Attainment
Sulfur Dioxide (SO_2)	Unclassified	Attainment
Sulfates	No Federal Standards	Attainment
Lead (Pb)		Attainment

6 Sulfur dioxide emissions will be below 0.064 pound per day during construction and below 0.0286 pound per day during operations.

Pollutants	Federal Classification	State Classification
Hydrogen Sulfide (H_2S)	Unclassified	
Visibility Reducing Particles		

Sources: ARB, 2020, USEPA, 2022a

Presented below is a description of the air pollutants of concern, and their known health effects.

Nitrogen oxides (NO_X) serve as integral participants in the process of photochemical smog production and are precursors for certain particulate compounds that are formed in the atmosphere and for ozone. A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an ambient air quality standard (AAQS) has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQSs. When NO_X and ROG are released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown pungent gas formed by the combination of NO and oxygen. NO_2 acts as an acute respiratory irritant and eye irritant and increases susceptibility to respiratory pathogens (USEPA, 2011).

Carbon monoxide (CO) is a colorless, odorless non-reactive pollutant produced by incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft and trains. In urban areas, such as the project location, automobile exhaust accounts for most CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions. High concentrations are lethal (USEPA, 2010).

Particulate matter (PM) consists of finely divided solids or liquids, such as soot, dust, aerosols, fumes and mists. Primary PM is emitted directly into the atmosphere from activities such as agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air. Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides, NO_X, and ROGs.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have focused on two types of PM. PM_{10} corresponds to the fraction of PM no greater than 10 micrometers in aerodynamic diameter and is commonly called respirable particulate matter, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 micrometers, which is commonly called fine particulate matter.

PM_{10} and $PM_{2.5}$ deposition in the lungs results in irritation that triggers a range of inflammation responses, such as mucus secretion and bronchoconstriction, and exacerbates pulmonary dysfunctions, such as asthma, emphysema, and chronic bronchitis. Sufficiently small particles may penetrate the bloodstream and impact functions such as blood coagulation, cardiac autonomic control, and mobilization of inflammatory cells from the bone marrow. Individuals susceptible to higher health risks from exposure to PM_{10} airborne pollution include children, the elderly, smokers, and people of all ages with low pulmonary/cardiovascular function. For these individuals, adverse health effects of PM_{10} pollution include coughing, wheezing, shortness of breath, phlegm, bronchitis, and aggravation of lung or heart disease, leading, for example, to increased risks of hospitalization and mortality from asthma attacks and heart attacks (USEPA, 2022a).

Reactive organic gases (ROG) are defined as any compound of carbon, excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. It should be noted that there are no state or national ambient air quality standards for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility. The term "ROG" is used by the ARB for this air quality analysis and is defined the same as the federal term "volatile organic compound" (VOC).

Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NO_X. Ozone creation requires ROG and NO_X to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant. The health effects of ozone include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber (USEPA, 2022b).

Climate/Meteorology

Air quality is affected by both the rate and location of pollutant emissions, and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The project site is located wholly within the SCAB, which includes all of Orange County, as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The distinctive climate of the SCAB is determined by its terrain and geographical location. The SCAB is in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. Thus, the climate is mild, tempered by cool sea breezes. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds (SCAQMD, 1993).

The average high and low temperatures as recorded at the Laguna Beach meteorological station (#044647; latitude 33.5472°, longitude: -117.780°) (WRCC, 2022), which is approximately 13.2 miles west of the project site and has a period of record from 1926 to 2016, are 71.2 degrees Fahrenheit (°F) and 51°F, respectively. Average winter (December, January, and February) high and low

temperatures are approximately 65.8°F and 43.5°F, respectively, and average summer (June, July, and August) high and low temperatures are approximately 75.9°F and 58.3°F, respectively. The annual average of total precipitation is approximately 12.52 inches, which occurs mostly during the winter and relatively infrequently during the summer. Monthly precipitation averages approximately 2.4 inches during the winter (December, January, and February), approximately 1.1 inches during the spring (March, April, and May), approximately 0.7 inch during the fall (September, October, and November), and approximately 0.1 inch during the summer (June, July, and August).

Local Air Quality

The SCAQMD has divided the SCAB into source receptor areas (SRAs), based on similar meteorological and topographical features. The project site is in SCAQMD's Capistrano Valley air monitoring area (SRA 21), and is served by the SCAQMD's Mission Viejo-26081 Via Pera monitoring station, about 14 miles north-northwest at 26081 Via Pera, Mission Viejo, California. This station monitors ozone, PM_{10} and $PM_{2.5}$. The nearest station that monitors NO_2 is Anaheim - 812 W Vermont Street monitoring station on 812 West Vermont Street, Anaheim, California, about 32 miles northwest of the project. The ambient air quality data in the project vicinity as recorded from 2020 through 2022, along with applicable standards, are shown in **Table 4.3-7**.

Table 4.3-7
AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	2020	2021	2022
Ozone (O_3)	Max. 1-hour Concentration (ppm)	0.171	0.105	0.110
	Max. 8-hour Concentration (ppm)	0.123	0.082	0.089
	# Days > Federal 8-hour Std. of 0.070 ppm	32	8	5
	# Days > California 1-hour Std. of 0.09 ppm	20	2	1
	# Days > California 8-hour Std. of 0.070 ppm	34	8	6
Respirable Particulate Matter (PM_{10})	Max. Federal 24-hour Concentration (µg/m^3)	56.2	35.2	31.0
	Est. # Days > Fed. 24-hour Std. of 150 µg/m^3	ND	0	ND
	Federal Annual Average (50 µg/m^3)	56.2	16.2	12.7
Fine Particulate Matter ($PM_{2.5}$)	Max. 24-hour Concentration (µg/m^3)	46.5	32.6	22.6
	# Days > Fed. 24-hour Std. of 35 µg/m^3	6.9	0	ND
	State Annual Average (12 µg/m^3)	9.3	8.2	ND
Nitrogen Dioxide (NO_2)	Max. 1-hour Concentration (ppm)	0.052	0.055	0.052
	State Annual Average (0.030 ppm)	0.018	0.019	0.018
	# Days > California 1-hour Std. of 0.18 ppm	0	0	0

Source: ARB, 2023
Source Receptor Area 21 (Capistrano Valley)
O_3, PM_{10}, and $PM_{2.5}$ data from Mission Viejo-26081 Via Pera monitoring station on 26081 Via Pera, Mission Viejo.
NO_2 data from Anaheim-812 W Vermont Street monitoring station on 812 West Vermont Street, Anaheim, California.
ND - There were insufficient (or no) data available to determine the value.

Air Quality Management Plan (AQMP)

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act (CCAA) requires that these plans be updated triennially to incorporate the most recent available technical information.[7] A multi-level partnership of governmental agencies

[7] CCAA of 1988.

at the federal, state, regional, and local levels implement the programs contained in these plans. Agencies involved include the USEPA, ARB, local governments, Southern California Association of Governments (SCAG), and SCAQMD. The SCAQMD and SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SCAB. The SCAQMD updates its AQMP every three years.

The 2022 AQMP (SCAQMD, 2022b) was adopted by the SCAQMD Board on December 2, 2022. It focuses on reducing ozone by limiting the emissions of NO_x, which is a key reactant in ozone formation. The NO_x reductions are through extensive use of zero-emission technologies across all stationary and mobile sources categories. The majority of NO_x emissions are from heavy-duty trucks, ships and other state and federally regulated mobile sources that are mostly beyond the SCAQMD's control. The SCAQMD's primary authority is over stationary sources, which account for approximately 20 percent of the SCAB's NO_x emissions.

The AQMP incorporates updated emission inventory methodologies for various source categories and incorporates the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG (2020). The 2020-2045 RTP/SCS was determined to conform to the federally mandated State Implementation Plan for the attainment and maintenance of the NAAQS. county and city general plans.

Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours (Chico and Koizumi, 2008, p. 3-2). Commercial and industrial facilities are not included in the definition of sensitive receptor, because employees typically are present for shorter periods of time, such as eight hours.

Impacts Analysis

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact

New Information

Since the previously approved project, the SCAQMD adopted a new AQMP. The current is the 2022 AQMP (SCAQMD, 2022b). The 2022 AQMP also develops projections for achieving air quality goals and on reducing ozone by limiting the emissions of NO_x, which is a key reactant in ozone formation. Implementation of the proposed changes to the Steed Park Master Plan – addition of six pickleball courts and about 65 parking spaces, reducing the size of the soccer field, and relocation of some project components – would not change the previously approved determination that emissions associated with the development of the project have been considered less than significant.

Significance Thresholds

The SCAQMD has developed criteria for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the NAAQS and/or whether the project is in conformity with plans to achieve attainment.

SCAQMD's significance thresholds for criteria pollutant emissions during construction activities and project operation are summarized in **Table 4.3-1**. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed the corresponding SCAQMD significance thresholds.

Air Quality Methodology

Estimated criteria pollutant emissions from the project's onsite and offsite project activities were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.22

Construction activities for the project are anticipated to begin in January 2025 and end in September 2028 and would have five construction phases:

- Site preparation.
- Grading.
- Building construction.
- Landscaping, irrigation and paving.
- Architectural coating.

Table 4.3-8 shows the project schedule used for the air quality, GHG emissions, and noise analyses.

Table 4.3-8
CONSTRUCTION SCHEDULE

Construction Phase	Start	End
Site Preparation	January 1, 2025	February 1, 2025
Grading	February 2, 2025	May 1, 2025
Building Construction	May 2, 2025	March 31, 2028
Paving	April 1, 2028	June 1, 2028
Architectural Coating	June 2, 2028	September 1, 2028

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.22) (CAPCOA, 2022).

Regional Short-Term Air Quality Effects

Project construction activities will generate short-term air quality impacts. Construction emissions can be distinguished as either onsite or offsite. Onsite air pollutant emissions consist principally of exhaust emissions from offroad heavy-duty construction equipment, as well as fugitive particulate

matter from earth working and material handling operations. Offsite emissions result from workers commuting to and from the job site, as well as from trucks hauling materials to the site and construction debris for disposal. As shown in **Table 4.3-9**, unmitigated construction emissions would be *decrease* for all pollutants except PM_{10}. For that pollutant, they would increase by 0.07 pound per day. The modified project would not exceed SCAQMD regional thresholds. Therefore, the project's short-term regional air quality impacts would be less than significant.

Table 4.3-9
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
Previously Approved Project					
Maximum Emissions, 2023	3.38	34.55	28.66	10.31	5.77
Maximum Emissions, 2024	4.26	16.45	22.90	3.34	1.33
Approved Project Maximum	4.26	34.55	28.66	10.31	5.77
Pickleball Courts and Parking Additions					
Maximum Emissions, 2025	1.11	10.10	10.47	2.63	1.45
Maximum Emissions, 2026	0.49	4.81	6.91	0.19	0.17
Maximum Emissions, 2027	0.48	4.56	6.90	0.17	0.15
Maximum Emissions, 2028	0.55	4.30	6.91	0.38	0.20
Modified Project Maximum Increase	1.11	10.10	10.47	2.63	1.45
Soccer Field Size Additions					
Maximum Emissions, 2025	(1.55)	(14.10)	(15.07)	(3.54)	(1.96)
Maximum Emissions, 2026	(1.01)	(8.57)	(9.96)	(0.29)	(0.27)
Maximum Emissions, 2027	(0.97)	(8.25)	(9.91)	(0.26)	(0.24)
Maximum Emissions, 2028	(0.93)	(7.89)	(9.88)	(0.31)	(0.21)
Net Change					
Previously Approved Project Maximum	4.26	34.55	28.66	10.31	5.77
Maximum Modified Project Net Change[a]	(0.38)	(3.59)	(2.97)	0.07	(0.01)
Revised Total Emissions	3.88	30.96	25.69	10.38	5.76
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*55*

Construction Activity	Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.22) (CAPCOA, 2022).
[a]Maximum value of increase – decrease for an individual year.

Regional Long-Term Air Quality Effects

The primary source of operational emissions would be vehicle exhaust generated from project-induced vehicle trips, known as "mobile source emissions." Other emissions, identified as "energy source emissions," would be generated from energy consumption for water conveyance, space heating, and cooking equipment, while "area source emissions," would be generated from structural maintenance and landscaping activities, and the use of consumer products.

As seen in **Table 4.3-10**, for each criteria pollutant, operational emissions would be below the pollutant's SCAQMD significance threshold. Therefore, operational criteria pollutant emissions would be less than significant.

Table 4.3-10
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS

Emission Source	Pollutant (lbs/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Approved Project Emissions					
Mobile Source Emissions	0.37	0.41	8.11	3.80	1.02
Area Source Emissions	0.13	0.00	0.02	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00
Pickleball Courts and Parking Additions					
Mobile Source Emissions	0.40	0.31	5.63	2.07	0.53
Area Source Emissions	0.13	0.00	0.00	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00
Soccer Field Size Additions					
Mobile Source Emissions	(0.01)	(0.01)	(0.12)	(0.03)	(0.01)
Area Source Emissions	(0.01)	0.00	0.00	0.00	0.00
Energy Source Emissions	0.00	0.00	0.00	0.00	0.00
Net Change[a]	0.51	0.30	5.51	2.04	0.52
Revised Total Operational Emissions	**1.01**	**0.71**	**13.64**	**5.84**	**1.54**
SCAQMD Significance Thresholds	*55*	*55*	*550*	*150*	*55*
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems, Inc. with CalEEMod (Version 2022.1.1.22).
[a]Maximum value of increase – decrease for an individual year.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

No Changes or New Information

Since the SCAB is currently in nonattainment for ozone, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. The SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects, nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the District recommends that a project's potential contribution to cumulative impacts be assessed by utilizing the same significance criteria as those for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction and operational emissions generated by the project would not exceed any of the SCAQMD's significance thresholds. Also, as discussed below, localized emissions generated by the Project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). Therefore, the project would not contribute a cumulatively considerable increase in emissions for the pollutants which the SCAB is in nonattainment, and thus, cumulative air quality impacts associated with the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact

Construction of the project would generate short-term and intermittent emissions. Following the SCAQMD's Final Localized Significance Threshold (LST) Methodology (Chico and Koizumi, 2008), only onsite construction emissions were considered in the localized significance analysis. A residence located 1,000 feet southwest of the project site is the nearest sensitive receptor. LSTs for projects in Source Receptor Area 21 (Capistrano Valley) were obtained from tables in Appendix C of the aforementioned methodology. **Table 4.3-11** shows the results of the localized significance analysis for the previously approved project and the modified. Localized short-term air quality impacts from construction of the project would be less than significant.

Table 4.3-11
RESULTS OF UNMITIGATED LOCALIZED SIGNIFICANCE ANALYSIS

Nearest Sensitive Receptor	Maximum Onsite Construction Emissions (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Approved Maximum daily unmitigated emissions	14.1	14.5	2.76	1.33
Increase in Maximum daily unmitigated emissions	11.8	10.0	2.07	1.0
Decrease in Maximum daily unmitigated emissions	(14.1)	(14.5)	(2.76)	(1.34)
Revised Maximum daily unmitigated emissions[a]	**11.8**	**10**	**2.07**	**0.99**
SCAQMD LST for 5 acres @ 304.8 meters	*242*	*6,525*	*100*	*51*
Significant (Yes or No)	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems, Inc. with CalEEMod (Version 2022.1.1.22).
[a] Maximum value of increase – decrease for an individual year.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Changes or New Information

A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD CEQA Air Quality Handbook (SCAQMD, 1993), land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Potential sources that may emit odors during construction activities include

equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

The modified project would not create substantial objectionable odors. Therefore, the finding of less than significant impact for the previous Approved Project will not change.

4.4 Biological Resources

4.4.1 Summary of Previous Approved Project (Steed Memorial Park IS/MND) Analysis and Conclusions

The analysis of impacts to biological resources in the IS/MND was based on a literature review; a query of publicly available databases; and habitat assessment surveys by two UltraSystems biologists of Steed Park and a 500-foot buffer zone surrounding the park (the biological study area or BSA), on November 4, 2022 and January 6, 2023.

Impacts on special status species: direct or through habitat modification:

Sensitive Plant Species

No special-status plant species were observed during the surveys. Two special-status plant species were determined to have a high potential to occur within the BSA:

- decumbent goldenbush (*Isocoma menziesii* var. *decumbens*) CRPR: 1B.2
- thread-leaved brodiaea (*Brodiaea filifolia*) FT, SE, CRPR: 1B.1 (in BSA)

Eight special-status plant species were determined to have a high potential to occur within the BSA:

- San Diego ambrosia (*Ambrosia pumila*) FE, CRPR: 1B.1
- Encinitas baccharis (*Baccharis vanessae*) FT, SE, CRPR: 1B.1
- Allen's pentachaeta (*Pentachaeta aurea* ssp. *allenii*)
- white rabbit-tobacco (*Pseudognaphalium leucocephalum*) CRPR: 2B.2
- chaparral ragwort (*Senecio aphanactis*) CRPR: 2B.2
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) CRPR: 4.3
- long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*) CRPR: 1B.2
- intermediate mariposa lily (*Calochortus weedii* var. *intermedius*)

Sensitive Animal Species

One special-status animal species, California thrasher (*Toxostoma redivivum*), a bird of conservation concern (BCC), was identified visually and vocally in the eastern part of the BSA. Three other special-status animal species were determined to have high potential to occur in the BSA:

Coastal California gnatcatcher (*Polioptila californica californica*): federally threatened species (FT); California Species of Special Concern (SSC)

Cooper's hawk (*Accipiter cooperii*); CDFW Watch List (WL); and

Burrowing owl (*Athene cunicularia*) SSC, BCC, Season of Concern: burrowing sites and some wintering sites

Eight special-status animal species were determined to have moderate potential to occur in the BSA:

Allen's hummingbird (*Selasphorus sasin)* BCC;

Rufous hummingbird (*Selasphorus rufus*) BCC;

Costa's hummingbird (*Calypte costae*) BCC;

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*); CDFW WL;

Loggerhead shrike (*Lanius ludovicianus*) SSC, BCC, Season of Concern: nesting

White-tailed kite (*Elanus leucurus*) California Fully Protected Species (FP), Season of Concern: nesting;

Western Spadefoot Toad (Spea hammondii), SSC;

Mountain Lion (*Puma concolor*), a California Candidate threatened species.

Project construction could cause several potential direct and indirect impacts to nesting and foraging behavior of protected wildlife, including year-round residents, seasonal residents, and migrants. Although only one special-status species was observed during the field surveys (California thrasher), a majority of the birds observed during the field surveys are protected by the Migratory Bird Treaty Act (MBTA) and Fish and Game Code § 3503, § 3503.5, and § 3513. Another potential direct impact would be the conversion of onsite vegetated areas to developed areas, as vegetated areas support habitat for foraging and cover. However, impacts due to foraging habitat loss would be less than significant because there are many alternative foraging areas that could be utilized within the general vicinity of the BSA; the BSA is surrounded primarily by undeveloped space containing native vegetation. Potential for noise and fugitive dust generated by construction activities and unanticipated pollutants such as oil or gas that leak from machinery, could contaminate soil surfaces or temporary onsite water sources.

The project site contains numerous opportunities for wildlife foraging, nesting, and shelter to support a diverse assortment of wildlife species. Impacts on special-status species, either direct or through habitat modification, would be significant without mitigation. Implementation of mitigation measures BIO-1 through BIO-10 would reduce these impacts to less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures: refer to mitigation measures BIO-1 through BIO-10.

<u>Impacts on Riparian Habitat and Sensitive Natural Communities</u>

The BSA consists of 14 land cover types: ten of which occur onsite and an additional four offsite within the BSA; listed below in **Table 4.4-1**.

Table 4.4-1
MAPPED LAND COVER TYPES

Land Cover Type	Acreage Mapped in BSA (offsite)	Acreage Mapped in Project Area
Disturbed	1.39	10.45
Disturbed lemonade berry scrub	2.05	4.67
Coastal sage scrub (undifferentiated)	7.10	0
Arroyo willow thickets - coast live oak woodland and forest	5.10	0
Coast live oak – ornamental (planted)	1.56	0.16
Pepper tree groves	0	1.73
Pepper tree groves – disturbed lemonade berry scrub	0.17	3.24
Eucalyptus groves-disturbed lemonade berry scrub	0	0.85
Developed/ornamental	39.83	14.63
Coyote brush scrub	6.61	0.16
Disturbed coyote brush scrub	6.74	0
California buckwheat scrub	5.89	0
Disturbed California buckwheat scrub	14.32	1.37
Acacia patches - upland mustard fields	0	1.73

Two of the land cover types within the BSA, lemonade berry scrub and coast live oak woodland, are sensitive natural communities. Both the literature review and results of the reconnaissance-level field survey indicate that one sensitive natural community, lemonade berry scrub (disturbed state), is present on the project site. Therefore, construction of the project would result in impacts to sensitive natural communities identified in local, regional state, or federal plans, policies, or regulations. Mitigation for direct impacts to approximately 8.76 acres of disturbed lemonade berry scrub is proposed.

An unnamed drainage is present in the northeast section of the BSA, adjacent to the existing dog park. This drainage is fed by stormwater generated on the project site and adjacent areas, including Avenida La Pata and Calle Extremo, and discharged into a storm drain inlet located at the eastern terminus of Avenida La Pata. This storm drain runs beneath the existing dog park and discharges into the unnamed drainage, approximately 340 feet southeast of the inlet. The outfall of the storm drain is protected by rock slope protection (RSP) at the head of the unnamed drainage, which discharges into Cristianitos Creek, approximately 0.75 mile downstream of the RSP (UltraSystems, 2023, p. 4.4-26).

Several tributaries discharge into the unnamed drainage, including a longer drainage that originates in the Bella Collina San Clemente Golf Club, located north of the BSA. Cristianitos Creek is a tributary of San Mateo Creek, which discharges into the Pacific Ocean at San Mateo Point, near Trestles Beach. Additionally, the 2018 § 303(d) List of Impaired Water Quality Segments lists Cristianitos Creek as impaired by metals (selenium, cadmium) and pathogens (indicator bacteria), and San Mateo Creek by pathogens and invasive species (UltrSystems, p. 4.4-26).

San Mateo Creek and Cristianitos Creek are waters of the U.S.; therefore, the unnamed drainage may be a water of the U.S. under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and the San Diego Regional Water Quality Control Board (RWQCB). The unnamed drainage is a water of the State

of California (water of the State) under the jurisdiction of both the RWQCB and the California Department of Fish and Wildlife, South Coast Region (CDFW). Due to proximity of proposed project activities at the existing dog park, a jurisdictional delineation survey would be required to ascertain potential impacts, if any, to waters of the U.S. and State.

If the jurisdictional delineation determines that the proposed project may result in temporary or permanent impacts to the unnamed drainage, the project will obtain the required authorizations from relevant agencies: i.e., § 404 Clean Water Act (CWA) permit from the USACE, a § 401 CWA and/or a Waste Discharge Requirements permit (WDR) from the RWQCB, and a Lake or Streambed Alteration Agreement from CDFW.

- ***Previous Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures: refer to mitigation measure BIO-11.

Impacts on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.

Impacts to potentially jurisdictional waters are addressed above in the preceding impact analysis. Wetlands may be present both onsite and within the BSA. This impact would be significant before mitigation.

- ***Previous Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures: refer to mitigation measure BIO-12.

Impacts on wildfire movement or migration, including via established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The eastern segment of the BSA occurs within a CDFW Natural Landscape Block which is a large, relatively natural habitat block that supports native biodiversity. The BSA does not overlap with CDFW Essential Connectivity Areas or Small Natural Areas.

Construction and operation of the proposed project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with native resident or migratory wildlife corridors. The eastern boundary of the BSA intersects with the Natural Landscape Block at the eastern segment of the BSA. The BSA is not completely overlain with this Natural Landscape Block. In addition, this Natural Landscape Block covers expansive open space; construction of the project would only result in minimal effect to the function of this wildlife corridor due to the vast availability of other open space within this Natural Landscape Block supporting biodiversity. Less than significant impact would occur, and therefore mitigation is not proposed.

Direct impacts to native wildlife nursery sites of fossorial species are not anticipated as a result of the project. Several burrows were observed in offsite areas within the eastern segment of the BSA, but it is not anticipated that project activities will impact any potential resident populations of species that may utilize these burrows. No burrowing species were observed during the field survey.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Impacts on local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

The City's Local Coastal Program (LCP) only applies to areas within the city's designated coastal zone. The BSA is not located within the coastal zone, and therefore no conflict with this LCP is present (California Coastal Commission, 1985). There are no protected tree species or other biologically significant resources on the Project site.

The project is required to comply with San Clemente Municipal Code Section 17.68.040, *General Landscaping Requirements*. The Planning Division and the Beaches, Parks and Recreation Department should be consulted for general landscape requirements for public property. These requirements are further discussed below (BIO-13).

In addition, requests for removal or relocation of street and park trees may be made to the Director of Beaches, Parks, and Recreation. Tree replacement measures, as per City Ordinance 1115, are discussed below (BIO-13). With adherence to these City policies, the project would not conflict with local policies or ordinances. The project does not conflict with other local policies or ordinances.

- ***Previous Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures: refer to mitigation measure BIO-12.

Impacts on an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The City of San Clemente is located within the Orange County Southern Subregion Habitat Conservation Plan (HCP), established in 2007, through issuance of a Biological Opinion (BO), otherwise known as an Incidental Take Permit (ITP), administered by the USFWS (USFWS, 2007). The project site does overlap the HCP, however the City of San Clemente is not a signatory or permittee to the HCP.

Redevelopment of the site would not affect, or conflict with, implementation of the Orange County Southern Subregion HCP. No other local or area-wide preservation or conservation plans or policies apply to the project site.

- ***Previous Approved Project Determination: No Impact.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures:

The following biological resources mitigation measures in the IS/MND are relevant to the modified project.

No.	Mitigation Measure
BIO-1	**Focused Botanical Surveys.** To avoid impacts to special-status plant species, a qualified biologist will survey the project site for the presence of special-status plant species with

No.	Mitigation Measure
	potential to occur within the direct and indirect impact areas of the project. The focused plant surveys will be conducted in accordance with the Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Sensitive Natural Communities (CDFW, 2018). A minimum of two surveys would be conducted at appropriate times of the year to coincide with the optimum conditions and bloom periods, during different seasons of the same year, to adequately capture the floristic diversity of a site. Every plant taxon that occurs on site will be identified to the taxonomic level necessary to determine rarity and listing status, as feasible. Plant species will be identified using plant field and taxonomical guides. when optimum conditions for identification are present (generally blooms, fruits, and/or leaves). Special-status plant species will be identified, recorded in field notes, counted or estimated, and mapped on an aerial map or with a GPS unit. Following completion of the focused botanical surveys, a focused botanical survey report will be prepared in accordance with agency guidelines. The report will: 1) summarize information regarding the habitat of the survey area and the habitat's suitability for special-status plants; 2) assess the potential presence of special-status plants onsite; 3) analyze the potential impacts to special-status plants from project development; and 4) recommend, as appropriate, BMPs, avoidance and protection measures, and mitigation measures to reduce or avoid potential impacts to special-status plants. The report will include: 1) methods and results of the literature review and field surveys; 2) figures depicting the location of special-status plants; 3) a complete flora compendium; and 4) site photographs. CDFW generally considers botanical surveys to be valid for a period of one to three years, with variation attributed to seasonal factors, such as during drought years or post-fire recovery. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if the project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
BIO-2	**Focused Burrowing Owl Surveys.** The BSA contains suitable habitat to potentially support BUOW in the future. Therefore, a series of focused BUOW surveys is required. A qualified biologist will conduct the focused surveys in accordance with the Staff Report Burrowing Owl Mitigation (Staff Report; CDFG, 2012). A total of four breeding surveys should be conducted: one site visit should take place between February 15 and April 15, and a minimum of three site visits at least three weeks apart should take place between April 15 and July 15. In addition, a total of four surveys shall take place during the non-breeding season (July 16-February 14); these site visits should be spaced at relatively even intervals. Following the completion of the focused surveys, the biologist would prepare a letter report in accordance with the Staff Report summarizing the results of the survey. The report would be submitted to the City and CDFW prior to initiating any ground disturbing activities. If no BUOWs or signs of BUOW are observed during the survey and concurrence is received from CDFW, project activities may commence and no further mitigation would be required. If BUOW or signs of BUOW are observed during the survey, the site would be considered occupied. The biologist would then prepare a Burrowing Owl Mitigation, Monitoring, and Exclusion Plan and contact the City and CDFW to assist in the development of avoidance, minimization, and mitigation measures, prior to commencing project activities.
BIO-3	**Focused Coastal California Gnatcatcher Surveys**. The BSA is located in the known distributional range of the coastal California gnatcatcher (CAGN) and contains suitable coastal sage scrub habitat to potentially support this bird; therefore, focused surveys in accordance with the Coastal California Gnatcatcher Presence/Absence Survey Protocol (USFWS, 1997; survey protocol) would be performed. The City or its designee will be responsible for retaining

No.	Mitigation Measure
	a qualified biologist authorized under a Section 10(a)(1)(A) recovery permit to conduct focused surveys for CAGN. The Recovery Permit Coordinator at the Carlsbad USFWS Office should be notified by the qualified biologist of the intent to conduct CAGN surveys at least 10 working days prior to the anticipated start date of the survey effort. The qualified biologist shall follow the conditions within their recovery permit and the CAGN survey protocol should be adhered to unless an exception is otherwise granted by USFWS. Protocol surveys are valid for a period of one year. (USFWS, 1997). A minimum of six surveys shall be conducted at least one week apart, between March 15 and June 30. A minimum of nine surveys shall be conducted at least two weeks apart between July 1 and March 14. Surveys should be conducted between the hours of 6:00 a.m. and 12:00 p.m. and shall avoid periods of inclement conditions. No more than 80 acres of suitable CAGN habitat should be surveyed per biologist per day. No attempts to examine or closely approach CAGN nests are approved unless authorization is obtained through service permits. A survey report should then be prepared and submitted with 45 days from survey effort completion to the Carlsbad USFWS Office and the CDFW South Coast (Region 5) Office. The survey report should include written and mapped qualitative descriptions of plant communities in the survey area and areas adjacent, number, age, sex, and applicable color band information, the names and permit numbers of all surveyors, and survey area location. If CAGN or their territories are located within direct or indirect impact areas, then consultation will occur with the USFWS to initiate informal consultation for preparation of a CAGN mitigation and monitoring plan, or a formal consultation for preparation of a Biological Assessment ("will affect letter") for review and potential issuance of a Biological Opinion ("Incidental Take Permit") from the USFWS. Incidental observations of non-listed avian species shall be recorded during the CAGN surveys; incidental species include but are not limited to: Cooper's hawk, loggerhead shrike, rufous hummingbird, Allen's hummingbird, Costa's hummingbird, Cooper's hawk, California thrasher, and southern California rufous-crowned sparrow.
BIO-4	**Coastal California Gnatcatcher Noise Attenuation.** Impacts to CAGN would be considered permanent if pickleball noise levels cannot be attenuated below the significance limit of 60 dBA at the locations of mapped CAGN territories, determined during the focused surveys. If impacts cannot be avoided, then noise attenuating BMPs are required, such as installation of a 10-foot acoustifence, or similar, would reduce the noise originating from the proposed pickleball courts by approximately 15 Leq. If installation of the acoustifence is not practicable or does not reduce the noise levels to less than 60 dBA at the locations of mapped CAGN territories, it is recommended that the design engineers provide alternate noise attenuating BMPs and/or move the proposed pickleball courts are to an alternate location or consultation with the USFWS and CDFW is recommended. If the aforementioned mitigation options are not possible and the project will have permanent impacts to occupied CAGN habitat, either during Project activities or over the duration of the Project, the City will contribute to an appropriate state-approved mitigation bank with CAGN credits. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project related ground disturbing activities. All mitigation strategies will be approved by the USFWS and City prior to implementation.
BIO-5	Pre-Construction General Wildlife Survey. The following measures will be implemented to minimize impacts to non-listed sensitive species which include but are not limited to: coast

No.	Mitigation Measure
	horned lizard, silvery legless lizard, red-diamond rattlesnake, Nuttall's woodpecker, pallid San Diego pocket mouse, San Diego kangaroo rat, and Dulzura pocket mouse. The measures below will help to reduce direct and indirect impacts caused by construction on various sensitive species, if present, to less than significant levels. • A qualified biologist will conduct a pre-construction general wildlife survey for sensitive wildlife and potential nesting sites such as open ground, shrubs, and burrows within the limits of project disturbance. The survey will be conducted at least seven days prior to the onset of scheduled activities, such as mobilization and staging. It will end no more than three days prior to vegetation, substrate, and structure removal and/or disturbance. • If sensitive species and/or active nesting sites are observed during the pre-construction survey or they are observed and will not be impacted, project activities may begin and no further mitigation will be required. • If any sensitive wildlife species are identified within the project site during the pre-construction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and to determine if additional surveys or focused protocol surveys are necessary. Project activities may begin within the area only when concurrence is received from the appropriate resource agency. • If no sensitive species and/or active nesting sites are observed during the pre-construction survey or they are observed and will not be impacted, project activities may commence and no further mitigation will be required. • Sensitive wildlife species and/or potential nesting sites will not be disturbed, captured, handled or moved.
BIO-6	**Pre-Construction Breeding Bird Survey.** To maintain compliance with the MBTA and Fish and Game Code, and to avoid impacts or take of migratory non-game breeding birds, their nests, young, and eggs, the following measures will be implemented. The measures below will help to reduce direct and indirect impacts caused by construction on migratory non-game breeding birds to less than significant levels. • Project activities that will remove or disturb potential nest sites, such as open ground, trees, shrubs, grasses, or burrows, during the breeding season would be a potential significant impact if migratory non-game breeding birds are present. Project activities that will remove or disturb potential nest sites will be scheduled outside the breeding bird season to avoid potential direct impacts to migratory non-game breeding birds protected by the MBTA and Fish and Game Code. The breeding bird nesting season is typically from February 15 through September 15, but can vary slightly from year to year, usually depending on weather conditions. Removing all physical features that could potentially serve as nest sites will also help to prevent birds from nesting within the project site during the breeding season and during construction activities. • If project activities cannot be avoided during February 15 through September 15, a qualified biologist will conduct a pre-construction breeding bird survey for breeding birds and active nests or potential nesting sites within the limits of project disturbance. The survey will be conducted at least seven days prior to the onset of scheduled activities, such as mobilization and staging. It will end no more than three days prior to vegetation, substrate, and structure removal and/or disturbance.

No.	Mitigation Measure
	• If no breeding birds or active nests are observed during the pre-construction survey or they are observed and will not be impacted, project activities may begin and no further mitigation will be required. • If a breeding bird territory or an active bird nest is located during the pre-construction survey and will potentially be impacted, the site will be mapped on engineering drawings and a no-activity buffer zone will be marked (fencing, stakes, flagging, orange snow fencing, etc.) a minimum of 100 feet in all directions or 500 feet in all directions for listed bird species and all raptors. The biologist will determine the appropriate buffer size based on the type of activities planned near the nest and the type of bird that created the nest. Some bird species are more tolerant than others of noise and activities occurring near their nest. This no-activity buffer zone will not be disturbed until a qualified biologist has determined that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be impacted by project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. Once the nesting cycle has finished, project activities may begin within the buffer zone. • If listed bird species are observed within the project site during the pre-construction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and to determine if additional surveys or focused protocol surveys are necessary. Project activities may begin within the area only when concurrence is received from the appropriate resource agency. • Birds or their active nests will not be disturbed, captured, handled or moved. Active nests cannot be removed or disturbed; however, nests can be removed or disturbed if determined inactive by a qualified biologist.
BIO-7	**Worker Environmental Awareness Program (WEAP) and Biological Monitor.** Prior to project construction activities, a qualified biologist will prepare and conduct a Worker Environmental Awareness Program (WEAP) that will describe the biological constraints of the project. All personnel who will work within the project site will attend the WEAP prior to performing any work. The WEAP will include, but not be limited to the following: results of pre-construction surveys; description of sensitive biological resources potentially present within the project site; legal protections afforded the sensitive biological resources; BMPs for protecting sensitive biological resources (i.e., restrictions, avoidance, protection, and minimization measures); individual responsibilities associated with the project; and, a training on grading to reduce impacts to biological resources. A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) , the need to adhere to the provisions of the Act, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to the project site boundaries within which the project activities must be accomplished. The program will also include the reporting requirements if workers encounter a sensitive wildlife species (i.e., notifying the biological monitor or the construction foreman, who will then notify the biological monitor). Training materials will be language-appropriate for all construction personnel. Upon completion of the WEAP, workers will sign a form stating that they attended the program, understand all protection measures, and will abide all the rules of the WEAP. A record of all trained personnel will be kept with the construction foreman at the project field construction office and will be made available to any resource agency personnel. If new construction

No.	Mitigation Measure
	personnel are added to the project later, the construction foreman will ensure that new personnel receive training before they start working. The biologist will provide written hard copies of the WEAP and photos of the sensitive biological resources to the construction foreman.
BIO-8	**Biological Monitor.** A qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint. A biological monitor shall monitor activities that result in tree or vegetation removal to minimize the likelihood of inadvertent impacts to nesting birds and special-status wildlife species, with special attention given to any protected species observed during the pre-construction breeding bird surveys. Monitoring shall also be conducted periodically during construction activities to ensure no new nests are built during any vegetation removal or building demolition activities between February 1 and August 31. The biological monitor shall ensure that all BMPs, avoidance, protection and mitigation measures described in the relevant project permits and reports are in place and are adhered to. The biological monitor shall have the authority to temporarily halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly affected. The monitor shall notify the appropriate resource agency and consult if needed. If necessary, the biological monitor shall relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in adverse effects on the species. The appropriate agencies shall be notified if a dead or injured protected species is located within the project site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include; location of the carcass, a photograph, cause of death (if known), and other pertinent information
BIO-9	**Best Management Practices.** Project work crews will be directed to use BMPs where applicable. These measures will be identified prior to construction and incorporated into the construction operations. Implementation of this conservation measure will help to avoid, eliminate or reduce impacts to sensitive biological resources, such as special-status terrestrial wildlife species, to less than significant levels. Standard BMPs that apply to construction of this project, and that are not incorporated to other mitigation measures proposed for this project, are as follows: • To minimize the amount of disturbance, the construction/laydown areas, parking areas, staging areas, storage areas, spoil areas, and equipment access areas will be restricted to designated areas. To the extent possible, designated areas will comprise, existing disturbed areas (parking lots, access roads, graded areas, etc.). • Water pollution and erosion control plans shall be developed and implemented in accordance with SWRCB and RWQCB requirements. • Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials shall be reported to appropriate entities, including but not limited to applicable jurisdictional city, USFWS, CDFW, and RWQCB, and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

No.	Mitigation Measure
	• Vehicles and equipment will be free of caked mud or debris prior to entering the project site to avoid the introduction of new invasive weedy plant species • The project proponent will ensure that construction activities will include measures to prevent accidental falls into excavated areas. The construction crew will inspect excavated areas daily to detect the presence of trapped wildlife. All deep or steep-walled excavated areas will be covered with tarp and either be furnished with escape ramps or be surrounded with exclusionary fencing in order to prevent wildlife from entering them. Wildlife found in excavation areas should be trapped and relocated out of harm's way to a suitable habitat outside of the project area, if possible.
BIO-10	**Vegetation and Wildlife Avoidance.** The BSA contains habitats which can support many wildlife species. The City of San Clemente will also implement the following general avoidance and protection measures to protect vegetation and wildlife, to the extent practical: • Non-native species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible • Cleared or trimmed non-native, invasive vegetation will be disposed of in a legal manner at an approved disposal site as soon as possible to prevent regrowth and the spread of weeds. • The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. • Vehicles and equipment will be free of caked mud or debris prior to entering the project site to avoid the introduction of new invasive weedy plant species. • To minimize construction-related mortalities of nocturnally active species such as mammals and snakes, it is recommended that all work be conducted during daylight hours. Nighttime work (and use of artificial lighting) will not be permitted unless specifically authorized. If required, night lighting will be directed away from the preserved open space areas to protect species from direct night lighting. All unnecessary lights will be turned off at night to avoid attracting wildlife such as insects, migratory birds, and bats. • Wildlife will not be disturbed, captured, harassed, or handled. Animal nests, burrows and dens will not be disturbed without prior survey and authorization from a qualified biologist. • Contractors, subcontractors, employees, and site visitors will be prohibited from feeding wildlife and collecting plants and wildlife. • To avoid impacts to wildlife and attracting predators of protected species, the project proponent will institute a litter control program using covered trash receptacles at each designated work site. The contents will be properly disposed at least once a week. throughout project construction. • Work within wetted areas such as ponded is prohibited until the biological monitor determines the area does not contain protected wildlife, such as amphibians and sensitive invertebrates.
BIO-11	**Avoidance, Minimization, and Replacement of Sensitive Vegetation Communities.** To avoid impacts to native vegetation communities, a qualified biologist would designate Environmentally Sensitive Areas (ESAs) to be preserved. Prior to clearing or construction, highly visible barriers (such as orange construction fencing) will be installed around coastal sage scrub, lemonade berry scrub, oak woodland, and riparian communities adjacent to the project footprint, as well as around any trees and special-status plants that can be avoided within the project footprint, if any. Limited activities, such as foot traffic, will be allowed

No.	Mitigation Measure
	within the ESAs, otherwise, full avoidance (i.e., no construction activity of any type) should be included within the construction specifications for these ESAs. Heavy equipment, including motor vehicles, will be prohibited within the ESAs. All construction equipment should be operated in a manner so as to prevent accidental damage to nearby preserved areas. No structure of any kind, or incidental storage of equipment or supplies, will be allowed within these protected zones. If the ESAs cannot be avoided, then replacement for losses will be required for lemonade berry scrub, oak woodland, and coastal sage scrub. The proposed project is expected to impact all areas of lemonade berry scrub onsite. Therefore, to mitigate for the loss of approximately 8.76 acres of lemonade berry scrub, replanting of native species similar to pre-existing conditions and species assemblages at a 1:1 ratio should be performed onsite within the sloped terraced landscaping. Examples of native species of similar assemblages include: lemonade berry, California buckwheat, coyote bush, black sage (Salvia mellifera), white sage (Salvia apiana), laurel sumac (Malosma laurina) and California sagebrush. Avoidance is planned for the oak woodland/oak trees and coastal sage scrub onsite. However, if avoidance is not possible, then replacement for losses to coastal sage scrub and oak woodland and/or native oak trees, would occur on a 1:1 ratio, or as deemed appropriate by the City.
BIO-12	**Jurisdictional Delineation Survey and Report.** A jurisdictional delineation survey shall be conducted by a qualified biologist to determine the presence and extent of potential federal or state wetlands, waters, and habitats that are potentially subject to the jurisdictional authority of the U.S. Army Corps of Engineers (USACE), the San Diego Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife, South Coast Region (CDFW). A jurisdictional delineation survey shall be conducted by a qualified biologist to conduct a jurisdictional delineation assessment on their property to determine the presence and extent of potential waters of the U.S. or State (including but not limited to wetlands, ephemeral and intermittent drainages, and associated vegetation communities) that would be subject to the jurisdictional authority of the U. S. Army Corps of Engineers (USACE) Los Angeles District, San Diego Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife, South Coast Region (CDFW). Upon completion of the survey, waters of the U.S or State, would be mapped and described in a jurisdictional delineation report that meets or exceeds the report standards of the USACE, Los Angeles District office. The report would include a determination of potential impacts to waters of the U.S. or State (including associated vegetation communities) that would result from the applicant's project, quantify the area (in acres and square feet) of impacts to waters under the jurisdiction of each agency, and provide a list of permits, authorizations, and agreements required by the applicant from each agency. The report would also recommend impact avoidance and/or minimization measures and best management practices, and compensatory mitigation, as applicable.
BIO-13	**General Landscaping Requirements and Tree Replacement Measures.** The following are general landscaping requirements for new development and improvements to existing development warranting landscape improvements that would apply to the project: A. "Living Plant Materials. Landscaping shall consist primarily of drought tolerant living plant material. Hardscape improvements shall not be counted toward fulfilling the required landscape. B. California Native Species. California Native plant species shall be planted in at least 60 percent of required landscaped areas. C. Irrigation Systems. All landscaping for nonresidential, mixed-use, and multi-family residential projects shall have automatic irrigation systems. Duplexes and single-family

No.	Mitigation Measure
	residential projects need not have automatic irrigation systems, but shall have a permanent means of irrigating landscaping. Low precipitation and drip-type systems are encouraged. D. Utilities. Utilities may occur within required landscaped areas, but only if underground utilities will not preclude appropriate planting of trees, and the utility facilities are screened from public view. E. More Restrictive Provision Shall Apply. Should any provision of this chapter conflict with any other provisions of this title or any adopted specific or Master Plans, the more restrictive requirements shall apply." In addition, City Policy Number 301-2-1"City Owned Trees: Protection and Administration" allows for the removal of City-owned trees. According to City Ordinance 1115, replacement trees must be a minimum of 15-gallon size.

Source: UltraSystems, 2023, pp. 4.4-13 – 4.4-20; 4.4-25; 4.4-26 – 4.4-27; and 4.4-30 – 4.4-31.

4.4.2 Summary of Approved Project versus Modified Project Impacts

The potential impacts of the modified project concerning biological resources have been evaluated as applicable to the present environmental regulatory setting, the impacts identified in the IS/MND, and site-specific baseline conditions. Impacts associated with implementation of the modified project would be consistent with those associated with implementation of the previous Approved Project, no additional significant impacts beyond those identified for the previous Approved Project were identified, and no additional mitigation measures would be required.

4.4.3 Modified Project Analysis and Conclusions

With regard to biological resources the following checklist compares the impacts of the previous Approved Project analyzed in the Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND with those of the modified project described in this document. The comparative conclusions provided in the following table for the project are based on the discussions immediately thereafter.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			**X**	
b) 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 Wildlife or US Fish and Wildlife Service?				**X**
c) Have a substantial adverse effect on federally protected wetlands as defined by § 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?			**X**	
d) Interfere substantially 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 nursery sites?			**X**	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				**X**

a) Would the project have a substantial adverse impact, 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 Wildlife or U.S. Fish and Wildlife Service?

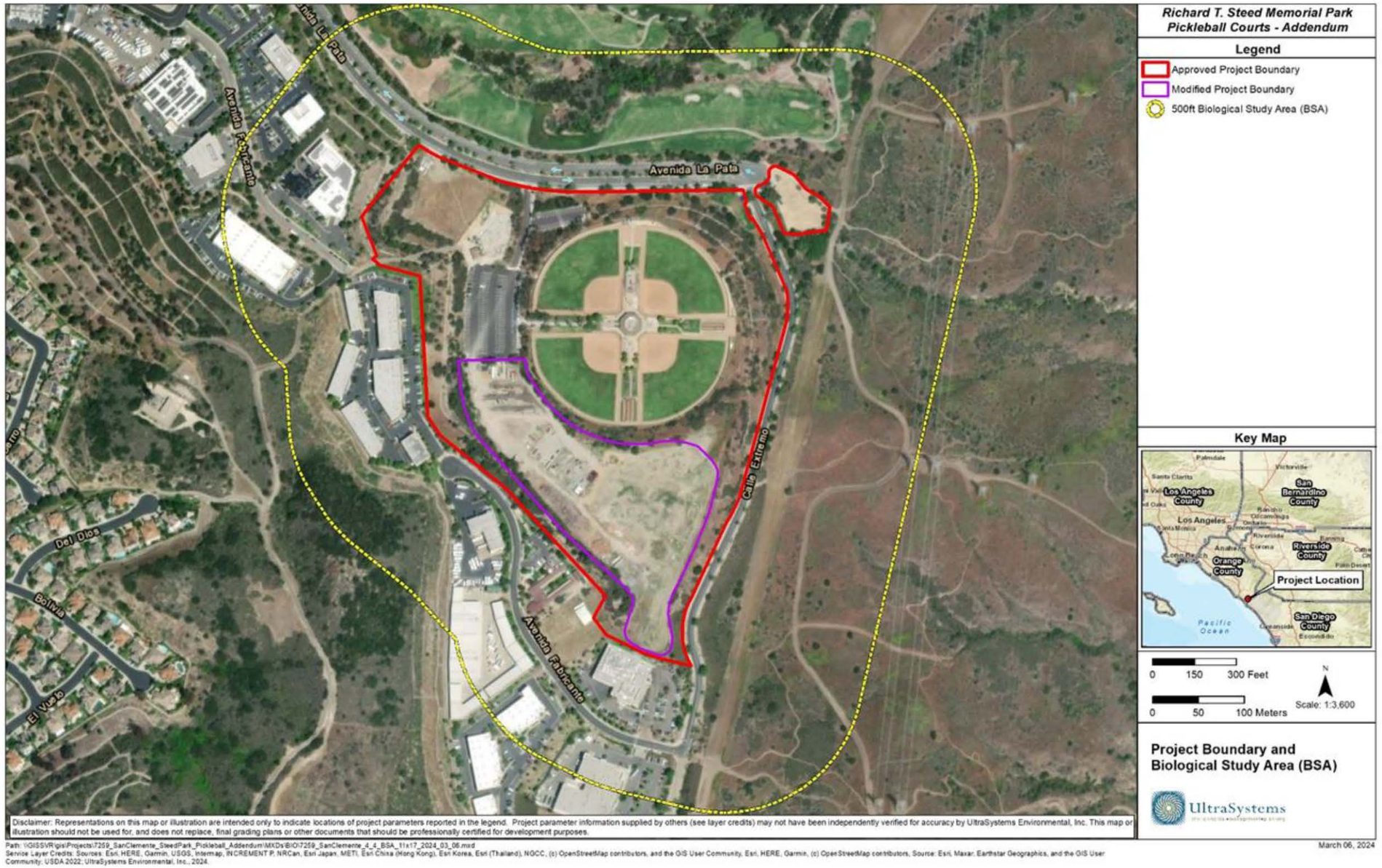
Less than Significant Impact/No Changes or New Information

Figure 4.4-1 shows the Approved Project site; the Biological Study Area (BSA) for the Approved Project site; and the modified project site. No special-status plant species were observed in the BSA during the biological resources assessment conducted for the Approved Project IS/MND. Eight special-status plant species were determined to have a high potential to occur within the BSA. One special-status animal species, California thrasher (*Toxostoma redivivum*), was observed in the BSA. Three other special-status animal species were determined to have high potential to occur in the BSA, and eight other special-status animal species were determined to have moderate potential to occur in the BSA (see Section 4.4.1 for details). Impacts of the Approved Project to special-status species were determined to be less than significant after implementation of Mitigation Measures **BIO-1** through **BIO-10**.

Most of the modified project site is vacant disturbed land. The western part of the modified project site is part of a developed parking lot. Two narrow strips of the modified project site are vegetated: disturbed lemonade berry scrub along the northeast edge of the site, and pepper tree groves-disturbed lemonade berry scrub along the southwest edge.

The entire modified project site is within the Approved Project site; and the entire modified project site would be developed in both scenarios. Both vegetated areas within the modified project site are subject to frequent disturbances including landscaping activities; the northerly of the two vegetated areas is also subject to disturbances during uses of the adjacent baseball/softball fields. Thus, the vegetated areas do not provide high-quality habitat for special status species. As with the Approved Project, impacts of the modified project on special-status species would be less than significant after implementation of Mitigation Measures **BIO-1** through **BIO-10**. No new or intensified impact to sensitive or special-status species would occur, and no new IS/MND is needed.

Figure 4.4-1
PROJECT BOUNDARY AND BIOLOGICAL STUDY AREA (BSA)



b) Would the project have a substantial adverse impact to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact

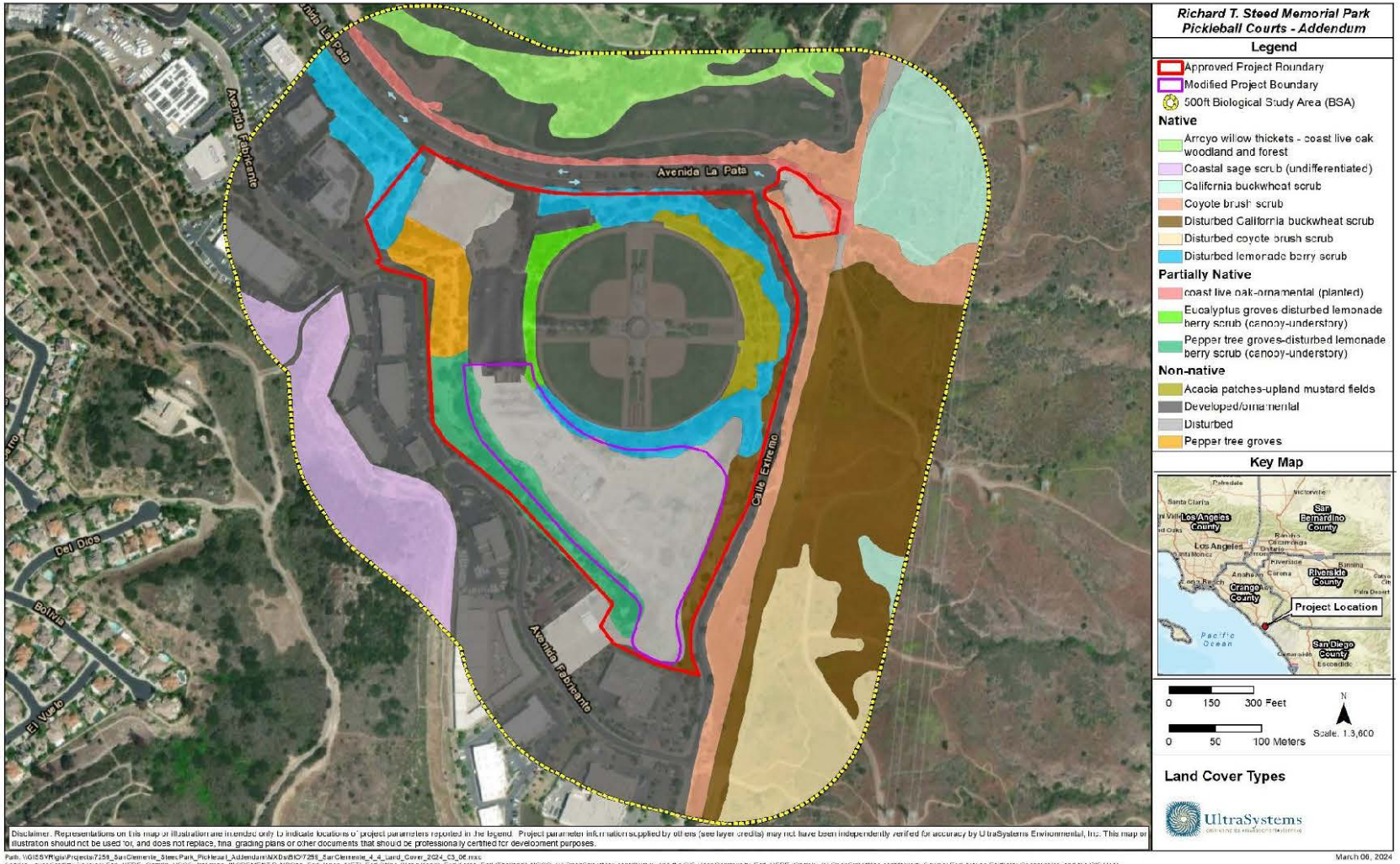
The IS/MND found that Approved Project development would cause direct impact to 8.76 acres of one sensitive natural community, disturbed lemonade berry scrub; such impact was determined to be less than significant after implementation of mitigation measure **BIO-11**.

One sensitive natural community, lemonade berry scrub (disturbed state), is present within the modified project site: about 0.29 acres in one narrow strip along the north edge of the site next to the baseball and softball fields (see **Figure 4.4-2**). That habitat is subject to frequent disturbances from uses of the baseball/softball fields and from periodic landscaping activities. Therefore, the lemonade berry scrub onsite is not high-quality habitat.

The modified project site is entirely within the Approved Project footprint. Modified project development would not cause any new impact to sensitive natural communities.

No riparian habitat was mapped within the modified project site. The four land cover types within the modified project site are disturbed lemonade berry scrub; pepper tree groves-disturbed lemonade berry scrub; disturbed; and developed/ornamental (see **Figure 4.4-2**); none of those land cover types are riparian habitat. No impact to riparian habitat would occur and no new IS/MND is needed.

Figure 4.4-2
LAND COVER TYPES



c) Would the project have a substantial adverse effect on federally protected wetlands as defined by § 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?

Less than Significant Impact/No Changes or New Information

The IS/MND determined that one unnamed drainage is present in the northeast section of the BSA, next to the existing dog park, as shown on **Figure 4.4-3**. The modified project site is in the south and southwest parts of the Approved Project site, on the opposite side of the Approved Project site from the unnamed drainage. The modified project site is also within the development footprint of the Approved Project. The IS/MND determined that a jurisdictional delineation survey would be required for the Approved Project to ascertain potential impacts, if any, to waters of the U.S. and State.

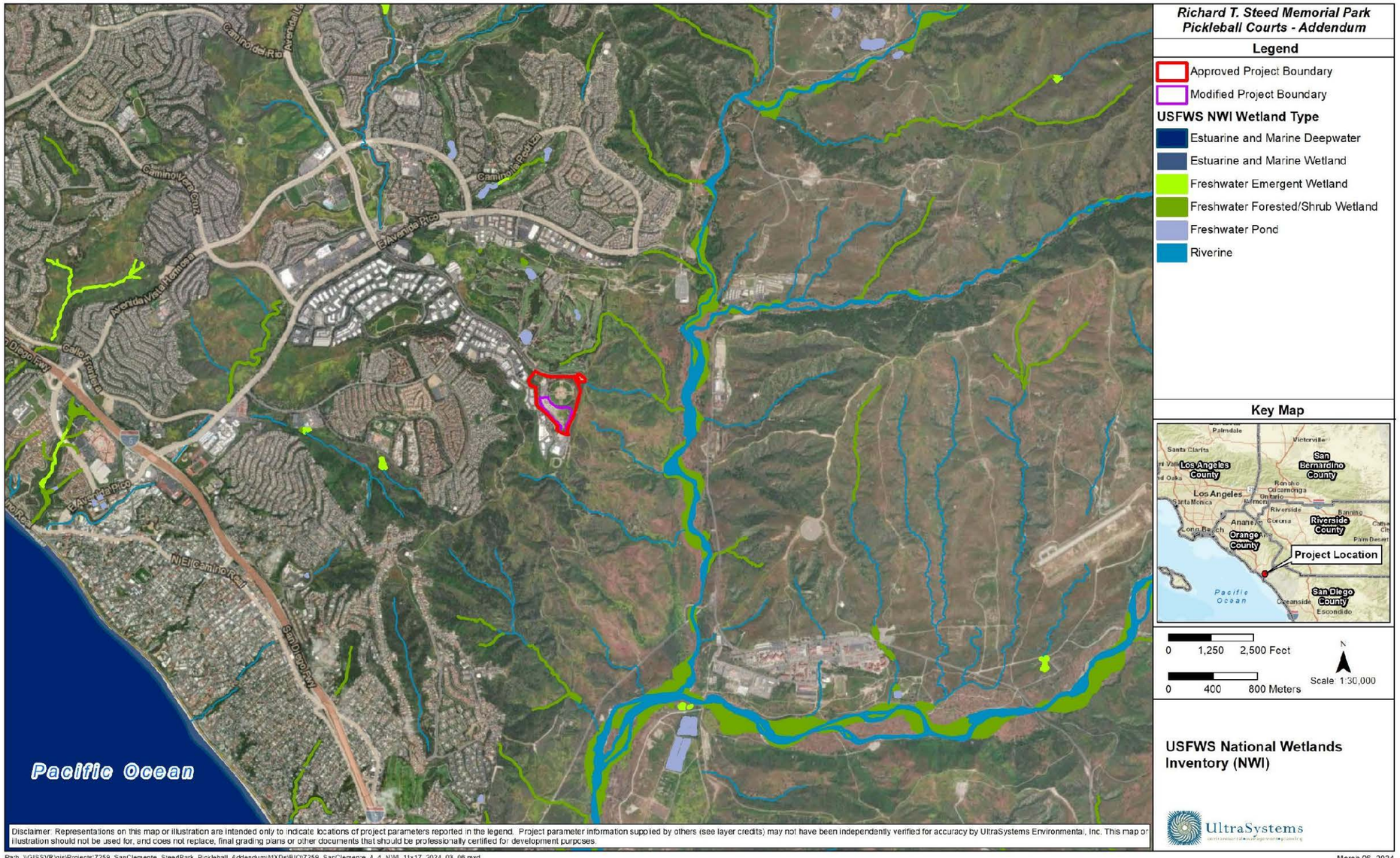
If the jurisdictional delineation determines that the Approved Project may result in temporary or permanent impacts to the unnamed drainage, the Approved Project will require permits from the three relevant agencies. The same determination applies to the modified project. No new or intensified impact would occur.

d) Could the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less than Significant Impact/No Changes or New Information

The easternmost part of the project site is within a CDFW Natural Landscape Block identified in the IS/MND (see **Figure 4.4-4**). The modified project site is within the development footprint of the Approved Project; and the entire modified project site would be developed in both scenarios. In addition, the affected Natural Landscape Block encompasses a wide area; thus, modified project development would have minimal impact on wildlife movement. No new or intensified impact would occur and no new IS/MND is required.

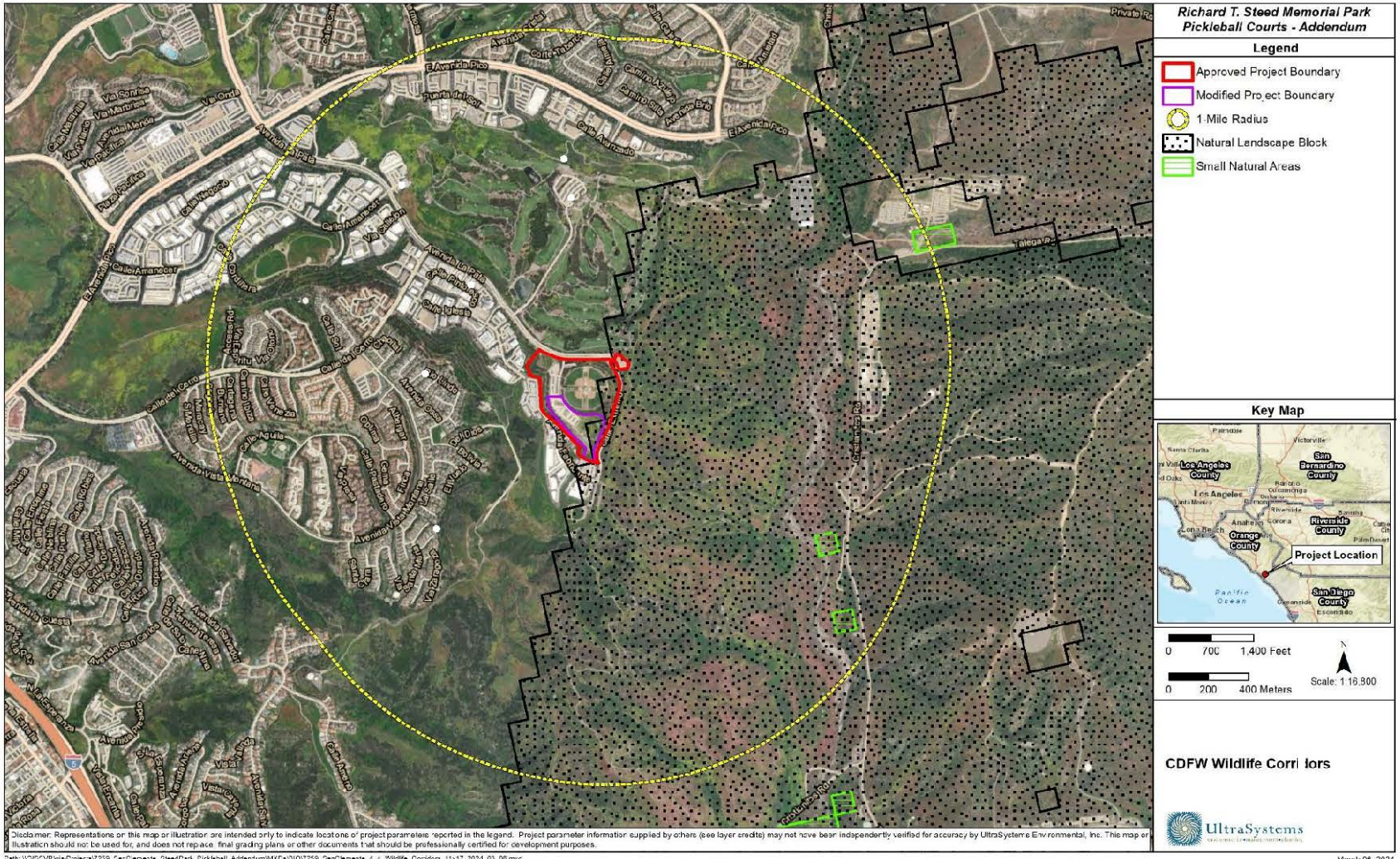
Figure 4-4-3
USFWS NATIONAL WETLANDS INVENTORY (NWI)



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7259_SanClemente_SteedPark_Pickleball_Addendum\MXDs\EIO\7259_SanClemente_4_4_NWI_11x17_2024_03_06.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, MET, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; USFWS NWI, May 2021; UltraSystems Environmental, Inc., 2024.

Figure 4.4-4
CDFW WILDLIFE CORRIDORS



e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact

The modified project site is not in the coastal zone, and thus the City's Local Coastal Program (LCP) does not apply to the project site. The modified project site is within the development footprint of the Approved Project. The modified project, as with the Approved Project, would be required to comply with City of San Clemente Municipal Code Chapters 17.68, *Landscaping Standards*, and 12.24, *Maintenance, Repair, Protection and Landscaping of Public Property by Abutting Property Owners.* Mitigation measure BIO-13 included in the IS/MND sets forth landscaping and tree replacement requirements from the two specified Municipal Code chapters. No new or intensified impact would occur after implementation of mitigation measure **BIO-13**, and no new IS/MND is required.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

The modified project site is not in a habitat conservation plan. While the modified project site is within the Orange County Southern Subregion Habitat Conservation Plan (HCP), the City of San Clemente is not a signatory or permittee to the HCP. No new impact would occur and no new IS/MND is required.

4.5 Cultural Resources

4.5.1 Summary of Previous Approved Project (Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

The information below summarizes the analysis and conclusions in Section 4.E, Cultural Resources, in the IS/MND (UltraSystems, 2023). The analysis of cultural resources is derived from a technical report prepared by UltraSystems in October 2022. The Cultural Resources Assessment was provided in the Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND as Appendix 6 (UltraSystems, 2023, Appendix 6).

Historical Resources - cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

There are no historic cultural resources recorded within the project boundary. The pedestrian survey was negative for prehistoric and historic cultural resources. The extensive prior grading throughout the park would preclude the presence of any potential past cultural resources unless they were situated very deep in the ground, a type of site not found in prior surveys in the immediate area.

With this very low potential for the presence of cultural resources, there would be no impact on historical resources by this project (UltraSystems, 2023, p. 4.5-3).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: No mitigation measures are required.

Archaeological Resources - cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064?

The past singular use of the project site for cattle grazing suggests that original ground on the project site had been minimally disturbed. However, with the extensive grading of the entire park that took place during its initial development, there is no native surface soil remaining. The cultural resources investigation conducted by UltraSystems, which included a CHRIS records search of the project site and buffer zone, a search of the SLF by the NAHC, and pedestrian field survey, suggests there is a low potential for undisturbed unique archeological resources existing on the project site.

The result of the pedestrian survey was negative for both prehistoric sites and isolates. Based on the survey results, in combination with the observed considerable disturbance to the natural topography of the project parcel and the negative findings of the CHRIS records search for cultural resources sites on the property, it is therefore determined that there is a low potential for the presence of cultural material at the project site and that prehistoric cultural resources would not be adversely affected by subsurface construction work for the project. However, there is always the potential that further grading and trenching activities would cause new subsurface disturbance and may result in the unanticipated discovery of prehistoric and/or historic archeological resources. Implementation of Mitigation Measure **CUL-1** would reduce this impact to less than significant (UltraSystems, 2023, p. 4.5-6).

- ***Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Mitigation Measures: Mitigation Measure **CUL-1**.

Paleontological Resources - directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

This section was moved and is addressed in ***Section 4.6,*** *Geology and Soils*, for consistency with the current 2023 CEQA thresholds.

Human Remains - disturb any human remains, including those interred outside of formal cemeteries?

The project would be built on considerably disturbed land that has intensively graded and is in a suburban area. No human remains have been previously identified or recorded onsite. The project proposes grading and trenching activities for the installation of infrastructure including water, sewer, and utility lines for proposed restroom facilities, parking lots, overlooks and stairs. Grading and trenching would involve new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. In the unlikely event of an unexpected discovery, implementation of mitigation measure **CUL-2** would ensure that impacts related to the accidental discovery of human remains would be less than significant (UltraSystems, 2023, p. 4.5-7).

- ***Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Mitigation Measure: Mitigation measure **CUL-2**.

4.5.2 Summary of Approved Project versus Modified Project Impacts

The modified project's potential impacts on cultural resources have been evaluated in light of the present environmental regulatory setting. The modified project would be similar to the previous Approved Project in that there would be no significant impacts on cultural resources with mitigation incorporated. Therefore, impacts associated with implementation of the modified project would be similar to those of the previous Approved Project and no additional impacts beyond those identified for the previous Approved Project would occur.

4.5.3 Proposed Steed Memorial Park Master Plan Addendum Project Analysis and Conclusions

The following checklist responses compare the previous Approved Project analyzed under the adopted Steed Memorial Park Master Plan Update IS/MND with the modified project as described in this document and analyze the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Steed Memorial Park Master Plan IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Steed Memorial Park Master Plan IS/MND	Less than Significant Impacts/No Changes Compared to the Adopted Steed Memorial Park Master Plan IS/MND	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				**X**
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			**X**	
c) Disturb any human remains, including those interred outside of formal cemeteries?			**X**	

No new cultural resources investigation was performed, as a cultural resources investigation is valid for five years and the cultural resources inventory for the Approved Project was completed in October 2022.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

No Impact

The modified project site is entirely within the Approved Project development footprint. No historical resources were identified in the Approved Project site in the cultural resources inventory for the Approved Project (UltraSystems, 2023, p. 4.5-3). Modified project development would not adversely affect a historical resource, and no impact would occur. No new IS/MND is needed.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impacts/No Changes or New Information

The modified project site is part of the Approved Project development footprint. Both the pedestrian survey and the CHRIS records search conducted as part of the cultural resources inventory for the Approved Project yielded negative findings (UltraSystems, 2023, p. 4.5-6). As with the Approved Project, grading and trenching activities would cause new subsurface disturbance and may result in the unanticipated discovery of prehistoric and/or historic archeological resources. Implementation of Mitigation Measure **CUL-1** from the IS/MND would reduce this impact to less than significant. No new or more intensified impact would occur and no new IS/MND is required.

c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impacts/No Changes or New Information

The modified project is entirely within the Approved Project development footprint. Unanticipated discovery of human remains due to ground disturbance during modified project development is considered unlikely, as it is for the Approved Project. In the unlikely event of an unexpected discovery, implementation of IS/MND mitigation measure **CUL 2** would ensure that impacts related to the accidental discovery of human remains would be less than significant. No new significant impact would occur and no new IS/MND is required.

4.6 Energy

4.6.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park and Baron Von Willard Dog Park Project) Analysis and Conclusions

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Transportation Energy

During project construction, trucks and construction equipment would be required to comply with the ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel Fueled Fleets regulation would also apply (ARB, 2016). Vehicles driven to or from the project site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency standards established by the federal government. Therefore, project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy.

Electricity

Lighting used during project construction would comply with Title 24 standards/requirements (such as wattage limitations). This compliance would ensure that electricity use during project construction would not result in the wasteful, inefficient, or unnecessary use of energy. Lighting would be used in compliance with applicable City of San Clemente Municipal Code requirements to create enough light for safety.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Therefore, the proposed project is not anticipated to have a demand for natural gas during project construction.

Operational

Energy would be consumed during project operations related to space and water heating, water conveyance, solid waste disposal, and vehicle trips of workers. Project operation energy usage, which was estimated by the California Emissions Estimator Model (CalEEMod) as part of the air quality and greenhouse gas emissions analyses (refer to Section 4.3), is shown in Table 4.6-1.

The proposed project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards. Therefore, the implementation of the proposed project would result in less than significant impacts on energy resources.

Continued use of energy resources is consistent with the anticipated growth within the city and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Therefore, the energy demand associated with the project would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- ***Previous Approved Project Determination: Less Than Significant Impact.***

The proposed project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards, the General Plan, and the City of San Clemente Climate Action Plan. Therefore, impacts would be less than significant.

4.6.2 Summary of Approved versus Modified Project Impacts

Modified project impacts on energy have been evaluated in light of the present environmental regulatory setting as well as existing and known planned baseline conditions in the field. The modified project would be similar to the previously approved Initial Study although it would increase the number of parking spaces and pickleball courts constructed. The modified project comprises the development of an additional eight pickleball courts (from 16 to 24) and 65 additional parking spaces, and halving the size of the soccer field that was analyzed in the previously approved Initial Study. Impacts associated with implementation of the modified project would be similar to those of the previous Approved Project and would be less than significant.

4.6.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted IS/MND with the project as described in this document and analyze the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

4.6.3.1 Thresholds of Significance

The Initial Study Environmental Checklist Form in Appendix G of the CEQA Guidelines includes two questions relating to energy consumption, which have been used as the thresholds of significance in this section. A project would result in potentially significant environmental effects if it would (1) result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or (2) conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.3.2 Impact Analysis

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact

Construction

The following forms of energy and associated units of measure are anticipated to be expended during construction of the modified project.

Electricity

During project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Due to the fact that electricity usage associated with lighting and construction equipment that utilizes electricity is not easily quantifiable or readily available, the estimated electricity usage during project construction is speculative.

Lighting used during project construction would comply with Title 24 standards/requirements (e.g., wattage limitations). This compliance would ensure that electricity use during project construction would not result in the wasteful, inefficient, or unnecessary use of energy.

Transportation Energy

Project construction would consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the project site, construction workers' travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site.

During project construction, trucks and construction equipment would be required to comply with the ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the project site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency standards requirements established by the Federal Government.

Therefore, project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy.

Natural Gas

Construction activities typically do not involve the consumption of natural gas. Therefore, the modified project is not anticipated to have a demand for natural gas during project construction.

Operation

Energy would be consumed during modified project operations related to lighting, water conveyance, solid waste disposal, and vehicle trips of employees and customers. The modified project's operational energy usage, which was estimated by CalEEMod as part of the greenhouse gas emissions analysis (see **Section 4.3**), is shown in **Table 4.6-1.**

Table 4.6-1
PREVIOUSLY APPROVED AND MODIFIED PROJECT OPERATIONAL ENERGY USE

Energy Type	Units	Annual Value	Daily Value
Previously Approved Project Totals			
Onroad Motor Vehicle Travel (Fuel)[a]	Gallons gasoline/year	26,044	71
	Gallons diesel/year	49	0.13
Electricity Use	Kilowatt-hours per year	14,000	38
Additional Operational Uses			
Onroad Motor Vehicle Travel (Fuel)[a]	Gallons gasoline/year	13,134	36
	Gallons diesel/year	21	0.06
Electricity Use	Kilowatt-hours per year	22,323	61
New Totals			
Onroad Motor Vehicle Travel (Fuel)[a]	Gallons gasoline/year	39,178	107
	Gallons diesel/year	70	0.19
Electricity Use	Kilowatt-hours per year	36,323	99

[a] Onroad Motor Vehicle Fuel Consumption calculated by UltraSystems using EMFAC2021(v1.0.2) emissions inventory web platform tool (ARB, 2022) and CalEEMod (2022.1.1.22) (CAPCOA, 2022); see **Appendix B1**.
Electricity Use calculated by UltraSystems with CalEEMod (2022.1.1.22); see **Appendix B1**.
Source: CalEEMod (2022.1.1.22) (CAPCOA, 2022).

The modified project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards. Additionally, there would not be any inefficient, wasteful, or unnecessary energy usage in comparison to similar development projects of this nature regarding construction-related fuel consumption. Therefore, the implementation of the modified project would result in less than significant impacts on energy resources.

Continued use of energy resources is consistent with the anticipated growth within the city and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Therefore, the energy demand associated with the modified project would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Changes or New Information

The modified project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards, the General Plan, and the City of San Clemente Climate Action Plan. Therefore, impacts would be less than significant.

4.7 Geology and Soils

4.7.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Ground Shaking/Seismicity

Implementation of the previous Approved Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking (UltraSystems, 2023, p. 4.7-5).

The previous Approved Project is located within a seismically active region, with a number of regionally active or potentially active faults traversing or near the Approved Project site, including the Newport-Inglewood-Rose Canyon fault zone. Strong ground shaking is likely to occur within the design lifetime of the proposed restroom building. The project would be constructed in accordance with the applicable 2022 California Building Code (CBC; California Code of Regulations, Title 24). The CBC, adopted as Chapter 15.08 of the City's Municipal Code (Municode.com, 2022), provides minimum standards to protect property and public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site.

The City of San Clemente Building Code requires a geotechnical investigation for the project. The geotechnical investigation report would estimate seismic parameters for use in design and construction of the proposed restroom building. Therefore, regulatory compliance would be sufficient to minimize hazards from strong ground shaking. Impacts would be less than significant, and mitigation is not required.

- ***Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Soil Erosion and Loss of Top Soil

Clearing and grading for Approved Project implementation could result in short-term soil erosion by wind and water, and loss of topsoil. Erosion of soils that could result in a significant loss of topsoil would largely depend on the location of that development, the properties of underlying soils, the extent of vegetative cover, and the prevailing weather patterns. Given the potential for erosion to occur during development of the Approved Project, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared incorporating Best Management Practices (BMPs) for erosion control in accordance with the San Diego Regional Water Quality Control Board (RWQCB). Design elements would be incorporated to reduce soil erosion. Adherence to the erosion requirements set forth by the RWQCB would make impacts associated with soil erosion less than significant.

- ***Approved Project Determination: Less Than Significant Impact.***

Compressible/Collapsible Soils

Implementation of the previous Approved Project would not result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse (UltraSystems, 2023, p. 4.7-9). The geotechnical

investigation report required for the Approved Project would assess the capability of site soils for supporting the proposed improvements including the proposed restroom building, parking lots, and other paved areas. The geotechnical investigation report would provide any needed recommendations for removal of soils unsuitable for supporting the proposed improvements and engineering of such soils and replacement of such soils back within and next to the footprints of proposed improvements. Adherence with such recommendations would reduce risks arising from collapsible soils to less than significant.

- ***Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures: Refer to mitigation measure **F-1**.

Paleontological Resources - directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Results of the paleontological resources records search through the Los Angeles County Natural History Museum (LACM) indicated that there are no recorded fossil localities within the project site or within the surrounding vicinity. Several fossil localities are known from San Clemente, and fossils could be present in rock under the site. Grading and excavation during project development could damage fossils, for which mitigation is required (UltraSystems, 2023, p. 4.7-11).

- ***Approved Project Determination: Less Than Significant Impact with Mitigation Incorporated.***

Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Mitigation Measures:

No.	Mitigation Measure
GEO-1 Paleontological Resources	Prior to the issuance of the grading permit, the applicant shall provide a letter to the City of San Clemente Planning Division, or designee, from a qualified paleontologist stating that the paleontologist has been retained to provide services for the project. The paleontologist shall develop, as needed, a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite for the review and approval by the City. The PRIMP shall require that the paleontologist monitor any ground disturbing activities within undisturbed native sediments during mass grading, site preparation, and underground utility installation. The project paleontologist may reevaluate the necessity for monitoring after 50 percent or greater of the excavations have been completed. In the event paleontological resources are encountered, ground-disturbing activity within 50 feet of the area of the discovery shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered. Criteria for discard of specific fossil specimens will be made explicit. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if a significant fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage and treatment shall be done at the

No.	Mitigation Measure
	Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository such as the Los Angeles County Museum of Natural History. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

Source: UltraSystems 2023, 2015a, p. 4.7-11.

4.7.2 Summary of Approved Project Versus the Modified Project Impacts

Impacts of modified project development concerning geology and soils have been evaluated in light of the present environmental regulatory setting and the impacts identified in the Master Plan Update IS/MND. Impacts associated with modified project development would be similar to those of the previous Approved Project, no additional significant impacts beyond those identified for the previous Approved Project were identified, and no additional mitigation measures would be required.

4.7.3 Proposed Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND Project Analysis and Conclusions

The following checklist compares the geology and soils impacts of the previous Approved Project analyzed in the Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND with those of the modified project in Planning Areas 44 and 45. The comparative conclusions provided in the following table are based on the discussions immediately thereafter.

Would the project:	New Information Showing New or Increased Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to			**X**	

Would the project:	New Information Showing New or Increased Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?			**X**	
iii) Seismic-related ground failure, including liquefaction?			**X**	
iv) Landslides?			**X**	
b) Result in substantial soil erosion or the loss of topsoil?			**X**	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**	
d) Be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial risks to life or property?			**X**	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				**X**
f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on

other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact

As shown in **Figure 4.7-1**, the nearest Alquist Priolo Earthquake Fault Zone to the project site is along the Wildomar Fault approximately 20 miles to the northeast (UltraSystems, 2023, p. 4.7-2). The nearest active fault to the project site mapped by the California Geological Survey (see **Figure 4.7-2**) is a trace of the Newport-Inglewood-Rose Canyon Fault Zone offshore, approximately six miles to the southwest (UltraSystems, 2023, p. 4.7-2). The Modified Project does not propose development of additional structures for human occupancy. Since no known earthquake faults are beneath the project site, the potential for loss, injury, or death due to fault rupture on the project site is considered to be extremely low and no impacts would occur.

ii) Strong seismic ground shaking?

No Impact

The Modified Project does not propose development of additional structures for human occupancy, and no incremental impact would occur.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impacts/No Change or New Information

The project site is not in a zone of required investigation for liquefaction (see **Figure 4.7-3**). A geotechnical investigation, required for the Approved Project, will assess liquefaction potential in soils under the project site and provide any needed recommendations to minimize hazards arising from liquefaction. Therefore, mitigation is not required to ensure completion of geotechnical investigations and compliance with recommendations therein. Impacts would be less than significant after completion of geotechnical investigation reports and compliance with recommendations in such reports. No new significant impacts would occur compared to impacts identified in the IS/MND.

Figure 4.7-1
REGIONALLY ACTIVE FAULTS

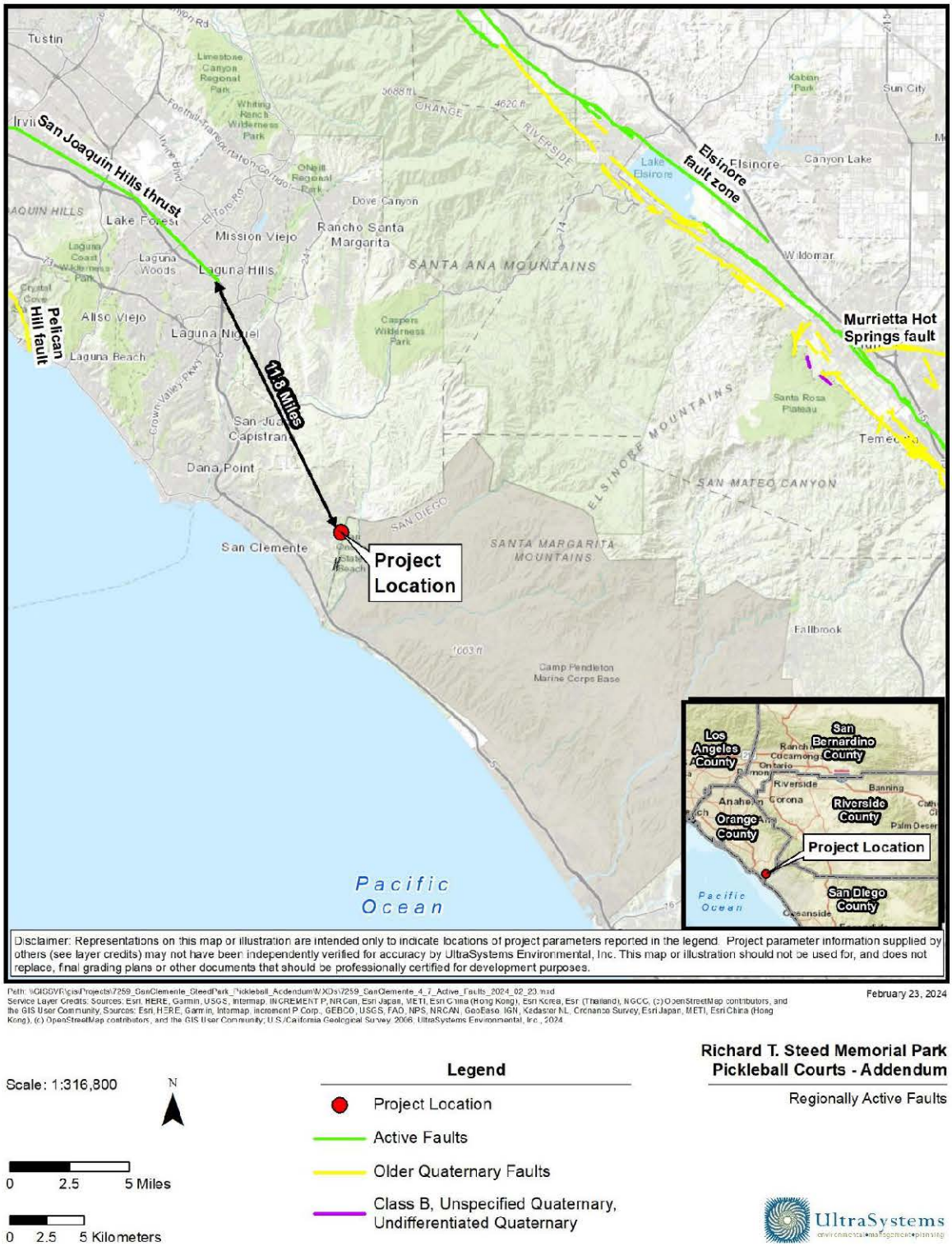


Figure 4.7-2
ALQUIST PRIOLO FAULT ZONES

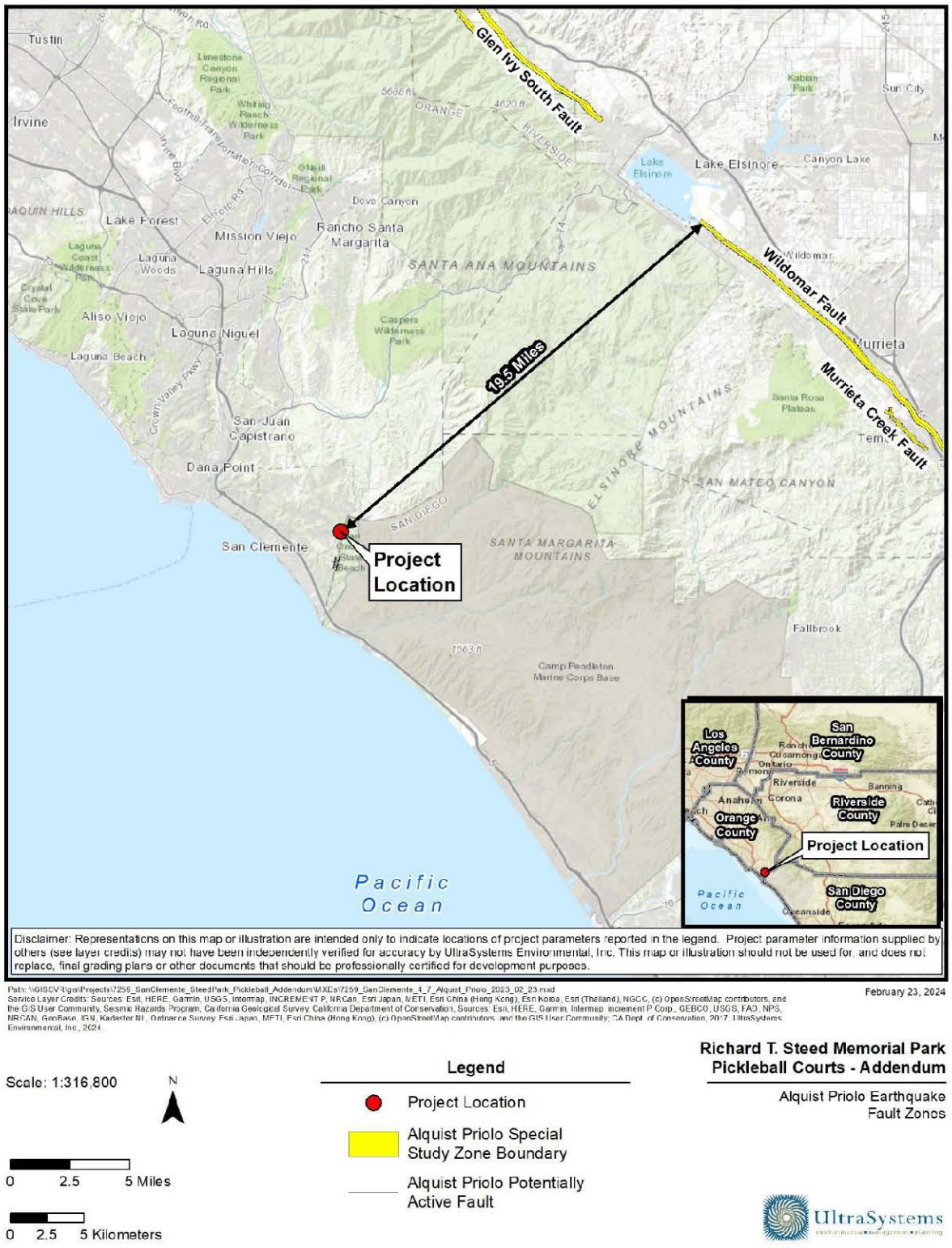
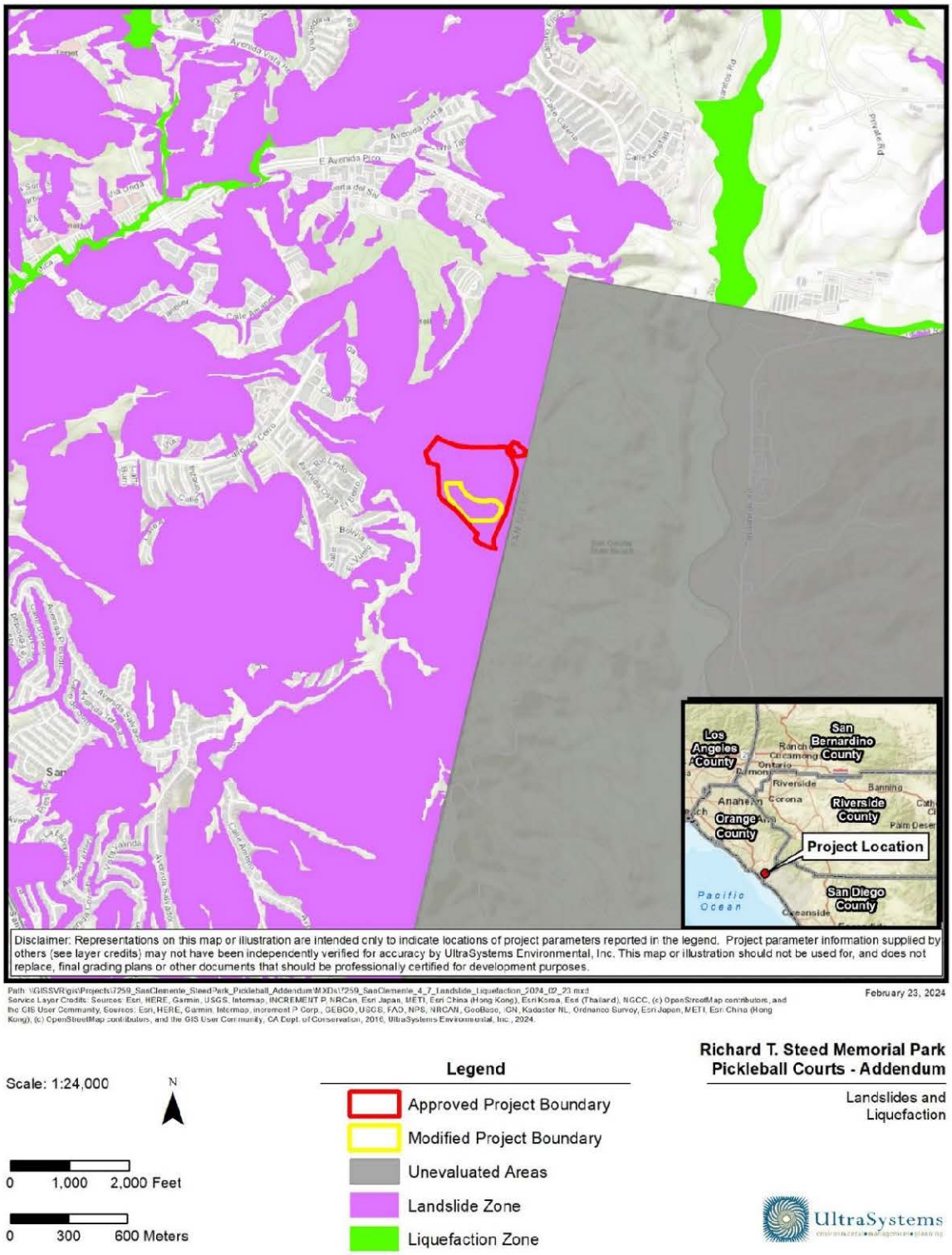


Figure 4.7-3

ZONES OF REQUIRED INVESTIGATION FOR LIQUEFACTION AND LANDSLIDES



iv) Landslides?

Less than Significant Impacts/No Change or New Information

The entire project site is within a landslide area – a dormant young rock slide – identified by the California Geological Survey, as shown in **Figure 4.7-3** (UltraSystems, 2023, p. 4.7-7). A geotechnical investigation would be required, including an assessment of stability of both existing slopes and slopes that would be constructed by project development. The geotechnical investigation, and any recommendations of the geotechnical investigation report, must comply with the 2022 California Building Code. Project design and construction would be required to comply with recommendations of the geotechnical report. No new significant impacts would occur after completion of the geotechnical investigation report and adherence with any relevant recommendations therein.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impacts/No Change or New Information

Modified project construction would involve ground surface disturbance, such as excavation, grading, and trenching. These activities would disturb substantial amounts of soil and could cause soil erosion. However, this potential will be reduced through erosion control measures. The Stormwater Pollution Prevention Plan (SWPPP) that would be prepared for the Approved Project would be revised to apply to the Modified Project as well. The SWPPP will specify Best Management Practices (BMPs) for minimizing construction impacts (including erosion) to stormwater. The project construction contractor would implement the SWPPP. With adherence to the project SWPPP, no new significant soil erosion impacts would occur.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impacts/No Change or New Information

Refer to the discussions under **Sections a)iii and a)iv** above. They respectively conclude that impacts related to seismically-induced landslides or liquefaction as a consequence of project development would be less than significant.

Subsidence

The project site is not in an area of subsidence mapped by the US Geological Survey (UltraSystems, 2023, p. 4.7-9). Impacts arising from ground subsidence would be less than significant. No new significant impact would occur compared to those disclosed in the Certified EIR.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. As with the Approved Project, the geotechnical investigation report would assess the capability of site soils for supporting the proposed improvements; and would provide any needed recommendations for removal of soils unsuitable for supporting the proposed improvements and replacement of such soils with engineered fill soils. No new impact would occur after adherence with such recommendations.

The adopted IS/MND for the Approved Project identified compressible soils on the project site. The project would comply with regulatory requirements for geotechnical investigations and with implementing recommendations in such investigation reports. Impacts of the Modified Project would be less than significant after regulatory compliance. No new significant impact would occur.

d) Would the project be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impacts/No Change or New Information

Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. Much of the soil underlying San Clemente is highly expansive (UltraSystems, 2023, p. 4.7-9), and expansive soils could be present under the project site.

The project geotechnical investigation report would include testing samples of subsurface site soils for expansion index, and providing any needed recommendations for remedial grading, soil moistening, subsurface drainage systems, and/or foundation design to minimize risks from expansive soils. No new significant impacts would occur after adherence with such recommendations.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact

The Modified Project would include construction of sewer laterals connecting to sewer mains in surrounding roadways and would not involve use of alternative wastewater disposal systems.

f) The project site is in an urbanized area served by wastewater infrastructure. Therefore, the project would not include septic tanks or alternative wastewater disposal systems. Therefore, no impacts from septic tanks or alternative waste water disposal systems would occur. No new significant impacts would occur compared to those disclosed in the Adopted IS/MND. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impacts/No Change or New Information

The Approved Project IS/MND identified several fossil localities in San Clemente and determined that fossils could be present in soils under the site. The IS/MND concluded that Approved Project impacts to fossils would be potentially significant, required mitigation measure GEO-1 to reduce such impacts, and determined that impacts after mitigation would be less than significant. Modified project development would not involve excavations to greater depths than Approved Project development would have. Thus, modified project development would not cause greater impacts to fossil resources than Approved Project development would have. Impacts of modified project development on fossils would be less than significant after mitigation, as was the case for the Approved Project. No new or more severe significant impact would occur.

4.8 Greenhouse Gas Emissions

4.8.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park and Baron Von Willard Dog Park Project) Analysis and Conclusions

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Neither the City of San Clemente, the SCAQMD, nor the State CEQA Guidelines Amendments has adopted quantitative thresholds of significance for addressing a project's GHG emissions. Nonetheless, § 15064.4 of the CEQA Guidelines assists lead agencies in determining the significance of the impacts of GHGs. As required in § 15064.4, the analysis of the previous approved project included an impact determination based on: (1) an estimate of the amount of GHG emissions resulting from the Richard T. Steed Memorial Park project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the project would increase GHG emissions as compared to the existing environmental setting; and (4) the extent to which the project would comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

SCAQMD's guidance (SCAQMD, 2008) uses a tiered approach rather than a single numerical emissions threshold. If a project's GHG emissions "fail" the non-significance of a given tier, then one goes to the next tier. The threshold selected for this analysis was Tier 3, which establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate. For Tier 3, the SCAQMD estimated that at a threshold of approximately 3,000 metric tons CO_2e per year emissions would capture 90 percent of the GHG emissions from nonindustrial projects. Thus, this analysis used 3,000 $MTCO_2e$ per year as the significance threshold under the first impact criterion in **Section 4.8.4**.

Construction GHG Emissions

Construction is an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from onsite construction activities and offsite hauling and construction worker commuting are considered as project-generated. As explained by the California Association of Air Pollution Control Officers Association (CAPCOA) in its 2008 white paper (CAPCOA, 2008), the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* § 15145). Therefore, the construction analysis does not consider such GHG emissions, but does consider non-speculative onsite construction activities, offsite hauling, and construction worker trips. All GHG emissions are quantified on an annual basis.

Estimated GHG emissions from the Previous Approved Project's onsite and offsite project construction activities were calculated using CalEEMod, Version 2020.4.0.[8] The results of this analysis are presented in **Table 4.8-1**. The project construction was expected to begin around the second or third quarter of 2023 with all construction completed by the end of 2024. The annual

[8] The greenhouse gas analysis was performed on October 17, 2022, prior to the December 21, 2022 full launch of CalEEMod Version 2022.1.1.3.

increase in GHG emissions from the project construction activities would be 347.34 metric tons in 2023 and 590.40 metric tons in 2024. Consistent with SCAQMD recommendations (SCAQMD, 2008, p. 3-10) and to ensure that construction emissions are assessed in a quantitative sense, construction GHG emissions were amortized over a 30-year period. The amortized value, 31.27 $MTCO_2e$, was added to the project's annual operational GHG emissions. (See below.) Modeling results can be found in **Appendix B.**

Table 4.8-1
PREVIOUS APPROVED PROJECT CONSTRUCTION-RELATED GHG EMISSIONS

Year/Phase	Annual Emissions (MT/year)			
	CO_2	CH_4	N_2O	CO_2e
2023	342.57	0.0622	0.0108	347.34
2024	581.16	0.0766	0.0246	590.41
Total	**924**	**0.139**	**0.035**	**938**

Source: Calculated by UltraSystems with CalEEMod (Version 2020.4.0) (CAPCOA, 2022).

Operational GHG Emissions

For a reasonable maximum emissions case, it was assumed that GHG emissions from the Richard T. Steed Memorial Park project site were currently zero. Operational GHG emissions calculated by CalEEMod are shown in **Table 4.8-2**. Total annual unmitigated emissions from the project would be **230.2 $MTCO_2e$ per year**. Energy production and mobile sources would account for about 95 percent of annual operational emissions and about 82 percent of total annual emissions.[9]

Table 4.8-2
PREVIOUS APPROVED PROJECT OPERATIONAL GHG EMISSIONS

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	0.00451
Energy Demand (Electricity & Natural Gas)	1.12
Mobile (Motor Vehicles)	187.59
Solid Waste Generation	0.19
Water Demand	10.03
Construction Emissions[a]	31.27
Total	**230.20**

[a] *Total construction GHG emissions were amortized over 30 years and added to those resulting from the operation of the project.*

Source: Calculated by UltraSystems with CalEEMod (Version 2020.4.0) (CAPCOA, 2022).

[9] Calculations are provided in **Appendix B**.

Therefore, under the first significance criterion, GHG emissions would be less than significant, and no mitigation is necessary.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG?

The City of San Clemente, through its Climate Action Plan and Sustainable Action Plan, has identified measures that it can take to reduce GHG emissions from City operations and from development in its jurisdiction. The City of San Clemente selected a goal to reduce its community GHG emissions to a level that is 37.7 percent below its 2009 GHG emissions level by 2030. The city will meet and exceed this goal subject to reduction measures that are technologically feasible and cost-effective through a combination of state (~74 percent) and local (~26 percent) efforts (City of San Clemente Climate Action Plan, 2014, p. 2-5). While none of these measures is directly relevant to the project, the project does not conflict with any of them and impact would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

4.8.2 Summary of Previous Approved versus Modified Project Impacts

The modified project's potential climate change impacts from GHG emissions have been evaluated considering the present environmental regulatory setting. The modified project would be similar to the previously approved Initial Study although it would increase the number of parking spaces and pickleball courts constructed, and would decrease the area of the soccer field. The modified project is for the development of an additional eight pickleball courts (from 16 to 24) and additional parking. Impacts associated with implementation of the modified project would be similar to those of the previous Approved Project and no additional significant impacts would occur.

4.8.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted IS/MND with the project as described in this document and analyze the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to Prior Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact

Analysis of the modified project used the same significance threshold as was used for the previous Approved Project (3,000 metric tons CO_2e per year).

Construction GHG Emissions

Estimated GHG emissions from the project's onsite and offsite project construction activities were calculated using CalEEMod, Version 2022.1.1.22. The results of this analysis are presented in **Table 4.8-3.** The modified project construction is expected to begin in 2025 with all construction completed by the end of 2028. The modified project would decrease annual GHG emissions from construction activities by 210 metric tons per year, to a level of 728 metric tons. Consistent with SCAQMD recommendations (SCAQMD, 2008, p. 3-10) and to ensure that construction emissions are assessed in a quantitative sense, construction GHG emissions have been amortized over a 30-year period. The additional amortized value, 10.98 $MTCO_2e$, has been added to the modified project's annual operational GHG emissions. (See **Table 4.8-3** below.) Modeling results can be found in **Appendix B**.

Table 4.8-3
CHANGE IN PROJECT CONSTRUCTION-RELATED GHG EMISSIONS

Year/Phase	Annual Emissions (MT/year)			
	CO_2	CH_4	N_2O	CO_2e
Previously Approved Project				
2023	342.57	0.0622	0.0108	347.34
2024	581.16	0.0766	0.0246	590.41
Additional Pickleball Courts and Parking				
2025	165.32	0.0066	0.0014	165.92
2026	154.26	0.0063	0.0013	154.79
2027	154.25	0.0063	0.0013	154.78
2028	63.12	0.0024	0.0006	63.38
Soccer Field Size Reduction				
2025	(239.91)	(0.0096)	(0.0021)	(240.78)
2026	(212.98)	(0.0086)	(0.0017)	(213.71)
2027	(212.97)	(0.0086)	(0.0017)	(213.70)
2028	(79.92)	(0.0032)	(0.00074)	(80.22)
Net Change				
2025	(74.59)	(0.003)	(0.0007)	(74.86)
2026	(58.72)	(0.0023)	(0.0004)	(58.92)
2027	(58.72)	(0.0023)	(0.0004)	(58.92)
2028	(16.8)	(0.0008)	(0.00014)	(16.84)
Net Change Total	**(208.83)**	**(0.0084)**	**(0.00164)**	**(209.54)**
Previously Approved Total Emissions	923.73	0.1388	0.0354	937.75
Revised Total Emissions	714.9	0.1304	0.03376	728.21

***Source**: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.22) (CAPCOA, 2022).*

Operational GHG Emissions

For a reasonable maximum emissions case, it was assumed that GHG emissions from the Richard T. Steed Memorial Park project site were zero before the previously approved project. Operational GHG emissions calculated by CalEEMod are shown in **Table 4.8-4**. Total annual unmitigated emissions from the project would be **353.15 $MTCO_2e$ per year**. Energy production and mobile sources account for about 85 percent of total annual emissions.[10]

[10] Calculations are provided in **Appendix B**.

Table 4.8-4
MODIFIED PROJECT OPERATIONAL GHG EMISSIONS

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Previously Approved Project	
Area Sources	0.00451
Energy Demand (Electricity & Natural Gas)	1.12
Mobile (Motor Vehicles)	187.59
Solid Waste Generation	0.19
Water Demand	10.03
Amortized Construction Emissions	31.27
Pickleball Courts and Parking Additions	
Area Sources	0
Energy Demand (Electricity & Natural Gas)	5.98
Mobile (Motor Vehicles)	107
Solid Waste Generation	0.01
Water Demand	1.92
Amortized Construction Emissions[a]	17.96
Soccer Field Size Additions	
Area Sources	0
Energy Demand (Electricity & Natural Gas)	0
Mobile (Motor Vehicles)	(2.91)
Solid Waste Generation	(0.04)
Water Demand	0
Amortized Construction Emissions[a]	(6.98)
Net Total Annual Emissions	**353.15**

[a] *Total construction GHG emissions were amortized over 30 years and added to those resulting from the operation of the project.*

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.22) (CAPCOA, 2022).

Therefore, under the first significance criterion, GHG emissions would be less than significant, and no mitigation is necessary.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG?

No Changes or New Information

The modified project will result in a decrease in GHG emissions from those estimated for the previous Approved Project. In addition, it will not create conflict with the City of San Clemente's Climate Action Plan and Sustainable Action Plan. Therefore, the finding of Less than Significant Impact for the previous Approved Project will not change.

4.9 Hazards and Hazardous Materials

4.9.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Based on the RecCheck report, the project site contains no potential areas of concern or contamination.

Construction

Transportation of hazardous materials/waste is regulated by *California Code of Regulations* (CCR) Title 26. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) enforce federal and state regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary among federal, state and local governmental authorities and private persons through a state-mandated Emergency Response Plan. Due to the significant short-term risks to public health and the environment associated with hazardous waste management during transportation of wastes, specific Commercial Hazardous Waste Shipping Routes are designated with the intent of minimizing the distance that wastes are transported and the proximity to vulnerable locations.

Construction of the proposed project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials commonly associated with construction activities. Chemical transport, storage, and use would comply with Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); Occupational Safety and Health Administration (OSHA); California hazardous waste control law (California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control); California Division of Safety and Health (DOSH); South Coast Air Quality Management District (SCAQMD); Orange County Health Care Agency's Environmental Health Division requirements (EHD)[11]. Therefore, compliance with applicable laws and regulations during project construction would reduce the potential for accidental releases of hazardous materials, and construction hazards impacts would be less than significant.

Operation

The Approved Project at Richard T. Steed Memorial/Baron Von Willard Dog Park includes 100 parking spaces with solar overhead structures, expanded skateboard park, three restroom facilities, two pump track facilities, four volleyball courts, 16 pickleball courts, one activity meadow/multipurpose field, scenic overlook and trellis, outdoor flex classroom/event space, foul ball netting surrounding baseball fields, baseball scoreboards and a stairs connection to possible future parking lot. During operation, the park facilities may require the transport of hazardous materials for maintenance supplies onsite and for disposal of waste offsite. Transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion.

[11] The Environmental Health Division was designated as the Certified Unified Program Agency (CUPA) for the County of Orange by the State Secretary for Environmental Protection on January 1, 1997. The CUPA is the local administrative agency that coordinates the regulation of hazardous materials and hazardous wastes in Orange County (OCHCA, 2022).

The park is currently zoned Rancho San Clemente Specific Plan – OS (Open Space) and publicly owned, with the closest residences located approximately 0.26 mile southwest of the project site. San Onofre State Beach Park is located to the south, and the Camp Pendleton Marine Corps Base is to the east of the park. Located to the northwest of the park is the Bella Colina Golf Club. Since hazardous materials must not be transported through existing residential areas, the City would propose routes that are surrounded primarily by existing industrial land uses. Impacts to the environment or public would be less than significant (UltraSystems, 2023, p. 4.9-2 and 4.9-3).

- ***Approved Project Determination: Less Than Significant Impact***

Mitigation Measure: None Required.

Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

As mentioned above, the RecCheck report found no potential areas of concern or contamination on the project site. Additionally, the construction of the proposed project would adhere to applicable federal, state and local regulations in regard to the safe handling and transportation of hazardous materials during construction. The construction contractor would maintain equipment and supplies onsite for containing and cleaning up small spills of hazardous materials and would train construction workers on such containment and cleanup. In the event of a release of hazardous materials of quantity and/or toxicity that onsite construction workers could not safely contain and clean up, the project proponent would notify the Orange County Health Care Agency's Environmental Health Division immediately. Therefore, impacts would be less than significant during construction.

Operation

Project operation would involve the handling and storage of materials such as commercial cleansers, solvents and other janitorial or industrial-use materials, paints, and landscape fertilizers/pesticides during project operations. However, these materials would be stored, handled, and disposed of in accordance with applicable regulations and would not be stored in amounts that would create a significant hazard to the public or the environment through accidental release. The project would have a less than significant impact in this regard (UltraSystems, 2023, p. 4.9-3).

- ***Approved Project Determination: Less Than Significant Impact***

Mitigation Measure: None Required.

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school?

No schools are located within 0.25 mile of the project site. The closest school to the project site is The Goddard School of San Clemente, located at 1351 Calle Avanzado, approximately 0.72 mile to the north of the project site. The project would not be within 0.25 mile of an existing or a proposed school; therefore, no impacts to schools would occur and mitigation is not required (UltraSystems, 2023, p. 4.9-3).

- ***Approved Project Determination: No Impact***

Mitigation Measure: None Required.

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

These lists are collectively referred to as the "Cortese List." There are no Cortese List sites within 0.25 mile of the project site. Therefore, there would be no impacts (UltraSystems, 2023, p. 4.9-4).

- ***Approved Project Determination: No Impact***

Mitigation Measure: None Required.

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The nearest public-use airport to the project site is John Wayne Airport, approximately 23 miles to the northwest. The project site is outside of John Wayne Airport's safety, runway protection, obstacle free, and noise contour zones. Therefore, project development would not cause airport-related hazards, or excessive noise, to persons at the project site, and no impacts would occur (UltraSystems, 2023, p. 4.9-4).

- ***Approved Project Determination: No Impact***

Mitigation Measure: None Required.

Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction

Project construction will be within the boundaries of Richard T. Steed Memorial Park and will not involve temporary closure of any lane in Avenida La Pata. During the construction phase of the project, there will not be temporary lane closures that could increase hazards due to geometric design features or incompatible uses.

The project would comply with applicable city regulations, such as the requirement to comply with the city's fire code to provide adequate emergency access, as well as the California Building Standards Code. The City of San Clemente would review project site plans, including location of all buildings, fences, access driveways and other features that may affect emergency access. The site design includes access and fire lanes that would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All onsite access and sight-distance requirements would be in accordance with all applicable design requirements. The City's review process and compliance with applicable regulations and standards would ensure that adequate emergency access would be provided. Therefore, the project would not result in inadequate emergency access and there would be less than significant impacts.

Operation

City of San Clemente Natural Hazard Mitigation Plan

The City of San Clemente Natural Hazard Mitigation Plan (HMP) was adopted by the City Council in 2004. The purpose of the City's HMP is to promote sound public policy designed to protect citizens, critical facilities, infrastructure, private property, and the environment from natural hazards. The goals of the HMP are to: protect life, property, and the environment; improve public awareness; protect the continuity of government; and improve emergency management preparedness, collaboration and outreach. The City, in cooperation with the Orange County Health Care Agency's Environmental Health Division, will enforce disclosure laws that require all users, generators and transporters of hazardous materials and wastes to clearly identify the materials they store, use or transport. Users, generators and transporters are required to notify the appropriate city, county, state and federal agencies of a change in the quantity or type of hazardous materials and any violations. Therefore, project development would have less than significant impacts on emergency and evacuation plans (UltraSystems, 2023, p. 4.9-7).

- ***Approved Project Determination: Less Than Significant Impact***

Mitigation Measure: None Required.

Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The project site is located within a Very High Fire Hazard Severity Zone in a Local Responsibility Area (LRA VHFHSZ) for Orange County. The nearest State Responsibility Area to the project site is in unincorporated Orange County approximately 0.8 miles to the northeast.

The Orange County Fire Authority (OCFA) provides fire protection services under contract to the City of San Clemente and has specialist air and ground resources to tackle wildfires.

Buildings constructed in areas identified as VHFHSZ are required to be built using fire-resistant features identified in the California Building Code, Chapter 7A - and/or the California Residential Building Code, § R327 – Materials and Construction Methods for Exterior Wildfire. The project is an improvement of an existing park and does not add any significant wildfire risk. Thus, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the proposed project would have less than significant impact in this regard.

- ***Approved Project Determination: Less Than Significant Impact***

Mitigation Measure: None Required.

4.9.2 Summary of Approved Project versus the Modified Project Impacts

The modified project's potential impacts regarding hazards and hazardous materials have been evaluated in light of the present environmental regulatory setting in relation to the impacts identified in the Approved Project. The modified project would not expand the project site of the Approved Project and would introduce similar park components. Therefore, the project site and operations would have no new hazardous impacts compared to the Approved Project. The project site is located

in a LRA VHFHSZ and the project would be developed in accordance with applicable regulations for fire-resistant designs and building materials. Therefore, impacts associated with implementation of the Modified project would be similar to those of the previous Approved Project.

4.9.3 Proposed Modified Project Analysis and Conclusions

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			**X**	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			**X**	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			**X**	

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact/No Change or New Information

The proposed project would not expand the project site of the Approved Project. Therefore, the project site does not contain any potential areas of concern/contamination. Additionally, the project would introduce similar park facilities analyzed in the Approved Project. Therefore, with adherence to applicable hazard regulations as detailed in the Approved Project, there would be less than significant impacts.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact/No Change or New Information

The proposed project would not expand the project site of the Approved Project. Therefore, the project site does not contain any potential areas of concern/contamination. Additionally, the project would introduce similar park facilities analyzed in the Approved Project. Therefore, with adherence

to applicable hazard regulations as detailed in the Approved Project, there would be less than significant impacts.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact

The proposed project would not expand the project site of the Approved Project. Therefore, there are no schools within 0.25 mile of the project site. No impact would occur,

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact

The proposed project would not expand the project site of the Approved Project. Therefore, the project site is not within or adjacent to a Cortese List site. No impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact

The proposed project would not expand the project site of the Approved Project. Therefore, there are no airports within two miles. No impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact/No Change or New Information

Similar to the Approved Project, the proposed project would follow applicable city regulations, including the City's Natural Hazard Mitigation Plan, and undergo a site plan review to ensure that the project would not result in inadequate emergency access during construction and operation. Therefore, there would be less than significant impacts.

g) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than Significant Impact/No Change or New Information

The proposed project would not expand the project site of the Approved Project. Therefore, the project site is located in a VHFHSZ in LRA. Buildings constructed in areas identified as VHFHSZ are required to be built using fire-resistive features identified in the California Building Code, Chapter 7A - Materials and Construction Methods for Exterior Wildfire Exposure. The project is an improvement

of an existing park and does not add any significant wildfire risk. Thus, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the proposed project would have less than significant impact in this regard.

4.10 Hydrology and Water Quality

4.10.1 Summary of Previous Approved Project (Steed Memorial Park IS/MND) Analysis and Conclusions

a) Violate any water quality standards or waste discharge requirements:

Project development could cause two types of water quality impacts: (1) short-term construction impacts; and (2) long-term operational impacts. Temporary soil disturbance would occur during project construction, due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. Disturbed soils are susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the project area. Erosion and sedimentation affect water quality through interference with photosynthesis, oxygen exchange and respiration, and growth and reproduction of aquatic species. Runoff from construction sites may include sediments and contaminants such as oils, fuels, paints, and solvents. Additionally, other pollutants such as nutrients, trace metals, and hydrocarbons can attach to sediment and be carried by stormwater into storm drains which discharge eventually to the Pacific Ocean.

Spills and mishandling of construction materials and waste may also leave the project site and contaminate stormwater. The use of construction equipment and machinery may cause contamination from petroleum products, hydraulic fluids, and heavy metals. Contamination from construction materials such as paints and solvents, and landscaping materials such as fertilizers, pesticides, and herbicides may also degrade water quality. Trash and demolition debris may also be carried into storm drains and discharged into receiving waters.

The City of San Clemente is required by the California State Water Resources Control Board (SWRCB) to obtain coverage under a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2022-0057-DWQ, for projects which will disturb one or more acres of soil during construction). The Construction General Permit requires potential dischargers of pollutants into waters of the U.S. (WOUS) to prepare a site-specific Stormwater Pollution Prevention Plan (SWPPP), which establishes enforceable limits on discharges, requires effluent monitoring, designates reporting requirements, and requires construction best management practices (BMPs) to reduce or eliminate point and non-point source discharges of pollutants. Additionally, BMPs must be maintained, inspected before and after each precipitation event, and repaired or replaced as necessary. Because the project is required by the SWRCB to comply with all applicable conditions of Construction General Permit Order 2022-0057-DWQ, potential violations of water quality standards or waste discharge requirements during project construction would be less than significant.

Operational Pollutant Controls

The municipal stormwater permit for the San Diego Region (MS4 permit) regulates the discharge of pollutants into WOUS by way of stormwater and urban runoff conveyance systems, including flood control facilities (RWQCB, 2015). These conveyance systems are commonly referred to as MS4s, or storm drains.

New development and redevelopment can significantly increase pollutant loads in stormwater and urban runoff through higher levels of vehicle emissions, municipal sewage wastes, and general hazardous wastes including, fertilizers, pet waste, trash, and other pollutants. The MS4 permit

requires all new development projects, regardless of size, to incorporate post construction water quality BMPs and low-impact development (LID) into project design in compliance with the City's Model Water Quality Management Plan to maximize stormwater infiltration, provide stormwater retention, slow stormwater runoff, and reduce pollutants at their sources.

Pursuant to the Model Water Quality Management Plan, a project-specific preliminary Water Quality Management Plan (WQMP) will be prepared for the proposed project. The MS4 and the Model Water Quality Management Plan require the implementation of LID features to ensure that most stormwater runoff is treated and retained onsite.

The project WQMP will include structural BMPs, such as stenciling and signage for the storm drain system; design and construct trash and waste storage areas to reduce pollution introduction; use efficient irrigation systems and landscape design, water conservation, smart controllers, and source control; and finish grade of landscaped areas at a minimum of one to two inches below top of curb, sidewalk, or pavement. Additionally, the proposed project would include LID BMPs such as minimizing impervious areas, maximizing infiltration capacity, preserving the existing drainage patterns, and installation of infiltration basins to mitigate the impacts of runoff and stormwater pollution as close to the source as possible. LID facilities are highly effective at removing water pollutants such as sediment, nutrients, trash, metals, bacteria, oil and grease, and organic compounds while reducing the volume and intensity of stormwater flow leaving a site.

The WQMP may also include non-structural source control BMPs including BMP maintenance, adherence to local water quality ordinances, a hazardous spill contingency plan, litter/debris control program, employee training, catch basin inspection program, and vacuum sweeping of private streets and parking lots.

With implementation of construction and operational BMPs, potential impacts to water quality would be less than significant and mitigation is not proposed (UltraSystems, 2023, p. 4.10-5).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

b) 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):

The project site is not over a groundwater basin. The City of San Clemente would provide water to the project. City of San Clemente water supplies in 2020 were comprised of about 81 percent imported water from the State Water Project and the Colorado River; 14 percent recycled water; and 5 percent local groundwater.

The City projects that full water use demands will be met through year 2045 (City of San Clemente, 2020). The project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. The project would have a less than significant impact in this regard and mitigation is not required (UltraSystems, 2023, pp. 4.10-5 – 4.10-6).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

c) 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 which would:

i. result in substantial erosion or siltation on- or off-site:

The project site is in the Lower San Mateo Creek hydrologic unit. San Mateo Creek discharges into the Pacific Ocean at Trestles Beach, approximately four air miles south of the project site. Project development would not substantially alter the drainage pattern of the site or area. Project construction would include implementation of erosion control, sediment control, and wind erosion control BMPs, all prescribed in a SWPPP pursuant to the Statewide General Construction Permit, as described above. Erosion or siltation impacts would be less than significant after implementation of relevant BMPs (UltraSystems, 2023, p. 4.10-7).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Project development would increase impervious areas onsite, which would increase the rate and/or volume of runoff from the site. The project Preliminary Hydrology Report will estimate the existing and proposed condition stormwater flows. The project drainage plan will maintain consistency with the historical drainage patterns for the proposed project site. The LID BMPs that will be proposed by the Preliminary WQMP would mitigate the post-construction increase in peak flow of runoff from the site for the 2-, 5-, and 10-year storm events.

As will be discussed in the project's preliminary WQMP, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Impacts would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

iv. Impede or redirect flood flows?

The project site is located in Flood Hazard Zone X, that is, outside of 100-year and 500-year flood zones. The proposed project would not impede or redirect flood flows. No impact would occur, and mitigation is not required.

- ***Previous Approved Project Determination: No Impact.***

b) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Two dams or reservoirs are within a five-mile radius of the project site: Palisades Reservoir and Trampas Canyon. The project is not located within the dam breach inundation areas of the dams or reservoirs (DWR, 2022) and would not be at risk of flood hazards due to dam breaches. The project site is located outside the 500-year floodplain and would not be at risk of inundation by flood hazards.

The tsunami inundation area nearest to the project site is in the City of San Clemente, located approximately 2.7-miles and downslope to the southwest (Google Earth Pro, 2022; CEMA, CGS, and USC, 2009). Due to the elevation of the project area and its location outside of the nearest tsunami inundation area, there would be no risk of inundation by tsunami.

A seiche is an oscillating wave, formed by earthquakes or winds, in an enclosed or partially enclosed waterbody. The nearest enclosed or partially enclosed waterbody in which a seiche could form is Dana Point Harbor, approximately 6.5 miles northwest from the project. The project would not be at risk of inundation by seiche.

The proposed project would not be at risk of inundation by flood hazards, tsunami, or seiche, and would therefore not be at risk of release of pollutants due to inundation. No impact would occur, and mitigation is not required.

- ***Previous Approved Project Determination: No Impact.***

i) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed in **Section 4.10 a)**, the proposed project would comply with the Construction General Permit by developing and implementing a site-specific SWPPP and construction stormwater BMPs throughout the construction phase. The proposed project would also comply with the MS4 Permit by incorporating LID BMPs into project design, which would avoid or minimize the amount and type of pollutants leaving the project, entering receiving waters, and impacting water quality and beneficial uses defined for these waters by the Basin Plan (RWQCB, 1994). In addition, the LID BMPs would allow stormwater infiltration into the local aquifer, similar to existing conditions, and minimize or avoid impacts to groundwater quality and beneficial uses of the San Mateo Valley Groundwater Basin. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; no impact would occur, and mitigation is not required.

- ***Previous Approved Project Determination: No Impact.***

Steed Memorial Park IS/MND Mitigation Measures: None are required.

4.10.2 Summary of Previous Approved Project versus Modified Project Impacts

Modified project impacts on hydrology and water quality have been evaluated in light of the present environmental regulatory setting as well as existing and known planned baseline conditions in the field. The Approved Project IS/MND determined that impacts on hydrology and water quality attributable to the Approved Project would be less than significant and that mitigation measures are not required. Therefore, modified project impacts on hydrology and water quality would be equal to or less than those of the Approved Project.

4.10.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted IS/MND with the project as described in this document and analyze the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			**X**	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			**X**	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			**X**	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			**X**	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			**X**	
iv) impede or redirect flood flows?			**X**	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				**X**
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				**X**

ii) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact/No Change or New Information

Implementation of the proposed changes to the Steed Park Master Plan – addition of six pickleball courts and about 65 parking spaces, reducing the size of the soccer field, and relocation of some project components – would not change the types of land uses, or substantially change the intensity of land uses, on the site. Therefore, the types of pollutants that would be generated, during both project construction and operation, would be the same as for the Approved Project, and the amounts of pollutants would be generally similar. The modified project would involve preparation and implementation of a SWPPP in accordance with the General Construction Permit, and a WQMP complying with the MS4 permit, as would the Approved Project. No new significant impact would occur after regulatory compliance. No changes or new information would require the preparation of a new IS/MND.

iii) Would the project substantially decrease groundwater supply or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact/No Change or New Information

The project site is not over a groundwater basin. Groundwater comprised about five percent of the City of San Clemente Water Division's water supplies in 2020 and is estimated to comprise about six percent of groundwater in 2045 (City of San Clemente, 2021, pp. 6-1 and 6-2). The modified project includes some expansion of hardscape (six additional pickleball courts and 65 additional parking spaces) compared to the Approved Project. Thus, modified project development is expected to reduce irrigation water demand slightly compared to Approved Project development. Therefore, the incremental impact of the modified project would be less than significant and no changes or new information would require the preparation of a new IS/MND.

iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

d) result in a substantial erosion or siltation on- or off-site;

e) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

f) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

g) impede or redirect flood flows?

Less than Significant Impact/No Change or New Information

The modified project site ranges in elevation from about 565 feet at the south end to 551 feet at the northeast end to 555 feet at the northwest end. The north slope (from south to northeast) is about two percent grade. The modified project does not propose changes to the Approved Project drainage plan. The LID BMPs that will be proposed by the Preliminary WQMP would mitigate the post-construction increase in peak flow of runoff from the site for the 2-, 5-, and 10-year storm events. Thus, modified project development would not cause flooding. The modified project site is outside of 100-year and 500-year flood flows, and modified project development would not impede or change flood flows. Modified project impacts regarding stormwater pollution are addressed in Section 4.10.a. Marginal impacts of the modified project would be less than significant, and no changes or new information would require the preparation of a new IS/MND.

h) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact

The modified project site is 2.7 miles inland from tsunami hazard zones, and modified project development would not exacerbate tsunami flood hazards. Steed Memorial Park is on the graded top of a small hill. The nearest water body to the project site is an artificial lake in Bella Colina Golf Course about 0.3 mile to the north. A seiche from that lake would flow around the hill and would not flood the project site. Thus, modified project development would not exacerbate an existing flood hazard arising from a seiche. Therefore, no new significant adverse impacts are identified or anticipated, and no changes or new information would require the preparation of a new IS/MND.

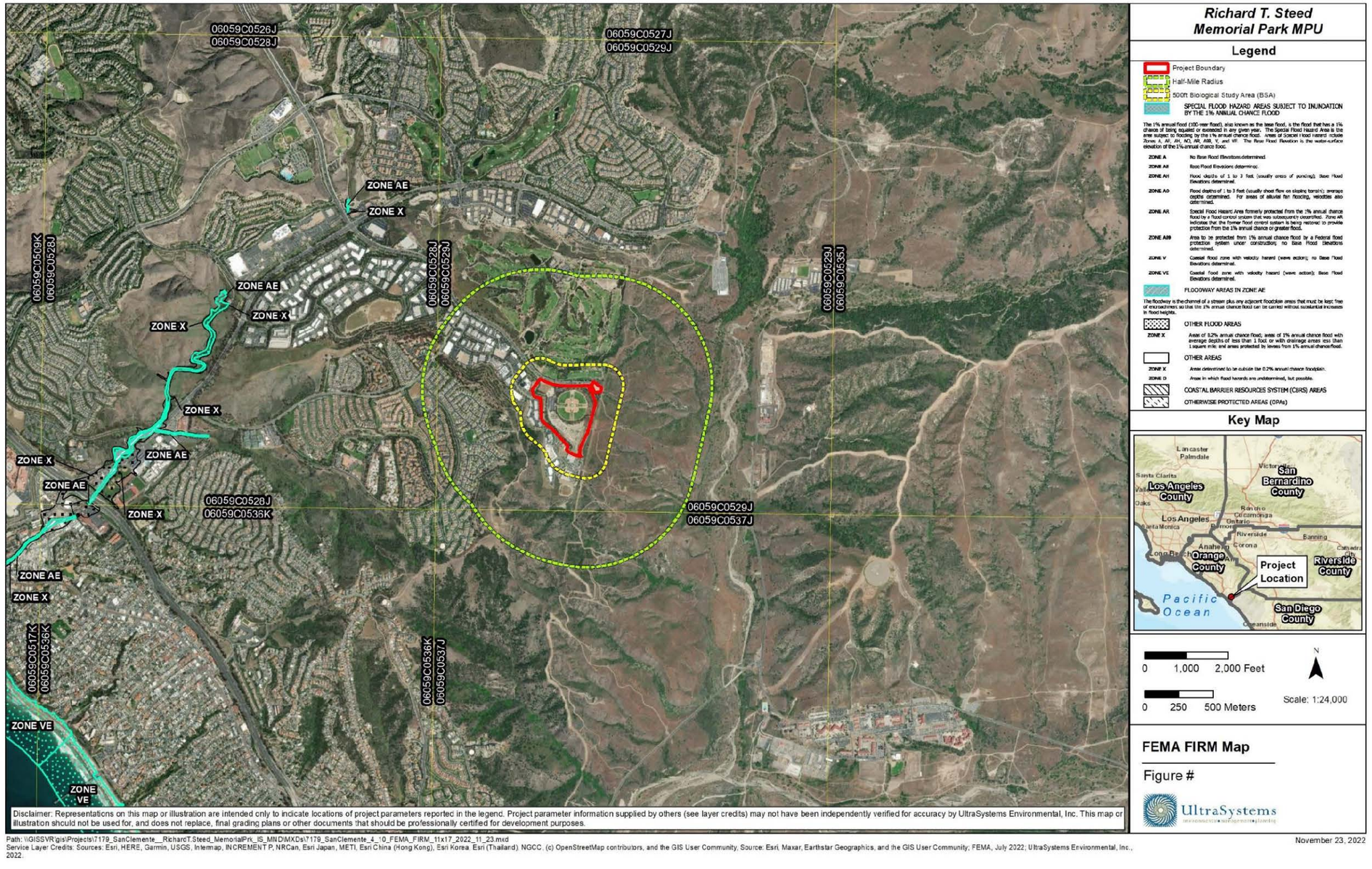
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact

Modified project development would comply with the Water Quality Control Plan for the San Diego Region through adherence with the MS4 permit for the portion of Orange County within the San Diego region, The project site is not over a groundwater basin, and thus modified project

development would not conflict with a sustainable groundwater management plan. Therefore, no new significant adverse impacts are identified, no changes or new information would require the preparation of a new IS/MND.

Figure 4.10-1
FEMA FIRM MAP



4.11 Land Use and Planning

4.11.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Physically divide an established community?

The 46.9-acre partially developed Richard T. Steed Memorial Park (formerly Softball Park [Planning Area 9] in the Rancho San Clemente Specific Plan) is located at the easterly terminus of Avenida La Pata. The location of this facility away from residential areas is anticipated to avoid potential conflicts such as glare from night lighting in residential areas and noise conflicts from organized sporting activities. The project site is surrounded by Bella Collina San Clemente private golf club to the north; San Onofre State Beach Park to the east; and various commercial and industrial uses to the south and west. The nearest established community is approximately 1,000 feet to the southwest, with no direct accessibility or line of sight visibility from the proposed project site. The project would have no impact on an established community (UltraSystems, 2023, p. 4.11-1).

- ***Previous Approved Project Determination: No Impact***

Mitigation Measure: None Required.

Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is zoned and regulated by the Rancho San Clemente Specific Plan, which is both a planning and a regulatory document to implement the goals, policies, and objectives of San Clemente's Centennial General Plan. The project site has a General Plan land use designation of Open Space Public (OS1) which is intended for publicly owned existing and dedicated parklands, passive open space areas, recreational facilities, and golf courses. The project would be consistent with applicable regulations of the San Clemente Centennial General Plan Land Use and the Rancho San Clemente Specific Plan goals and policies. No impacts would occur (UltraSystems, 2023, p. 4.11-1).

- ***Previous Approved Project Determination: No Impact***

Mitigation Measure: None Required.

4.11.2 Summary of Previous Approved Project versus Modified Project Impacts

The potential impacts of the modified project and potential impacts on land use have been evaluated in light of the current environmental regulatory setting. The modified project would not expand the project site of the Approved Project. Additionally, the modified project would introduce and relocate park amenities that were evaluated in the Approved Project. Therefore, the impacts of the modified project implementation would be similar to those of the Approved Project and no additional significant impacts would occur beyond those identified.

4.11.3 Modified Project Analysis and Conclusions

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impact/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Physically divide an established community?				**X**
b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				**X**

a) Would the project physically divide an established community?

No Impact

The proposed project would not expand the project site of the Approved Project. Therefore, the project would not physically divide an established community, resulting in no impacts.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact

The proposed project would expand the number of pickleball courts; add a ticket booth in the pickleball area; reduce the size of the soccer field; relocate the dog parks and volleyball courts to the southeastern portion of the project site; and add additional parking. The proposed project would not expand the project site of the Approved Project and would introduce and relocate park amenities that were evaluated in the Approved Project. Therefore, the project would be consistent with applicable regulations and there would be no impact.

4.12 Mineral Resources

4.12.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

and

Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The project site is mapped in Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey (CGS), meaning that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. The nearest oil or gas well to the project site is a plugged well approximately 0.4 mile to the south. Project development would not cause a loss of availability of known mineral resources valuable to the region, and no impact would occur (UltraSystems, 2023, p. 4.12-1).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

4.12.2 Summary of Approved Project versus Modified Project Impacts

The modified project would not expand the project site of the Approved Project. Therefore, the modified project would not cause any impacts on mineral resources.

4.12.3 Proposed Modified Project Analysis and Conclusions

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				**X**
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local				**X**

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
general plan, specific plan or other land use plan?				

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

and

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact

The proposed project would not expand the project site of the Approved Project. Thus, the proposed project would not cause any impact on the availability of mineral resources or oil wells.

4.13 Noise

4.13.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

a) Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Both short term (construction) and long-term (operational) noise impacts are associated with park renovation projects.

Construction Noise

Construction activities, especially heavy equipment operation, would create noise effects on and adjacent to the construction site. Additional noise would be generated by onroad traffic by commuting workers and transport of building materials and construction wastes. For the purpose of this analysis, it was estimated that the Previous Approved Project would be built in five phases. Construction was anticipated to run 1.5 years, from early July 2023 to December 2024.

The types and numbers of pieces of equipment to be deployed during each construction phase were determined as part of the air quality and greenhouse gas emissions analyses for this project.[12] Using calculation methods published by the Federal Transit Administration (FTA, 2018), UltraSystems estimated the average hourly exposures at the nearest sensitive receiver for each construction subphase. The receivers evaluated included two churches on the west side of the project boundary (Branches and the Shoreline Church), single-family residences along the west side of the project site and the Bella Collina golf course north of the project site. Noise attenuation by intervening structures was taken into account where applicable. Hourly total noise exposures (ambient plus construction-related) would range from 39.1 to 65.3 dBA L_{eq}. None of these exposures would exceed the chosen significance criterion of 80 dBA L_{eq}.

Operational Noise

Onsite noise sources from the proposed park renovation project would include operation of mechanical equipment such as lawnmowers, leaf blowers, building maintenance equipment, landscape construction equipment, and motor vehicles accessing, driving on, and exiting the parking lot.

Of particular concern would be the introduction of a new type of sports activity to the park: pickleball courts. Because there are no widely used "standard" noise emissions values for pickleball court activity, UltraSystems reviewed previous studies for useful information. A comprehensive study of pickleball noise was prepared by (Woo, 2012). The Woo (2012) study conducted ambient and operations noise level measurements of pickleball operations, different paddle types, and a noise barrier system for the Cimarron Pickleball Courts in Surprise, Arizona. From the Woo (2012) study data, UltraSystems developed a baseline noise exposure at a distance of 10 feet for 32 pickleball players playing simultaneously. Under maximum noise conditions (conventional paddles, no barriers), the exposure at 10 feet was 66.9 dBA L_{eq}.

The Previous Approved Project will have 16 pickleball courts.[13] Assuming a maximum of four players per court, as many as 64 players would be active at any given time. The study by Woo (2012) included 32 players. It is reasonable to assume that the noise from 64 players would be

12 See **Section 4.3**.

13 In other parts of the previously Approved Project IS/MND, the number of courts is stated as 16 to 18. For comparison purposes, the baseline number of courts analyzed for noise impacts in this Addendum is 16.

about double for the project. The noise emissions would therefore be 66.9 dBA L_{eq} at 10 feet.[14] Using the same methodology as was used for the construction noise, but assuming a utilization factor of 1 and a hard ground surface would result in an estimated exposure of 25.0 to 28.2 dBA L_{eq} at the nearest sensitive receivers. This noise is far below ambient levels and would not be noticed. Therefore, impacts from pickleball playing would not be significant, and no mitigation is necessary.

Mobile Sources

A City-commissioned traffic survey on December 20, 2018 measured 5,426 vehicles per day on Avenida La Pata south of Calle del Cerro (City of San Clemente, 2019, Data File 19101050). The traffic study supporting the EIR for the Centennial General Plan (City of San Clemente, 2013)) contains ADT estimates for a segment of Avenida La Pata just north of Calle del Cerro. The 2010 and 2035 ADT estimates were 8,573 and 12,000, respectively. The corresponding annual growth rate would be 1.354 percent. Assuming that this rate to the road segment south of Calle del Cerro, the ADT in 2022 would be $5426(1.01354)^4$ = 5,726. The VMT analysis prepared for this project (CWE, 2022, p. 5) estimates that the development will generate a maximum of 827 ADT. This would constitute an increase of about 14 percent in the local traffic volume. Given the logarithmic nature of the decibel, traffic volume needs to be doubled in order for the noise level to increase by 3 dBA (ICF Jones & Stokes, 2009), the minimum level perceived by the average human ear. A doubling is equivalent to a 100 percent increase. Because the maximum increase in traffic on any road segment would be far below 100 percent, the increase in roadway noise experienced at sensitive receivers would not be perceptible to the human ear. Therefore, roadway noise associated with project operation would not expose a land use to noise levels that are considered incompatible with or in excess of adopted standards, and impacts would be less than significant.

- ***Approved Project Determination: Less Than Significant With Mitigation Incorporated[15]***

Mitigation Measures

The IS/MND for the Previous Approved project provided information supporting the conclusion that noise impacts would be less than significant without mitigation but erroneously stated a finding that mitigation was necessary. No mitigation is necessary.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance). The PPV of construction equipment at the nearest sensitive receiver (101 feet) is at most 0.01916 inch per second, which is less than the FTA

14 Due to a calculation error, the IS/MND for the Previous Approved Project used 72.9 dBA for this value. Exposures to sensitive receivers were therefore overestimated. All comparisons of noise emissions to the Approved Project in this Addendum are based on changes from a base level of 69.9 dBA.

15 The Previous Approved Project Determination erroneously states "Less than Significant With Mitigation Incorporated." It should have been "Less Than Significant" because no mitigation is necessary.

damage threshold of 0.12 inch per second PPV for fragile historic buildings. The maximum VdB are 69 VdB, which are below the FTA threshold for human annoyance of 80 VdB. Unmitigated vibration impacts would therefore be less than significant.

Operational Vibration

The project involves the operation of a park and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the project site and immediate vicinity currently result from heavy duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the project would not result in a substantive increase of these heavy-duty vehicles on the public roadways. Therefore, vibration impacts associated with operation of the project would be less than significant.

- ***Approved Project Determination: Less Than Significant***

Mitigation Measure: None Required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The closest active public airport is the John Wayne Airport, located approximately 21.8 miles north of the project site (Google Earth Pro, 2021). The project site is located outside of the airport's influence area boundary and noise contours (OC Air, 2021). Therefore, no impact related to the exposure of people residing or working in the proposed project area to excessive airport-related noise levels is anticipated.

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

4.13.2 Summary of Approved Project versus Modified Project Impacts

The modified project's potential noise impacts have been evaluated considering the present environmental regulatory setting. The modified project would be similar to the previously approved Initial Study although it would increase the number of parking spaces and pickleball courts constructed. The modified project is for the development of an additional eight pickleball courts (from 16 to 24) and additional parking. Impacts associated with implementation of the modified project would be similar to those of the previous Approved Project and no additional significant impacts would occur.

4.13.3 Modified Project Analysis and Conclusions

The following checklist responses compare the previous Approved Project with the project as described in this document, and analyzes the potential impacts resulting from the development of the Modified Project.

Would the project result in:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			**X**	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			**X**	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			**X**	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			**X**	

4.13.3.1 Existing Noise

No new ambient noise measurements were made.

4.13.3.2 Evaluation of Impacts

d) Would the project result in generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards

established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact

The modified project would include construction activities and operating characteristics similar to those described in the Richard T. Steed Memorial Park Initial Study. The main differences between the modified project and the previously Approved Project is the expansion of the number of pickleball courts to 24 and the addition of 65 parking spaces. Construction would not include exceptionally noisy equipment, such as impact pile drivers and construction noise impacts on offsite sensitive receivers would be similar to those described in the previously prepared Initial Study since the sensitive receivers would be farther away than 50 feet and noise generating equipment would be distributed throughout the site rather than grouped on the boundary nearest the residences. Impacts under this criterion would be less than significant.

Table 4.13-1 shows the estimated short-term increase in noise exposure at each sensitive receiver. Because exposures would be relatively low, noise attenuation by intervening buildings was not taken into account. Total exposures at all sensitive receivers would be below the short-term exposure criterion of 80 dBA L_{eq} (FTA, 2018). Therefore, no mitigation is required.

Table 4.13-5
MAXIMUM ESTIMATED CONSTRUCTION NOISE EXPOSURES AT NEAREST SENSITIVE RECEIVERS

Site Preparation	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	958	58.3	60.1	1.8
2 – 211 Avenida Fabricante	684	44.7	59.3	**14.6**
3 – 612 Del Dios	1,376	39.0	48.5	**9.5**
4 – 216 Avenida Fabricante	410	41.6	64.7	**23.1**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Grading – Mountain Bike Park	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	638	58.3	63.4	5.1
2 – 211 Avenida Fabricante	1,679	44.7	52.2	**7.5**
3 – 612 Del Dios	2,502	39.0	43.8	4.8
4 – 216 Avenida Fabricante	1,556	41.6	52.5	**10.9**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Grading - Parking	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	958	58.3	60.9	2.6
2 – 211 Avenida Fabricante	684	44.7	61.2	**16.5**
3 – 612 Del Dios	1,376	39.0	50.3	**11.3**
4 – 216 Avenida Fabricante	410	41.6	66.6	**25.0**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Grading - Skatepark	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	864	58.3	61.4	3.1
2 – 211 Avenida Fabricante	379	44.7	67.5	**22.8**
3 – 612 Del Dios	1,519	39.0	46.7	**7.7**
4 – 216 Avenida Fabricante	655	41.6	61.5	**19.9**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Building Construction – Bathroom / Pickleball Structures	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	1,657	58.3	58.7	0.4
2 – 211 Avenida Fabricante	1,740	44.7	49.3	4.6
3 – 612 Del Dios	1,754	39.0	44.0	5.9
4 – 216 Avenida Fabricante	1,217	41.6	51.7	**10.1**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Building Construction – Dog Park and Structures	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	1,222	58.3	59.1	0.8
2 – 211 Avenida Fabricante	993	44.7	54.0	**9.3**
3 – 612 Del Dios	1,293	39.0	46.5	7.5
4 – 216 Avenida Fabricante	465	41.6	61.7	**20.1**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Paving - Parking	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	958	58.3	59.6	1.3
2 – 211 Avenida Fabricante	684	44.7	57.5	**12.8**
3 – 612 Del Dios	1,376	39.0	47.0	**8.0**
4 – 216 Avenida Fabricante	410	41.6	69.2	**21.1**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Paving - Skatepark	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	864	58.3	59.9	1.6
2 – 211 Avenida Fabricante	379	44.7	63.8	**19.1**
3 – 612 Del Dios	1,519	39.0	44.9	**5.9**
4 – 216 Avenida Fabricante	655	41.6	57.9	**16.3**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Architectural Coating – Bathroom / Pickleball Structures	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	1,657	58.3	58.4	0.1
2 – 211 Avenida Fabricante	1,740	44.7	45.8	1.1
3 – 612 Del Dios	1,754	39.0	40.2	1.2
4 – 216 Avenida Fabricante	1,217	41.6	45.5	3.9

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Architectural Coating – Dog Park and Structures	Distance (feet)	15-minute L_{eq} (dBA)		
		Existing	Projected[a]	Change
1 – 278 Avenida La Pata	1,222	58.3	58.4	0.1
2 – 211 Avenida Fabricante	993	44.7	48.1	3.4
3 – 612 Del Dios	1,293	39.0	41.3	2.3
4 – 216 Avenida Fabricante	465	41.6	53.9	**12.3**

[a]Existing plus construction-related; adjusted for intervening buildings and/or terrain between source and receiver.

Operations

The most important new potential long-term noise source will be the expansion of the pickleball facility. Pickleball court play tends to be noisier than tennis because a group of 16 pickleballers talking and cheering can occupy the same amount of court space as one tennis court with two to four players, and pickleball paddles and balls are made of plastic, which make more noise on contact than tennis rackets and tennis balls (Levy, 2022).

The previously Approved Project's analysis assumed that there would be 16 pickleball courts, with four players using each one. The modified project will have 24 courts. Assuming a maximum of four players per court, as many as 96 players would be active at any given time. A comprehensive study of pickleball noise was prepared by (Woo, 2012) and ambient noise measurements were made near an existing pickleball facility. The study by Woo included 32 players. It is reasonable to assume that the noise from 96 players would be about three times that measured by Woo. The previously Approved Project yielded a noise exposure value of 69.9 dBA at 10 feet. The Modified Projected would have a noise exposure of 71.7 dBA at 10 feet. Using the same methodology as was used for the construction noise, but assuming a utilization factor of 1 and a hard ground surface results in an estimated exposure of 26.8 to 30.0 dBA Leq at the nearest sensitive receivers. The change in exposure from the previously Approved project to the modified project would not be detected by the human ear. The new total noise exposure is far below ambient levels and would not be noticed. Therefore, impacts from pickleball playing would not be significant, and no mitigation is necessary.

Mobile Sources

The modified project considered alone would not result in significant increases in traffic noise exposures to offsite sensitive receptors. Therefore, roadway noise associated with project operation would not expose a land use to noise levels that are considered incompatible with or in excess of adopted standards, and impacts would be less than significant.

e) Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

No Changes or New Information

It is expected that groundborne vibration from the modified project's construction activities would cause only intermittent, localized intrusion. The project's construction activities most likely to cause vibration impacts are:

- **Heavy Construction Equipment:** Although all heavy, mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage. It is not expected that heavy equipment such as large bulldozers would operate close enough to any sensitive receivers to cause vibration impact.

- **Trucks:** Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes almost always eliminates the problem.

As discussed, the previously prepared Initial Study analyzed the vibration impact to nearby sensitive receptors during both construction and operational phases, and concluded that impacts would be less than significant. Construction of the modified project will not use major sources of groundborne vibration or noise, such as impact pile drivers. It will therefore not add any new impacts or intensify those from the Approved Project. Impacts under this criterion would be less than significant.

f) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Changes or New Information

The modified project will not change the distance to the nearest active public airport. Therefore, the finding of No Impact for the previous Approved Project will not change.

4.14 Population and Housing

4.14.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project would not induce any direct population growth, given that the project is an update to the Richard T. Steed Memorial Park Master Plan. The project would not directly or indirectly impact unplanned growth in an area because it does not propose any new homes or businesses and does not create or extend any roads or other infrastructure. The project would have no impact on unplanned population growth in the area (UltraSystems, 2023, p. 4.14-1).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No housing exists onsite and no persons reside on the project site. Therefore, the project would not displace any existing housing or people, and the project would not necessitate the construction of replacement housing elsewhere. The project would have no impact on existing housing (UltraSystems, 2023, p. 4.14-1).

- ***Approved Project Determination: No Impact.***

Mitigation Measure: None Required.

4.14.2 Summary of Approved Project versus Modified Project Impacts

The modified project would not include any components that would directly or indirectly increase the population, or displace and housing. Therefore, the modified project and Approved Project would have no impacts.

4.14.3 Proposed Modified Project Analysis and Conclusions

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X

a) Would the project induce substantial growth in an area either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact

The proposed project would not induce any direct population growth, given that the project is an update to the Richard T. Steed Memorial Park Master Plan. The project would not directly or indirectly impact unplanned growth in an area because it does not propose any new homes or businesses and does not create or extend any roads or other infrastructure. The project would have no impact on unplanned population growth in the area.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact

No housing exists onsite and no persons reside on the project site. Therefore, the project would not displace any existing housing or people, and the project would not necessitate the construction of replacement housing elsewhere. The project would have no impact on existing housing.

4.15 Public Services

4.15.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions.

Fire Protection

The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services to the City of San Clemente including the project site. There are three OCFA fire stations in the City. Station #59, located at 59 Avenida La Pata is nearest the project site, approximately two miles northwest and a four-minute drive time from the project. The project does not propose development of new housing or commercial properties and would not increase the resident population and therefore would not affect the population-based OCFA response demands.

Further, the project site would be redeveloped with contemporary recreational and fitness facilities. Therefore Project development would not cause a substantial increase in demands on fire protection services. Nonetheless, implementation of the project could incrementally increase demands for fire protection services and would contribute cumulatively to demands for fire protection services within the City and region. As means of offsetting these increased demands for services, the project would be designed and constructed consistent with applicable City and OCFA requirements. The project would be required to comply with agency-specific criteria outlined in the Project Conditions of Approval. Compliance with these Conditions of Approval and subsequent OCFA requirements is identified through the City's final site plan and plan check/building permit review processes. Compliance with these requirements would further reduce potential demands for, and impacts upon, fire department services. Approved Project development would not require construction of new or expanded fire protection facilities, and impacts would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Police Protection

The Orange County Sheriff's Department (OCSD) provides police protection to the City of San Clemente including the project site. The City of San Clemente Police Station (located at 910 Calle Negocio, San Clemente) is approximately 1.8 miles east and a five-minute drive time from the project site (Google Earth Pro, 2022b). The OCSD provides the following Sheriff staffing to the City of San Clemente for police protection services:

- Patrol Services: Five Sergeants, 30 Patrol Deputies, two Traffic Deputies, one School Resource Deputy, three Community Services Officers.
- Investigative Services: Four General Investigators.
- Support Services: Two Office Specialists, one Crime Prevention Specialist.

The OCSD provides law enforcement services that include patrol, investigations, traffic enforcement, community support, drug education, parking control, and crime prevention. For a resident population of 65,975, this would translate to a service ratio of 0.73 police personnel per 1,000 residents. The project does not propose development of new housing or commercial properties and would not increase the resident population and therefore would not affect sworn personnel/population service ratios. (City of San Clemente, 2022c, f).

Further, the subject site would be redeveloped with compatible recreational and fitness facilities that would enhance the existing facilities. Development of the project would therefore not cause any substantial increase in demand for police protection services. Nonetheless, implementation of the project could incrementally increase demands for police protection services and would contribute cumulatively to demands for police protection services within the City of San Clemente and region. For recreational/fitness facilities such as those proposed by the project, provision and maintenance of adequate police protection services is realized through a combination of project site and facility designs that incorporate appropriate safety and security elements, and adequate law enforcement funding.

The project would be required to comply with agency-specific criteria outlined in the project Conditions of Approval. Compliance with these Conditions of Approval and subsequent OCSD requirements is identified through the City's final site plan and plan check/building permit review processes. Compliance with these requirements would further reduce potential demands for, and impacts upon, police protection services. Approved Project development would not require construction of new or expanded police facilities, and impacts would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact***

Schools

The project site is in the Capistrano Unified School District (CUSD), which serves all of the City of San Clemente. Demand for schools is generated by the number of households in the schools' attendance areas. The project does not propose development of housing and thus project development would not create demands for new or expanded schools. No impact would occur.

- ***Previous Approved Project Determination: Less Than Significant Impact***

Parks and Recreation

The City of San Clemente Beaches, Parks and Recreation Department oversees the use of 324 acres of recreational space including 23 parks, 25.9 miles of hiking trails and two miles of public beaches, as well as a 133-acre golf course (San Clemente, 2022a). Approved Project development would involve a favorable impact on facilities at Steed Memorial Park. No adverse impact would occur.

- ***Previous Approved Project Determination: Less Than Significant Impact***

Other Public Services – Libraries

The Orange County Public Libraries (OCPL) serves the City of San Clemente. Demands for library services are generated by the population within the libraries' service areas. The project does not propose development of housing, and project development would not generate demand for new or expanded library facilities. No impact would occur.

Hospitals

The nearest hospital to the project site is Providence Mission Hospital Mission Viejo at 27700 Medical Center Road, Mission Viejo, about 14 miles northwest of project site, a 504-bed facility that includes an emergency department (Providence, 2022). The project is located in and serves a mixed commercial and residential area away from any tourist attractions such as the beach, so additional demand on hospitals is unlikely to occur. Adequate hospital facilities are present in the project region for project users, and project development would not require construction of new or expanded hospitals. Impacts would be less than significant.

- ***Previous Approved Project Determination: Less Than Significant Impact***

4.15.2 Summary of Previous Approved Project versus Modified Project Impacts

Fire Protection and Police Protection

Demands for fire protection and police protection are generated by the population and the total building area within the agencies' service areas. The modified project does not propose housing; or any new buildings, compared to the Approved Project. Modified project development would not require construction of new or expanded fire protection or police protection facilities, and no new impact would occur.

Parks and Libraries

Demands for parks are generated by the population within the parks' service areas. The modified project does not propose development of housing and would not generate demands for libraries. The modified project proposes some changes to facilities at Richard T. Steed Memorial Park; modified project development would have some favorable impact on park facilities compared to existing conditions. No new impact would occur.

Schools

Demand for schools is generated by the number of households within the schools' service areas. The modified project does not propose development of housing; thus, modified project development would not generate demands for schools. No new IS/MND is needed.

4.15.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted IS/MND with the modified project as described in this document and analyze the potential impacts resulting from its implementation.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			**X**	
2) Police protection?			**X**	
3) Schools?			**X**	
4) Parks?			**X**	
5) Other public facilities?			**X**	

a) Fire protection?

Less than Significant Impact/No Change or New Information

Modified project operation could involve a slight increase in park usage compared to Approved Project operation. The impacts of the Approved Project on fire protection and emergency medical services were determined to be less than significant. Modified project development would not require construction of new or expanded fire protection facilities and would not cause any new significant impact on fire protection and emergency medical services. No new IS/MND is required.

b) Police protection?

Less than Significant Impact/No Change or New Information

Modified project operation could involve a slight increase in park usage compared to Approved Project operation. The impacts of the Approved Project on police protection were determined to be less than significant. Any increase in park use due to modified project operation would not generate an increase in demands for police services and thus would not require construction of new or expanded police facilities. Modified project development would not cause any new significant impacts on police protection, and no new IS/MND is required.

c) Schools?

Less than Significant Impact/No Change or New Information

The demand for school facilities is generated by the number of households in the service areas of the facilities. The modified project does not propose development of housing and would not generate increased numbers of students within the CUSD. The changes to proposed recreational facilities in Richard T. Steed Memorial Park proposed by the modified project would not attract additional residents to move into the City of San Clemente. Modified project development would not cause any new significant impact on schools, and no new IS/MND is needed.

d) Parks?

Less Than Significant Impact/No Change or New Information

Demands for parks are generated by the population within the parks' service areas. The modified project does not propose development of housing and would not increase population in the City of San Clemente. The modified project proposes some changes to facilities in Richard T. Steed Memorial Park compared to facilities planned in the Approved Project. Modified project development, as with the Approved Project, would involve some favorable impact to facilities in Richard T. Steed Memorial Park. No new adverse impact would occur and no new IS/MND is needed.

e) Other public facilities?

Less than Significant Impact/No Change or New Information

Demands for libraries are generated by the population within the libraries' service areas. The modified project does not propose development of housing and would not increase population in the City of San Clemente. Modified project development would not cause impacts on library facilities or services, and no new IS/MND is required.

4.16 Recreation

4.16.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Parks and Recreation

The IS/MND determined that development of the proposed improvements to Richard T. Steed Memorial Park would not generate demand for parks and would not cause an adverse effect on parks in San Clemente.

- ***Approved Project Determination: Less than Significant Impact***

4.16.2 Summary of Approved Project versus Modified Project Impacts

The modified project consists of certain alterations to Richard T. Steed Memorial Park as planned under the Master Plan Update. Modified project development would not generate demand for park facilities in San Clemente or otherwise cause or accelerate deterioration of Steed Memorial Park. No new significant impact would occur.

4.16.3 Proposed Modified Project Analysis and Conclusions

The following checklist responses compare the previous Approved Project analyzed under the adopted IS/MND with the modified project as described in this document and analyzes the potential impacts resulting from the development of the project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impacts/No Changes or New Information

Demands for parks are generated by the population in the parks' service areas. The modified project does not propose development of housing. Development of the proposed park facilities, as altered under the modified project, would not increase use of Steed Memorial Park substantially. Thus, modified project development would not cause or accelerate deterioration of Steed Memorial Park. No new significant impact would occur and no new IS/MND is needed.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impacts/No Changes or New Information

The modified project proposes certain changes to Richard T. Steed Memorial Park facilities planned under the Master Plan Update. Impacts of development of the modified project are analyzed throughout this Addendum. No new significant impacts would occur.

4.17 Transportation and Traffic

4.17.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit

The IS/MND assessed project compliance with the following plans and policies: Statewide Transportation Improvement Program (STIP); Orange County Long-Range Transportation Plan; Orange County Measure M; City of San Clemente General Plan – Mobility and Complete Streets Element. Implementation of the Approved Project would not conflict with an applicable transportation plan or policy. The Approved Project screened out of the requirement for vehicle miles traveled (VMT) analysis, as it is an essential land use serving the community (UltraSystems, 2023, p. 4.17-3).

- ***Approved Project Determination: Less than Significant Impact.***

Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)

The Approved Project screened out of the requirement for vehicle miles traveled (VMT) analysis, as it is an essential community-serving land use (UltraSystems, 2023, p. 4.17-3).

- ***Approved Project Determination: Less than Significant Impact.***

Increase hazards due to a design feature or incompatible uses

The proposed project would not alter the surrounding roadways. Vehicular access to the project would be provided by the existing access roadway off Avenida La Pata. The intersection of the access road with Avenida La Pata is perpendicular and would not cause hazards due to a geometric design feature. The project's circulation system, including driveways and parking areas, would be designed to meet the City's development standards and would not involve design features that would create traffic hazards. Therefore, impacts regarding increases in hazards due to geometric design features or incompatible uses would be less than significant. (UltraSystems, 2023, p. 4.17-4).

- ***Approved Project Determination: Less than Significant Impact.***

4.17.2 Summary of Approved Project versus Modified Project Impacts

Modified project development would not cause any new or more severe transportation impact compared to those identified in the Adopted IS/MND. The modified project would be consistent with the transportation plans and policies assessed in the IS/MND. As with the Approved Project, the modified project would screen out of the requirement for VMT analysis, as it would be an essential community-serving land use.

4.17.3 Modified Project Impacts Analysis and Conclusions

The following checklist responses compare the previous Approved Project analyzed under the adopted IS/MND with the modified project, and analyzes the potential impacts resulting from the development of the modified project.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			**X**	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			**X**	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			**X**	
d) Result in inadequate emergency access?			**X**	

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant Impact/No Changes or New Information

The proposed changes to Richard T. Steed Memorial Park facilities would not conflict with any of the plans and policies addressed in the IS/MND. Modified project operation could involve a very slight increase in project trip generation compared to the Approved Project. Such very slight increase would not conflict with any plans or policies referenced above. No new impact would occur.

b) Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less than Significant Impact

As with the Approved Project, the modified project screens out of the requirement for VMT analysis, as it is an essential community-serving land use.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact/No Changes or New Information

Modified project construction would not change the construction effort compared to the Approved Project. Modified project access and circulation would be the same as for the Approved Project. Modified project development would not cause any new impacts regarding hazards from roadway designs or incompatible uses. No new IS/MND would be needed.

d) Would the project result in inadequate emergency access?

Less than Significant Impact/No Changes or New Information

Construction

As with the Approved Project, modified project construction would be within Richard T. Steed Memorial Park and would not involve lane closures in public roadways. Modified project construction would not cause inadequate emergency access.

Operation

As with the Approved Project, the modified project would comply with City policies, and modified project design would be subject to City and Orange County Fire Authority review. No new impact on emergency access would occur and no new IS/MND is needed.

4.18 Utilities and Service Systems

4.18.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

Would the project require or result in the Utilities and Service Systems of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Wastewater Treatment

The City of San Clemente owns and operates its water treatment plant, the San Clemente Water Reclamation Plant (San Clemente WRP), located within the city. The project site is within the WRP service area. The WRP has 5 million gallons per day (mgd) capacity; average wastewater flows in 2020 were 3.89 mgd (City of San Clemente 2021). There is sufficient capacity to treat wastewater and any impacts in regard to water treatment and conveyance would be less than significant (UltraSystems, 2023, p. 4.19-2).

Domestic Water and Water Treatment

San Clemente's domestic water is a blend of surface water imported by the Metropolitan Water District of Southern California (MWDSC) and local groundwater. MWDSC sources for imported water are the State Water Project (SWP), which draws water from the Sacramento-San Joaquin Delta, and the Colorado River. Typically, 82 percent of the total water supply for San Clemente is imported.

Additionally, nearly 16 percent of the total water supply comes from the city's water reclamation plant that treats wastewater while also producing recycled water for irrigation. Beginning in 2017, the city began to receive water from the Irvine Ranch Water District (IRWD) processed through the Baker Water Treatment Plant as an additional source of water to further ensure a constant water supply to its customers. With sufficient capacity to supply the needs of residents and park users, any impacts in regard to domestic water services would be less than significant (UltraSystems, 2023, p. 4.19-2).

Stormwater Drainage

Under existing conditions, stormwater generated on the project site drains to the north and east/northeast and enters an existing storm drain inlet in the cul-de-sac at the eastern termination of Avenida La Pata. This storm drain feeds into an unnamed drainage extending eastward and discharging into Cristianitos Creek, which is approximately 0.7 miles east. Cristianitos Creek is a tributary of San Mateo Creek.

Pursuant to the Model Water Quality Management Plan, a project-specific preliminary Water Quality Management Plan (WQMP) will be prepared for the proposed project. The MS4 and the Model Water Quality Management Plan require the implementation of Low Impact Development (LID) features to ensure that most stormwater runoff is treated and retained onsite. The project WQMP will include structural and non-structural source control BMPs. Therefore, any impacts in regard to stormwater would be less than significant (UltraSystems, 2023, p. 4.19-3).

Electric Power

Electric power for the City of San Clemente is provided by San Diego Gas and Electric (SDG&E). The proposed project is in a developed area, and the infrastructure for providing electric power to the area and the project site is well established. Lighting used during project construction would comply with Title 24 standards/requirements (such as wattage limitations). This compliance would ensure that electricity use during project construction would not result in the wasteful, inefficient, or unnecessary use of energy. Lighting during project operations would comply with applicable federal, state, and local requirements for energy efficiency, including Title 24 standards, the General Plan, and the City of San Clemente Climate Action Plan. Therefore, any impacts in regard to electric power would be less than significant (UltraSystems, 2023, p. 4.19-4).

Natural Gas

The proposed development would be all-electric and no impacts on natural gas supplies or natural gas distribution infrastructure would occur. Therefore, there are no impacts with regard to natural gas (UltraSystems, 2023, p. 4.19-4).

Telecommunications Facilities

Telephone, television, and internet services are offered by a variety of providers in San Clemente, including Xfinity, Cox Communications, Spectrum, and others. These services are privately operated and offered to each location in San Clemente for a fee defined by the provider (Smartmove, 2022). The project would not interfere with the operation of telecommunications facilities. Therefore, any impacts in regard to telecommunications facilities would be less than significant (UltraSystems, 2023, p. 4.19-4).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The City meets its demands with a combination of imported water, local groundwater, and recycled water. The city works together with three primary agencies – the Metropolitan Water District of Southern California (MWD), Municipal Water District of Orange County (MWDOC), and Joint Regional Water Supply System (JRWSS) – to ensure a safe and reliable water supply that will continue to serve the community in periods of drought and shortage. The sources of imported water supplies include water from the Colorado River and the State Water Project (SWP) provided by MWD and administered through MWDOC.

It is projected that by 2045, the City's water supply portfolio will change to approximately 66 percent imported water from MWD/MWDOC, 15 percent recycled water, 14 percent purchased water from TCWD, and six percent groundwater.[16] Note that these representations of supply match the projected demand. However, the city can purchase more MWD water through MWDOC, should the need arise. Therefore, any impacts in regard to water supply and demands would be less than significant (UltraSystems, 2023, p. 4.19-4).

[16] Due to rounding, the percentages total slightly more than 100 percent.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Would the project 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?

As substantiated above, sufficient wastewater treatment capacity is available in the region for estimated project wastewater generation, and impacts would be less than significant (UltraSystems, 2023, p. 4.19-2).

- ***Previous Approved Project Determination: Less Than Significant Impact.***

Solid Waste - Landfill Disposal Capacity

The city contracts with the County of Orange for the collection and disposal of the city's solid waste (San Clemente, 2016). According to the San Clemente Centennial General Plan Draft EIR, two solid waste facilities accept the vast majority of solid waste from San Clemente. About 85 percent of the solid waste from San Clemente that is disposed of at landfills was sent to the Prima Deshecha Sanitary Landfill in the City of San Juan Capistrano. The remainder was sent to the Frank R. Bowerman Sanitary Landfill in the City of Irvine. Both facilities are operated by OC Waste & Recycling.

- ***Previous Approved Project Determination: Less Than Significant Impact.***

e) **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

The project would include storage areas for recyclable materials in accordance with Assembly Bill 341 (AB 341; Chapter 476, Statutes of 2011). Impacts regarding compliance with laws and regulations requiring solid waste reduction would be less than significant.

4.18.2 Summary of Previous Approved Project versus Modified Project Impacts

The potential impacts of the modified project and potential impacts on utilities and service systems have been evaluated considering the current environmental regulatory setting. Modified project impacts on utilities and service systems would be similar to the Approved Project and would be less than significant.

4.18.3 Modified Project Analysis and Conclusions

The following checklist responses compare the Approved Project analyzed under the adopted Master Plan Update IS/MND with the modified project as described in this document and analyze the potential impacts resulting from its implementation.

Would the project:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			**X**	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			**X**	
c) Result in a determination by the waste water 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?			**X**	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			**X**	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			**X**	

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impacts/No Changes or New Information

Water Supply

The City of San Clemente provides water to most of the city including the project site. Water sources (in descending order by prevalence) are imported water from northern California and the Colorado River; recycled water; and groundwater (UltraSystems, 2023, p. 4.19-2). The City of San Clemente forecasts that it will have sufficient water supplies to meet demands in its water service area over the 2025-2045 period in normal, single-dry-year, and multiple-dry-year conditions (City of San Clemente, 2021, p. 7-9). Water demand forecasts are based on projections of City population and housing units. The population of the City is projected to increase by 2.5 percent, and the number of housing units by 2.1 percent, between 2025 and 2045.

Modified project operation could involve a slight increase in park usage compared to Approved Project operation, through addition of six pickleball courts and replacement of a full-size soccer field with a smaller U10 soccer field. Any slight increase in water use would be within City of San Clemente supply forecasts, and modified project impacts on water supplies would be less than significant. No changes or new information require the preparation of a new IS/MND.

Wastewater Treatment

The City of San Clemente WRP, with 5 mgd capacity, provides wastewater treatment for most of the city of San Clemente including the project site. Average wastewater flows through the WRP in 2020 were 3.89 mgd (City of San Clemente 2021). Wastewater generation in the WRP's service area over the 2025-2045 period is expected to be proportional to changes in population and housing units. Modified project development could attract a very slight increase in usage of, and thus in wastewater generation at Richard T. Steed Memorial Park. Any slight increase in wastewater generation would be within the available treatment capacity at the WRP, and modified project impacts on wastewater treatment capacity would be less than significant. No changes or new information require the preparation of a new IS/MND.

Stormwater Drainage

A project-specific preliminary Water Quality Management Plan (WQMP) will be prepared for the Approved Project; the WQMP will prescribe LID BMPs and structural and non-structural source control BMPs.

Modified project development would involve a very slight increase in impervious area in Richard T. Steed Memorial Park: increase of six pickleball courts and 65 parking spaces, most of which would be offset by the reduction in size of the soccer field. The project WQMP would be revised to accommodate the design storm volume for the modified project. No new significant impact would occur, and no new IS/MND is needed.

Electric Power

San Diego Gas and Electric (SDG&E) provides electricity to Richard T. Steed Memorial Park. Modified project development could attract a slight increase in park users, and thus a very slight increase in electricity use at the Park. Any nominal increase in electricity use would be well within the capacity of SDG&E to supply. No new significant impact would occur, and no new IS/MND is needed.

Natural Gas

As with the Approved Project, the modified project would be all-electric. No new impacts on natural gas supplies or infrastructure would occur.

Telecommunications Facilities:

The modified project does not propose any facilities—such as park offices—that would require telecommunications facilities. Modified project development would not cause any adverse impacts on telecommunications facilities, and no new IS/MND is required.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impacts/No Changes or New Information

In descending order of prevalence, City of San Clemente water supplies consist of imported water from northern California and the Colorado River; recycled water; and groundwater (UltraSystems, 2023, p. 4.19-2). The City forecasts that it will have sufficient water supplies to meet demands over the 2025-2045 period under normal, single-dry-year, and multiple-dry-year conditions (City of San Clemente, 2021, p. 7-9). Modified project operation could involve a very slight increase in park usage compared to Approved Project operation, and thus could involve a nominal increase in water demands at Richard T. Steed Memorial Park. The City has sufficient water supplies to meet modified project water demands. Therefore, modified project impacts would be less than significant, and no changes or new information require the preparation of a new IS/MND.

c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to meet the projected demand of the project in addition to the existing commitments?

Less than Significant Impacts/No Changes or New Information

Modified project impacts on wastewater treatment capacity would be less than significant as substantiated above, and no changes or new information require the preparation of new IS/MND.

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impacts/No Changes or New Information

Solid waste landfilled from the City of San Clemente is disposed of at the Prima Deschecha and Frank Bowerman landfills. The two landfills combined have residual daily disposal capacity of 9,584 tons (CalRecycle, 2024a; CalRecycle 2024b; CalRecycle, 2024c; CalRecycle, 2024d). Modified project operation could involve a very slight increase in park usage compared to Approved Project operation, and thus could involve a nominal increase in solid waste generation at Richard T. Steed Memorial Park. Modified project construction effort would be similar to that of the Approved Project, and thus generation of construction waste by modified project construction would be similar to that of the Approved Project. Sufficient landfill capacity is available in the region for any slight increase in solid waste generation, and impacts would be less than significant. No changes or new information require the preparation of a new IS/MND.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impacts/No Changes or New Information

Assembly Bill 341 (AB 341; Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020 and mandates recycling for commercial and multifamily residential land uses. The modified project would include storage areas for recyclable materials in accordance with AB 341.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the 2022 California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Modified project construction would include recycling and/or salvage of construction and demolition waste in conformance with CALGreen Section 5.408.

Modified project construction and operation would comply with federal, state, and local laws and regulations related to solid waste. Impacts would be less than significant and no changes or new information require the preparation of a new IS/MND.

4.19 Wildfire

4.19.1 Summary of Previous Approved Project (Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND) Analysis and Conclusions

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is not located in a State Responsibility Area (SRA), i.e., where the State is responsible for the costs of wildfire prevention and suppression. The nearest SRA to the project site is in unincorporated Orange County, approximately 0.8 miles to the northeast (see **Figure 4.20-1**;). As shown in **Figure 4.20-2**, the project site is located entirely in a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA), that is, where cities or counties are responsible for the costs of wildfire prevention and suppression (UltraSystems, 2023, p. 4.20-1).

The City of San Clemente has developed an Emergency Plan for large scale emergencies and disasters which includes wildfires (San Clemente, 2012). In addition, the Orange County Fire Authority (OCFA) provides Fire protection services under contract to City of San Clemente and has specialist air and ground resources for wildland firefighting (UltraSystems, 2023, p. 4.20-1).

Project implementation would not block emergency access or hinder emergency evacuation because the project is not on a disaster route. Therefore, the project would have less than significant Impact in this regard (UltraSystems, 2023, p. 4.20-1).

- ***Approved Project Determination: Less Than Significant.***

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site is located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No significant slopes which could exacerbate wildfire risks are on or near the project site. The most severe fire protection problem is wild-land fire during Santa Ana wind conditions (UltraSystems, 2023, p. 4.20-2).

The project is not located in a wildland-urban interface (WUI), but the southwestern border is adjacent to a Wildland Urban Interface (WUI) classified as a medium density/interface. The eastern border of the park is adjacent to Camp Pendleton Marine Corps Base. However, as a public park, the area can be closed by the City of San Clemente (San Clemente, 2012 p. 35). The project is an improvement of an existing park and does not add any significant wildfire risk. Thus, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the proposed project would have less than significant impact in this regard (UltraSystems, 2023, p. 4.20-2).

- ***Approved Project Determination: Less Than Significant.***

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated

infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project site is located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project does not propose installation of, nor require maintenance of, infrastructure – such as roads or powerlines – in or next to wildland vegetation, that would exacerbate wildfire risk. Impacts would be less than significant (UltraSystems, 2023, p. 4.20-4).

- ***Approved Project Determination: Less Than Significant.***

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The risk of landslides is less than significant and the project site is not in a dam inundation area. Therefore, the project site has low potential for landslides and project development would comply with City grading and building codes, which would reduce potential project impacts related to potential slope failure to a less than significant impact.

4.19.2 Summary of Approved Project versus Proposed Project Impacts

The proposed project's potential impacts regarding wildfire have been evaluated considering the present environmental regulatory setting. The modified project would be similar to the previous project in that it is located within the Specific Plan area and wildfire hazards have already been evaluated for the Approved Project site. Therefore, impacts associated with implementation of the proposed project would be similar to those of the previous approved project and no additional significant impacts beyond those identified for the previous approved project would occur.

4.19.3 Proposed Project Analysis and Conclusions

The following checklist responses compare the previous approved project analyzed under the adopted IS/MND with the project as described in this document, and analyze the potential impacts resulting from the development.

Would the project result in:	New Information Showing New or Increased Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Richard T. Steed Memorial Park/Baron Von Willard Dog Park Master Plan Update IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			**X**	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			**X**	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			**X**	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			**X**	

State Responsibility Areas or Lands Classified as Very High Fire Hazard Severity Zones

As shown in **Figure 4.20-1**, the project site is located entirely in a VHFHSZ within a LRA, (UltraSystems, 2023, p. 4.20-1). The project site is not located in a SRA; the nearest SRA to the project site is in unincorporated Orange County, approximately 0.8 miles to the northeast (see **Figure 4.20-1**).

Figure 4.20-1
FIRE HAZARD SEVERITY ZONE - LOCAL RESPONSIBILITY AREA (LRA)

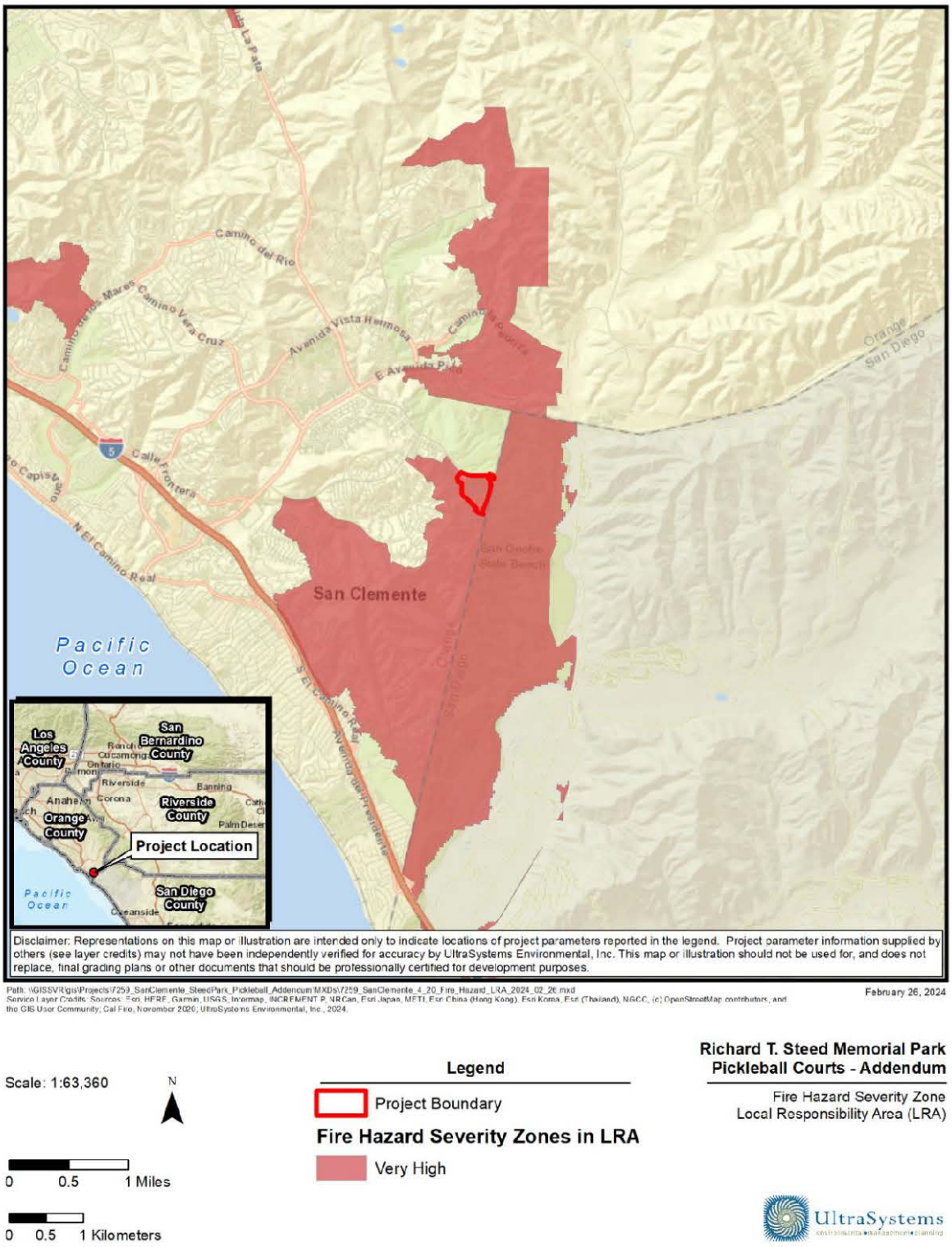
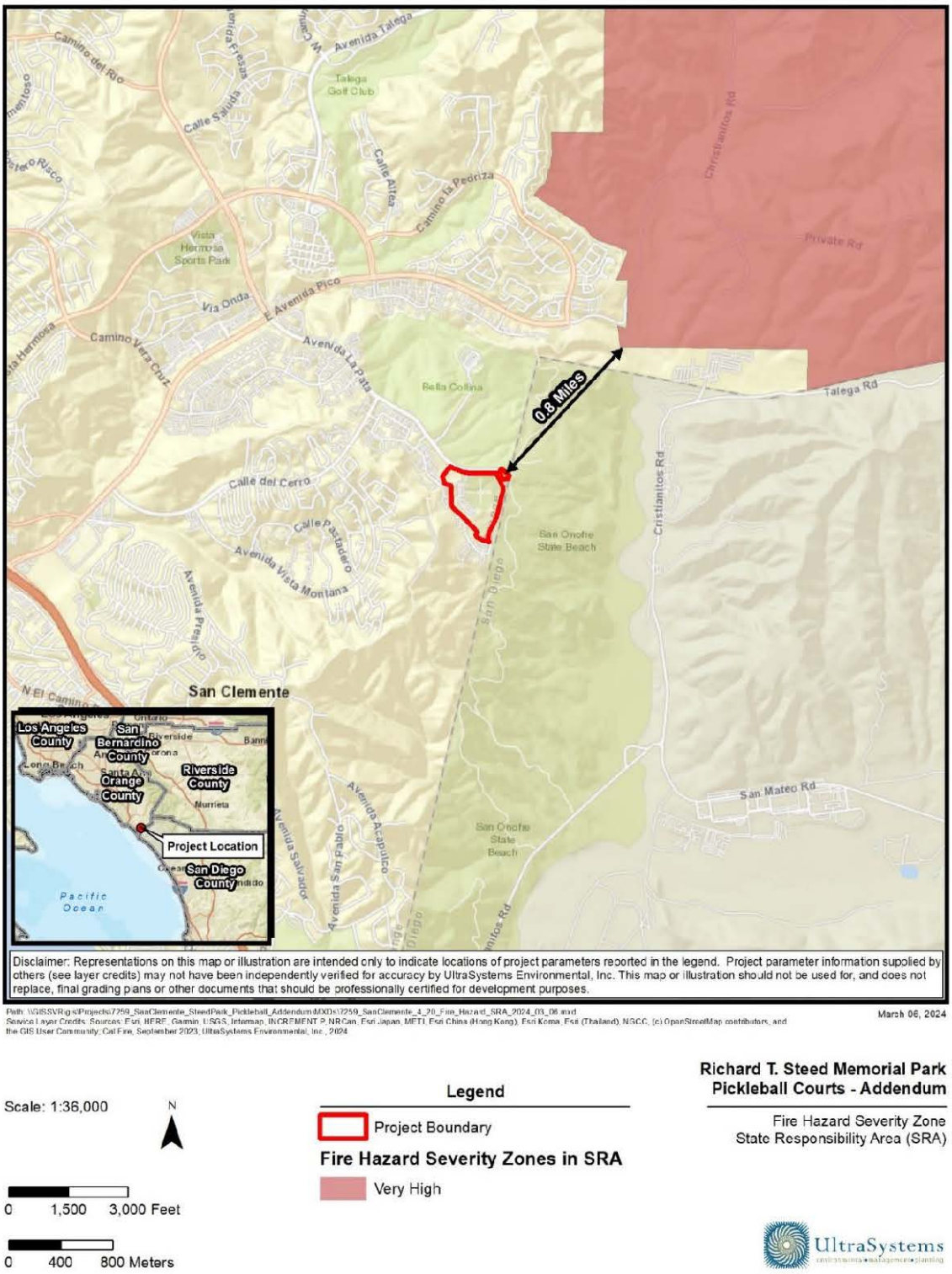


Figure 4.20-2
FIRE HAZARD SEVERITY ZONE - STATE RESPONSIBILITY AREA (SRA)



a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impacts/No Changes or New Information

The project site is in a VHFHSZ in a LRA, as shown on **Figure 4.20-1**. The project site is not in a SRA.

The City of San Clemente Multi-Hazard Emergency Plan sets forth responsibilities and procedures for responding to major emergencies or disasters. The plan identifies potential hazards, identifies authorities and assigns responsibilities to the appropriate agencies, establishes an organizational structure for managing emergency responses, outlines planned response actions to mitigate the effects of a disaster, outlines a method of communicating emergency information and instructions to the public, describes resources available for emergency responses (RECON Environmental Inc., 2013).

The nearest arterial roadway to the project site is Avenida La Pata, next to the north boundary of Steed Memorial Park. Modified project development would not involve closures of Avenida La Pata. Modified project development would also not block fire access roads within Steed Memorial Park. No new adverse impact to emergency response plans or evacuation plans would occur, and no new IS/MND is needed.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impacts/No Changes or New Information

The project site is located entirely in a VHFHSZ within LRA. The modified project site ranges in elevation from about 565 feet at the south end to 551 feet at the northeast end to 555 feet at the northwest end. The north slope (from south to northeast) is about two percent grade. Such slope would not substantially accelerate wildfire spread. Park vegetation is irrigated and maintained and thus is considerably less flammable than wildland vegetation in the region. Modified project development would decrease the amount of planned vegetation onsite through addition of six pickleball courts and 65 parking spaces, thus slightly reducing wildfire fuel onsite. San Clemente is subject to strong Santa Ana winds occasionally in autumn and winter; modified project development would not change the susceptibility of the site to strong winds, or exacerbate wildfire hazards onsite related to strong winds. No new significant impact would occur, and no new IS/MND is needed.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impacts/No Changes or New Information

The modified project does not propose installation of infrastructure – such as roadways or overhead powerlines – that would exacerbate wildfire risk. Existing powerlines in and next to Steed Memorial Park are underground; powerlines to the lights at the proposed pickleball courts would also be underground. No new impact would occur and no new IS/MND is needed.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impacts/No Changes or New Information

The project site is located entirely in a VHFHSZ within a LRA. The modified project site has a very slight north slope, and is within a built-out park with storm drains installed. Thus, modified project development would not expose people or structures to significant risks consequent to wildfire, such as downslope or downstream flooding or landslides. No new impact would occur, and no new IS/MND is needed.

4.20 Mandatory Findings of Significance

Does the project have:	New Information Showing New or Increased Effects Compared to the Adopted Steed Memorial Park IS/MND	New Information Showing Ability to Reduce, but Not Eliminate Effects Compared to the Adopted Steed Memorial Park IS/MND	Less than Significant Impacts/ No Changes or New Information Requiring the Preparation of an MND or EIR	No Impact
a) The potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			**X**	
b) Impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			**X**	
c) Environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			**X**	

The Steed Memorial Park Master Plan IS/MND concluded the following:

Degradation of the Environment

Section 15065(a) of the CEQA Guidelines states that a project may have a significant impact on the environment if it has the potential to "substantially degrade the quality of the environment." The Steed Memorial Park Master Plan IS/MND details all potential environmental effects associated with development, including direct, indirect, and cumulative impacts on the following environmental issue areas: (UltraSystems, 2023, p. i)

- Aesthetics/Visual Resources

- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Steed Memorial Park Master Plan IS/MND discuses all potential environmental impacts, the level of significance prior to mitigation, project requirements that are required by law, feasible mitigation measures, and the level of significance after the incorporation of mitigation measures.

Cumulative Impacts

Section 15065(a)(3) of the CEQA Guidelines states that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. No cumulatively considerable impacts of the Approved Project were identified in the IS/MND (UltraSystems, 2023, p. 4.21-3).

Impacts on Species

Section 15065(a)(1) of the CEQA Guidelines states that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species. **Section 4.4**, *Biological Resources*, of the Steed Memorial Park Master Plan IS/MND addresses potential impacts on species.

Impacts on Historical Resources

Section 15065(a)(1) of the CEQA Guidelines states that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to eliminate important examples of a major periods of California history or prehistory. **Section 4.5**, Cultural Resources, of the Steed Memorial Park Master Plan IS/MND addresses impacts related to California history and prehistory, historic resources, archaeological resources and paleontological resources.

Impacts on Human Beings

As required by § 15065(a)(4) of the CEQA Guidelines, a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. While changes to the environment that could indirectly affect human beings are possible for all designated CEQA issue areas, those areas that could directly affect human beings include: air quality; greenhouse gases, hazards and hazardous materials; noise; public services, utilities and infrastructure; and traffic and circulation, each of which are addressed in the appropriate sections of the Steed Memorial Park Master Plan IS/MND.

4.20.1 Project Impact Analysis

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

Less than Significant Impacts/No Changes or New Information

Biological Resources

Most of the modified project site is vacant disturbed land and developed area. Two narrow strips of the modified project site are vegetated: disturbed lemonade berry scrub along the northeast edge of the site, and pepper tree groves-disturbed lemonade berry scrub along the southwest edge. The entire modified project site is within the Approved Project site; and the entire modified project site would be developed in both scenarios. Both vegetated areas within the modified project site are subject to frequent disturbances including landscaping activities; the northerly of the two vegetated areas is also subject to disturbances during uses of the adjacent baseball/softball fields. Thus, the vegetated areas do not provide high-quality habitat for special status species. As with the Approved Project, impacts of the modified project on special-status species would be less than significant after implementation of Mitigation Measures **BIO-1** through **BIO-10**.

One sensitive natural community, lemonade berry scrub (disturbed state), is present within the modified project site: about 0.29 acres in one narrow strip along the north edge of the site next to the baseball and softball fields. That habitat is subject to frequent disturbances from uses of the baseball/softball fields and from periodic landscaping activities. Therefore, the lemonade berry scrub onsite is not high-quality habitat. Modified project development would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. Modified project impacts would be less than significant after implementation of mitigation measures **BIO-1** through **BIO-13**, and no new or intensified impact would occur. No new IS/MND is required.

Cultural Resources

No historical or archaeological resources were identified within the modified project site during the cultural resources inventory for the Approved Project. No impact to historical resources was

identified in **Section 4.5**, Cultural Resources; and impacts on archaeological resources were determined to be less than significant after implementation of mitigation measures **CUL-1** and **CUL-2** (**CUL-2** addresses impacts to human remains). Modified project development would not have the potential to eliminate important examples of the major periods of California history or prehistory. No new or more intensified impact would occur, and no new IS/MND is needed.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impacts/No Changes or New Information

No cumulatively considerable impacts of the Approved Project were identified in the IS/MND (UltraSystems, 2023, p. 4.21-3). The modified project impact is within the development footprint of the Approved Project. No cumulatively considerable impacts of the modified project are identified in this Addendum.

The modified project's impacts have been fully examined and mitigated to the extent discussed in this Addendum. The modified project does not require substantial changes to the adopted Steed Memorial Park Master Plan IS/MND, or to previously adopted mitigation measures. Thus, the appropriate CEQA document for the modified project, as outlined in CEQA Guidelines §§ 15162 and 15164, is the preparation of this Addendum to the previously adopted Steed Memorial Park Master Plan IS/MND.

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

Less than Significant Impacts/No Changes or New Information

Section 4.9, Hazards and Hazardous Materials, substantiates that modified project development would not cause any new or intensified impacts respecting hazardous materials. Hazards and hazardous materials impacts of the Approved Project were identified as less than significant. No other significant impacts of the modified project are identified in this Addendum. All impacts of the modified project that could cause significant adverse impacts on human beings would be less than significant after implementation of mitigation measures set forth in the adopted Steed Memorial Park IS/MND. No

Conclusions

The modified project would not have any new information or changes compared to the Steed Memorial Park IS/MND. Additionally, the modified project would not have any significant impacts with the incorporation of mitigation measures set forth in the adopted IS/MND. Therefore, modified project development would not cause cumulatively considerable impacts and would not require preparation of a new IS/MND.

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