

# ENVIRONMENT | PLANNING | DEVELOPMENT SOLUTIONS, INC.

*Submitted via email.*

June 21, 2022

Damaris Abraham  
City of Lake Elsinore  
[dabraham@lake-elsinore.org](mailto:dabraham@lake-elsinore.org)

**RE: Proposal for Environmental Analysis and CEQA Compliance Management on the proposed 191-Unit Residential Community on Mission Trail, Lake Elsinore**

Dear Ms. Abraham:

We are thrilled to have another opportunity to work with you on the CEQA compliance efforts for the proposed 191-unit residential community on Mission Trail. Below is our proposed scope of work based on our discussion related to a similar project in terms being consistent with a Specific Plan and therefore potentially qualify for tiering off the associated EIR.

## **PROJECT UNDERSTANDING**

The 18-acre project site (17.2 net acres) is west of the I-15 and shares an easterly boundary with Mission Trail, which provides access to the site. The project site is rectangular in shape and currently undeveloped. The site is east of the Lake Elsinore Motorsports Park and is sandwiched by vacant land on the south and north. Commercial and industrial uses are located further south. Residential, commercial and industrial uses are to the east.

The project site is designated in the General Plan as East Lake Specific Plan and zoned Mixed-Use Overlay.

The proposed project includes 191 2-story single-family detached homes in a gated community with a community park with a sport court, children's play equipment, pool, spa and bathroom building. With the available information provided to-date, the proposed project would be consistent with the site's General Plan and Specific Plan designations.

## **PROPOSED ENVIRONMENTAL REVIEW**

Due to the project's compliance with the General Plan and Specific Plan, we anticipate the appropriate CEQA compliance approach for the project would be pursuant to State Guidelines Section 15182, which is a CEQA streamlining provision available to projects that are analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project. consistent with a community plan (such as the City's General Plan) previously analyzed under an approved environmental document.

For purposes of this proposal, this is assumed to be the case, which will be validated by EPD through a thorough review of potential impacts of the project using an Initial Study. The Initial Study will guide the appropriate CEQA path and confirm the project can be streamlined under Section 15182. In the event impacts of the project are determined to significant and peculiar to the project or its site compared to what was previously approved under the applicable General Plan and East Lake Specific Plan environmental document, a Mitigated Negative Declaration (MND) or Environmental Impact Report (EIR) would be prepared if deemed appropriate.

## **SCOPE OF WORK**

1. Project Initiation and Project Description
2. Technical Studies
  - a. Peer Review of Applicant Prepared Studies
  - b. Air Quality and Greenhouse Gas Emissions Analysis
  - c. Energy Analysis
  - d. Noise Impact Analysis
  - e. Cultural and Paleontological Resources Assessment
  - f. Traffic Impact Analysis
3. Initial Study
4. Notice of Determination (NOD)
5. CEQA Project Management

### **1. Project Initiation and Project Description**

As part of this task, EPD will review the project's entitlement application submittal package, the City's General Plan and Municipal Code, and other relevant documents. EPD will then prepare a detailed project description for the project.

As you are likely aware, one of the keys to successful CEQA compliance is a clear definition of the project and its components. Prior to initiating technical studies, the project description must be complete, comprehensive, and stable and finite in order to ensure the studies analyze potential impacts accurately and fully. EPD will identify any additional information needed to develop a thorough and complete project description.

EPD will also confer with the City and project team during this early process to discuss the potential environmental impacts of the proposed project. As part of this initial review, EPD will confer with the team to determine if any issues might come up related to the thresholds of significance. Subsequent to this initial analysis, EPD will discuss with the team the results and identify any potential issues relative to the impact analysis and mitigation measures.

### **2. Technical Studies**

The following technical studies are proposed to be prepared in support of the IS.

- Air Quality and Greenhouse Gas Emissions Analysis
- Energy Analysis
- Noise Impact Analysis
- Cultural and Paleontological Resources Assessment
- Traffic Impact Analysis

Certain technical studies that are required for the project are expected to be contracted through the applicant and are therefore excluded from our scope. These studies include the Water Quality Management Plan (WQMP), hydrology study, biological study, and geotechnical study. In addition, we anticipate being provided a Phase I Environmental Site Assessment (ESA).

### **2.1. CEQA Adequacy Review of Applicant Prepared Studies**

EPD will review the Applicant-prepared biological study, hydrology study, WQMP, Geotechnical and Phase I ESA reports for an accurate and consistent project description, adequacy in responding to applicable CEQA impact questions, use of appropriate thresholds, and identification of appropriate mitigation, as necessary. For efficiency, we will provide comments and revisions within the Word files of the technical studies and use “track changes” and commenting features in the review of documents. Where Word files are not available, we will comment within the PDF files. Comments will be summarized in a peer-review memo.

### **2.2. Air Quality and Greenhouse Gas Emissions Analysis**

#### *Air Quality Analysis*

The proposed project is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The following scope of work serves to meet the City’s and SCAQMD’s requirements for preparation of a CEQA Air Quality and Greenhouse Gas Analysis.

#### *Air Quality*

- Evaluate the existing conditions of the project study area; this will include gathering background air quality data, local wind patterns in the study area and identifying applicable rules, plans and thresholds of significance.
- Identify construction-related air quality impacts from associated construction activities at the project site which may include import/export of fill dirt, mass grading, building construction, paving, concrete pouring, etc.
- Evaluate operational emissions for the proposed project, based upon trip generation projections provided as part of the traffic study. Peak hour trips will be used along with estimates of the types of trips generated and average travel speeds to estimate daily emissions generated by the project. In addition, emissions from other operational sources such as heaters, air conditioners, water heaters, consumer products, and lawn care equipment will also be considered.
- Perform a screening-level CO Hot Spot analysis of future conditions at key intersections located in the project study area will be prepared. It is anticipated that a qualitative discussion on CO Hotspot potential and rationale as to why more detailed modeling of CO Hotspot analysis is not required.
- Perform Construction Localized Significance Threshold (LST) analysis as recommended by the South Coast Air Quality Management District (SCAQMD) for construction and operational activity. No dispersion modeling is anticipated to be required.
- Evaluate potential odor impacts resulting from the proposed project. Identify applicable mitigation measures and regulatory requirements that the project must comply with to minimize odors. For purposes of this evaluation a qualitative assessment of odors and odor controls is expected.
- Qualitatively discuss cumulative impacts within the context of planned and foreseeable projects for short-term construction and long-term operational activity. A “list” approach per CEQA will be utilized when discussing cumulative impacts using the list of cumulative projects identified in the traffic report. Since the basin is in non-attainment the determination of significance will likely be based on whether or not the Project results in a substantial incremental increase.

#### *Greenhouse Gas Emissions Analysis*

- Evaluate applicable federal and state regulatory requirements (i.e., AB32, SCAQMD, CARB thresholds). Qualitatively discuss the effects of GHG emissions on regional air quality.
- Evaluate applicable GHG emissions associated with heavy-duty construction equipment combustion that will likely occur during the various phases of construction. Data available from the project team and technical air quality analysis will be utilized in characterizing GHG-generating activities.
- Evaluate operational GHG emissions for the proposed project which will include emissions from mobile sources, heaters, air conditioners, water heaters, consumer products, cargo handling equipment (CHE), and lawn care equipment will also be considered.
- The emissions evaluation for short-term construction, long-term mobile source, and long-term stationary source activity will consider project design, and mitigation measures that have the potential to reduce GHG emissions.
- Evaluate project significance based on an applicable Climate Action Plan or direction provided by the Project CEQA preparer and/or the lead agency.
- Identify and recommend mitigation measures that are feasible to implement and that will reduce any potential impacts to the maximum extent possible. Prepare a greenhouse gas report that incorporates the findings and all supporting calculations.

#### **2.3. Energy Analysis**

We will prepare energy calculations associated with electricity, natural gas, and transportation fuels in a summary table for inclusion in the CEQA document.

#### **2.4. Noise Impact Analysis**

- Identify and review applicable, Federal, State and Local Noise criteria. This includes the City Noise Element and Municipal Code to determine appropriate noise standards and significance criteria.
- Collect long-term 24-hour ambient noise level measurements in the project study area at up to six locations to quantify the existing noise environment. All noise level measurement equipment will satisfy American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. The noise level measurements will be collected consistent with the criteria outlined in the Municipal Code. Briefly describe the ambient noise conditions in the Project study area.
- Collect reference noise level measurements to represent the expected stationary source impacts associated with the proposed Project land uses including the planned car wash.
- Evaluate the potential stationary source noise impacts associated with the operation of the proposed Project and recommend measures to reduce the potential noise impacts to any nearby noise-sensitive uses.

Provide a detailed construction noise and vibration analysis for each stage of construction using reference noise level measurements of similar activities.

Summarize the results of the study in a noise impact analysis report addressing the potential impacts associated with the Project and provide the appropriate measures to reduce the impacts to levels of less than significant.

#### **2.5. Cultural and Paleontological Resources Assessment**

Brian F. Smith & Associates will prepare a cultural and paleontological resources assessment for the project site.

- Cultural Resources Background Research – the cultural specialist will request an updated cultural resources records search of the project area from the South Central Coastal Information Center

(SCCIC) at California State University, Fullerton and the Native American Heritage Commission (NAHC). The results of the records searches will identify previous studies and previously registered cultural resources within or near the property. The receipt of records searches from the SCCIC may be delayed due to COVID-19 restrictions. If necessary, the survey and report will be completed with a provision that the record searches will be forwarded to the City upon receipt.

- The property will be surveyed by a qualified archaeologist. Should any cultural resources be identified during the survey, either historic or prehistoric, subsequent significance evaluations may be required. Any additional efforts required will be presented in a subsequent proposal document.
- A paleontological review of available research will be completed to determine if fossil resources exist within the project area and which could require mitigation measures as part of any future development.
- Two technical reports will be prepared for use in the CEQA environmental review process. The archaeological report will provide the results of the previous studies, the updated record searches, data from field survey, and NAHC consultation. The paleontological assessment will provide results of the research of fossil records and projections of the potential to encounter significant fossil deposits at this location. For the purposes of this proposal, we will anticipate that the cultural resources report will be negative. If cultural resources, either historic or prehistoric, are identified on the property as a result of the records information or the field inspection, CEQA protocol will require that the resources be evaluated for significance and potential impacts analyzed.

## **2.6. Traffic Impact Analysis**

The following scope is based on buildout of up to 191 single-family detached homes. Based on a preliminary analysis of the project trip generation using the ITE rates for Single Family Detached Housing, the project would generate approximately 1,801 daily trips, 134 AM peak hour and 180 PM total peak hour vehicle trips. As the number of peak hour trips is greater than 100, a LOS analysis would be required. The following scope of work is based on the requirements of the City of Lake Elsinore, *Traffic Impact Analysis Preparation Guide* (TIA Guidelines) It is understood the scope of the project may change and changes to the unit mix or count could result in a change in the number of intersections analyzed. Our budget includes a per-intersection fee if added analysis is required by the City.

EPD will complete the TIA according to the tasks outlined below. The scope of work will be adjusted as required when a site plan showing product types and proposed density is provided.

### *2.6.1. Scoping Agreement.*

EPD will complete the City's Scoping Agreement for Traffic Impact Study and submit it for City staff review within two weeks of receipt of site plans showing unit types and counts and proposed access points. EPD will work with City staff to obtain approval of the scope outlined below prior to proceeding with the TIA. During this process, EPD will request a list of planned roadway improvements and cumulative development projects in the vicinity of the project study area. In addition, EPD will request signal timing plans for study intersections from the City of Lake Elsinore for use in the existing conditions analysis.

### *2.6.2. Existing Roadway Network.*

EPD will document conditions of the surrounding roadway network, including speed limits, number of travel lanes, and non-motorized and transit facilities. Traffic control, channelization and other relevant characteristics will be documented at study intersections as well.

### *2.6.3. Existing Traffic Operations.*

EPD will contract with a qualified traffic data collection firm to collect existing traffic volumes at all study area intersections. It is anticipated that up to 7 intersections would be included in the study area; an

additional budget will be required if the Scoping Agreement approved by the City requires additional intersections. Traffic counts will be charged as an expense. EPD will calculate existing AM and PM peak hour levels of service (LOS) at study intersections.

#### *2.6.4. Project Trip Generation, Distribution and Assignment.*

Daily and weekday AM and PM peak hour trip generation will be estimated based on the size of the project and information published by the ITE in *Trip Generation, 11th Edition*. Project trips will be distributed to the study intersections and surrounding roadway network using observed patterns of travel as identified in the traffic count data as well as logical paths of travel to and from the site. The project trip generation will be distributed to study area intersections and added to baseline and future scenarios.

#### *2.6.5. Project Completion and Cumulative Traffic Volumes.*

Project Completion AM and PM peak hour traffic volumes will be estimated at study intersections based on a growth rate applied to existing traffic volumes plus project trips. The Cumulative scenario will be estimated using Project Completion volumes plus approved and pending development projects. EPD will contact the City of Lake Elsinore to identify cumulative projects that would add traffic to the project area.

#### *2.6.6. Project Impact Analysis.*

Levels of service at the study intersections and roadway segments will be calculated for the Existing, Project Completion, and Cumulative scenarios. Project-generated impacts will be identified by using the City's thresholds for Level of Service stated in their TIA guidelines. The TIA will also analyze Traffic Signal Warrants for all unsignalized intersections that operate with unsatisfactory LOS. The TIA will also include a Safety and Operational Analysis as described in the City's TIA Guidelines.

#### *2.6.7. VMT Analysis.*

Effective July 1, 2020, the evaluation of transportation impacts for CEQA purposes requires the assessment of vehicle miles traveled (VMT) rather than level of service (LOS). As such, a VMT analysis will be required for the project if the project does not screen out of VMT analysis. The City of Lake Elsinore has VMT Analysis Guidelines that EPD will use for the VMT analysis. A preliminary analysis using the Fehr and Peers WRCOG VMT screening tool shows the project does screen out; therefore, a screening memorandum will be prepared.

#### *2.6.8. Mitigation Measures.*

If potentially significant traffic impacts are anticipated, EPD will identify mitigation measures that would reduce or off-set these impacts. Project fair-share for cumulative impacts will be calculated and identified in the study.

#### *2.6.9. Documentation of Analysis and Findings.*

A draft TIA will be prepared documenting all analyses, findings, and conclusions. Upon review by the project team and/or City, EPD will revise the TIA and provide the revised TIA for City review.

### **3. Initial Study**

This scope of work assumes an Initial Study (IS) in support of a Section 15183 will be sufficient to achieve CEQA compliance. EPD will work with the City, and the applicant, and their design team, as authorized by the City, to mitigate all impacts to below a level of significance; however, if an impact cannot be mitigated adequately, it could be elevated to an IS/MND or deemed significant and unavoidable by the City, which would trigger the need for an Environmental Impact Report (EIR). We will advise the project team immediately if we find any impacts could reach this severity.

#### **3.1. Administrative Draft IS**

EPD will prepare an Initial Study consistent with the State CEQA Guidelines and the City's local CEQA guidelines. We anticipate the Initial Study will be used to support the use of a Section 15183 determination. One round of review is assumed.

### **3.2. Public Review Draft IS**

Based on comments from the project team, a Public Review draft will be submitted to the City for review. Project team and City comments will be incorporated into an updated document. One round of review per entity is expected.

### **3.3. Response to Comments**

Although not required by CEQA, at the City's request, EPD will prepare responses to comments received by interested parties and agencies on the IS and will assist the City in preparation for public hearings. This scope assumes 11 hours of professional staff time. If a large volume of letters is received requiring extensive responses, EPD will advise the City and costs will be extra to contract.

### **4. Notice of Determination**

EPD will prepare a Notice of Determination (NOD) for the project using the Office of Public Resource standard NOD form. EPD will be responsible for filing the NOD with the State Clearinghouse and with the County.

### **5. Meetings, Hearings, and CEQA Project Management**

EPD's CEQA project manager will coordinate closely with City staff to assure that the IS and associated documents are legally defensible, accurate, and useful to decision makers considering the approval of the project. The project manager will also coordinate with City staff throughout the process not only to streamline the CEQA process, but to avoid or anticipate any changes that could result in delays.

To effectively manage the costs of the project, EPD will attend bi-monthly conference calls (briefings) to update the City on upcoming deliverables and discuss any potential issues that may impact the scope of work. EPD will draft agendas in advance of these meetings and deliver minutes via email to the entire project team. The minutes will identify action items and the responsible party to implement said action item. In addition to standing meetings, EPD will be available to the project team and City staff to answer questions, address concerns, or to clarify issues as they arise.

The project manager will be responsible for managing (1) task scheduling and assignment, management of resources, monitoring of costs, and schedule adherence; (2) consultation and coordination with local and state agencies relative to the environmental document and the environmental review process; (3) coordination and communications with the project team and City to ensure that City policies, procedures, and any applicable codes are complied with and, where applicable, are incorporated into the CEQA document; and (4) ensuring that the environmental review process and the CEQA document satisfy the statutes and guidelines of CEQA and CEQA procedures.

This scope of work assumes attendance at one public hearing by the project manager and the principal in charge and project management of 2 hours per month of the 3-4-month duration of the CEQA portion of the project.

### **FEES & EXPENSES**

EPD proposes the following labor fees. Tasks 1 through 4 will be billed as fixed fees; Task 5 will be billed on a time-and-materials basis, with the balance billed following filing of the NOD.

<b>Proposed Work Scope Tasks</b>	<b>Proposed Fee</b>
<b>Task 1: Project Initiation and Project Description</b>	<b>\$5,100</b>
Project Initiation	\$2,100
Project Description	\$3,000
<b>Task 2: Technical Studies</b>	<b>\$76,345</b>
2.1: Peer Review of Applicant Studies	\$4,025
2.2: Air Quality & GHG Emissions Analysis	\$14,375
2.3: Energy Analysis	\$2,865
2.4: Noise Impact Analysis	\$10,530
2.5: Cultural/Paleontological Resources Assessment	\$7,475
2.6: Traffic Impact Analysis (LOS & VMT Analysis)	\$37,075
<b>Task 3. Initial Study</b>	<b>\$27,900</b>
3.1: Administrative Draft	\$19,500
3.2: Public Review Draft	\$5,725
3.3: Response to Comments	\$2,675
<b>Task 4. Notice of Determination</b>	<b>\$1,050</b>
<b>Task 5. CEQA Project Management</b>	<b>\$10,300</b>
Management	\$6,100
Meetings	\$4,200
<b>Estimated Fees &amp; Expenses</b>	<b>\$6,000</b>
<b>TOTAL (Without Estimated Expenses)</b>	<b>\$120,695</b>
<b>TOTAL (With Estimated Expenses)</b>	<b>\$126,695</b>

The reimbursable Estimated Expenses (mileage, records searches reprographics, shipping) are an estimate only. This budget does not include direct expenses, processing or application fees, or deposits for environmental consultants contracted directly by the client. Expenses would be billed per the attached Provisions of Agreement.

Our cost estimate is based on our scope of services and schedule, and the following assumptions:

- The cost estimate is valid for up to 180 days from the date of submittal/opening, after which it may be subject to revision.
- Costs have been allocated to tasks to determine the total budget. EPD may reallocate costs among tasks, as needed, as long as the total budget is not exceeded.
- Additional review cycles or additional versions of administrative drafts of any documents beyond the assumptions contained within the scope of work will constitute additional work.

The budget is based on completion of work within a maximum 6-month schedule. If a delay of 90 days or more occurs as a result of circumstances beyond control we reserve the right to adjust our budget to account for increased labor rates and other costs.



Thank you again for the opportunity to work on this project. Should you have any questions, please do not hesitate to contact me at (949) 794-1183 or [konnied@epdsolutions.com](mailto:konnied@epdsolutions.com).

Sincerely,  
**EPD Solutions, Inc.**



Konnie Dobрева, JD  
Vice President of Environmental Planning

Enclosure (1)

To begin work, EPD requires this agreement be signed by the client below.

Agreed to by:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name and Title