Life Time Athletic & Tennis Club – San Clemente Project

Initial Study/Mitigated Negative Declaration

Prepared
for
City of San Clemente

September 2017

appliedplanning inc

Initial Study and Mitigated Negative Declaration
for
Life Time Athletic & Tennis Club –
San Clemente Project

Prepared for:

City of San Clemente
910 Calle Negocio, Suite 100
San Clemente, CA 92673

Prepared by:

Applied Planning, Inc.
11762 De Palma Road, 1-C 310
Corona, CA 92883

September 2017

Table of Contents

List of Figures

List of Tables

Table **Page**

Table **Page**

1.0 INTRODUCTION

1.0 INTRODUCTION

1.1 PROJECT OVERVIEW, DOCUMENT PURPOSE AND SCOPE

This Initial Study/Mitigated Negative Declaration (IS/MND, MND) addresses potential environmental impacts associated with the proposed Life Time Athletic & Tennis Club – San Clemente Project (Project). As part of the Project, 13 of the 19 existing tennis courts[1] within the existing Rancho San Clemente (RSC) Tennis & Fitness Club site would be retained and other existing dated facilities would be redeveloped/renovated with similar expanded contemporary family-oriented recreational and fitness uses.

In this latter regard, the easterly portions of the Project site would be redeveloped with a new 45,000-square-foot, single-story clubhouse with terraced, below-grade facilities, providing a restaurant, spa, locker rooms, child care facilities, exercise rooms, pro shop, and associated administrative/office spaces. A new swimming pool, shaded outdoor gathering space, and expanded parking area are also proposed.

The Project site comprises approximately 10.39 total acres located at 111 Avenida Vista Montana, San Clemente, CA 92672, in the northerly portion of the City, at the southwesterly corner of Avenida Vista Montana at Calle Del Cerro. The proposed operating hours of the Project would be from 5:00 AM to 11:00 PM, daily.

Please refer also to the detailed Project Description presented at IS/MND Section 2.0, *Project Description*.

[1] The Project considered here specifically excludes tennis court refurbishment activities underway as of July 2017. The 13 tennis courts that would be retained and their associated permitting would not be substantively affected by the Project.

This IS/MND was prepared pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines. Although this document was prepared with consultant support, all analysis, conclusions, findings and determinations presented in the Initial Study fully represent the independent judgment and position of the City of San Clemente, acting as Lead Agency under CEQA. In accordance with the provisions of CEQA, and the State and local CEQA Guidelines, as the Lead Agency, the City is solely responsible for approval of the proposed Project. As part of the decision-making process, the City is required to review and consider the potential environmental effects that could result from the Project.

CEQA Guidelines Article 6[2] discusses the Mitigated Negative Declaration Process, which is applicable to the Project. Article 6 states in pertinent part:

> "A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:
>
> (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
>
> (b) The initial study identified potentially significant effects, but:
>
> (1) Revisions in the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

2 Title 14. California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act, Article 6. Negative Declaration Process.

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

As supported by the Initial Study presented herein, the City has determined that the Project may result in or cause potentially significant effects. However, compliance with existing policies, plans and regulations, and any applicable revisions to the Project plans, together with design features and mitigation measures incorporated in the proposal would avoid the effects or mitigate the effects to a point where no significant impacts would occur. The City has consequently determined that a Mitigated Negative Declaration (MND) should be prepared for the proposed Life Time Athletic & Tennis Club – San Clemente Project.

The City of San Clemente as the Lead Agency has the authority to review and approve the Project. This IS/MND is intended to be an informational document, providing the City's decision-makers, other public agencies, and the public with an objective assessment of the potential environmental impacts that could result from implementation of the proposed Project.

1.2 DOCUMENT ORGANIZATION

This IS/MND includes the following sections.

Introduction: This Section (1.0) describes the format of the IS/MND and provides summary findings of the environmental analysis.

Project Description: This Section (2.0) describes the Project and its objectives, and outlines the existing regulations that will affect development of the Project.

Environmental Evaluation: This Section (3.0) presents the Initial Study Environmental Checklist and responses to topical environmental questions posed within the Checklist. Answers provided for items in the Checklist are substantiated qualitatively in all instances, and quantitatively where appropriate.

Under topical issues where the Project would have no impact or impacts are determined to be less-than-significant, no mitigation is required. In instances where impacts are determined to be "potentially significant unless mitigation incorporated," mitigation measures are proposed that would reduce potentially significant environmental impacts to levels that would be less-than-significant.

Determination: This Section (4.0) responds to questions relating to mandatory findings of impact significance and presents the determination regarding the appropriate environmental document for the Project.

Mitigation Monitoring Plan: This Section (5.0) presents the Project Mitigation Monitoring Plan (MMP). The MMP summarizes mitigation measures that would reduce potentially significant environmental impacts to levels that would be less-than-significant. The MMP also identifies mitigation timing, and parties responsible for implementing and monitoring of mitigation measures.

1.3 DISPOSITION OF THIS DOCUMENT

This Mitigated Negative Declaration and supporting Initial Study will be circulated by the City of San Clemente for 20 days, to allow for public and agency review. Comments received on the IS/MND will be considered by the City in their review of the proposed Project. The general public is encouraged to contact the City for responses to specific questions regarding the CEQA process and its administration for the proposed Project. Comments on the analysis contained herein may be sent to:

Ms. Amy Vazquez, Contract Planner
VazquezA-temp@san-clemente.org
or
City of San Clemente, Planning Division
910 Calle Negocio, Suite 100
San Clemente, CA 92673

2.0 PROJECT DESCRIPTION

2.0 PROJECT DESCRIPTION

2.1 OVERVIEW

As part of the proposed Life Time Athletic & Tennis Club – San Clemente Project (Project), 13 of the 19 existing tennis courts[1] within the existing Rancho San Clemente (RSC) Tennis & Fitness Club site would be retained, and other existing dated facilities would be redeveloped/renovated with similar expanded contemporary family-oriented recreational and fitness uses.

In this latter regard, the easterly portions of the Project site would be redeveloped with a new 45,000-square-foot, single-story clubhouse with terraced, below-grade facilities, providing a restaurant, spa, locker rooms, child care facilities, exercise rooms, pro shop, and associated administrative/office spaces. A new swimming pool, shaded outdoor gathering space, and expanded parking area are also proposed. The proposed operating hours of the Project would be from 5:00 AM to 11:00 PM, daily.

2.2 DISCRETIONARY APPROVALS AND PERMITS

Discretionary actions, permits and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

[1] The Project considered here specifically excludes tennis court refurbishment activities underway as of July 2017. The 13 tennis courts that would be retained and their associated permitting would not be substantively affected by the Project.

2.2.1 Lead Agency Discretionary Actions and Permits

- CEQA Compliance. The City must adopt the Mitigated Negative Declaration prior to, or concurrent with, any approval of the Project.

- Conditional Use Permit(s) for general operations, to include allowance for on-site consumption of alcohol ancillary to clubhouse activities. CUPs for uses within the Project area would comply with procedures and requirements outlined at City Zoning Ordinance Section 17.16.060 – *Conditional Use Permits*.

- Site Plan Permit. The Project uses and their proposed configurations are subject to review and approval by the City pursuant to RSCSP Section 601 V. *Site Plan Permits*.

- Architectural Permits. Architectural designs of the Project facilities are subject to review and approval by the City pursuant to RSCSP Section 601 VI. *Architectural Permits*.

- Master Sign Program Permit. The Project Master Sign Program is subject to review and approval by the City pursuant to City Zoning Ordinance Section 17.16.250 - *Discretionary Sign Permits*.

- Various other City of San Clemente construction, grading, and encroachment permits are required to allow implementation of the Project facilities.

2.2.2 Other Consultation and Permits

Based on the current Project design concept, anticipated permits necessary to realize the proposal would likely include, but are not limited to, the following:

- Tribal Resources consultation with requesting Tribes as provided for under AB 52, Gatto. *Native Americans: California Environmental Quality Act*;

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;

- Permitting may be required by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented within the Project area; and

- Various construction, grading, and encroachment permits allowing implementation of the Project facilities.

2.3 PROJECT LOCATION

The Project site is located in the City of San Clemente in south Orange County. Please refer to Figure 2.3-1, *Project Location*. More specifically, the Project is located at 111 Avenida Vista Montana, San Clemente CA, 92672, in the northerly portion of the City, at the southwesterly corner of Avenida Vista Montana at Calle Del Cerro. Legal description of the Project site is Tract 12124, Lot F, M.M. 532/1 – 10.

2.4 EXISTING LAND USES

Existing land uses within and adjacent to the Project site are identified at Figure 2.4-1. The Project site is currently developed with the existing RSC Tennis & Fitness Club, which includes an 11,000-square-foot clubhouse, 19 tennis courts, a swimming pool, and basketball courts. Properties to the north (across Calle Del Cerro), west, and south are vacant and undeveloped. Easterly of the Project site, across Avenida Vista Montana, properties are developed with single-family residential uses.

Source: Google Earth; Applied Planning, Inc.

Figure 2.3-1
Project Location

Source: Google Earth, Applied Planning, Inc.

Figure 2.4-1
Existing Land Uses

2.5 EXISTING LAND USE DESIGNATIONS

2.5.1 General Plan Land Use

The Project site General Plan Land Use designation is OS2 – "Open Space - Private." General Plan Land Use designation of adjacent properties to the north (across Calle Del Cerro), south, east (across Avenida Vista Montana), and west is also OS2 – Open Space - Private. Please refer to Figure 2.5-1, *General Plan Land Use Designations*. Intent of the OS2 Land Use is to provide for "[p]rivately owned parklands, recreational facilities, passive open space areas and golf courses." (General Plan, p. LU-11). The Project land uses and development concepts are consistent with the stated intent of the General Plan OS2 Land Use. The Project does not propose or require amendment of the site's current General Plan Land Use designation.

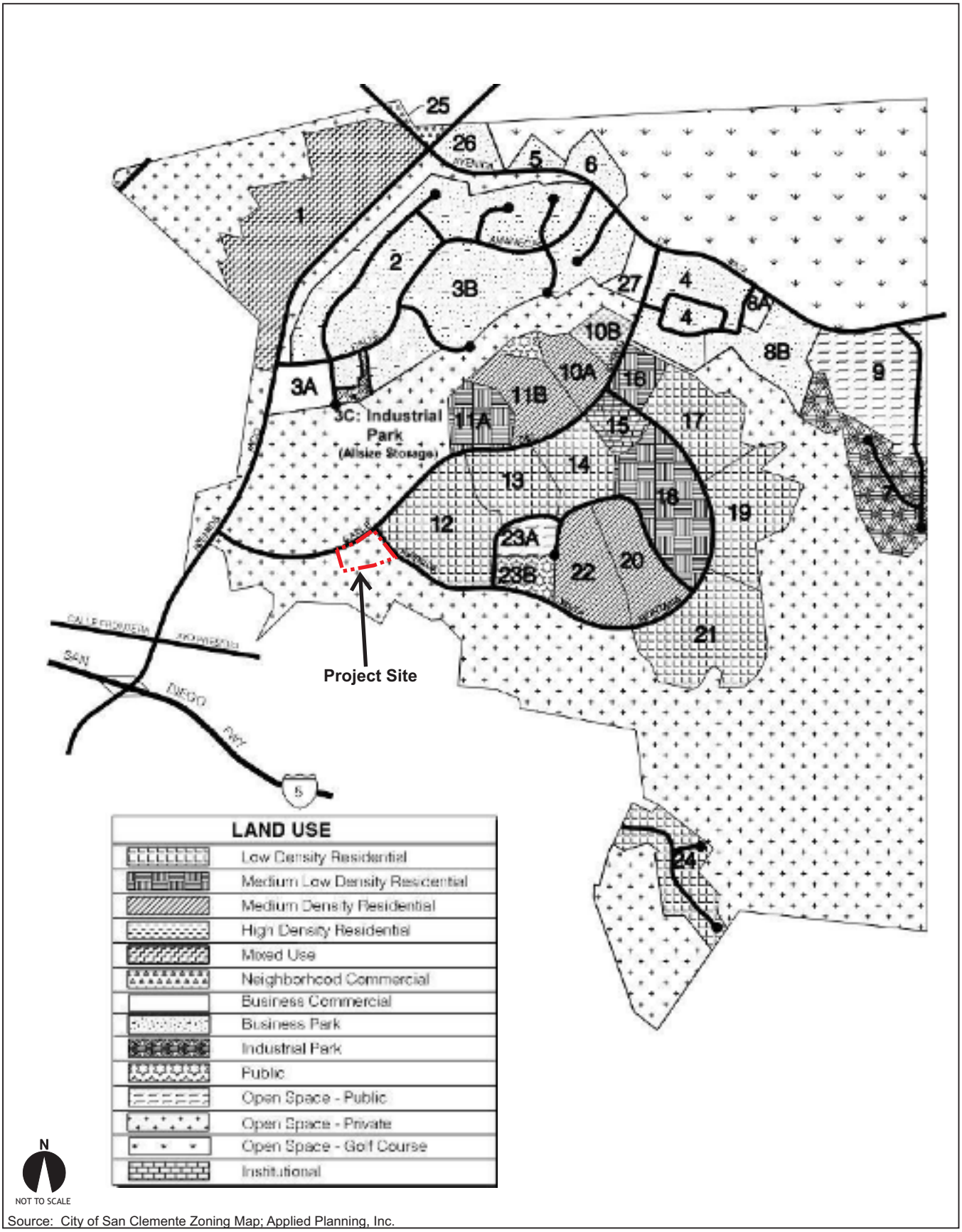
2.5.2 Zoning

Zoning of the Project site is established by the Rancho San Clemente Specific Plan (RSCSP, Specific Plan). The Specific Plan (Zoning) designation of the Project site is "Open Space - Private." Properties to the north (across Calle Del Cerro), south, and west are also designated Open Space - Private. To the east (across Avenida Vista Montana) properties are designated "Low Density Residential." Please refer to Figure 2.5-2, *Existing Zoning Designations*. The Specific Plan Open Space - Private designation allows for development of active open space uses (including those proposed by the Project) within the existing tennis club [Project] site (Specific Plan, p. 2-8).

The Project would also conform to Design Guidelines and Development Standards articulated within the Specific Plan. In instances where the Specific Plan is silent, the Project would conform to applicable City Design Guidelines. The Project does not propose or require amendment of the governing Specific Plan.

Source: City of San Clemente General Plan Map; Applied Planning, Inc.

Figure 2.5-1
General Plan Land Use Designations



Source: City of San Clemente Zoning Map; Applied Planning, Inc.

Figure 2.5-2
Existing Zoning Designations

2.6 PROJECT ELEMENTS

2.6.1 Demolition

As an initial action, the existing RSC Tennis & Fitness Club clubhouse, swimming pool, basketball courts, and 6 of the 19 existing tennis courts would be demolished. Demolition activities would occur over a period of approximately 20 work days. All demolition debris would be recycled, reclaimed, and/or disposed of consistent with *San Clemente Construction & Demolition Recycling Requirements* (San Clemente Ordinance #1286).

2.6.2 Site Preparation

Following demolition of existing facilities, the Project site would be cleared of any remaining surface features, graded and prepared for construction of the Project buildings and supporting facilities. Site preparation and grading activities would occur over a period of approximately 45 work days[2]. Preliminary grading concepts indicate that site preparation would require approximately 3,000 cubic yards of select fill (soil import), and 16,900 cubic yards of soil export. Any debris generated during site preparation activities would be recycled, reclaimed, and/or disposed of consistent with *San Clemente Construction & Demolition Recycling Requirements* (San Clemente Ordinance #1286).

2.6.3 Site Plan/Development Concept Overview

The Project Site Plan/Development Concept in context of surrounding land uses is presented at Figure 2.6-1. Figure 2.6-2 provides a rendered concept of the developed Project as integrated within the RSC Tennis & Fitness Club site. As indicated at Figure 2.6-2, the easterly portions of the Project site would be redeveloped with proposed clubhouse, outdoor recreational areas, swimming pools, and supporting parking and landscape areas. Thirteen existing tennis courts in the westerly portion of the Project site would be retained in place.

[2] It is noted that the MND air quality modeling conservatively assumes 25 days, establishing a potential likely maximum impact scenario.

Source: Life Time; Applied Planning, Inc.

Figure 2.6-1
Site Plan Concept

NOT TO SCALE
Source: Life Time; Applied Planning, Inc.

appliedplanning inc

Figure 2.6-2
Site Plan Concept 2

2.6.4 Facility Design Concepts

Proposed facility designs evidence Spanish Colonial Revival influences. Typical defining design elements and architectural features would include:

- Simple stucco walls;
- Red clay tile roofs;
- Arches as an architectural feature;
- Distinctive roof lines with low pitches; and
- Balconies and verandas.

At its highest point, the Project clubhouse building height would be 27 feet-6 inches. This coincides exactly with the high point of the existing building. Minimum building setback from Calle Del Cerro would be greater than 210 feet. Minimum building setback from Avenida Vista Montana would be greater than 245 feet.

A rendered view of the implemented Project as seen from adjacent Calle Del Cerro is presented at Figure 2.6-3. Figure 2.6-4 presents the Clubhouse design concept as seen from easterly adjacent parking areas. Figure 2.6-5 depicts the proposed Clubhouse as seen from westerly adjacent tennis court/pool areas.

Source: LMACG Ltd.; Applied Planning, Inc.

Figure 2.6-3
Project Concept Rendering (Street View-Calle del Cerro)

Source: LMACG Ltd; Applied Planning, Inc.

Figure 2.6-4
Project Concept Rendering (Parking Lot View Westerly)

Source: LMACG Ltd; Applied Planning, Inc.

Figure 2.6-5
Project Concept Rendering (Clubhouse View Easterly)

As illustrated in the comparative Existing Condition and Project renderings presented at Figures 2.6-6 through 2.6-9, the Project as implemented would not substantively alter views of the Project site as seen from off-site vantages. Please refer also to related discussions presented at IS/MND Section 3.0, *Environmental Evaluation*, Checklist Item I. *Aesthetics*.

Fire-rated construction with fully automatic sprinkler systems would be implemented. All final facility designs would conform to applicable provisions of the Rancho San Clemente Specific Plan, subject to review and approval by the City.

2.6.5 Vehicular Access and Circulation

Vehicular access to the Project site is provided by a STOP-controlled driveway connecting easterly to adjacent Avenida Vista Montana. The current driveway access connection to Avenida Vista Montana would be maintained as part of the Project. Driveway alignment within the Project site will be realigned to accommodate internal grade differentials.

Any additional roadway frontage improvements along Calle Del Cerro and Avenida Vista Montana that may be required will be implemented consistent with standard City Conditions of Approval. The Project does not require access alteration(s) or any off-site circulation system improvements. Please refer also to related discussions presented at IS/MND Section 3.0, *Environmental Evaluation*, Checklist Item XVI. *Transportation/Traffic*.

2.6.6 Parking

In support of the Project, 231 parking spaces (including 7 ADA spaces) would be provided. Project parking would equal estimated demands based on Parking Land Use Codes provided at San Clemente Zoning Code Table 17.64.050. Please refer to the Project Traffic and Parking Study[3] provided at IS/MND Appendix G.

[3] *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017, p. 26, Table 5-1: *Project Parking Requirements*.

Source: LMACG Ltd; Applied Planning, Inc.

Figure 2.6-6
Existing Project Condition-View Westerly

Source: LMACG Ltd; Applied Planning, Inc.

appliedplanning inc

Figure 2.6-7
Conceptual Project Rendering

Source: LMACG Ltd; Applied Planning, Inc.

Figure 2.6-8
Existing Project Condition (View Easterly)

Source: LMACG Ltd; Applied Planning, Inc.

appliedplanning inc

Figure 2.6-9
Conceptual Project Rendering (Court View)

Unless noted herein, or otherwise specified by the City, all parking facilities including parking stalls and drive aisles configurations would be designed and constructed pursuant to RSCSP and City requirements.

2.6.7 Landscape/Hardscape

Perimeter and internal landscape/hardscape features would be provided consistent with provisions of the RSCSP and City requirements. The implemented landscape/hardscape concept would enhance the appearance of parking areas, provide shade and visual interest, define entry/access points, accentuate site and architectural features, and provide screening of potentially visually intrusive elements. The Project Landscape Concept and Plant Legend are presented at Figures 2.6-10 and 2.6-11, respectively.

2.6.8 Streetscape

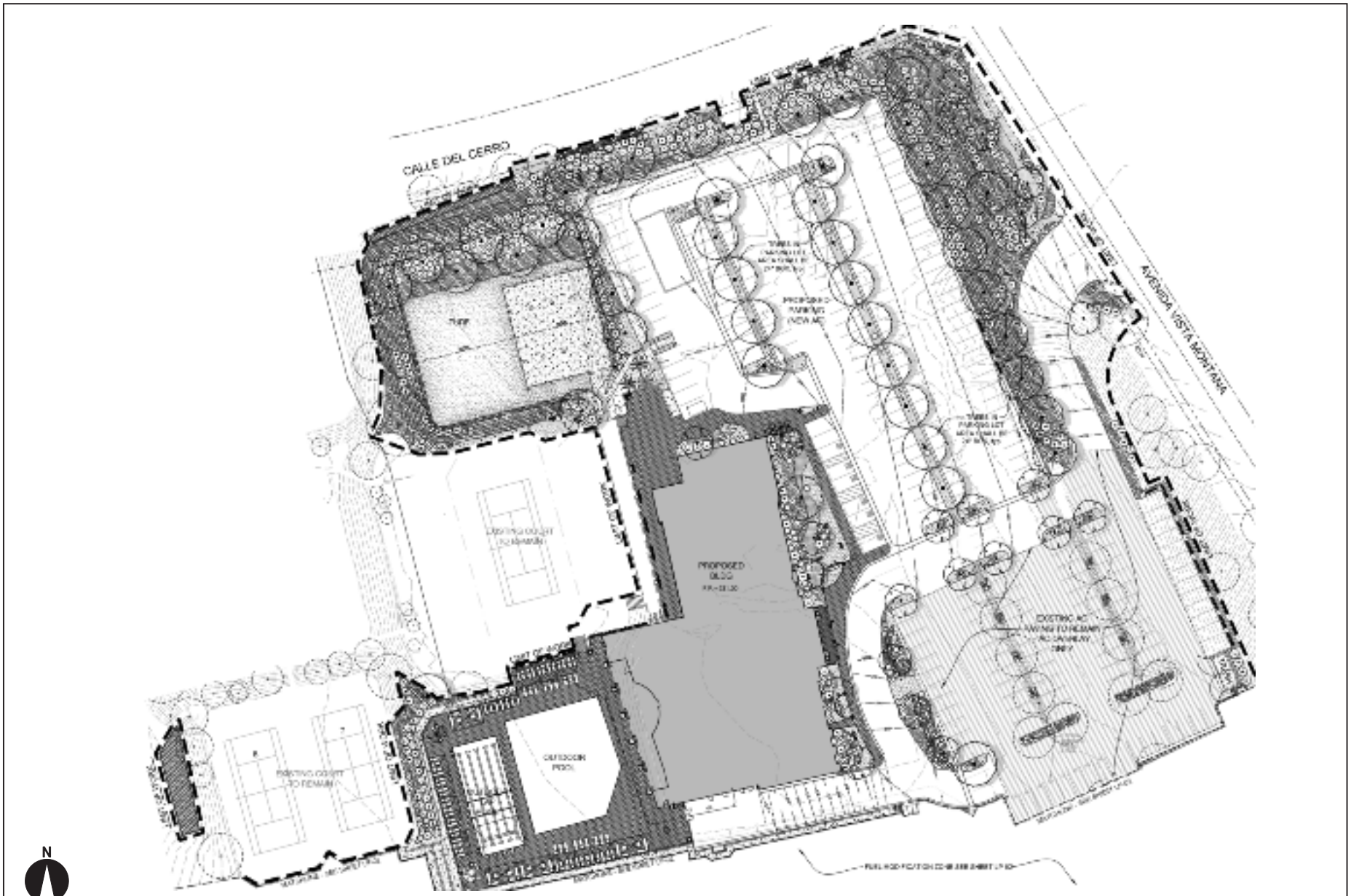
Existing sidewalks along the Calle Del Cerro and Avenida Vista Montana frontages provide pedestrian access to the Project site and adjacent properties. As part of the Project, existing sidewalks along the Project frontages would be maintained, and new ADA access to Calle Del Cerro would be provided. Landscape/streetscape concepts along the Project frontages are presented at Figure 2.6-10.

2.6.9 Signs

New identification and directional signs would be implemented. Pursuant to City Zoning Ordinance Section 17.16.250, a Project Master Sign Program has been submitted to the City. Representative sign configurations and design concepts are presented at Figure 2.6-12. Figure 2.6-13 illustrates the location of the proposed building signage.

2.6.10 Other Site Improvements and Amenities

Supporting site improvements to be implemented by the Project include, but are not limited to: decorative and security lighting; and directional and informational signage. Lighting and signage would conform to applicable provisions of the RSCSP, subject to review and approval by the City.

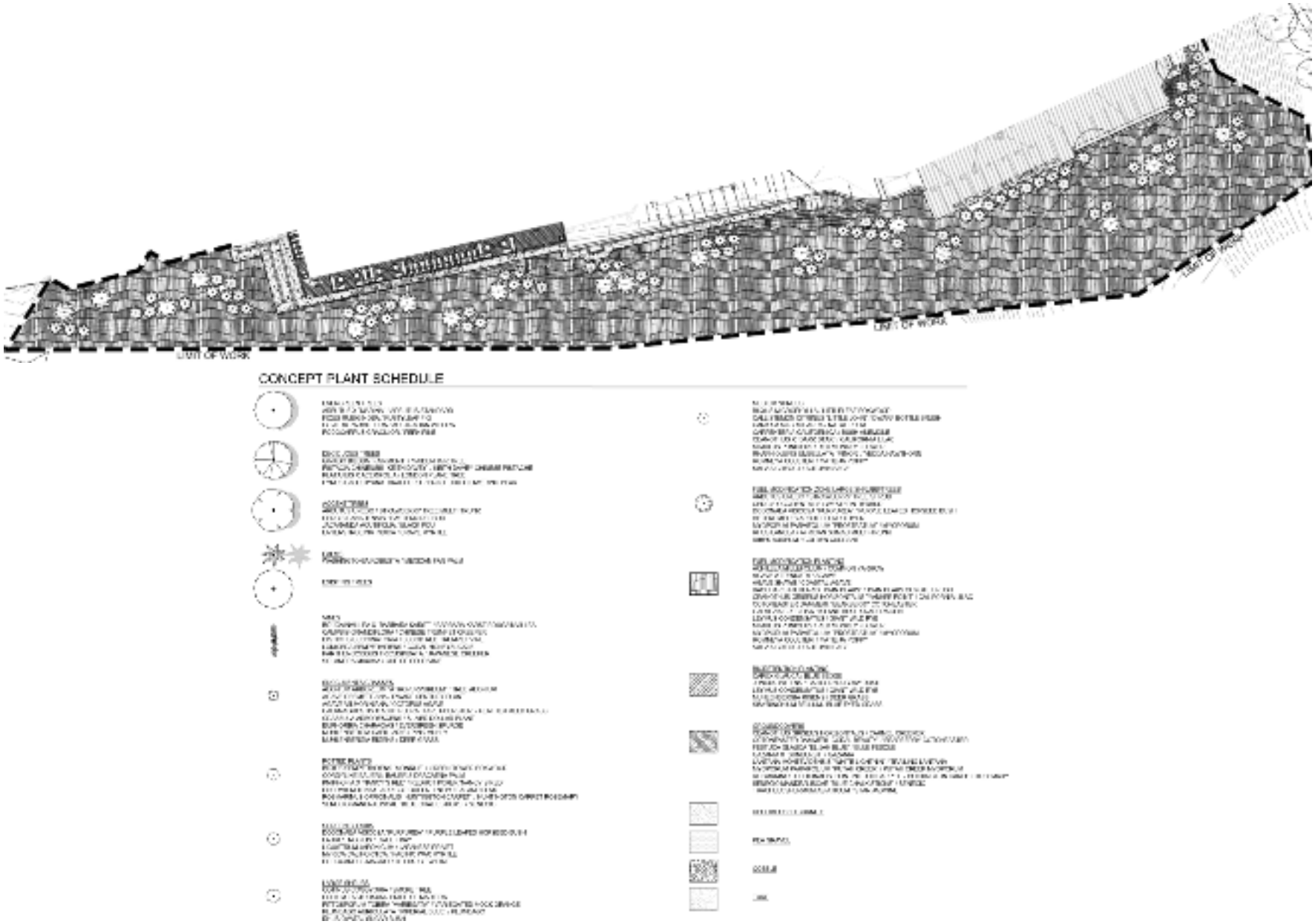


NOT TO SCALE

Source: RRM Design Group, Applied Planning, Inc.

appliedplanning inc

Figure 2.6-10
Landscape Concept

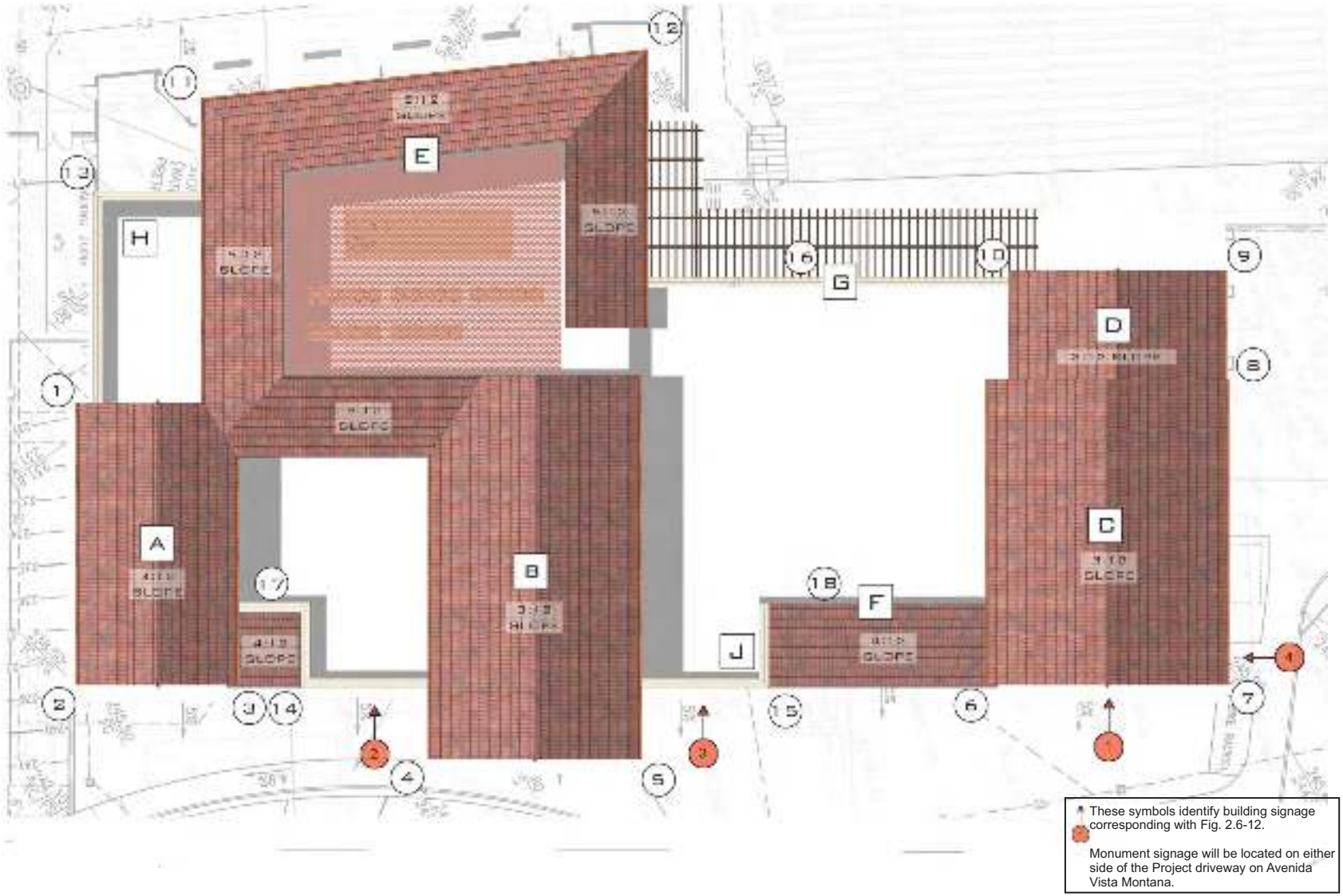


Source: RRM Design Group, Applied Planning, Inc.

Figure 2.6-11
Landscape/Plant Legend

Source: Life Time; Applied Planning, Inc.

Figure 2.6-12
Project Sign Concepts



Source: Life Time; Applied Planning, Inc.

Figure 2.6-13
Building Signage Locations

2.6.11 Infrastructure/Utilities

Infrastructure and utilities that would serve the Project site are summarized below.

2.6.11.1 Water/Sewer Services

Water and sewer services would be provided to the Project by the City of San Clemente Utilities Division. Water service extensions to the Project site would connect to existing facilities. Water lines (12-inch) exist within Calle Del Cerro and Avenida Vista Montana adjacent to the Project site. Sanitary sewer services to the Project would similarly be provided by connection to the existing sewer conveyance(s). Sewer lines (8-inch) exist within Calle Del Cerro and Avenida Vista Montana adjacent to the Project site. Final locations and alignments of service lines within the Project site, and connection to existing services would be as required by the City. Wastewater would be conveyed from the Project for treatment at the City of San Clemente Water Reclamation Plant (WRP).

Recycled water would be available to the Project from 6-inch lines within Calle Del Cerro and Avenida Vista Montana. Recycled water lines for non-potable purposes would be installed, and would connect to the City recycled water system.

2.6.11.2 Storm Water Management Systems

The Project storm water management system comprehensively includes proposed drainage improvements, and facilities and programs which act to control and treat storm water pollutants. Preliminary storm water management system concepts reflected in the Project Preliminary Water Quality Management Plan (WQMP) would direct storm water runoff from the developed Project site to on-site retention and bio-treatment areas. Treated storm waters would be released in a controlled manner to existing storm drains. A 66-inch storm drain exists in Calle Del Cerro adjacent to the Project site. A 54-inch storm drain exists in Avenida Vista Montana adjacent to the Project site. The Project Preliminary WQMP is provided at IS/MND Appendix E.

A Storm Water Pollution Prevention Plan (SWPPP) would be implemented, consistent with the requirements of the City's National Pollutant Discharge Elimination System

(NPDES) Permit and other water quality requirements or storm water management programs specified by the Regional Water Quality Control Board (RWQCB). In combination, implementation of the Project SWPPP, WQMP and compliance with NPDES Permit and RWQCB requirements act to protect City and regional water quality by preventing or minimizing potential storm water pollutant discharges to the watershed.

2.6.11.3 Solid Waste Management

It is anticipated that Project-generated solid waste would be conveyed by existing service providers to proximate Orange County landfills. The landfill nearest the Project site is the Prima Deshecha Landfill, located at 32250 La Pata Avenue, San Juan Capistrano, approximately 6 miles northerly of the Project site. The California Integrated Waste Management Act under the Public Resources Code requires that local jurisdictions divert/recycle at least 50% of all solid waste. Additionally, as of July 1, 2012, the State of California requires that all businesses that generate four cubic yards or more of refuse per week implement a recycling program. This requirement is set forth in Assembly Bill 341, passed by the California legislature in October 2011.

The City remains committed to its existing waste reduction and minimization efforts pursuant to the California Integrated Waste Management Act and AB 341. Compliance with the California Integrated Waste Management Act and AB 341, as implemented by the City, would be required of the Project.

2.6.11.4 Electricity

Electrical service to the Project would be provided by Southern California Edison (SCE). New lines installed pursuant to the Project would be placed underground. Alignment of service lines and connection to existing services would be as required by SCE. Surface-mounted equipment, such as transformers, meters, and service cabinets would conform to building setback requirements outlined in the RSCSP, or as otherwise required by the City and SCE.

To allow for, and facilitate, Project construction activities, provision of temporary SCE electrical services improvements would be required. The scope of such temporary improvements are considered to be consistent with, and reflected within the total scope of development proposed by the Project. Similarly, potential environmental impacts resulting from the provision of temporary SCE services would not be substantively different from, or greater than, impacts resulting from development of the Project in total.

2.6.11.5 Natural Gas

Natural gas service would be provided by the Gas Company. Existing service lines would be extended to the Project uses. Alignment of service lines and connection to existing services would be as required by the Gas Company.

2.6.11.6 Communications Services

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. As with electrical service lines, all existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters, service cabinets, etc., would be screened and would conform to building setback requirements outlined in the RSCSP, or as otherwise required by the City.

2.6.12 Fire Protection and Police Protection Services

Police and fire protection services are currently available to the Project site, and are described below.

- Fire Protection Services: Fire protection services are provided under contract with Orange County Fire Authority (OCFA). The OCFA provides rescue, fire prevention, fire investigation, hazardous materials response, public information/education, paramedic and ambulance transport services.

- Police Protection Services: Police protection services are provided under contract with Orange County Sheriff's Department (OCSD). The OCSD provides law enforcement services that include patrol, investigations, traffic enforcement, community support, drug education, parking control, and crime prevention.

2.6.13 Schools, Parks and Other Public Services

The City also provides or facilitates provision of a range of other services that would be generally available to the Project patrons and employees. These services include, but are not limited to: educational services, library services, arts and entertainment, and human services. These services and associated facilities are generally programmed and implemented in response to residential development and demands of resident populations. The Project recreational and fitness facilities would not substantively affect the City's resident population. As such, facilities proposed by the Project would not affect schools, parks, or other public services or their availability.

2.6.14 Energy Efficiency/Sustainability

Energy-saving and sustainable design features and operational programs would be incorporated into all facilities developed pursuant to the Project including, the California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City of San Clemente. The Project also incorporates and expresses the following design features and attributes promoting energy efficiency and sustainability.

- Redevelopment and revitalization of the subject site as proposed by the Project promotes efficient use of scarce real property. Further, redevelopment and reuse of the subject site supports sustainable and efficient use of resources by taking advantage of currently available utilities and public services.

- To reduce water demands and associated energy use, the Project uses would be required to implement a Water Conservation Strategy and demonstrate a minimum 20% reduction in indoor water usage when compared to baseline water demand (total expected water demand without implementation of the

Water Conservation Strategy).[4] Project uses would also be required to implement the following:

- Landscaping palette emphasizing drought-tolerant plants consistent with provisions of the State Model Water Efficient Landscape Ordinance and/or City of San Clemente requirements;

- Use of water-efficient irrigation techniques consistent with City of San Clemente requirements;

- U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and other plumbing fixtures.

2.6.15 Construction Traffic Management Plan

Temporary and short-term traffic detours and traffic disruptions could result during Project construction activities including implementation of access and circulation improvements noted above. Accordingly, the Project Applicant would be responsible for the preparation and submittal of a construction area traffic management plan (Plan) to be reviewed and approved by the City. Typical elements and information incorporated in the Plan would include, but would not be limited to:

- **Name of on-site construction superintendent and contact phone number.**

- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).

[4] Reduction of 20% indoor water usage is consistent with the current CalGreen Code performance standards for residential and non-residential land uses. Per CalGreen, the reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code.

- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).

- **Identification and Description of Material Storage Locations (if any).**

- **Location and Description of Construction Trailer (if any).**

- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.

- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.

- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the building permit. The Plan and its requirements would also be provided to all contractors as one required component of building plan/contract document packages.

2.7 PROJECT OPENING YEAR

For the purposes of this analysis, the Project Opening Year is defined as 2018.

2.8 PROJECT OBJECTIVES

The primary goal of the Project is the redevelopment of the subject site with a complementary mix of recreational and fitness facilities that respond to needs of the City of San Clemente. Supporting objectives of the Project include the following:

- Maintain an existing tennis club serving City of San Clemente residents.

- Transition and repurpose the Rancho San Clemente Tennis and Fitness Club site to a contemporary family-oriented tennis and recreational/fitness facility, with resulting fiscal benefits to the City of San Clemente. Benefits would include new sales tax revenues and increased property tax revenues.

- Preserve and enhance visual attributes of the Project site.

- Provide recreational and fitness facilities and programs that are responsive to community needs and that are compatible with proximate land uses.

- Implement land uses that are consistent with and support goals and objectives of the City of San Clemente General Plan and Rancho San Clemente Specific Plan.

- Take advantage of access and visual recognition provided by the Project site's corner location at the intersection of Calle Del Cerro at Avenida Vista Montana.

- Implement employment-generating land uses that would create new jobs available to City residents.

- Take advantage of available infrastructure.

2.9 INTENDED USE OF THIS MND

The City of San Clemente (City) is the Lead Agency for the purposes of CEQA because it has the principal responsibility and authority for consideration of Project discretionary actions and associated permitting. As the Lead Agency, the City is also responsible for preparing CEQA-compliant Project environmental documentation.

The Lead Agency will employ this MND in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project, to include potential effects of the Project's component elements. This MND will also be used by various Responsible Agencies, e.g., Air Quality Management District(s), Regional Water Quality Control Board(s), *et al*.; as well as utilities and service providers when such entities issue permits necessary to carry out the Project. For example, if this MND and/or its Mitigation Measures would require permits from the South Coast Air Quality Management District (SCAQMD), this MND will serve as the environmental assessment for such permits. (Please refer to California Code of Regulations, Sections 15050 and 15162.)

In employing this MND, the City and other agencies need to recognize that Project plans and development concepts identified herein are just that, plans and concepts which are subject to refinement as the Project is further defined. Recognizing the potential for these future minor alterations to the Project, this MND in all instances evaluates likely maximum impact scenarios that would account for these minor alterations. These refinements and/or minor revisions to development proposals do not typically warrant modified or revised environmental documentation. Notwithstanding, at the discretion and direction of the City, substantive modifications to the Project described herein may warrant additional environmental evaluation.

3.0 ENVIRONMENTAL EVALUATION

3.0 ENVIRONMENTAL EVALUATION

3.1 PROJECT TITLE

Life Time Athletic & Tennis Club – San Clemente Project

3.2 LEAD AGENCY NAME AND ADDRESS

City of San Clemente
910 Calle Negocio, Suite 100
San Clemente, CA 92673

3.3 PROJECT APPLICANT

Recupero and Associates, Inc.
31877 Del Obispo Street, Suite 204
San Juan Capistrano, CA 92675

3.4 PROJECT LOCATION

The 10.39-acre Project site is located within the boundaries of the Rancho San Clemente Specific Plan, near the southwest corner of Avenida Vista Montana and Calle Del Cerro, in the City of San Clemente. The site currently contains the existing Rancho San Clemente Tennis & Fitness Club, which includes an 11,000-square-foot clubhouse, 19 tennis courts, a swimming pool, and basketball courts.

3.5 GENERAL PLAN AND ZONING DESIGNATIONS

The Project site General Plan Land Use designation is OS2 – "Open Space - Private." Zoning of the Project site is established by the Rancho San Clemente Specific Plan (RSCSP, Specific Plan). The Specific Plan (Zoning) designation of the Project site is

"Open Space - Private." The Project does not propose or required amendment of existing General Plan Land Use or Zoning designations.

Existing Land Use Designations for the Project site are presented at IS/MND Section 2.0, *Project Description*, Figures 2.5-1 and 2.5-2.

3.6 EXPLANATION OF CHECKLIST CATEGORIES

CEQA suggests format and content for environmental analyses, including topical checklists to assist in evaluation of a project's potential environmental effects. The Checklist presented in this Section follows the Checklist format and presentation of information identified in the *CEQA Guidelines*, Appendix G.

3.6.1 EXPLANATION OF CHECKLIST CATEGORIES

Potential environmental effects of the Project are classified and described within the Checklist under the following general headings:

"No Impact" applies where the impact simply does not apply to projects like the one involved. For example, if the project site is not located in a fault rupture zone, then the item asking whether the project would result in or expose people to potential impacts involving fault rupture should be marked as "No Impact."

"Less-Than-Significant Impact" applies where the impact would occur, but the magnitude of the impact is considered insignificant or negligible. For example, a development which would only slightly increase the amount of surface water runoff generated at a project site would be considered to have a less-than-significant impact on surface water runoff.

"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." Incorporated mitigation measures should be outlined within the checklist and a discussion should be provided which explains

how the measures reduce the impact to a less-than-significant level. This designation is appropriate for a Mitigated Negative Declaration, where potentially significant issues have been analyzed and mitigation measures have been recommended.

"Potentially Significant Impact" applies where the project has the potential to cause a significant and unmitigable environmental impact. If there are one or more items marked as "Potentially Significant Impact," an EIR is required.

3.7 INITIAL STUDY CHECKLIST AND SUBSTANTIATION

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
I. AESTHETICS. Would the proposal:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to trees, rocks, outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect the day or nighttime views in the area?	☐	☐	☒	☐

Substantiation:

a, b) *No Impact*. General Plan Figure NR-1, *Aesthetics Resources*, illustrates designated scenic vistas and view corridors within the City. The Project site is not located

within a scenic vista or along a scenic highway, nor does not propose elements that would affect scenic vistas or scenic resources within a designated scenic highway. Implementation of the Project represents the redevelopment of an existing land use. It is noted that the height of the redeveloped Clubhouse would be constructed to the same height as the existing building. No historic buildings exist within the Project site, and development of the Project would not otherwise affect any historic resources. On this basis, the development of the Project would result in no impacts to scenic vistas. Likewise, the development of the Project would not result in any impacts to trees, rocks, outcroppings, and/or historic buildings within a state scenic highway.

c) *Less-Than-Significant Impact*. Design and development of the Project would be regulated by the Rancho San Clemente Specific Plan (RSCSP, Specific Plan). The City has previously determined that development consistent with the Specific Plan would not result in potentially significant aesthetic impacts, including but not limited to the potential for development to substantially degrade the existing visual character or quality of the site and its surroundings. The Project architectural concepts have been reviewed by the City Design Review Subcommittee; and it was determined that the Project is in compliance with the Specific Plan. Project compliance with the Specific Plan would preclude the potential for the Project to substantially degrade the existing visual character or quality of the site and its surroundings.

Moreover, the Project represents revitalization of an existing tennis club with contemporary development types that are compatible with and complement existing on-site and off-site land uses.

Based on the preceding discussion, the potential for the Project to substantially degrade the existing visual character and quality of the site and its surrounding is considered less-than-significant.

d) *Less-Than-Significant Impact*. Lighting would be provided consistent with lighting regulations and guidelines set forth by the Rancho San Clemente Specific Plan. The subject site is currently a source of urban light; Project lighting would not substantively alter ambient light levels. In instances where the Specific Plan may be silent, the compliance with lighting standards articulated in the City of San Clemente Municipal Code would be implemented. Compliance with Specific Plan and City Municipal Code standards would ensure that any potential light and glare impacts remain at a less-than-significant level.

Based on the preceding, the potential for the Project to create a new source of substantial light or glare, which would adversely affect the day or nighttime views in the area is less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
II. AGRICULTURE AND FOREST RESOURCES - In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range				

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Substantiation:

a) *No Impact*. There are no agricultural uses within the City of San Clemente. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The site currently accommodates the Rancho San

Clemente Tennis & Fitness Club, ruderal non-native vegetation, ornamental landscaping, asphalt pavement, and concrete surfaces. The redevelopment of a portion of the Project site would have no effect on farmlands.

b) *No Impact*. The Project site General Plan Land Use designation is OS2 – "Open Space - Private." Zoning of the Project site is established by the Rancho San Clemente Specific Plan. The Specific Plan (Zoning) designation of the Project site is "Open Space - Private." No Williamson Act contracts are in place for the subject site. The development of the Project would therefore not conflict with any existing agricultural zoning designations, nor affect any existing Williamson Act contract(s).

c,d) *No Impact*. No timberland or forest land is located on the Project site or in the vicinity. Development of the Project would have no effect on timberland or forest land.

e) *No Impact*. As discussed in the preceding paragraph II.a, there are no agricultural uses within the City of San Clemente. The Project does not involve other changes to the environment which could result in the conversion of farm land or forest land to other uses.

Sources: *City of San Clemente Centennial General Plan*, January 2016; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
III. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Substantiation:

To evaluate potential impacts in this regard, a Project-specific Air Quality Impact Analysis (AQIA) has been prepared. The following paragraphs summarize the information and conclusions presented in *Life Time Athletic & Tennis Club, Air Quality Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017, presented at IS/MND Appendix A.

a) *Less-Than-Significant Impact*. The Project site is located within the South Coast Air Quality Basin (SCAB), which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county SCAB and the Los Angeles County and Riverside County portions of what used to be referred to as the Southeast Desert Air Basin.

In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards (CAAQS and NAAQS). AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the AQMD released the Final 2016 AQMP. The 2016 AQMP evaluates current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. The 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories. The Project's consistency with the 2016 AQMP is discussed below:

- *Consistency Criterion No. 1: The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

The violations that Criterion No. 1 refers to are the state and federal ambient air quality standards (CAAQS and NAAQS). The CAAQS and NAAQS comprise,

and are reflected in, the SCAQMD Localized Significance Thresholds (LSTs). LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent NAAQS or CAAQS at the nearest sensitive receptor. LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO2), particulate matter ≤ 10 microns (PM_{10}) and particulate matter ≤ 2.5 microns ($PM_{2.5}$). The LST analysis is presented subsequently in the discussion of sensitive receptors.

It is noted that the CAAQS and NAAQS are not equivalent to SCAQMD regional emissions thresholds. The first AQMP consistency criterion specifically inquires whether or not a project would "result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations . . ." The only way to effectively answer this question is to determine if the NAAQS or CAAQS are exceeded – both of which are concentration-based thresholds, as opposed to the regional burden emissions "pounds per day" thresholds established by the SCAQMD. The SCAQMD employs these regional thresholds to allow for and establish uniform mitigation requirements for all projects. However, evaluating whether a project would generate emissions exceeding SCAQMD regional thresholds does not answer the first criterion question since these regional thresholds are not tied back to the CAAQS/NAAQS.

The Project Localized Significance Thresholds (LST) analysis (presented subsequently) substantiates that Project emissions would not exceed applicable LSTs. Emissions generated by the operation of the Project would therefore not violate the CAAQS or the NAAQS. Further, applicable best available control measures (BACMs) would be implemented, as well as applicable SCAQMD Rules, acting to further reduce the Project's already less-than-significant air pollutant emissions. Additionally, Project incorporation of contemporary energy-efficient technologies and operational programs; and compliance with SCAQMD emissions reductions and control requirements act to reduce stationary-source air emissions. These Project attributes and features are consistent with and

support AQMP air pollution reduction strategies and promote timely attainment of AQMP air quality standards.

On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

- *Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City of San Clemente General Plan is considered to be consistent with the AQMP.

Construction-Source Emissions

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.

Operational-Source Emissions

A project would conflict with the AQMP if its proposed land uses or other development attributes would exceed development intensity assumptions in the AQMP or increments based on the year of project buildout and phase. The AQMP reflects land uses and development anticipated under area general plans.

Consistency of a project with an adopted general plan demonstrates consistency with assumptions in the AQMP.

The Project site General Plan Land Use designation is OS2 – "Open Space - Private." The intent of the OS2 Land Use is to provide for "[p]rivately owned parklands, recreational facilities, passive open space areas and golf courses." (General Plan, p. LU-11). The Project land uses and development concepts are consistent with the stated intent of the General Plan OS2 Land Use. The Project does not propose or require amendment of the site's current General Plan Land Use designation. Based on the preceding discussion, the Project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion

Project emissions would not result in or cause NAAQS or CAAQS violations. The Project does not propose or require any change in land use designations, nor any increase in development intensity beyond that currently anticipated for the subject site. Project operations would not generate operational-source criteria pollutant emissions not already reflected in the current AQMP regional emissions inventory. The potential for the Project to conflict with or obstruct implementation of the applicable air quality plan is therefore considered less-than-significant.

b) *Less-Than-Significant Impact*. The latest SCAQMD/California Air Pollution Control Officers Association (CAPCOA)-approved version of the California Emissions Estimator Model (CalEEMod, v2016.3.1) was utilized to estimate Project-related air pollutant emissions levels. Project emissions levels were then compared to applicable SCAQMD thresholds to determine if air quality standards would be exceeded; or if Project emissions would contribute substantially to existing or projected air quality violations.[1]

[1] CEQA allows the applicable air pollution control district or air pollution management district, which in this case is the SCAQMD, to establish standards of significance (significance thresholds) for air quality impacts. Please refer to AQIA Section 3.2, *Standards of Significance*, for details regarding standards of significance adopted by SCAQMD and reflected in these discussions.

Construction-Source Emissions

Construction activities associated with the Project would result in emissions of CO, VOCs, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Construction-source emissions would result from the following construction activities:

- Demolition;
- Site Preparation;
- Grading;
- Building Construction;
- Paving;
- Architectural Coating; and
- Construction Workers Commuting.

Construction is expected to commence in September 2017 and would last through November 2018. Table III-1 compares Project construction-source air pollutant emissions with the applicable SCAQMD regional thresholds.

Table III-1
Construction-Source Emissions Summary (lbs./day)

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2017	6.57	88.32	26.11	0.13	11.45	7.12
2018	24.97	28.27	22.18	0.04	2.43	1.75
Maximum Daily Emissions	24.97	88.32	26.11	0.13	11.45	7.12
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Life Time Athletic & Tennis Club, Air Quality Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017.

As indicated at Table III-1, Project construction-source emissions would not exceed applicable SCAQMD regional significance thresholds and would therefore be less-than-significant.

Operational-Source Emissions

Operational activities associated with the proposed Project would result in emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources:

- Area Source Emissions (architectural coatings, consumer products, landscape equipment);
- Energy Source Emissions (natural gas and electricity); and
- Mobile Source Emissions (vehicles).

Table III-2 summarizes Project operational-source daily emissions in comparison with the applicable SCAQMD regional thresholds.

Table III-2
Summary of Peak Operational-Source Emissions (Pounds per day)

Emissions Source	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Summer Scenario						
Area Source Emissions	1.05	2.70E-04	0.029	0.00	1.00E-04	1.00E-04
Energy Source Emissions	0.028	0.25	0.21	1.52E-03	0.019	0.019
Mobile Emissions	3.02	13.22	33.31	0.089	6.85	1.91
Maximum Daily Emissions	4.10	13.47	33.55	0.095	6.87	1.93
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Scenario						
Area Source Emissions	1.05	2.70E-04	0.029	0.00	1.00E-04	1.00E-04
Energy Source Emissions	0.028	0.25	0.21	1.52E-03	0.019	0.019
Mobile Emissions	2.89	13.46	31.97	0.089	6.85	1.91
Maximum Daily Emissions	3.96	13.71	32.21	0.090	6.87	1.93
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Life Time Athletic & Tennis Club, Air Quality Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017.

As shown at Table III-2, above, Project operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance for any criteria pollutant, and would therefore be less-than-significant.

Summary

Based on the information presented at Tables III-1 and III-2, above, Project emissions would not exceed applicable SCAQMD regional thresholds of significance for any criteria pollutant. As such, the potential for the Project to violate any air quality standard or contribute substantially to an existing or projected air quality violation is considered less-than-significant.

c) *Less-Than-Significant Impact*. The Project area is designated as an extreme non-attainment area for ozone and a serious non-attainment area for $PM_{2.5}$. Germane to these federal non-attainment conditions, the Project-specific evaluation of emissions presented herein substantiates that Project air pollutant emissions would not exceed applicable SCAQMD significance thresholds. The fact that the Project emissions would not exceed applicable SCAQMD thresholds indicates that the Project impacts in these regards would be less-than-significant on an individual basis, and under SCAQMD significance criteria, would not be cumulatively considerable. Further, *CEQA Guidelines* Section 15064 (h)(3) stipulates that for an impact involving a resource that is addressed by an approved plan or mitigation program, the lead agency may determine that a project's incremental contribution is not cumulatively considerable if the project complies with the adopted plan or program. In addressing cumulative effects for air quality, the AQMP is the appropriate document to use because it sets forth a comprehensive program that will lead the Basin, including the Project area, into compliance with all federal and State air quality standards. The AQMP utilizes control measures and related emission reduction estimates based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. As previously discussed at preceding paragraph III.a, the Project is consistent

with the AQMP. Based on the preceding discussion, the potential for the Project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard is considered less-than-significant.

d) *Less-Than-Significant Impact*. The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual and cumulatively significant impact. A sensitive receptor is defined as a location where individuals most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality) can remain for 24 hours, such as residences, schools, day care centers, playgrounds, and medical facilities.

Receptors

Potential localized air quality impacts were evaluated at the five sensitive receptor locations nearest the Project site, as illustrated at Figure III-1.

Emissions Considered

SCAQMD's Methodology clearly states that "off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

N

NOT TO SCALE

Source: Urban Crossroads; Applied Planning, Inc.

Figure III-1
Sensitive Receptor Locations

Construction-Source Emissions

Table III-3 identifies the construction-source emissions at the nearest receptor location (R5) in the vicinity of the Project. Since air quality emissions dissipate with distance, if no LST exceedances are projected at the nearest receptor, other receptors located farther from the source would likewise not result in any LST exceedances.

Table III-3
Construction-Source Emissions
Localized Significance Summary

	NO_x	CO	PM_{10}	$PM_{2.5}$
Site Preparation Emissions				
Maximum Daily Emissions	77.14	25.08	11.25	7.07
SCAQMD Localized Threshold	162	1,660	32	9
Threshold Exceeded?	**No**	**No**	**No**	**No**
Grading Emissions				
Maximum Daily Emissions	52.24	18.32	5.37	3.37
SCAQMD Localized Threshold	141	1,271	25	7
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: *Life Time Athletic & Tennis Club, Air Quality Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017.

As shown above at Table III-3, localized construction emissions would not exceed the applicable SCAQMD LSTs. As such, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is considered less-than-significant.

Operational-Source Emissions

According to SCAQMD LST methodology, LSTs would only apply to the operational phase of a proposed project, if the project under consideration includes substantive stationary emissions sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). Given the recreational nature of the Project, and the lack

of substantive stationary emissions sources, no long-term localized significance threshold analysis is required.

CO Hot Spots

It has long been recognized that adverse CO concentrations (CO hot spots) may result from vehicular emissions, primarily when vehicles are idling at congested intersections. As substantiated in detail in the Project AQIA, Project-related traffic would reach the volume required to generate a CO hot spot; therefore, modeling of Project-specific CO hot spots is unnecessary. The Air Quality Impact Analysis determined that CO hot spots are not an environmental concern for the Project (AQIA, p. 35).

Summary

Based on the preceding discussions, localized construction-source emissions would not exceed the applicable SCAQMD LSTs. Additionally, given the scope and nature of the Project, analysis of localized operational-source emissions is not applicable. Further, the Project would not generate traffic volumes or result in vehicle congestion that would result in or cause CO hot spots. As such, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is considered less-than-significant.

e) *Less-Than-Significant Impact*. Temporary, short-term odor releases are potentially associated with Project construction activities. Potential odor sources include, but are not limited to: asphalt/paving materials, glues, paint, and other architectural coatings. It is expected that any associated odors would quickly dissipate and would not adversely affect vicinity properties.

From an operational perspective, substantial odor-generating land uses include agricultural activities, feedlots, wastewater treatment facilities, landfills, or various heavy industrial uses. The Project does not propose any such uses or activities that would result in potentially significant operational-source odor

impacts. Potential sources of operational odors generated by the Project would include frequent disposal of miscellaneous commercial refuse.

Moreover, construction-source and operational-source odor impacts are controlled as a byproduct of hazardous/potentially hazardous materials handling plans and Best Management Practices implemented under SCAQMD Rule 402 et al. Compliance with all SCAQMD Rules regulating and controlling odors and odor sources would be required of the Project.

Consistent with City requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Based on the preceding, the potential for the Project to create objectionable odors affecting a substantial number of people is considered less-than-significant.

Sources: *Life Time Athletic & Tennis Club, Air Quality Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the Project:				
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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 wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact*. The Project site is entirely developed. Landscaping includes non-native shrubs, grass cover and common trees. Ornamental landscaping typically does not support candidate, sensitive, or special status species. The site is devoid of any natural habitat and has no significant biological resource value. Based on the preceding, the potential for the Project to have a

substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species is considered less-than-significant.

b) *No Impact*. No riparian habitat, native habitat, or other sensitive natural community exists within the Project site. Any existing site vegetation serves as habitat for local common species that would likely relocate subsequent to implementation of the Project. Based on the preceding, development of the Project would have no impact on any riparian habitat or other sensitive natural community.

c) *No Impact*. No wetlands areas exist within the Project site. This environmental concern is thus not applicable to implementation of this proposal. The development of the Project would have no impact on wetlands habitat.

d) *Less-Than-Significant Impact*. Due to the disturbed nature of the Project site and surrounding roadways and development, the potential for native wildlife species to use the Project site as a migratory corridor or nursery site is unlikely. On this basis, the potential for the Project to 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 wildlife nursery sites is considered less-than-significant.

e, f) *Less-Than-Significant Impact*. There are no protected tree species or other biologically significant resources on the Project site. The City of San Clemente is located within the Orange County Southern Subregion Habitat Conservation Plan (HCP). As previously mentioned, the site is entirely developed, and contains typical urban landscaping, such as non-native shrubs, grass cover and common trees.

Upon its approval in 1985, the City found the original tennis club use was consistent with the Rancho San Clemente Specific Plan, the City's General Plan, and the site's zoning designation of Private Open Space; and that it would not conflict with the HCP. In as much as the proposed land use is consistent with the original approvals, the Project would therefore be consistent with these governing documents, and also would not conflict with the adopted 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 applicable to the subject site. On this basis, the potential for the Project to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact.* California Code of Regulations, Title 14, Chapter 3 §15064.5 defines a historical resource as (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource included in a local register of historical resources; or (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically or otherwise significant.

No unique or historical resources are known to exist on the Project site. Any historical resources that may have been present at one time have likely been disturbed by previous construction and other on-site human activities. No on-site buildings or features are listed (or eligible for listing) in the California Register of Historical Resources. Further, the City maintains a Designated Historic Resources List and a Landmark List that identify historic buildings, features, sites and districts worthy of preservation. No on-site buildings or features are included on these City-maintained lists.

Based on the preceding, the potential for the Project to cause a substantial adverse change in the significance of a historical resource is considered less-than-significant.

b,c) *Less-Than-Significant With Mitigation Incorporated*. There is no evidence suggesting that the Project site would contain potentially significant archaeological, paleontological or unique geological elements. Any such resources that may have been present at one time have likely been disturbed by the previous construction and other on-site human activities. Regardless, it is possible that such resources could be encountered during grading and excavation activities. As such, the following mitigation will preclude impacts in this regard.

CR-1 To ensure avoidance of adverse impacts to potentially significant archaeological, paleontological, and geologic resources during the initial grading and excavation activities for the proposed clubhouse and pool, the Project site shall be monitored by a professional archaeological consultant meeting Secretary of Interior's Standards and Guidelines for Archaeological and Historic Preservation [Code of Federal Regulations, 36 CFR Part 61]. The monitor shall have the authority to halt any activities affecting potentially significant resources until a program for addressing the resource(s) is developed and implemented.

With the incorporation of Mitigation Measure CR-1, the potential for the Project to cause a substantial adverse change in the significance of an archaeological, paleontological, or unique geological element is considered less-than-significant.

d) *Less-Than-Significant Impact*. The likelihood of encountering human remains in the course of Project development is minimal. However, as required by California Health and Safety Code Section 7050.5, should human remains be found, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains were found to be prehistoric, the coroner would coordinate with the California Native American Heritage Commission as required by State law.

Based on compliance with these existing regulations, the Project's potential to disturb any human remains, including those interred outside of formal cemeteries is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the Project:				
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 Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Substantiation:

To evaluate potential impacts in this regard, a site-specific Geotechnical Investigation has been completed for the Project site. The report (*Geotechnical Investigation, Proposed Life Time Fitness, 111 Avenida Vista Montana, San Clemente, California* [Geotechnical Professionals, Inc.] April 12, 2016) is provided at Appendix B to this IS/MND.

a.i) *Less-Than-Significant Impact*. There are no known active or potentially active faults, with known surface traces, traversing the City of San Clemente. The two nearest active faults are the Glen Ivy North fault (about 17 miles northeast of the City's Sphere of Influence), and an unnamed offshore fault (about 11 miles southwest of the City). The site is not located within an Alquist-Priolo Special Study Zone. As such, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault is therefore considered less-than-significant.

a.ii) *Less-Than-Significant Impact*. The Project site is located in a region known to be seismically active and strong seismic ground-shaking is anticipated during an earthquake. However, because the site is not located in an Alquist-Priolo Fault Study Zone, potential impacts would not be higher at the Project site than elsewhere in the region.

As part of the City's standard review and approval of development projects, any new development must provide a geotechnical study for review and approval by the City Engineer, and comply with the requirements of the approved geotechnical report and Uniform Building Code (UBC) or California Building Code (CBC), as appropriate. To this end, a site-specific Geotechnical Investigation has been completed for the Project site. The report (*Geotechnical Investigation, Proposed Life Time Fitness, 111 Avenida Vista Montana, San Clemente, California* [Geotechnical Professionals, Inc.] April 12, 2016) is provided at Appendix B to this IS/MND. The Geotechnical Investigation presents site-specific design and construction requirements, and concludes that "…from a geotechnical viewpoint, it is feasible to develop the site as proposed" (Geotechnical Investigation, p.6). Compliance with these requirements would reduce potential risks relative to geologic or soils conditions to acceptable levels. The Project does not propose uses or activities that would contribute to or exacerbate any existing strong seismic groundshaking hazard conditions. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic groundshaking is considered less-than-significant.

a.iii) *Less-Than-Significant Impact*. Liquefaction and seismically induced settlement or ground failure are generally associated with strong seismic shaking in areas where ground water tables are at relatively shallow depths (within 50 feet of the ground surface) and/or when the area is underlain by loose, cohesionless deposits. During a strong groundshaking event, saturated, cohesionless soils may acquire a degree of mobility to the extent that the overlying ground surface distorts. In extreme cases, saturated soils become suspended in groundwater and become fluid-like.

According to General Plan Figure S-1, *Geologic, Seismic, and Soils Hazards Map*, the Project site is not located within an area where liquefaction is expected. Additionally, groundwater was not encountered within the exploratory borings

(maximum depth of 30 feet below ground surface) performed as part of the Geotechnical Investigation. The Investigation determined that the underlying Capistrano Bedrock is not considered to be water bearing. The Project does not propose uses or activities that would contribute to or exacerbate any existing liquefaction hazard conditions. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving liquefaction is considered less-than-significant.

a.iv) *Less-Than-Significant Impact*. According to General Plan Figure S-1, *Geologic, Seismic, and Soils Hazards Map*, the Project site is located within an area where the potential for landslides exists. However, as part of the previous on-site development, any evidence of historic landslides was stabilized, and any landslide deposits were removed (Geotechnical Investigation, p.4). The Project site is essentially level, and as such, is not internally susceptible to landslide. The Project does not propose uses or activities that would contribute to or exacerbate any existing landslide hazard conditions. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides is considered less-than-significant.

b) *Less-Than-Significant Impact*. Construction activities associated with the proposed Project would temporarily expose underlying soils, thereby increasing their susceptibility to erosion until the Project is fully implemented. Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved Storm Water Pollution Prevention Plan (SWPPP). Further, the proposal involves the redevelopment of a portion of an already-developed site; as such, the Project does not propose to significantly alter existing topography and would not substantively affect existing erosion conditions. As supported by the preceding

discussions, the potential for the Project to result in substantial soil erosion or the loss of topsoil is considered less-than-significant.

c,d) *Less-Than-Significant With Mitigation Incorporated.* On-site soils include non-structural compacted fill soils and underlying Capistrano Bedrock. The Geotechnical Investigation concluded that the on-site soils are highly expansive and may also be subject to settlement. The Geotechnical Investigation provides recommendations regarding grading, site preparation, and building foundations; and concludes that development of the site is feasible from a geotechnical standpoint, provided that the recommendations of the Investigation are included within the Project design and construction processes. As such, the following mitigation is required.

GEO-1 Prior to the issuance of grading permits, and to the satisfaction of the City, the Project Applicant shall ensure that the recommendations, performance standards and requirements established within the Final Project Geotechnical Engineering Investigation are incorporated into the Project design and construction plans. A qualified geotechnical engineer shall be retained on site to ensure that Project implementation is realized consistent with specifications and requirements identified in the Project Geotechnical Engineering Investigation.

With the incorporation of Mitigation Measure GEO-1, potential impacts related to unstable soils are considered less-than-significant.

e) *No Impact*. Sewer service currently exists at the site. No septic tanks or other alternative wastewater disposal systems are proposed. Thus, there is no potential for adverse impacts to result from inadequate soils in this regard.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; *Geotechnical Investigation, Proposed Life Time*

Fitness, 111 Avenida Vista Montana, San Clemente, California (Geotechnical Professionals, Inc.) April 12, 2016; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Substantiation:

To evaluate potential impacts in this regard, a Project-specific Greenhouse Gas Analysis (GHGA) has been prepared. The following paragraphs summarize the information and conclusions presented in *Life Time Athletic & Tennis Club, Greenhouse Gas Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017, presented at IS/MND Appendix C.

a) *Less-Than-Significant Impact. CEQA Guidelines* 15064.4 (a) (1) states that a lead agency may use a model or methodology to quantify greenhouse gas emissions associated with a project. On October 14, 2016, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2016.3.1. The purpose of this model is to accurately calculate construction-source and operational-source criteria pollutant (NOx, VOC, PM_{10}, $PM_{2.5}$, SOx, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG

reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod™ has been used for this Project.

The City of San Clemente has not adopted a numeric threshold for determining the significance of project-level greenhouse gas (GHG) emissions impacts. As such, the Greenhouse Gas Analysis utilized a screening threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO2e) annually to assess Project impacts. This approach, based on SCAQMD guidance, is widely accepted by numerous lead agencies within Orange County and the South Coast Air Basin.

Construction-Source Emissions

Construction activities associated with the Project would result in emissions of CO_2 and CH_4. Project construction-source GHG emissions are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

Operational-Source Emissions

Operational activities associated with the Project would result in emissions of CO_2, CH_4, and N_2O from the following primary sources, which are discussed in the following paragraphs:

- Area-Source Emissions;
- Energy-Source Emissions;
- Mobile-Source Emissions;
- Solid Waste; and
- Water Supply, Treatment and Distribution.

Area-Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy-Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.

Mobile-Source Emissions

GHG emissions would also result from mobile sources associated with the Project. These mobile-source emissions would result from the typical daily operation of motor vehicles by visitors, employees, and residents.

Solid Waste Management

The Project residential land uses would result in the generation and disposal of solid waste. A large percentage of solid waste generated by the Project would be diverted and recycled consistent with requirements of AB 39, yielding a minimum reduction of 50 percent in Project waste that would be transported to and disposed of at area landfills. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

Water Supply, Treatment and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to

convey, treat and distribute water depends on the volume of water, as well as the sources of the water.

Total Project GHG Emissions

Table VII-1 presents the annual GHG emissions that can be expected to be generated from the preceding sources.

Table VII-1
Total Project Greenhouse Gas Emissions (Annual) (Metric Tons Per Year)

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	12.55	2.39E-03	0.00	12.61
Area	6.85E-03	2.00E-05	2.20E-03	7.32E-03
Energy	199.86	7.14E-03	0.00	200.69
Mobile Sources	1,390.42	0.08	0.00	1,392.53
Waste	52.07	3.08	0.00	128.99
Water Usage	17.66	0.09	2.19E-03	20.50
Total CO_2E (All Sources)	**1,755.33**			
SCAQMD Threshold	**3,000**			
Threshold Exceeded?	**NO**			

Source: *Life Time Athletic & Tennis Club, Greenhouse Gas Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017.
Note: Totals obtained from CalEEMod and may not total 100% due to rounding.
Table results include scientific notation; E is used to represent times ten raised to the power of (which would be written as x 10b") and is followed by the value of the exponent

As shown above, the annual GHG emissions associated with the Project are estimated to be 1,755.33 MTCO2e. Direct and indirect emissions associated with the Project are compared with the SCAQMD threshold of significance of 3,000 MTCO2e per year. Since Project emissions would not exceed the threshold, the Project's potential to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment is considered less-than-significant.

b) *Less-Than-Significant Impact.* The following paragraphs discuss the Project's consistency with applicable plans, policies and/or regulations.

City of San Clemente Climate Action Plan

The Climate Action Plan (CAP) includes a 2009 communitywide greenhouse gas baseline and establishes GHG reductions goals for 2020 and 2030 similar to AB 32 and SB 32. The CAP offers alternative measures to reduce emissions from transportation, energy consumption, water consumption, wastewater generation, and solid waste disposal sources. Compliance with all City measures adopted for the purpose of reducing GHG emissions would be required of the Project, precluding any conflicts with the City of San Clemente Climate Action Plan.

Consistency with AB 32

ARB's Scoping Plan identifies strategies to reduce California's greenhouse gas emissions in support of AB 32. Reduction measures are grouped into the following action categories:

- California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.
- California Light-Duty Vehicle Greenhouse Gas Standards.
- Energy Efficiency.
- Renewables Portfolio Standards.
- Low Carbon Fuel Standard.
- Regional Transportation-Related Greenhouse Gas Targets.
- Vehicle Efficiency Measures.
- Goods Movement.
- Million Solar Roofs Program.
- Medium- and Heavy-Duty Vehicles.
- Industrial Emissions.
- High Speed Rail.
- Green Building Strategy.

- High Global Warming Potential Gases.
- Recycling and Waste.
- Sustainable Forests.
- Water.
- Agriculture.

Development and operations of the Project would not conflict with applicable provisions of the Scoping Plan. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. The Project's consistency with the action categories contained within the State Scoping Plan is summarized at GHGA Table 3-2. As summarized, some categories are applicable to and supported by the Project, such as energy efficiency, water conservation, recycling, and landscaping. Others, while not directly applicable to the Project, would not be obstructed by the Project.

Consistency with SB 32

SB 32 requires the State to reduce statewide greenhouse gas emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80 percent below 1990 levels by 2050.

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317

to 415 MTCO2e per year, "indicating that existing state policies will likely allow California to meet its target [of 2020 levels under AB 32]." CALGAPS also showed that by 2030, emissions could range from 211 to 428 MTCO2e per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40 percent below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Though the research indicated that the emissions would not meet the state's 80 percent reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

The Project reduces its GHG emissions to the maximum extent feasible. Additionally, the Project does not propose facilities or operations that would substantively interfere with or impede any future city-mandated, county-mandated, state-mandated, or federally-mandated retrofit obligations enacted or promulgated to legally require development to assist in meeting state-adopted greenhouse gas emissions reduction targets, including those established under Executive Order S-3-05, Executive Order B-30-15, or SB 32.

Construction and operation of the Project would not interfere with the state's implementation of (i) Executive Order B-30-15 and SB 32's target of reducing statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Nor would the Project interfere with implementation of GHG reduction plans described in the CARB's Updated Scoping Plan, including state measures to: provide 12,000 MW of renewable distributed generation by 2020; measures identified by the California Building Commission mandating net zero energy homes in the building code after 2020; or existing building retrofits under AB 758.

Summary

This evaluation acknowledges that GHG emissions would be generated by the construction and operations of the Project. However, as demonstrated within this discussion and the Project GHG Analysis (IS/MND Appendix C), conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases would not occur. Moreover, though the City has not adopted a quantified GHG emissions threshold, the analysis presented here demonstrates that Project emissions would not exceed proposed screening level GHG emissions thresholds under development by SCAQMD. On this basis, the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Life Time Athletic & Tennis Club, Greenhouse Gas Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 12, 2017; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	☐	☒	☐	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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 the people residing or working in the project area?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	☐	☐	☒	☐
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact*. The Project does not propose uses or activities that might require the substantial transportation, use or storage of hazardous or potentially hazardous materials. During construction activities, there would be limited transport of potentially hazardous materials (e.g., gasoline, diesel fuel, paints, solvents, fertilizer, etc.) to and from the Project site. The transport of these

materials is required to meet all City and County Hazardous Materials Management Plans and regulations.

Commercial use of cleaning solvents and typical pool supplies, such as chlorine and muriatic acid, would be used on-site. Compliance with existing regulations, as identified above, also reduces the potential for risk of accidental explosion or release of hazardous substances during materials transport. On the basis of the preceding discussion, the potential for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials is considered less-than-significant.

b) *Less-Than-Significant With Mitigation Incorporated*. A field survey was conducted at the site to identify any environmental concerns, such as contamination, distressed vegetation, petroleum-hydrocarbon staining, waste drums, illegal dumping, or improper waste handling/storage. No evidence of environmental concerns was identified; however, due to the age of the on-site structures that are planned for demolition, the Phase I recommended that a survey for Asbestos-Containing Materials (ACMs) and Lead-Based Paint (LBP) be performed.

To this end, samples of existing floor coverings (and associated adhesives), drywall/joint compound or interior plaster, acoustic ceiling textures, acoustic ceiling tiles, baseboard and associated adhesives, window putty, roof coverings, penetration tar and sealants, exterior stucco, thermal system insulation, and other insulation materials were taken to be analyzed for the presence of asbestos.

According to the Sampling and Testing Report (*Report Asbestos Sampling & Lead Testing* (Altec Testing & Engineering, Inc.) July 27, 2015 [IS/MND Appendix D]), none of the materials sampled were determined to contain asbestos.

The Sampling and Testing Report did note, however, that ACMs may still exist in areas that were inaccessible during the survey (namely thermal system

insulation (TSI) flooring materials that may exist below the sub-floors). Additionally, it should be assumed that asbestos-cement utility pipes may exist underground. This type of pipe was often used for water delivery and electrical systems, and should be assumed to exist under the site. As such, the following mitigation is required.

HAZ-1 If suspected ACMs are identified during the course of demolition, all activities involving the ACMs shall be halted, and the suspect materials shall be evaluated prior to their removal. Should ACMs be confirmed, they shall be properly handled and removed by a registered and licensed asbestos contractor.

HAZ-2 An investigation targeted at identifying asbestos-cement utility piping shall be performed at the site prior to any excavation or grading activities. If this type of piping is identified, the materials shall be properly handled and removed by a registered and licensed asbestos contractor.

Surfaces within the existing structures were also tested for the presence of lead in concentrations above the established action level of 1.0 milligram per square centimeter (mg/cm^2) that could be impacted during the proposed demolition activities. Out of the 52 materials/locations that were tested, nine were found to contain lead in excess of the established action level (see Table 2, pg. 12 of the Sampling and Testing Report). The following mitigation is required to assure all materials are handled and disposed of properly.

HAZ-3 Prior to any demolition activities, bulk samples shall be collected and analyzed in accordance with applicable guidelines to determine total lead concentrations, confirm previous results, and evaluate waste disposal options.

HAZ-4 All lead removal shall be performed by a qualified contractor in compliance with all applicable rules and regulations. All lead coated components that are deteriorated or peeling should be stabilized prior to demolition activities.

Exposure assessments and air monitoring should be conducted during the initial phases of any lead abatement to determine the amount of personal protection required by workers. Lead components shall be properly packaged and characterized, utilizing proper laboratory analysis as necessary to determine disposal requirements.

HAZ-5 If the exterior tested components contain lead above 1.0 mg/cm², soil samples shall be collected along the building foundation perimeter and analyzed to establish baseline lead levels in the soil prior to lead abatement. The same procedure shall be performed again upon completion of the lead removal to ensure that soil was not additionally contaminated.

Mitigation Measures HAZ-1 through HAZ-5 ensure the proper handling and disposal of all lead and asbestos-containing materials, and ensure worker safety during all removal activities. No other on-site hazards have been identified. With incorporation of Mitigation Measures HAZ-1 through HAZ-5, the potential for the Project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment is considered less-than-significant.

c) *Less-Than-Significant Impact*. The Project site is not located within one-quarter mile of an existing or proposed school. Schools nearest the site include Clarence Lobo Elementary School and San Clemente High School, both located approximately 0.4 mile from the Project site. The Project proposes the redevelopment of the Project site with recreational/fitness facilities, and does not include elements or aspects that would create or otherwise result in hazardous emissions. Development of the Project would therefore not result in potentially significant impacts related to hazardous emissions or hazardous materials handling within one-quarter mile of an existing or proposed school.

d) *No Impact.* As part of the Phase I Environmental Site Assessment conducted for the Project site (*Phase I Environmental Site Assessment, Life Time Fitness Real Estate Company, Inc., Rancho San Clemente Tennis and Fitness Club, 111 Avenida Vista Montana, APN 688-101-03, San Clemente, Orange County, California 92672* [EEI Geotechnical and Environmental Solutions] July 30, 2015), State and Federal databases were reviewed to determine if the site or adjacent properties have been identified as having environmental concerns. Additionally, the Orange County Health Care Agency Environmental Health, California Department of Toxic Substances Control, and California Regional Water Quality Control Board - Santa Ana Region were contacted for the same purpose. Based on the research conducted, the Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. On this basis, there is no potential for the Project to 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, create a significant hazard to the public or the environment.

e, f) *Less-Than-Significant Impact*. The Project site is not located within an airport land use plan, nor is it located within two (2) miles of any airport. Airfield/airport operations in the region include:

- Oceanside Municipal Airport, approximately 18 miles southeasterly of the Project site;
- John Wayne Airport, a commercial and general aviation airport, located more than 20 miles to the northwest of the Project site; and
- Marine Corps Air Station at Camp Pendleton, approximately 17 miles southeasterly of the Project site; and
- The SCE Songs Mesa heliport is located approximately 5 miles southerly of the Project site.

The Project does not propose or require uses or facilities that would contribute to or exacerbate airport/airfield safety hazards. On this basis, the potential for the Project to result in airport/airfield safety hazards for the people residing or working in the project area is considered less-than-significant.

g) *Less-Than-Significant Impact*. Development of the Project would not cause permanent alteration to vehicle circulation routes, and would not interfere with any identified emergency response or emergency evacuation plan. In accordance with City and County policies, coordination with the local fire and police departments during construction would ensure that potential interference with emergency response and evacuation efforts are avoided. The potential for the Project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is therefore considered less-than-significant.

h) *Less-Than-Significant Impact.* Fire protection services are provided to the City and the Project site by the Orange County Fire Authority (OCFA). As discussed in the General Plan EIR:

> To help protect the City and its residents from fire hazards, San Clemente has building and fire codes that must be followed. The fire chief of OCFA may also use their authority to instate certain building, planning, or landscaping requirements. On a site-specific basis, the fire chief may require the removal of brush in an area 10 feet from a structure and from a road or open space with the exception of single specimen trees, ornamental shrubbery or cultivated ground cover. The fire code official may require the submittal for approval of geological studies, evaluations, reports, remedial recommendations, and/or similar documentation from a state-licensed and department-approved individual or firm, on any parcel of land to be developed which has, is adjacent to, or within

> one 1,000 feet of a parcel of land that has an active, inactive, or abandoned oil or gas well operation; petroleum or chemical refining facility; petroleum or chemical storage; or may contain or give off toxic, combustible or flammable liquids, gases, or vapors. Fire code officials determine and publicly announce when hazardous fire areas are closed to entry and when such areas reopen. Outdoor fires are not allowed in hazardous fire areas except by permit from fire code officials. All new buildings constructed in areas containing combustible vegetation are required to submit and have approved by the fire code official a preliminary fuel modification plan when submitting any tentative map. Grading permits will be issued following the submittal and approval of the final fuel modification plan that meets the criteria of the OCFA Fuel Modification Plan guidelines.
> (General Plan EIR, p. 5.7-13, 5.7-14).

Adherence to local fire department regulations as outlined above would be required. As such, the potential for the Project to expose people or structures to a significant risk of loss, injury or death involving wildland fires is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report*, SCH No. 2013041021 (The Planning Center/DC&E) July 2013; *Phase I Environmental Site Assessment, Life Time Fitness Real Estate Company, Inc., Rancho San Clemente Tennis and Fitness Club, 111 Avenida Vista Montana, APN 688-101-03, San Clemente, Orange County, California 92672* (EEI Geotechnical and Environmental Solutions) July 30, 2015; *Report Asbestos Sampling & Lead Testing* (Altec Testing & Engineering, Inc.) July 27, 2015; Google Earth; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
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 the 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)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of the existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact*. Project-related construction activities have the potential to impact surface water quality as the result of minor soil erosion (during grading and soil stockpiling), subsequent siltation, and conveyance of other pollutants into municipal storm drains during the Project construction phase. However, Project construction would occur in compliance with erosion control measures, including grading and dust control measures imposed via City grading permit regulations.

Project operations would comply with the mandated City-approved Water Quality Management Plan (WQMP). Under the WQMP, post-development peak storm water runoff discharge rates would not exceed the estimated pre-development rates such that there would be an increased potential for downstream erosion. The WQMP requirements also include, but are not limited to, the following: minimizing stormwater pollutants of concern; containing properly designed outdoor material storage areas; containing properly designed trash storage areas; and providing proof of ongoing best management practices (BMPs) maintenance.

As detailed in the Project Water Quality Management Plan (WQMP) provided at IS/MND Appendix E, Project BMPs include:

- Impervious Area Dispersion (hardscape areas drain into adjacent landscaping).
- Storm Water Retention (holding tanks designed to address hydromodification concerns).
- Biotreatment BMPs (enclosed planter boxes at the downstream end of the improvement areas).

Additionally, the Project would be implemented consistent with Low Impact Development (LID) Standards, which address stormwater runoff, pollutant loadings from impervious surfaces, and erosion and other hydrologic impacts on natural drainage systems.

Implementation of WQMP and associated LID requirements would ensure that operation of the Project would not violate any water quality standards or waste discharge requirements. Based on the preceding discussion, the Project's potential to violate any water quality standards or waste discharge requirements is considered less-than-significant.

b) *Less-Than-Significant Impact*. Development of the Project would not contribute to groundwater depletion, nor discernibly interfere with groundwater recharge. Water connections throughout the City are provided by the City's Utility Division (Division). The Project site is currently served by both domestic and reclaimed water lines. Groundwater which may be consumed by the Project and the City of San Clemente as a whole is recharged pursuant to Division's policies and programs. Development of the Project would not affect designated recharge areas.

Direct additions or withdrawals of groundwater are not proposed by the Project. Further, construction proposed by the Project would not involve massive substructures at depths that would significantly impair or alter the direction or rate of flow of groundwater. Based on the preceding discussions, the Project's potential impacts to groundwater availability, quality, or recharge capabilities, are considered less-than-significant.

c,d) *Less-Than-Significant Impact*. The site currently drains to three distinct locations under existing conditions. To the north, a curb outlet discharges flows into the curb and gutter along Calle Del Cerro for collection by the City storm drain system. At the northwest corner, a drainage inlet collects storm water from on-site areas, as well as runoff from the neighboring natural area, and connects directly to the City storm drain system. Lastly, a natural channel along the southerly property boundary receives site runoff and conveys the water in a westerly direction toward Avenida Pico; the water is then collected by the City storm drain system.

Flows collected at each of these locations is ultimately discharged into the Segunda Deshecha Creek, at the intersection of Avenida Pico and Avenida Presidio, and conveyed to the Pacific Ocean at North Beach.

Post-development drainage patterns are intended to mimic the existing condition, with runoff discharged to the aforementioned three distinct collection locations. Additionally, all runoff from areas within the proposed development limits would be routed through LID BMPs intended to reduce the volume and pollutant loading of discharged storm water.

Because the site is currently developed and Project uses would use existing drainage facilities, implementation of the Project would not result in substantial changes to existing drainage patterns or substantial increases in surface water runoff quantities; nor does the Project propose to alter the course of a stream or

river. On this basis, the potential for the Project to substantially alter the existing drainage pattern of the site or surrounding area; or substantially increase the rate or amount of surface runoff in a manner that would result in erosion or flooding on- or off-site is considered less-than-significant.

e) *Less-Than-Significant Impact*. Consistent with WQMP requirements, post-development runoff quantities would not substantially increase as a result of the Project. The Project uses would generate pollution constituents in surface water runoff that are generally similar to existing conditions, and required water quality control measures would be introduced and implemented. The Project's potential to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff is therefore considered less-than-significant.

f) *Less-Than-Significant Impact*. Groundwater quality underlying the Project site is considered generally acceptable and is absent significant contaminants. Any wastewater or stormwater runoff generated by the Project would utilize existing municipal sewer and stormwater collection and disposal facilities. Runoff from the Project area may include small amounts of oils from paved areas and other chemicals which cumulatively may result in degradation of off-site surface waters, and could eventually affect ground waters. Compliance with applicable National Pollutant Discharge Elimination System (NPDES) permitting requirements supported by the Project's WQMP reduces Project-specific impacts to water quality, including groundwater quality, below the level of significance.

g, h) *No Impact*. Residential uses are not proposed as part of the Life Time Athletic & Tennis Club – San Clemente Project. Additionally, as illustrated at General Plan Figure S-2, *Flood Hazards Map*, the site is not located within a 100-year flood hazard area. Development of the Project would have no impact in this regard.

i) *Less-Than-Significant Impact*. Development of the Project would not alter the site in such a way as to create any flood hazards or otherwise substantially alter area drainage patterns. The site is relatively flat and is not located near any water storage facilities, nor does the subject site lie within a dam inundation area. The Project does not propose or require uses or facilities that would contribute to or exacerbate flood hazards. The Project's potential to create or expose people or property to a significant risk of loss due to flood hazards is therefore considered less-than-significant.

j) *Less-Than-Significant Impact*. The Project site is not located near any bodies of water or water storage facilities that would be considered susceptible to seiche. No slopes of significance have been identified on or near the Project site, and the Project site has not historically been affected by mudflows. The site is located approximately one-half mile from coastal waters. As illustrated at General Plan Figure S-3, *Tsunami Potential Inundation Map*, the site is not located within the identified tsunami inundation risk area. The Project does not propose or require uses or facilities that would contribute to or exacerbate seiche, tsunami or mudflow flood hazards. Impacts in these regards are therefore considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Water Quality Management Plan (WQMP), Rancho San Clemente Tennis Club* (Toal Engineering, Inc.) November 15, 2016; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☐	☐	☐	☒

Substantiation:

a) *No Impact*. The Project involves the revitalization of an existing tennis club with similar contemporary uses. No residents would be displaced by Project-related activities, nor would the physical arrangement of the surrounding residential communities be modified or divided. As such, development of the Project would not physically divide an established community.

b) *No Impact*. The Project site General Plan Land Use designation is OS2 – "Open Space - Private." The Project land uses and development concepts are consistent with applicable provisions of the General Plan OS2 Land Use. The Project does not propose or require amendment of the site's current General Plan Land Use designation. Zoning of the Project site is established by the Rancho San Clemente Specific Plan (Specific Plan). The Specific Plan (Zoning) designation of the Project site is "Open Space - Private." The Specific Plan Open Space - Private

designation permits development of active recreational/open space uses within the Project site.

Based on the preceding, development of the Project would not conflict with any applicable land use plan, policy, or regulation.

c) *No Impact.* There are no existing or proposed conservation plans that would affect the Project; nor would the Project affect any identified conservation plans. No impacts due to inconsistency with habitat conservation plans or natural community conservation plans are anticipated.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Rancho San Clemente Specific Plan*, December 2002; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and to the residents of the state?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

Substantiation:

a, b) *No Impact*. No known mineral resources of value to the region and the residents of the State have been identified on the Project site. Therefore, development of

the Project would not result in any impacts to mineral resources that would be of future value to the region and the residents of the State.

Sources: *City of San Clemente Centennial General Plan*, January 2016; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Substantiation:

Information presented in *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017 (Project Noise Impact Analysis) is summarized within, and provides the basis for, the following discussions. The Project Noise Impact Analysis is presented in its entirety at IS/MND Appendix F.

Within these discussions, applicable noise standards are summarized, compliance with standards is discussed, and potential noise impacts of the Project are evaluated in terms of their potential to substantially increase in ambient noise levels in the Project vicinity above levels existing without the Project. In this latter regard, CEQA does not define what noise level increase would be considered "substantial." Typically, Project-generated noise level increases of 3 dBA or greater would be perceptible and considered potentially significant where the resulting exterior noise levels would exceed the normally acceptable noise level standard. In instances where ambient noise levels already exceed acceptable standards, increases of 1.5 dBA would be considered potentially significant.[2]

a) *Less-Than-Significant Impact.* To establish baseline noise conditions, ambient noise levels were monitored and recorded at proximate noise-sensitive receptor land uses. Nearby noise-sensitive receptor land uses include the single-family

[2] Guidance in this regard is, however, provided at the federal level through the Federal Interagency Committee on Noise (FICON). FICON guidance facilitates assessment of project-generated increases in noise levels while accounting for ambient noise conditions. Although the FICON guidance was specifically developed to assess aircraft noise impacts, this guidance is broadly relevant to all environmental noise assessments in determining perceived effects of noise. The FICON guidance indicates that when ambient noise conditions are at or above normally acceptable standards, increases in noise of 1.5 dBA or greater would contribute to existing deficiencies, potentially resulting in increased community annoyance, citizen complaints, and potential litigation.

FICON guidance as applied within this analysis would indicate that when ambient conditions equal or exceed acceptable standards for stationary/area-sources, Project stationary/area-source noise increases of 1.5 dBA or greater in ambient conditions could result in increased community annoyance, citizen complaints, and potential litigation. For the purposes of this analysis then, when ambient conditions equal or exceed maximum acceptable standards, Project stationary/area-source noise increases of 1.5 dBA more in ambient conditions would therefore be considered substantial and therefore potentially significant.

residential uses southwest and east of the Project site. Noise monitoring locations and representative ambient noise conditions are presented at Table XII-1. Noise monitoring locations are mapped at Figure XII-1.

Table XII-1
Ambient Noise Conditions

Location[1]	Distance to Project Boundary (Feet)	Description	Energy Average Hourly Noise Level (dBA Leq)[2]		Average Median Noise Level (dBA L_{50})[2]		CNEL
			Daytime	Nighttime	Daytime	Nighttime	
L1	995'	Located northeast of the Project site on Maracay near existing residential homes.	57.8	54.3	50.1	39.9	61.7
L2	480'	Located south of the Project site on Calle Familia in an existing residential community.	44.5	43.1	39.7	38.4	49.8
L3	0'	Located within the existing Rancho San Clemente Tennis and Fitness Club parking lot.	46.5	40.1	41.6	36.8	48.5
L4	0'	Located at the eastern Project site boundary adjacent to Avenida Vista Montana.	57.3	50.4	45.1	37.0	59.2
L5	0'	Located at the northern Project site boundary adjacent to an existing Rancho San Clemente Tennis and Fitness Club basketball court on the south side of Calle Del Cerro.	58.6	56.2	52.8	41.7	63.3
L6	0'	Located at the northern Project site boundary adjacent to the existing Rancho San Clemente Tennis and Fitness Club tennis courts on Calle Del Cerro.	65.2	62.6	59.9	55.3	69.8

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.
Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.

N

NOT TO SCALE

Source: Urban Crossroads; Applied Planning, Inc.

Figure XII-1
Noise Monitoring Locations

Noise-Sensitive Receptors

Representative noise-sensitive receivers near the Project site include single-family residential uses at locations R1 to R5, described below and mapped at Figure XII-2.

R1: Located approximately 620 feet northeast of the Project site, R1 represents the existing residential homes on South Montilla. A long-term noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

R2: Location R2 represents the existing residential homes roughly 258 feet northeast of the southwest Project site boundaries across Avenida Vista Montana.

R3: Location R3 represents the existing residential homes located roughly 410 feet southeast of the Project site, south of South Montilla.

R4: Location R4 represents the residential homes south of the Project site at the cul-de-sac of Calle Familia approximately 244 feet from the Project site. A long-term noise measurement was taken near this location, L2, to describe the existing ambient noise environment.

R5: Located approximately 222 feet south of the Project site, R5 represents the existing residential homes on Calle Empalme.

Source: Urban Crossroads; Applied Planning, Inc.

Figure XII-2
Proximate Sensitive Receptors

Potential Construction-Source Noise Impacts

City of San Clemente Municipal Code Section 8.48.050 establishes maximum acceptable noise levels permitted at receiving off-site residential land uses. For the purposes of this analysis, the Municipal Code noise level limit of 75 dBA Lmax is established as the maximum allowable condition for Project construction-source noise received at proximate residential land uses. Project construction-source noise that would cause or result in noise levels exceeding 75 dBA Lmax would potentially expose persons to noise levels in excess of standards established as the threshold for determining the relative significance of Project construction-source noise levels, and would therefore be potentially significant.

Municipal Code Section 8.48.090(E) establishes the permitted hours during which construction within the City may take place: between 7:00 a.m. to 6:00 p.m. Monday to Friday; 8:00 a.m. to 6:00 p.m. on Saturdays; no activity allowed on Sundays or holidays. Project construction activities would conform to Municipal Code Section 8.48.090(E) timeframes. Construction-source noise standards employed in this analysis are summarized at Table XII-2.

Table XII-2
Construction-Source Exterior Noise Standards

Permitted Hours of Construction Activity	Exterior Noise Level Standard (dBA Lmax)
7:00 a.m. to 6:00 p.m. Monday to Friday; 8:00 a.m. to 6:00 p.m. on Saturdays; no activity allowed on Sundays or holidays.	75

Sources: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017; City of San Clemente Municipal Code, Section 8.48.090 (E), Section 8.48.050.

Project construction-source noise would temporarily and intermittently affect proximate off-site land uses. Project construction-source noise would result from on-site construction activities, such as site preparation, grading, building construction, paving and site finishes, and architectural coating. Noise levels at off-site receptors would be greatest during initial site preparation activities

(grading, excavation) when heavy equipment may operate near the Project boundaries. Maximum construction-source noise levels received at proximate residential land uses are summarized at Table XII-3. Threshold exceedances, if any, are also noted. Please refer also to the discussions of construction-source noise presented at Project Noise Impact Analysis Section 9, *Construction Impacts*.

Table XII-3
Maximum Construction-Source Noise Levels
Received at Proximate Residential Land Uses

Receiver Location	Peak Construction Activity Noise Levels (dBA Lmax)	Threshold (dBA Lmax)	Threshold Exceeded?
R1	63.3	75	No
R2	69.9	75	No
R3	64.8	75	No
R4	70.8	75	No
R5	70.9	75	No

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.

Based on the preceding, the potential for Project construction-source noise to result in exposure to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies is considered less-than-significant.

Potential Stationary/Area-Source Noise Impacts

The City of San Clemente Municipal Code (Municipal Code) regulates noise originating from private properties such as the Project site. Section 8.48.050 of the Municipal Code establishes maximum allowable exterior noise levels for noise-sensitive land uses. Noise-sensitive land uses include schools, hospitals, churches, residences and similar occupancies. Noise-sensitive receptor land uses nearest the Project site are the residential uses located to the southwest and east. Maximum acceptable exterior noise standards for these receptor land uses are

presented at Table XII-4. Pursuant to the Municipal Code, the base noise standards presented at Table XII-4 apply for a cumulative period of 30 minutes in any hour; the base noise standard plus 5 dBA shall not be exceeded for a cumulative period of more than 15 minutes in any hour; the base standard plus 10 dBA shall not be exceeded for a cumulative period of more than 5 minutes in any hour; the base standard plus 15 dBA shall not be exceeded for a cumulative period of more than 1 minute in any hour; the base standard plus 20 dBA shall not be exceeded for any period of time.

Table XII-4
Stationary/Area-Source Noise Standards

Receptor Land Use	Maximum Duration Period	Percentile Noise Level	Noise Level Adjustments Above Base Noise Standard	Exterior Noise Level Standards (dBA)	
				Daytime	Nighttime
Residential	> 30 Minutes	L_{50}	+0	55	50
	15 Minutes	L_{25}	+5	60	55
	5 Minutes	L_{8}	+10	65	60
	1 Minutes	L_{2}	+15	70	65
	Any Period	L_{max}	+20	75	70

Sources: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017; City of San Clemente Municipal Code, Section 8.48.050.
Notes: The percent noise level is the level exceeded "n" percent of the time during the measurement period. L_{50} is the noise level exceeded 50% of the time. Exterior Noise Level Standards reflect Base Exterior Noise Levels plus noise level adjustments.
Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.

The Project does not propose operational activities or uses that would generate or result in substantial noise levels. Typical on-site Project-related noise sources are expected to include: roof-top air conditioning units, parking lot vehicle movements, pool activity, and tennis court activity. Under special permit, the Project may also accommodate limited live music/event activity. Maximum stationary/area-source noise levels received at proximate residential land uses are summarized at Table XII-5. Threshold exceedances, if any, are also noted.

Table XII-5
Maximum Stationary/Area-Source Noise Levels
Received at Proximate Residential Land Uses

		Noise Level at Receiver Locations (dBA)					Threshold Exceeded?	
		L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (Anytime)	Daytime	Nighttime
Receiver Location	**Daytime Threshold**	**55**	**60**	**65**	**70**	**75**	**-**	**-**
	Nighttime Threshold	**50**	**55**	**60**	**65**	**70**	**-**	**-**
R1		19.7	27.4	30.2	32.3	39.7	No	No
R2		26.3	32.2	35.0	37.6	45.7	No	No
R3		22.2	28.5	31.3	33.7	41.4	No	No
R4		31.6	39.1	41.9	43.8	49.9	No	No
R5		29.6	36.9	39.6	41.5	47.5	No	No

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.
Notes: Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.

Based on the preceding, the potential for Project stationary/area-source noise to result in exposure to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies is considered less-than-significant. Please refer also to the discussions of construction-source noise presented at Project Noise Impact Analysis Section 8, *Stationary/Area-Source Noise Impacts*.

Potential Vehicular-Source Noise Impacts

Project-generated vehicular noise impacts were assessed by determining the Project's potential incremental contribution to roadway noise levels. All other factors being equal, the logarithmic nature of the dB scale means that a doubling of the traffic volumes results in a 3.0 dBA increase in noise levels, regardless of the absolute number of vehicles. Similarly, a 20 – 30 percent increase in traffic volumes results in a 1.0 dB increase in noise levels, regardless of the absolute number of vehicles. Relative increases in noise levels attributable to increases in traffic volumes are summarized at Table XII-6.

Table XII-6
Relative Increases in Noise Level from Increased Traffic Volumes

Increase in Traffic Volume (Percent)	*Increase in Traffic Noise (dBA, approx.)
10	0.4
20	0.8
30	1.1
40	1.5
50	1.8
60	2.0
70	2.3
80	2.6
90	2.8
100	3.0

***Note:** Increase in traffic noise = $10*\log_{10}$ (Relative Traffic Increase); e.g. A 10 percent increase in traffic = 1.1 x existing traffic: resulting increase in traffic noise = $10*\log_{10} 1.1 = 10*.041 = .41$dBA; A 100 percent in traffic = 2.0 x existing traffic: resulting increase in traffic noise = $10*\log_{10} 2.0 = 10*.30 = 3.0$ dBA.

The Project Traffic Impact Analysis (IS/MND Appendix G) indicates that Project peak hour traffic would represent at most, a 10.3 percent increase in Study Area traffic under Opening Year (2018) conditions (TIA Table 3-2). As indicated at Table XII-6 above, this increment of Project traffic would increase area traffic noise by approximately 0.4 dBA, which would be imperceptible. The City General Plan EIR establishes 65 dBA CNEL as the maximum acceptable vehicular-source exterior noise condition for residential land uses (General Plan EIR, p. 5.10-20). Project traffic would not discernibly affect area noise conditions and would not cause or result in an exceedance of the City's 65 dBA CNEL standard.

Based on the preceding, the potential for Project vehicular-source noise to result in exposure to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies is considered less-than-significant.

b) *Less-Than-Significant Impact.* The City of San Clemente has not identified or adopted quantified vibration standards. However, the United States Department of Transportation Federal Transit Administration (FTA) has established relevant guidelines for maximum-acceptable vibration levels received at different types of land uses. Germane to this analysis, these guidelines allow for 80 VdB for infrequent events (e.g., construction-source vibration) received at residential uses and buildings where people normally sleep.[3] For the purposes of this analysis, 80 VdB is established as the maximum acceptable received vibration level at proximate residential land uses.

The Project does not propose or require facilities or operations that would be substantive sources of vibration. However, Project construction activities could generate potentially perceptible vibration levels.

Construction activity can result in varying degrees of groundborne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. Occasionally large bulldozers and loaded trucks can cause perceptible vibration levels at close distances.

Maximum construction-source vibration levels received at proximate residential land uses are summarized at Table XII-7. Threshold exceedances, if any, are also noted.

[3] U.S. Department of Transportation, Federal Transit Administration. *Transit Noise and Vibration Impact Assessment*. May 2006.

Table XII-7
Maximum Construction-Source Vibration Levels
Received at Proximate Residential Land Uses

Receiver Location[1]	Vibration Levels at Receiver (VdB)					Threshold	Threshold Exceeded?
	Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Peak Vibration		
R1	15.7	36.7	43.7	44.7	44.7	80 VdB	No
R2	25.6	46.6	53.6	54.6	54.6	80 VdB	No
R3	18.0	39.0	46.0	47.0	47.0	80 VdB	No
R4	26.9	47.9	54.9	55.9	55.9	80 VdB	No
R5	27.2	48.2	55.2	56.2	56.2	80 VdB	No

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.

As indicated at Table XII-7, Project construction source vibration would not exceed 80 VdB, the maximum acceptable received vibration level at proximate residential land uses. On this basis, the potential for the Project to result in exposure of excessive vibration is considered less-than-significant. Please refer also to the discussions of construction-source noise presented at Project Noise Impact Analysis Section 9.5, *Construction Vibration Impacts*.

c, d) *Less-Than-Significant Impact.*

Potential Construction-Source Noise Impacts

As discussed previously in this Section, Project construction-source noise would not cause exceedances of applicable standards. Further, as indicated at Table XII-8, Project construction-source noise would not exceed reference ambient noise levels, and would contribute a maximum of 1.1 dBA to ambient conditions which would be imperceptible.

Table XII-8
Construction-Source Noise
Relative to Ambient Conditions

Receiver Location	Peak Construction Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project Construction and Ambient	Project Contribution	Threshold Exceeded?
R1	63.3	L1	84.4	84.4	0.0	No
R2	69.9	L1	84.4	84.6	0.2	No
R3	64.8	L1	84.4	84.4	0.0	No
R4	70.8	L2	76.2	77.3	1.1	No
R5	70.9	L2	76.2	77.3	1.1	No

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.

On this basis, the potential for Project construction-source noise to result in a substantial permanent or temporary increase in ambient noise levels in the Project vicinity is considered less-than-significant. Please refer also to discussions of construction-source noise contributions presented at Project Noise Impact Analysis Section 9.4, *Construction Noise Level Increases*.

Potential Stationary/Area-Source Noise Impacts

As discussed previously in this Section, Project stationary/area-source noise would not cause exceedances of applicable standards. Further, as indicated at Tables XII-9 and XII-10, Project stationary/area-source noise would not exceed reference ambient noise levels, and would contribute a maximum of 2.7 dBA to ambient conditions which would be imperceptible. On this basis, the potential for Project stationary/area-source noise to result in a substantial permanent or temporary increase in ambient noise levels in the Project vicinity is considered less-than-significant. Please refer also to discussions of construction-source noise contributions presented at Project Noise Impact Analysis Section 8.5, *Project Stationary/Area-Source Noise Contributions*.

Table XII-9
Stationary/Area-Source Noise
Relative to Ambient Conditions (Daytime)

Measurement Location		Evaluated Condition	Noise Levels (dBA)					Threshold Exceeded?
Receiver	Ambient		L_{50} (30 min)	L_{25} (15 min)	L_8 (5 min)	L_2 (1 min)	L_{max} (Anytime)	
R1	L1	Project Noise Level	19.7	27.4	30.2	32.3	39.7	No
		Ambient Noise Level	50.1	55.3	60.1	65.1	84.4	
		Combined	50.1	55.3	60.1	65.1	84.4	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	
R2	L1	Project Noise Level	26.3	32.2	35.0	37.6	45.7	No
		Ambient Noise Level	50.1	55.3	60.1	65.1	84.4	
		Combined	50.1	55.3	60.1	65.1	84.4	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	
R3	L1	Project Noise Level	22.2	28.5	31.3	33.7	41.4	No
		Ambient Noise Level	50.1	55.3	60.1	65.1	84.4	
		Combined	50.1	55.3	60.1	65.1	84.4	
		Project Contribution	0.0	0.0	0.0	0.0	0.0	
R4	L2	Project Noise Level	31.6	39.1	41.9	43.8	49.9	No
		Ambient Noise Level	39.7	40.9	43.8	47.4	76.2	
		Combined	40.3	43.1	46.0	49.0	76.2	
		Project Contribution	0.6	2.2	2.2	1.6	0.0	
R5	L2	Project Noise Level	29.6	36.9	39.6	41.5	47.5	No
		Ambient Noise Level	39.7	40.9	43.8	47.4	76.2	
		Combined	40.1	42.4	45.2	48.4	76.2	
		Project Contribution	0.4	1.5	1.4	1.0	0.0	

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.

Table XII-10
Stationary/Area-Source Noise
Relative to Ambient Conditions (Nighttime)

Measurement Location		Evaluated Condition	Noise Levels (dBA)					Threshold Exceeded?
			L_{50} (30 min)	L_{25} (15 min)	L_8 (5 min)	L_2 (1 min)	L_{max} (Anytime)	
Receiver	Ambient							
R1	L1	Project Noise Level	19.7	27.4	30.2	32.3	39.7	No
		Ambient Noise Level	39.9	43.1	51.3	59.1	83.0	
		Combined	39.9	43.2	51.3	59.1	83.0	
		Project Contribution	0.0	0.1	0.0	0.0	0.0	
R2	L1	Project Noise Level	26.3	32.2	35.0	37.6	45.7	No
		Ambient Noise Level	39.9	43.1	51.3	59.1	83.0	
		Combined	40.1	43.4	51.4	59.1	83.0	
		Project Contribution	0.2	0.3	0.1	0.0	0.0	
R3	L1	Project Noise Level	22.2	28.5	31.3	33.7	41.4	No
		Ambient Noise Level	39.9	43.1	51.3	59.1	83.0	
		Combined	40.0	43.2	51.3	59.1	83.0	
		Project Contribution	0.1	0.1	0.0	0.0	0.0	
R4	L2	Project Noise Level	31.6	39.1	41.9	43.8	49.9	No
		Ambient Noise Level	38.4	40.0	42.6	45.4	74.4	
		Combined	39.2	42.6	45.3	47.7	74.4	
		Project Contribution	0.8	2.6	2.7	2.3	0.0	
R5	L2	Project Noise Level	29.6	36.9	39.6	41.5	47.5	No
		Ambient Noise Level	38.4	40.0	42.6	45.4	74.4	
		Combined	38.9	41.7	44.4	46.9	74.4	
		Project Contribution	0.5	1.7	1.8	1.5	0.0	

Source: *Life Time Athletic & Tennis Club, Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017.

Potential Vehicular-Source Noise Impacts

As noted previously in these discussions, Project vehicular-source noise would increase noise along area roadways by approximately 0.4 dBA, which would be imperceptible. Project vehicular-source noise would therefore not discernibly affect ambient noise conditions.

Based on the preceding, the potential for Project vehicular-source noise to result in a substantial permanent or temporary increase in ambient noise levels in the Project vicinity is considered less-than-significant.

e, f) *Less-Than-Significant Impact.* Airfield/airport operations in the region include:

- Oceanside Municipal Airport, approximately 18 miles southeasterly of the Project site;
- John Wayne Airport, a commercial and general aviation airport, located more than 20 miles to the northwest of the Project site; and
- Marine Corps Air Station at Camp Pendleton, approximately 17 miles southeasterly of the Project site; and
- The SCE Songs Mesa heliport is located approximately 5 miles southerly of the Project site.

Physical separation of the Project site from the above noted airfield/heliport facilities acts to preclude potential interference with airport/heliport facilities, their operations or related airfield/aircraft noise. Further, the Project does not propose elements or aspects that would affect airfield/aircraft noise. The potential for the Project to expose people residing or working in the Project area to excessive noise levels associated airfield/aircraft operations is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report*, SCH No. 2013041021 (The

Planning Center/DC&E) July 2013; *Life Time Athletic & Tennis Club Noise Impact Analysis, City of San Clemente* (Urban Crossroads, Inc.) July 13, 2017; *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017; Federal Interagency Committee on Noise, Airport Noise Analysis Guidance; *Transit Noise and Vibration Impact Assessment* (FTA) May 2006; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Substantiation:

a) *Less-Than-Significant Impact*. Official local and regional population projections are predicated upon buildout of the City in accordance with the General Plan. The Project proposes development consistent with the site's General Plan Land Use designation of OS2 – "Open Space - Private" and correlating Rancho San Clemente Specific Plan Zoning designation of "Open Space - Private." Therefore, buildout of the site as proposed is reflected in adopted population projections for

the City and region. The Project does not propose modification or extension of utilities or services that would potentially induce growth. As such, the potential for the Project to induce substantial population growth in the area, either directly or indirectly is considered less-than-significant.

b,c) *No Impact*. The Project would be implemented on properties that are developed with recreational facilities. Housing does not exist within the Project site. Nor is the Project site designated for, or anticipated to be developed with, housing assets. The Project does not otherwise propose or require the displacement of any on-site or off-site housing stock. There is no resident population within the Project site, nor does the Project propose uses or activities that would displace off-site populations. Based on the preceding, there is no potential for the Project to displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or displace substantial numbers of people necessitating the construction of replacement housing elsewhere.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Rancho San Clemente Specific Plan*, December 2002; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of the new or physically altered governmental facilities, need for new or physically altered governmental facilities, the 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:				
a) Fire Protection?	☐	☐	☒	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact*. Existing fire protection and emergency medical services are available to the Project, and would be provided by the Orange County Fire Authority (OCFA). The OCFA provides rescue, fire prevention, fire investigation, hazardous materials response, public information/education, paramedic and ambulance transport services. There are 3 OCFA fire stations in the City. Station #59, located at 48 Avenida La Pata is nearest the Project site, approximately 2.5 road miles northerly of the Project site.

The OCFA 2016 Statistical Annual Summary indicates 5,218 incident responses for the City of San Clemente service population of 66,245.[4] While not strictly population driven, this would indicate an OCFA incident response to population ratio of approximately 0.08, or approximately one incident per 12.7 persons. Development of the Project would not substantively increase the City resident population and therefore would not affect population-based OCFA response demands.

[4] OCFA. "Orange County Fire Authority Fire Chief Jeff Bowman Statistical Annual Report." OCFA Annual Report 2016. OCFA, 2017. Web. 5 July 2017. <http://www.ocfa.org/Uploads/Transparency/OCFA%20Annual%20Report%202016.pdf>.

Further, the subject site would be redeveloped with contemporary recreational and fitness facilities similar to the site's RSC Tennis & Fitness Club occupancies. Development of the Project would therefore not result in or cause substantively different or increased demands on fire protection services than have historically occurred.

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 and emergency response services.

Additionally, pursuant to Municipal Code Chapter 15.52 and related fee resolution(s), the Project Applicant would be required to remit requisite Public Safety Construction Fees providing funding to expand or enhance current fire protection services available to the Project site and vicinity. The City, in consultation with OCFA, would ultimately determine the most effective use of fees and other revenues generated by the Project, and how they would be employed for the provision and enhancement of fire protection services.

Based on the preceding, the potential for the Project to result in the need or requirement for new physical facilities for fire protection services, the construction of which would result in potentially significant environmental impacts, is less-than-significant.

b) *Less-Than-Significant Impact.* Police protection services for the Project site and vicinity properties are currently provided under contract by the Orange County Sheriff's Department (OCSD). The City of San Clemente Police Station (located at 100 Avenida Presidio) is approximately 2.5 road miles southerly of the Project site.

The *Orange County Sheriff-Coroner FY 2016 – 2017 Law Enforcement Contract, City of San Clemente* indicates total Sheriff staffing of 43 sworn personnel under contract to the City to provide police protection services. Assuming a resident population of 66,245 persons as noted above, this would translate to a service ratio of 0.65 sworn personnel per 1,000 residents. Development of the Project would not substantively increase the City resident population and therefore would not affect sworn personnel/population service ratios.

Further, the subject site would be redeveloped with recreational and fitness facilities similar to the site's RSC Tennis & Fitness Club occupancies. Development of the Project would therefore not result in or cause substantively different or increased on police protection services than have historically occurred.

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 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.

Additionally, pursuant to Municipal Code Chapter 15.52 and related fee resolution(s), the Project Applicant would be required to remit requisite Public Safety Construction Fees providing funding to expand or enhance current police protection services available to the Project site and vicinity. The City, in consultation with OCSD, would ultimately determine the most effective use of fees and other revenues generated by the Project, and how they would be employed for the provision and enhancement of police protection services.

Based on the preceding, the potential for the Project to result in the need or requirement for new physical facilities for police protection services, the construction of which would result in potentially significant environmental impacts, is less-than-significant.

c) *Less-Than-Significant Impact*. Development of the Project would not substantively affect the City resident population, and would not demonstrably affect demands for population-driven demands for school services. The City of San Clemente is served by the Capistrano Unified School District. Mandated school impact fees would be paid acting to offset Project-source incremental demands on school services. The Capistrano Unified School District Statutory School fees assessed for commercial/industrial projects (effective May 23, 2016 – June 30, 2016, the latest dates of record) is $0.56/square foot.[5]

[5] CUSD. "Developer Fee Study 16-17.pdf." *Capistrano Unified School District Developer Fees*. Capistrano Unified School District, 2015-2016. Web. 5 July 2017. <http://capousd.ca.schoolloop.com/search/search_results?d=x&search_term=developer fees>.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered school facilities is considered less-than-significant.

d) *Less-Than-Significant Impact.* Development of the Project would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for park services. Further, new recreational/fitness facilities would be implemented, and would effect a net positive change in recreational assets available to the City. In this manner, the Project could reduce general demands for, and impacts on, park services.

Based on the preceding, the potential for the Project to result in substantial adverse physical impacts associated with the provision of the new or physically altered park facilities is considered less-than-significant.

e) *Less-Than-Significant Impact.* Development of the Project would require established public agency oversight including, but not limited to, various plan check and permitting actions by the City. Impacts of the Project would fall within routine tasks of these agencies/departments and are paid for via plan check and inspection fees. Impacts of the Project would therefore not be of such magnitude that new or physically altered facilities would be required. On this basis, the potential for the Project to result in substantial adverse physical impacts associated with new or physically "other" public facilities is therefore considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report,* SCH No. 2013041021 (The Planning Center/DC&E) July 2013; *Orange County Fire Authority Fire Chief Jeff Bowman Statistical Annual Report*, OCFA, 2017; *Capistrano Unified School District Developer Fees*, Capistrano Unified School District, 2015 – 2016; Rancho San Clemente Specific Plan, December 2002; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Substantiation:

a,b) *Less-Than-Significant Impact*. Development of the Project would not substantively affect the City resident population, and would not demonstrably affect population-driven demands for regional parks or other recreational facilities. Further, new recreational/fitness facilities would be implemented, and would effect a net positive change in recreational assets available to the City. In this manner, the Project could act to reduce demands on other existing recreational facilities.

Potential environmental impacts of the Project recreational facilities are evaluated in this IS/MND and are substantiated to be less-than-significant.

Based on the preceding, the potential for the Project to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration of the facility would occur or be accelerated; or include recreational facilities or require the construction or expansion of recreational

facilities, which might have an adverse physical effect on the environment is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report,* SCH No. 2013041021 (The Planning Center/DC&E) July 2013; Project IS/MND; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) 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?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Substantiation:

Consistent with City of San Clemente requirements, and in consultation with City Staff, a Traffic Impact Analysis (TIA) has been prepared for the Project. The Traffic Study evaluated potential Project Transportation/Traffic Impacts under existing (2017) and Opening Year (2018) Conditions. For details regarding the TIA methodologies and analytic protocols, please refer to *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017 presented as IS/MND Appendix G.

a) *Less-Than-Significant Impact.*

Study Area Existing Conditions

Study Area intersections and existing traffic controls are listed at Table XVI-1 and are identified at Figure XVI-1. The Study Area intersections comprise locations where the Project would potentially contribute 50 or more two-way peak hour trips. The "50 peak hour trip" criterion employed by the City is consistent with the methodology employed by within County of Orange, and generally represents the minimum number of trips at which a typical intersection would have the potential to be substantively affected by a given development

proposal. No Study Area intersections are Congestion Management Plan (CMP) facilities.

Table XVI-1
Study Area Intersections

ID No.	Intersection	Traffic Control
1	Avenida Pico / Calle Del Cerro	Traffic Signal
2	Avenida Vista Montana / Calle Del Cerro	Traffic Signal
3	Avenida Vista Montana / Project Dwy.	STOP-controlled access from Project site to Avenida Vista Montana

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.

Intersection operational efficiencies are expressed as Levels of Service (LOS). [6] LOS descriptors are summarized at Table XVI-2.

Table XVI-2
Signalized Intersection LOS Descriptors

Level of Service	Description
A	Operations with very low delay occurring with favorable progression and/or short cycle length.
B	Operations with low delay occurring with good progression and/or short cycle lengths.
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.

Source: *Highway Capacity Manual* (Transportation Research Board) 2000; Chapter 16.

[6] The TIA evaluated intersection LOS impacts employing both the Intersection Capacity Utilization (ICU) Methodology, and the Highway Capacity Manual (HCM) Methodology. In summary, the ICU Methodology evaluates intersections based on volume to capacity (v/c) ratios, while the HCM Methodology evaluates intersections based on intersection delays. Employing either Methodology, the analysis substantiates that acceptable LOS conditions would be maintained. Please refer to the Project TIA at p. 20 – 21 for further detail regarding application of the ICU and HCM Methodologies.

Source: Urban Crossroads: Applied Planning, Inc.

Figure XVI-1
Study Area Intersections

Existing Study Area intersection Level of Service (LOS) conditions are summarized at Table XVI-3.

Table XVI-3
Existing Conditions Intersection LOS

ID No.	Intersection	Traffic Control	ICU				HCM			
			ICU (v/c)		LOS		Delay (Secs)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Avenida Pico / Calle Del Cerro	TS	0.68	0.62	B	B	21.2	12.4	C	B
2	Avenida Vista Montana / Calle Del Cerro	TS	0.44	0.29	A	A	18.8	9.4	B	A
3	Avenida Vista Montana / Project Dwy.	CSS	--	--	--	--	17.7	11.2	C	B

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.
Notes: TS-Traffic Signal; CSS-Cross-Street STOP

Comparative Trip Generation

Project-related uses would generate comparatively more peak hour trips and daily trips than the existing RSC Tennis & Fitness Club, as indicated at Table XVI-4.

Table XVI-4
Comparative Trip Generation
Existing Land Use and Project Land Use

Existing Land Use Trip Generation									
Land Use	ITE Land Use Code	Metric/ Quantity	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Health/ Fitness Club	492	11 TSF	8	8	16	22	17	39	362
Project Trip Generation									
Land Use	ITE Land Use Code	Metric/ Quantity	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Health/ Fitness Club	492	44.7 TSF	32	32	64	90	68	158	1,472
Project Net Increase Over Existing			**24**	**24**	**48**	**68**	**51**	**119**	**1,110**

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.
Notes: Trip Generation Rates from: *Institute of Transportation Engineers (ITE), Trip Generation Manual, 9th Edition (2012).*
TSF-Thousand Square Feet

Potential Intersection LOS Impacts

Intersection LOS impacts at Study Area intersections were evaluated under Existing (2017) and Opening Year (2018) Conditions. Under both scenarios, effects of the Project are reflected in incremental LOS impacts. The City General Plan EIR at Policy 4.3.1 provides that LOS D be maintained for City intersections.[7] For the purposes of this analysis, LOS D is the established as the minimum acceptable peak hour operating condition for the Study Area intersections.

The TIA indicates that Project traffic would incrementally increase intersection v/c and intersection delays within the Study Area. Notwithstanding, the TIA substantiates that under all scenarios, the City's LOS D standard for intersections would not be exceeded. Project traffic would therefore not result in or contribute to potentially significant intersection LOS impacts. Please refer to Tables XVI-5 and XVI-6.

Table XVI-5
Existing Conditions Intersection LOS
Without and With Project

			Existing Conditions Without Project								Existing Conditions With Project								LOS Std.
ID No.	Intersection	Traffic Control	ICU				HCM				ICU				HCM				
			ICU (v/c)		LOS		Delay (Secs)		LOS		ICU (v/c)		LOS		Delay (Secs)		LOS		
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1	Avenida Pico / Calle Del Cerro	TS	0.68	0.62	B	B	21.2	12.4	C	B	0.68	0.64	B	B	22.0	13.6	C	B	D
2	Avenida Vista Montana / Calle Del Cerro	TS	0.44	0.29	A	A	18.8	9.4	B	A	0.45	0.32	A	A	19.5	11.3	B	B	D
3	Avenida Vista Montana / Project Dwy.	CSS	--	--	--	--	17.7	11.2	C	B	---	---	---	---	19.0	12.7	C	B	D

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.
Notes: TS-Traffic Signal; CSS-Cross-Street STOP

[7] Exception to this standard is made for the intersection of the I-5 southbound ramps at Avenida Pico, City of San Clemente Plan EIR, p. 5.14-15.

Table XVI-6
Opening Year Conditions Intersection LOS
With Existing Facility and With Project

ID No.	Intersection	Traffic Control	Opening Year Conditions With Existing Facility								Opening Year Conditions With Project								LOS Std.
			ICU				HCM				ICU				HCM				
			ICU (v/c)		LOS		Delay (Secs)		LOS		ICU (v/c)		LOS		Delay (Secs)		LOS		
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1	Avenida Pico / Calle Del Cerro	TS	0.69	0.63	B	B	22.2	12.8	C	B	0.70	0.65	B	B	23.1	14.1	C	B	D
2	Avenida Vista Montana / Calle Del Cerro	TS	0.45	0.30	A	A	19.1	9.4	B	A	0.46	0.33	A	A	19.8	11.3	B	B	D
3	Avenida Vista Montana / Project Dwy.	CSS	--	--	--	--	18.0	11.2	C	B	---	---	---	---	19.5	12.8	C	B	D

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.
Notes: TS-Traffic Signal; CSS-Cross-Street STOP

Based on the preceding discussions, the potential for the Project to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system is considered less-than-significant.

Parking

Project parking demands of the Project are summarized at Table XVI-7.

Table XVI-7
Project Parking Demands

Use/Allocation*	Metric	Units	Parking Rate	Parking Requirement
Tennis Courts	Courts	13.00	3.00	39
Fitness Facility	TSF	16.36	6.67	109
Group Instruction	Attendees	50.00	**	29
Office	TSF	2.83	3.33	9
Warehouse/Storage	TSF	7.25	0.5	4
Restaurant	Seats	56.00	0.25	14
Bar	Seats	9.00	0.25	2
Outdoor Restaurant	Seats	30.00	0.25	8
Beauty Shop/Massage	TSF	3.13	5.00	16

Table XVI-7
Project Parking Demands

Use/Allocation*	Metric	Units	Parking Rate	Parking Requirement
Retail	TSF	0.41	3.33	1
Day Care (parking accommodated within other uses)	---	---	0.20	---
Total Parking Required				**231 Spaces**

Source: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017.

Notes: *Based on San Clemente Municipal Code Table 17.64.050
**Based on empirical data for similar uses.

As indicated at Table XVI-7, a minimum of 231 Project parking spaces would be required. In response, the Project Site Plan Concept provides 231 parking spaces. Project parking would therefore support estimated parking demands. It is also recognized that Project parking demands could be reduced based on use of multiple collocated Project facilities, acting to reduce total vehicle trips and total parking demands. The Project design and available amenities encourage the use of non-motorized travel modes (walking, bicycling) also acting to reduce vehicle trips and related parking demands.

Unless noted herein, or otherwise specified by the City, all parking facilities including parking stalls and drive aisles configurations would be designed and constructed pursuant to Rancho San Clemente Specific Plan and City requirements.

The preceding discussions support the conclusion that adequate parking would be provided for the Project.

b) *Less-Than-Significant Impact.* There are no designated Congestion Management Plan (CMP) facilities within the Study Area. Nor does the Project require or propose uses or operations that would substantively affect CMP facilities external to the Study Area. On this basis, development of the Project would not

conflict with an applicable congestion management plan or other standards established by the county congestion management agency for designated roads or highways.

c) *Less-Than-Significant Impact.* Airfield/airport operations in the region include:

- Oceanside Municipal Airport, approximately 18 miles southeasterly of the Project site;
- John Wayne Airport, a commercial and general aviation airport, located more than 20 miles to the northwest of the Project site; and
- Marine Corps Air Station at Camp Pendleton, approximately 17 miles southeasterly of the Project site; and
- The SCE Songs Mesa heliport is located approximately 5 miles southerly of the Project site.

Physical separation of the Project site from the above noted airfield/heliport facilities acts to preclude potential interference with airport/heliport facilities, their operations or related air traffic patterns. Further, the Project does not propose elements or aspects that would affect air traffic patterns. The potential for the Project to result in a change in air traffic patterns that would result in substantial safety risks is therefore considered less-than-significant.

d,e) *Less-Than-Significant Impact.* The existing STOP-controlled access to adjacent Avenida Vista Montana would be maintained as part of the Project. Other on-site and site adjacent improvements, as required by the City and pursuant to the Project Conditions of Approval, would also be implemented. The Project does not otherwise require improvements or facilities that would be inherently dangerous or that would impede emergency access.

In conjunction with the review and approval of building permits, the City, OCFA, and OCSD would review all plans to assure compliance with all applicable emergency access and safety requirements.

Based on the preceding, implementation of the Project, including the improvements described above would not substantially increase transportation/traffic hazards or result in adequate emergency access.

f) *Less-Than-Significant Impact.* The Project land uses would take advantage of existing pedestrian access provided by site-adjacent sidewalks along Calle Del Cerro and Avenida Vista Montana. Additionally, the Project design and available amenities encourage the use of non-motorized travel modes (walking, bicycling). Specifically, bicycle racks/lockers will be provided at the new Clubhouse building. The Project does not propose elements or aspects that would conflict with adopted alternative transportation policies.

Based on the preceding discussions, the potential for the Project to conflict with adopted policies supporting alternative transportation is considered less-than-significant.

Sources: *Rancho San Clemente Tennis Life Time Fitness, Updated Traffic & Parking Study, City of San Clemente* (Urban Crossroads, Inc.) June 16, 2017; *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; City of San Clemente Municipal Code; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES. a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Substantiation:

a, b) *Less-Than-Significant Impact.* There are no known Tribal Cultural Resources (TCRs) within the Project site. Nor is it anticipated that development of the Project would adversely affect off-site TCRs. Further, there is no evidence suggesting that the Project site would contain potentially significant TCRs. The Project site is fully developed. Any TCRs that may have been present at one time have likely been disturbed by the previous construction and other on-site human activities.

Additionally, as part of the Tribal Resources consultation required under AB 52, Gatto. *Native Americans: California Environmental Quality Act,* the City contacted 22 tribes that are known to have traditional lands or cultural places near the Project site. Only one response was received during the 30-day notification period; The Rincon Band of Luiseno Indians stated that the Project site is not located with Luiseno Aboriginal territory, and no further consultation was requested. No other responses or requests for consultation have been received.

Given the previous on-site construction and that the requirements for consultation under AB 52 have been satisfied, the potential for the Project to cause a substantial adverse change in the significance of a tribal cultural resource as defined at Public Resources Code 21074 is considered less-than-significant.

Sources: AB 52, Gatto. *Native Americans: California Environmental Quality Act*; *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Substantiation:

a,b,d,e) *Less-Than-Significant Impact.*

Wastewater Treatment

Wastewater collection and treatment services for the Project would be provided by the City. Project land uses would connect to existing sanitary sewer lines located in road rights-of-ways adjacent to the Project site. In this regard, 8-inch sewer lines exist in Calle Del Cerro and Avenida Vista Montana adjacent to the Project site. Extensions of and connections to City sanitary sewer lines would comply with City requirements. A Will-Serve letter for sanitary service from the

City would be required, indicating the City's ability and capacity to meet the Project's wastewater treatment demands. Project wastewater generation is estimated at 25,000 gallons per day (gpd).[8] The Project does not propose or require construction or alteration of sewer service systems that would affect other facilities in the Service Area or the Service Area in total.

The City of San Clemente would be responsible for treatment of wastewater generated by the Project. The City provides local sewer lines for conveyance to the City of San Clemente Water Reclamation Plant (WRP). The WRP has a design capacity of 7.1 million gallons per day (MGD). In context, Project wastewater generation (25,000 gpd) represents approximately 0.35 percent (0.0035) of the WRP design capacity (7.1 MGD).

The Project does not propose or require amendment of the City General Plan Land Use element and wastewater treatment demands of the Project are reflected in total wastewater demands of the City as reflected in the City General Plan EIR. The City General Plan EIR concluded that the WRP has the capacity and capability to treat wastewater demands of all City land uses under buildout conditions (General Plan EIR, p. 5.15-19, 5.15-20).

It is noted further that the subject site would be redeveloped with recreational/fitness facilities similar to those implemented under the site's RSC Tennis & Fitness Club occupancy. Development of the Project would not result in or cause wastewater conveyance or wastewater treatment demands that are substantively different than have historically occurred.

Wastewater generated by the Project would be typical of recreational/fitness facility generators, and would not require treatment beyond that provided by existing City facilities. Moreover, the Project site would be developed and

[8] Project wastewater generation estimate provided by Emanuelson-Podas, Inc., Project Engineer.

operated in compliance with the regulations of the City and the standards of the San Diego Regional Water Quality Control Board (SDRWQCB).

Based on the preceding, there is available capacity at the WRP to serve the Project. Connection and service fees paid by the Project and other customers within the Service Area provide funds available to the City to provide for expansion, enhancement, and maintenance of wastewater collection and treatment facilities commensurate with anticipated Service Area demands.

Water Service, Supplies and Treatment

Overview

Water service, supply, and treatment issues germane to the Project are globally addressed within Draft City of San Clemente 2015 Urban Water Management Plan (UWMP). The UWMP can be obtained from the City, or is accessible at: http://san-clemente.org/departments-services/water-information/urban-water-management-plan

Water Service

Water service for the Project would be provided by connection to existing water system lines located in roadways adjacent to the Project site. Water lines (12-inch) exist within Calle Del Cerro and Avenida Vista Montana adjacent to the Project site. The Project does not propose or require construction or alteration of water service systems that would affect other facilities in the City Water Service Area or delivery of water to the Service Area in total. An internal system of recycled water lines (purple pipe) would be constructed as part of the Project. Recycled water would be available from 6-inch lines within Calle Del Cerro and Avenida Vista Montana. Recycled water would be used for non-potable purposes such as landscape irrigation and site maintenance, thereby reducing potable water demands. Availability of recycled water is not assumed in the analysis of Project water demands.

Water Supply and Demand

Water Sources and Water Treatment

The City receives its water from three main sources, groundwater from the City's wells, recycled water from treated wastewater, and imported water from the Municipal Water District of Orange County (MWDOC). MWDOC is Orange County's wholesale supplier and is a member agency of the Metropolitan Water District of Southern California (Metropolitan) (UWMP, p. 1-4). All City water is treated consistent with State and federal requirements ensuring its safety and potability. No additional or non-standard treatment is required to meet the Project's water demands.

Water Demands

The City estimated 2015 water demand (including non-potable demand) was 9,310 acre-feet per year (AFY). Estimated 2040 water demand (including non-potable demand) is 9,060 AFY (UWMP, p. 2-8).

The calculated likely maximum water demand of the Project is estimated at 25,000 gpd, or 28 AFY. In context, the Project's annual water demand (28 AFY) is approximately 0.3 percent (0.003) of the City's 2015 and 2040 water demands. The Project would be served by City potable water supply resources, delivered by the City water system. The Project does not require or propose direct withdrawal of groundwater. Nor does the Project require additional or enhanced water treatment beyond that already provided by the City.

It is noted further that the subject site would be redeveloped with recreational/fitness facilities similar to those implemented under the site's RSC Tennis & Fitness Club occupancy. Development of the Project would not result in water demands that are substantively different than have historically occurred.

Water Supply/Demand Comparison

The 2015 Draft UWMP provides a comparison of projected water supplies and water demands within the Service Area under varying hydrologic scenarios (normal year, single dry-year, multiple dry-year) as required under the California Urban Water Management Plan Act (Division 6 Part 2.6 of the Water Code §§ 10610 - 10656). In summary, the 2015 Draft UWMP concludes that water supplies available to the Service Area would be adequate to meet Service Area Demands under all anticipated hydrologic conditions (UWMP, p. 3-15).

Water supply/demand planning reflected in the Draft 2015 UWMP accounts for anticipated development of the City pursuant to the City General Plan. The Project does not propose or require amendment of the City General Plan Land Use element and water demands of the Project are reflected in total water demands of the City as reflected in the UWMP. A "Will-Serve" letter for water service from the City would be required indicating the City's ability and capacity to meet the Project's water demands.

Groundwater Considerations

The Project does not propose elements or aspects that would substantially interfere with, or detract from known or anticipated groundwater recharge plans or policies. In this regard, the Project site is not a designated groundwater recharge area. Moreover, Project site development and proposed stormwater management systems would employ and reflect appropriate structural and operational best management practices (BMPs) providing for treatment of storm water discharges; and would incorporate permeable materials to the extent feasible. Use of permeable materials acts to reduce total runoff from the site, and facilitates runoff percolation to groundwater.

Based on the preceding discussions, the potential for the Project to: exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater

treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; have insufficient water supplies available to serve the project from existing entitlements and resources; or result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments is considered less-than-significant.

c) *Less-Than-Significant Impact.* The Project storm water management system comprehensively includes proposed drainage improvements, and facilities and programs which act to control and treat storm water pollutants. Preliminary storm water management system concepts reflected in the Project Preliminary Water Quality Management Plan (WQMP), would direct storm water runoff from the developed Project site to on-site retention and bio-treatment areas. Treated storm waters would be released in a controlled manner to existing storm drains. A 66-inch storm drain exists in Calle Del Cerro adjacent to the Project site. A 54-inch storm drain exists in Avenida Vista Montana adjacent to the Project site. The Project Preliminary WQMP is provided at IS/MND Appendix E.

A Storm Water Pollution Prevention Plan (SWPPP) would be implemented consistent with City requirements. In this manner, the Project would comply with requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit and other water quality requirements or storm water management programs specified by the Regional Water Quality Control Board (RWQCB). In combination, implementation of the Project SWPPP, WQMP, and compliance with NPDES Permit and SDRWQCB requirements act to protect City and regional water quality by preventing or minimizing potential storm water pollutant discharges to the watershed.

It is noted further that the subject site would be redeveloped with recreational/fitness facilities similar to those implemented under the site's RSC

Tennis & Fitness Club occupancy. Development of the Project would not result in storm water management system demands that are substantively different than have historically occurred.

All proposed connections to, or modifications of, storm water drainage systems would be reviewed and approved by the City and the SDRWQCB. The potential for the Project to require or result in new or expanded storm water drainage facilities, the construction of which could result in adverse environmental effects, is therefore considered less-than-significant.

f) *Less-Than-Significant Impact.* It is anticipated that Project-generated solid waste would be conveyed by existing service providers to proximate Orange County landfills. The landfill nearest the Project site is the Prima Deshecha Sanitary Landfill (Landfill), located at 32250 La Pata Avenue, San Juan Capistrano, approximately 6 miles northerly of the Project site. Landfill statistical information is summarized at Table XVIII-1.

Table XVIII-1
Prima Deshecha Sanitary Landfill Information

Disposal Acreage	Permitted Daily Throughput (tons)	Remaining Capacity (cubic yards)	Projected Closure Date
698	4,000	87,384,799	12/31/2067

Source: CalRecycle Solid Waste Information System (SWIS).
<http://www.calrecycle.ca.gov/swfacilities/directory/Search.aspx>

Estimated Project waste generation is presented at Table XVIII-2.

Table XVIII-2
Estimated Project Solid Waste Generation

Generation Rate	Calculation	Annual Waste Generation
13 pounds per TSF/day	45.0 TSF x 13 pounds per TSF/day = 585 ppd or 0.29 tons per day	106.76 tons per year

Sources: Generation rate from CalRecycle Commercial Sector Generation Rates. Reflects likely maximum commercial waste generation. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Commercial

As indicated in Table XVIII-2, the Project land uses would generate an estimated 0.29 tons of solid waste daily. This represents 0.0073 percent (0.000073) of the Landfill maximum allowable daily throughput of 4,000 tons. On a yearly basis, the Project land uses would generate approximately 266.90 cubic yards of solid waste,[9] or approximately 0.0003 percent (0.000003) of the Landfill remaining capacity of 87,384,799 yards.

As indicated in the preceding discussions, Project-source solid waste would not substantively affect the receiving Landfill or its operations.

The General Plan EIR concludes that adequate capacity exists at landfills serving the City to accommodate development under General Plan buildout conditions; and further that buildout pursuant to the General Plan would comply with applicable Federal, State, and local statutes and regulations related to solid waste (General Plan EIR, p. 5.15-28). Project solid waste management requirements are reflected in these determinations.

Based on the preceding, Project-generated solid waste can be accommodated at the likely receiving Prima Deshecha Sanitary Landfill; and there is available throughput capacity to serve the Project and other customers. Solid waste diversion achieved pursuant to the City-implemented programs and policies would reduce potential Project impacts at the Landfill. A Construction and Demolition (C&D) program would be implemented further reducing potential Project solid waste management impacts. On this basis, the potential for Project solid waste to exceed the permitted capacity of receiving landfills is less-than-significant.

[9] CalRecycle. "Calculations: Construction and demolition and inert debris (CDI)." *Calrecycle.ca.gov*. CalRecycle, 23 Jan. 2004. Web. 7 July 2017.
<http://www.calrecycle.ca.gov/swfacilities/cdi/tools/Calculations.htm>.
Weight of trash is estimated at 800 lbs./cubic yard.

g) *Less-Than-Significant Impact.* The Project would be implemented and operated in compliance with applicable City General Plan Goals and Policies, and would comply with City Zoning regulations; specifically, compliance with local, state and federal initiatives and directives acting to reduce and divert solid waste from landfill waste streams would be required.

In these regards, the California Integrated Waste Management Act under the Public Resources Code requires that local jurisdictions divert/recycle at least 50% of all solid waste. Additionally, as of July 1, 2012, pursuant to AB 341, the State of California requires that all businesses that generate four cubic yards or more per week participate in recycling programs. Effective April 1, 2016, pursuant to AB 1826, businesses generating 8 cubic yards of organic waste per week must recycle their organic waste.

Additionally, consistent with Section 5.408 "Construction Waste Reduction, Disposal, and Recycling" of the California Green Building Standards Code (CALGreen Code), as adopted by the City of San Clemente, a minimum of 50 percent of the Project's nonhazardous construction and demolition waste would be recycled or salvaged for reuse. To these ends, a Project Construction Waste Management Plan would be prepared consistent with Section 5.408.1.1 of the CALGreen Code. These measures would collectively reduce Project construction waste and would act to reduce demands on solid waste management resources.

The General Plan EIR notes that the City has "actively pursued programs to comply with federal, state, and local regulations related to solid waste and facilities to minimize impacts from [City-generated] solid waste" (General Plan EIR, p. 5.15-28). Uses proposed by the Project, and solid waste generated by those uses would not otherwise conflict with federal, state, and local statutes and regulations related to solid waste.

Based on the preceding, the potential for the Project to conflict with state, and local statutes and regulations related to solid waste is considered less-than-significant.

Sources: *City of San Clemente Centennial General Plan*, January 2016; *Draft Centennial General Plan Environmental Impact Report, SCH No. 2013041021* (The Planning Center/DC&E) July 2013; City of San Clemente 2015 Urban Water Management Plan; Preliminary Plans for the Life Time Athletic & Tennis Club – San Clemente Project.

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
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?	☐	☐	☒	☐
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 reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Substantiation:

a) *Less-Than-Significant Impact.* The Project site is fully developed and does not evidence significant biological or cultural resources, or the potential existence of such resources. The Project does not propose or require facilities or operations that would affect off-site biological or cultural resources. On this basis, the potential for the Project 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 is considered less-than-significant.

b) *Less-Than-Significant Impact.* No significant or potentially significant unmitigable long-term environmental effects of the proposed Project have been identified. As such, the Project is not considered to have impacts that are individually limited; nor are the cumulative impacts of the Project considered to be significant.

c) *Less-Than-Significant Impact.* As supported by the preceding environmental evaluation, development of the Project would not cause substantial adverse effects on human beings. Under each environmental consideration addressed herein, the proposed Project is considered to have either no impact, or potential effects of the proposal are substantiated at, or are mitigated to, levels that are less-than-significant.

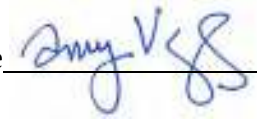
4.0 DETERMINATION

4.0 DETERMINATION

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 project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described previously have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	☒
I find that the project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the project MAY have a significant effect(s) 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 an earlier analysis as described on attached sheets. If the effect is a potentially significant impact or potentially significant unless mitigated an ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that need to be addressed.	☐
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 all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.	☐

City of San Clemente:

Signature  Date September 6, 2017

Printed Signature: Amy Vazquez, Contract Planner

5.0 MITIGATION MONITORING PLAN

5.0 MITIGATION MONITORING PLAN

5.1 INTRODUCTION

To ensure that the mitigation measures contained in the MND are properly implemented, a monitoring program has been devised pursuant to State law. This Mitigation Monitoring Plan (MMP) identifies measures incorporated into the Project which reduce its potential environmental effects; the entities responsible for implementation and monitoring of mitigation measures; and the appropriate timing for implementation of mitigation measures. As described at *CEQA* § 15097, this MMP employs reporting on, and monitoring of, Project mitigation measures.

The objectives of the MMP are to:

- Assign responsibility for, and ensure proper implementation of mitigation measures;
- Assign responsibility for, and provide for monitoring and reporting of compliance with mitigation measures; and
- Provide the mechanism to identify areas of noncompliance and need for enforcement action before irreversible environmental damage occurs.

Mitigation monitoring and reporting procedures incorporated into the Project are presented in the following Section 5.2. Specific mitigation measures incorporated into the Project, mitigation timing, and implementation and reporting/monitoring responsibilities are presented within this Section in Table 5-1.

5.2 MITIGATION MONITORING AND REPORTING

5.2.1 Mitigation Monitoring and Responsibilities

As the Lead Agency, the City of San Clemente is responsible for ensuring full compliance with the mitigation measures adopted for the proposed Project. The City will monitor and report on all construction-related and operational mitigation activities, and will require its contractors to implement this mitigation monitoring plan. Primary responsibility for compliance with Project mitigation measures, and reporting the progress of that compliance through the mitigation monitoring plan resides with the City. As notification to affected parties, all of the Mitigation Measures presented herein shall appear on all construction drawings and contract documents.

Any proposed substantive modifications to the mitigation measures presented herein will be reported immediately to any potentially affected agencies. Prior to their implementation, the City will ensure that any proposed substantive modification of the mitigation measures or procedures identified within this mitigation monitoring plan are first approved by any affected responsible agencies.

If, during the course of Project implementation, any of the mitigation measures identified herein cannot be successfully implemented, the City will immediately inform any affected responsible agencies. The City, in conjunction with any affected responsible agencies, will then determine if modification to the Project is required and/or whether alternative mitigation is appropriate.

Table 5-1
Life Time Athletic & Tennis Club – San Clemente Project
Mitigation Monitoring Plan

General Note: To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Impact	Mitigation Measures	Mitigation Timing	Implementation Entity	Monitoring/ Reporting Entity	Monitoring/ Reporting Timing
Cultural Resources					
CR-1	*To ensure avoidance of adverse impacts to potentially significant archaeological, paleontological, and geologic resources during initial grading and excavation activities for the proposed clubhouse and pool, the Project site shall be monitored by a professional archaeological consultant meeting Secretary of Interior's Standards and Guidelines for Archaeological and Historic Preservation [Code of Federal Regulations, 36 CFR Part 61]. The monitor shall have the authority to halt any activities affecting potentially significant resources until a program for addressing the resource(s) is developed and implemented.*	During grading and excavation activities.	Applicant and contractors(s).	City of San Clemente, Building Services.	Ongoing throughout ground-disturbing activities and at the discretion/direction of the Project Archaeological Monitor.
Geology and Soils					
GEO-1	*Prior to the issuance of grading permits, and to the satisfaction of the City, the Project Applicant shall ensure that the recommendations, performance standards and requirements established within the Final Project Geotechnical Engineering Investigation are incorporated into the Project design and construction plans. A qualified geotechnical engineer shall be retained on site to ensure that Project*	Prior to issuance of grading permits.	Applicant and contractors(s).	City of San Clemente, Building Services.	Verification of incorporated geotechnical engineering recommendations, performance standards, and requirements at issuance of grading permits. Ongoing monitoring of implementation of geotechnical engineering requirements per onsite Project geotechnical engineer.

Table 5-1
Life Time Athletic & Tennis Club – San Clemente Project
Mitigation Monitoring Plan

General Note: To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Impact	Mitigation Measures	Mitigation Timing	Implementation Entity	Monitoring/ Reporting Entity	Monitoring/ Reporting Timing
	implementation is realized consistent with specifications and requirements identified in the Project Geotechnical Engineering Investigation.				
Hazards and Hazardous Materials					
HAZ-1	*If suspected ACMs are identified during the course of demolition, all activities involving the ACMs shall be halted, and the suspect materials shall be evaluated prior to their removal. Should ACMs be confirmed, they shall be properly handled and removed by a registered and licensed asbestos contractor.*	Ongoing throughout demolition activities.	Applicant, contractor(s).	City of San Clemente, Building Services; California Department of Toxic Substances (DTSC).	ACM removal/abatement to be accomplished by registered and licensed contractor. City to verify contractor qualifications prior to issuance of demolition permits. DTSC oversight and assistance to be provided as determined by the City.

Table 5-1
Life Time Athletic & Tennis Club – San Clemente Project
Mitigation Monitoring Plan

General Note: To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Impact	Mitigation Measures	Mitigation Timing	Implementation Entity	Monitoring/ Reporting Entity	Monitoring/ Reporting Timing
HAZ-2	*An investigation targeted at identifying asbestos-cement utility piping shall be performed at the site prior to any excavation or grading activities. If this type of piping is identified, the materials shall be properly handled and removed by a registered and licensed asbestos contractor.*	Prior to issuance of development permits.	Applicant and contractors(s).	City of San Clemente, Building Services.	Results of investigation to be provided prior to issuance of development permits. If required, subsequent removal/abatement of asbestos-cement piping to be accomplished by registered and licensed asbestos contractor throughout excavation and grading activities. City to verify contractor qualifications prior to issuance of development permits.
HAZ-3	*Prior to any demolition activities, bulk samples shall be collected and analyzed in accordance with applicable guidelines to determine total lead concentrations, confirm previous results, and evaluate waste disposal options.*	Prior to issuance of demolition permits.	Applicant and contractors(s).	City of San Clemente, Building Services; DTSC	Proposed demolition waste disposal plans, including disposal of any hazardous materials disposal plans shall be approved by the City of San Clemente prior to the issuance of demolition permits. DTSC oversight and assistance to be provided as determined by the City.
HAZ-4	*All lead removal shall be performed by a qualified contractor in compliance with all applicable rules and regulations. All lead coated components that are deteriorated or*	Ongoing throughout demolition activities.	Applicant and contractor(s).	City of San Clemente, Building Services; DTSC.	Lead removal/abatement to be accomplished by registered and licensed contractor. City to verify contractor qualifications prior to

Table 5-1
Life Time Athletic & Tennis Club – San Clemente Project
Mitigation Monitoring Plan

General Note: To facilitate coordination and effective implementation of mitigation measures, the mitigation measures provided herein shall appear on all grading plans, construction specifications, and bid documents. Incorporation of required notations shall be verified by the City prior to issuance of first development permit. Implementation Entities shall comply with listed mitigation requirements.

Impact	Mitigation Measures	Mitigation Timing	Implementation Entity	Monitoring/ Reporting Entity	Monitoring/ Reporting Timing
	peeling should be stabilized prior to demolition activities. Exposure assessments and air monitoring should be conducted during the initial phases of any lead abatement to determine the amount of personal protection required by workers. Lead components shall be properly packaged and characterized, utilizing proper laboratory analysis as necessary to determine disposal requirements.				issuance of demolition permits. DTSC oversight and assistance to be provided as determined by the City.
HAZ-5	*If the exterior tested components contain lead above 1.0 mg/cm², soil samples shall be collected along the building foundation perimeter and analyzed to establish baseline lead levels in the soil prior to lead abatement. The same procedure shall be performed again upon completion of the lead removal to ensure that soil was not additionally contaminated.*	Ongoing throughout demolition activities.	Applicant and contractor(s).	City of San Clemente, Building Services; DTSC.	Lead removal/abatement to be accomplished by registered and licensed contractor. City to verify contractor qualifications prior to issuance of demolition permits. DTSC oversight and assistance to be provided as determined by the City.

APPENDICES

Please refer to accompanying CD for complete technical appendices.