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April 13, 2020

Ms. Belinda Ann Deines  
Interim Principal Planner  
City of Dana Point  
Planning Division  
33282 Golden Lantern  
Dana Point, CA 92629

RE: Comments on Notice of Preparation for the Doheny Village Zoning District Update Project

Dear Ms. Deines:

Thank you for the opportunity to review the Notice of Preparation (NOP) of a program-level Environmental Impact Report (EIR) for the proposed Doheny Village Zoning District Update Project (project). It is our understanding that the project purpose and intent is to amend the City's Zoning Code allowed uses (e.g. lot size, setback, density, open space, landscaping requirements), special development standards (e.g. maximum density, accessory uses and structures, parking requirements, sign programs, and art-in-public-places program), and special use standards. Additionally, the project proposes to amend the City's General Plan to reflect the new zoning district classification via appropriate land use designations, development intensity, and density standards. A Local Coastal Program Amendment would also be required to reflect the new land use and zoning district classifications.

Please accept the following comments:

- **Scoping Meeting:** The community scoping meeting identified within the NOP indicates a date of March 25, 2020. The City's webpage indicates the scoping meeting was cancelled. Please provide notice to the City of San Juan Capistrano at least two weeks prior to the rescheduled scoping meeting date. Because the rescheduled scoping meeting will likely occur outside of the NOP review period, we request that the City of Dana Point allow for the submittal of additional comments, if necessary.
- **Staff meeting:** In the spirit of cooperation, we believe it would be helpful for staff members from both cities to meet prior to the Draft EIR release to ensure we have a sound understanding of the proposed project.
- **Transportation:** The City of San Juan Capistrano notes that the City of Dana Point intends to evaluate potential impacts associated with the proposed project's construction and operational related traffic in a Traffic Impact Analysis. Consistent with SB 743, the preparation and analysis of Vehicle Miles Travelled (VMT) should be evaluated. In accordance with the City of Dana Point General Plan, Circulation Element, in order to evaluate the ability of the circulation system to serve future uses contemplated by the proposed project, the City of Dana Point will need to

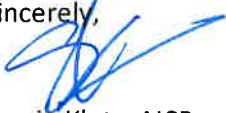
analyze impacts associated with level of service (LOS). To that end, the City of San Juan Capistrano requests that the City of Dana Point include the following intersections and roadway segments, which are within the project area, within the Traffic Impact Analysis:

- Intersections:
  - Camino Capistrano/Costco Driveway
  - Camino Capistrano/Stonehill Drive
  - Camino Capistrano/I-5 South Ramps
  - Stonehill Drive/Ganahl Development Project Proposed Driveway
- Roadway Segments:
  - Camino Capistrano – Costco Driveway to Stonehill Drive
  - Camino Capistrano – Stonehill Drive to I-5 South Ramps
  - Stonehill Drive -Camino Capistrano to Del Obispo Street
- Aesthetics: The NOP acknowledges *potential visual impacts with the proposed project due to blockage/effects from increased building heights along I-5 connecting to PCH as well as the change in character/quality of Doheny Village*. Potential visual impacts may also include blocked visibility to a high economic commercial node along the southern edge of San Juan Capistrano. The aesthetics analysis should include an evaluation of visual impacts to this important commercial node as a result of the changes in heights and densities proposed by the project. Moreover, to the extent that the proposed project would increase heights and densities of development along this commercial corridor, and because the view of the commercial node along the southern edge of San Juan Capistrano may be blocked entirely, the City of Dana Point should consider the economic impacts that the proposed project could have on the City of San Juan Capistrano. (State CEQA Guidelines, section 15131.).
- Land Use and Planning: Land use impacts should be fully analyzed. Analysis should include potential impacts from introducing residential uses near or adjacent to existing commercial nodes, specifically those located within the City of San Juan Capistrano’s southern boundary. Additionally, analysis should include future potential build out and other allowable uses within the commercial node.
- Noise: Study and analysis to include potential impacts from introducing residential uses near or adjacent to existing commercial nodes. Measures may be needed to attenuate noise sources emitted from existing commercial uses.

Again, we appreciate the opportunity to review the NOP, and look forward to working with the City of Dana Point as this study effort moves forward. Please keep us informed of any future environmental documents and meetings related to the Project.

Thank you for consideration of the City’s input.

Sincerely,



Sergio Klotz, AICP  
Assistant Development Services Director