DRAFT

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

26200 ENTERPRISE WAY NEW INDUSTRIAL BUILDING PROJECT

LAKE FOREST, CALIFORNIA

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26200 ENTERPRISE WAY NEW INDUSTRIAL BUILDING PROJECT

LAKE FOREST, CALIFORNIA

Submitted to:

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Project No. CLF2101.01

September 2023

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LIST OF ABBREVIATIONS AND ACRONYMS

AB 1881	Assembly Bill 1881
AB 32	Assembly Bill 32
AB 341	Assembly 341
AB 52	Assembly Bill 52
ACMs	asbestos-containing materials
afy	acre-feet per year
amsl	above mean sea level
APN	Assessor's Parcel Number
APST	Aboveground Petroleum Storage Tank
AQMP	Air Quality Management Plan
AST	aboveground storage tanks
BACMs	best available control measures
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan
BEP	Business Emergency Plan
bgs	below ground surface
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer-Aided Noise Abatement
CAL FIRE	California Department of Forestry and Fire Protection
CalARP Program	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
Cal/OSHA	California OSHA
CAPs	climate action plans
CARB	California Air Resources Board

CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERS	California Environmental Reporting System
CESA	California Endangered Species Act
CGP	Construction General Permit
CGS	California Geological Survey
CH_4	methane
City	City of Lake Forest
CIWMP	Countywide Integrated Waste Management Plan
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPEP	Clean Power and Electrification Pathway
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
cy	cubic yard/yards
DAMP	Drainage Area Management Plan
dB	decibel
dBA	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
DEFRA	Department for Environment, Food and Rural Affairs
DIR	California Department of Industrial Relations
DPM	diesel particular matter
Draft Guidance Document	*Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*
DOSH	Division of Occupational Safety and Health

DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EMFAC2017	California Emission Factor Model, version 2017
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallons per day
GSAs	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan
HASP	Health and Safety Plan
HFCs	hydrofluorocarbons
HHDTs	heavy-heavy duty trucks
HMD	Hazardous Materials Disclosure
HMBP	Hazardous Materials Business Plan
hp	horsepower
HRA	Health Risk Assessment
HW	Hazardous Waste
I-5	Interstate 5
IEPR	Integrated Energy Policy Report
IEPR	Integrated Energy Policy Report
in/sec	inches per second
L_{eq}	equivalent continuous sound level
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
RMP	Risk Management Plan

USEPA	U.S. Environmental Protection Agency
UST	Underground Storage Tank
SDSs	Safety Data Sheets

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1.0 PROJECT INFORMATION

1. **Project Title:**

   26200 Enterprise Way New Industrial Building Project

2. **Lead Agency Name and Address:**

   City of Lake Forest
   100 Civic Center Drive
   Lake Forest, California 92630

3. **Contact Person and Phone Number:**

   Jennifer Mansur, (949) 461-3472

4. **Project Location:**

   26200 Enterprise Way

5. **Project Sponsor's Name and Address:**

   Chris Stanford
   Ares Industrial Management
   4675 Macarthur Court
   Newport Beach, California 92660

6. **General Plan Designation:**

   Light Industrial

7. **Zoning:**

   Light Industrial (LI) in the Pacific Commercentre Planned Community

8. **Description of Project:**

   The proposed Project includes the demolition of the existing 144,906-square-foot (sq ft), two-story commercial and office facility and the construction and operation of a 35-foot tall, 165,803 sq ft, two-story industrial building. Approximately 155,803 sf are planned for warehouse use with the remaining 10,000 sq ft to be utilized as office space. The applicant has also submitted an alternative site plan that would include 105,000 sq ft of manufacturing, 50,803 sq ft of warehouse use, and the remaining 10,000 sq ft to be utilized as office space. The proposed Project includes a gated truck loading area, new landscaping, and a parking lot. Although the operator is yet to be determined, it is anticipated that operational uses could include, but are not limited to, warehouse/distribution, manufacturing, or research and development. The Project applicant also proposes to install various off-site improvements at five intersections within Lake Forest to enhance public safety and address concerns over pre-existing and future large truck turning movements.

9. Surrounding Land Uses and Setting:

The 8.83-acre Project site (Assessor's Parcel Number [APN] 610-401-06-) was previously operating as a corporate office building occupied by Panasonic Avionics. The areas surrounding the Project site consist of a mix of land uses, including commercial, office, warehouse, and residential uses (under construction). The Project site is bordered to the north, south, and west by existing multi-tenant office and warehouse buildings. The Meadows Residential Development (formerly the Nakase Nursery site) is to the northeast/east of the Project site; the Meadows Residential Development site is currently being developed. Local access to the Project site is provided by Enterprise Way, which is accessed by Dimension Drive or Bake Parkway. Lake Forest Drive is approximately 0.5 mile south and State Route 241 (SR-241) is approximately 0.7 mile north of the Project site.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

Orange County Fire Authority (OCFA)
State Water Resources Control Board (SWRCB)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.??

No tribes have requested consultation pursuant to Public Resource Code (PRC) Section 21080.3.1

2.0 PROJECT DESCRIPTION

This chapter describes the proposed 26200 Enterprise Way New Industrial Building Project (Site Development Permit 06-21-5437) (proposed Project) evaluated in this Initial Study/Mitigated Negative Declaration (IS/MND). A description of the proposed Project, its location, and required approvals is provided below.

2.1 REGIONAL LOCATION

The Project site is located at 26200 Enterprise Way in the north-central portion of Lake Forest in Orange County, California. As shown on Figure 2.1, Project Vicinity, regional access to the Project site is provided by State Route 241 (SR-241), which is located approximately 0.7 mile north of the Project site, and Interstate 5 (I-5), which is located approximately 3.75 miles southwest of the Project site.

2.1.1 Project Vicinity and Surrounding Land Uses

The 8.83-acre Project site (Assessor's Parcel Number [APN] 610-401-06) was previously operating as a corporate office building occupied by Panasonic Avionics. As shown on Figure 2.2, Project Location, the areas surrounding the Project site consist of a mix of land uses, including commercial, office, warehouse, and residential uses (under construction). The Project site is bordered to the north, south, and west by existing multi-tenant office and warehouse buildings. The Meadows Residential Development (formerly the Nakase Nursery site) is to the northeast/east of the Project site; the Meadows Residential Development site is currently being developed. Local access to the Project site is provided by Enterprise Way, which is accessed by Dimension Drive or Bake Parkway. Lake Forest Drive is approximately 0.4 mile south and SR-241 is approximately 0.7 mile north of the Project site.

2.2 ENVIRONMENTAL SETTING

2.2.1 Existing Project Site Conditions

In its existing condition, the Project site is developed with a 144,906-square-foot (sq ft) two-story commercial and office facility (previously occupied by Panasonic Avionics) and related parking. Figure 2.3, Existing Conditions, shows existing conditions on the Project site.

The Project site is generally flat; however, the eastern and southern boundaries of the site possess north- and west-facing slopes. These slopes ascend 10 to 15 feet from the Project site to the adjacent property. A concrete-lined drainage swale is near the midpoint of the slope. Vegetation covers the remaining areas of the slopes.

Access to the Project site is currently provided via two driveways on Enterprise Way and a reciprocal access on the northeast corner of the site to the adjacent property.

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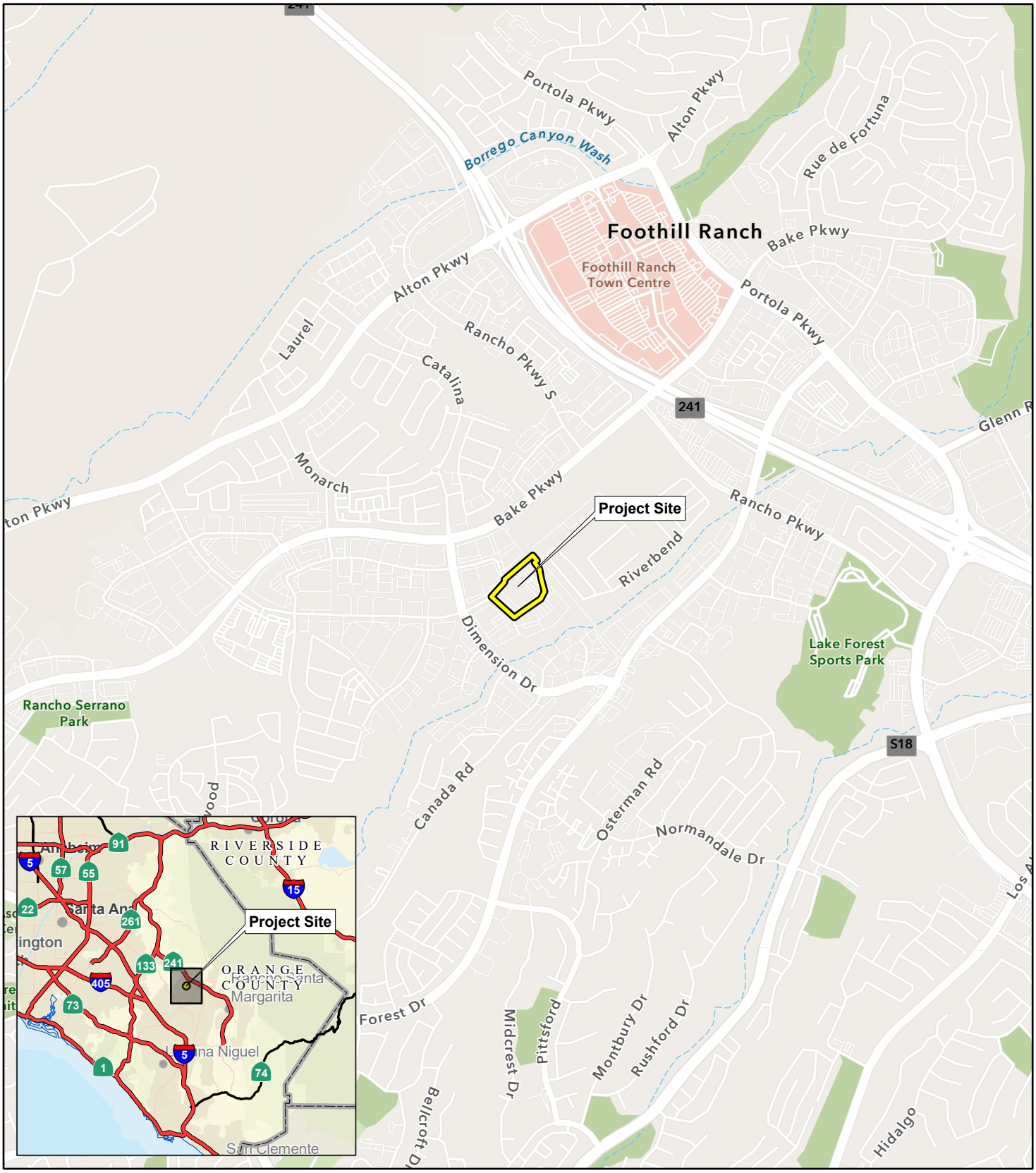

LSA

Project Site

FIGURE 2.1

N

0 1000 2000
FEET

SOURCE: Esri Community Map (2023)

26200 Enterprise Way New Industrial Building

Project Vicinity

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LSA

Project Site

FIGURE 2.2

N

0 100 200 300
FEET

SOURCE: Google Maps

26200 Enterprise Way New Industrial Building

Project Location

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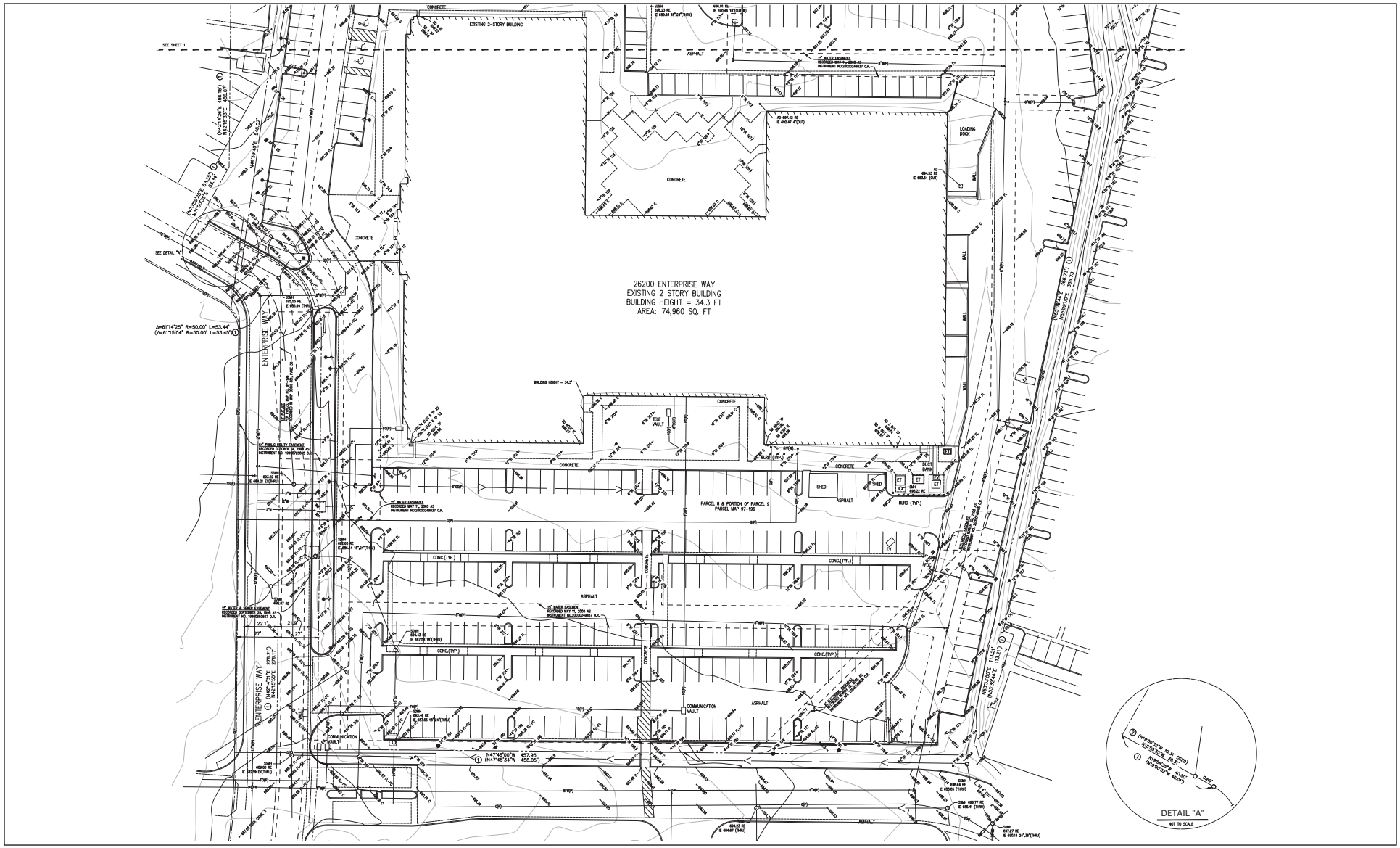

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FIGURE 2.3

N

0 30 60
FEET

SOURCE: Kier+Wright, April 2023

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26200 Enterprise Way New Industrial Building
Existing Conditions

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2.2.2 General Plan Land Use Designations

The Project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses.

Allowable uses include wholesale businesses, light manufacturing and processing, research and development uses, warehousing and storage, distribution and sales, high technology production, ancillary retail sales, and related uses. The proposed Project is consistent with the Light Industrial land use designation. No General Plan Amendment is required for the proposed Project.

2.2.3 Current Zoning

The Project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I". Permitted uses include a variety of office, manufacturing, and warehouse uses. Pursuant to the zoning, the proposed industrial building requires a Site Development Permit.

2.2.4 Project Site History

With the exception of the northeast portion of the Project site, which appears to have been utilized for orchards from approximately 1938 to 1952, the Project site was vacant and undeveloped land from at least 1930 until development of the existing structure in 1999. The following occupants have been associated with the current office and commercial structure: Matsushita Avionics Systems (2000-5005), and Panasonic Avionics Corporation (2006–2021).

2.3 PROJECT CHARACTERISTICS

The proposed Project includes the demolition of the existing 144,906 sq ft, two-story commercial and office facility and the construction and operation of a 35-foot tall, 165,803 sq ft, two-story industrial building, as shown on Figure 2.4, Conceptual Site Plan. Approximately 155,803 sq ft is planned for warehouse use with the remaining 10,000 sq ft to be utilized as office space. The applicant has also submitted an alternative site plan that would include 105,000 sq ft of manufacturing, 50,803 sq ft of warehouse use, and the remaining 10,000 sq ft to be utilized as office space as shown on Figure 2.5, Alternative Conceptual Site Plan[1]. The proposed Project includes a gated truck loading area, new landscaping, and a parking lot. Although the operator is yet to be determined, it is anticipated that operational uses could include, but are not limited to, warehouse/ distribution, manufacturing, or research and development. The Project applicant also proposes project features that include the installation of off-site improvements at the following five intersections within the City to enhance public safety and address concerns over pre-existing

[1] The only difference between the proposed site plan and the alternate site plan is the types of uses that would be housed inside the 165,803 sq ft building and the location and number of the parking stalls; the project components (e.g., the overall building square footage, footprint and associated infrastructure [stormwater facilities, water supply, wastewater treatment, lighting, etc.]) would be the same for either site plan. Therefore, the environmental analysis provided herein applies to both the proposed site plan and the alternate site plan. In any instance where the impacts would be different, such as the provision of parking, the differences between site plans are explicitly presented.

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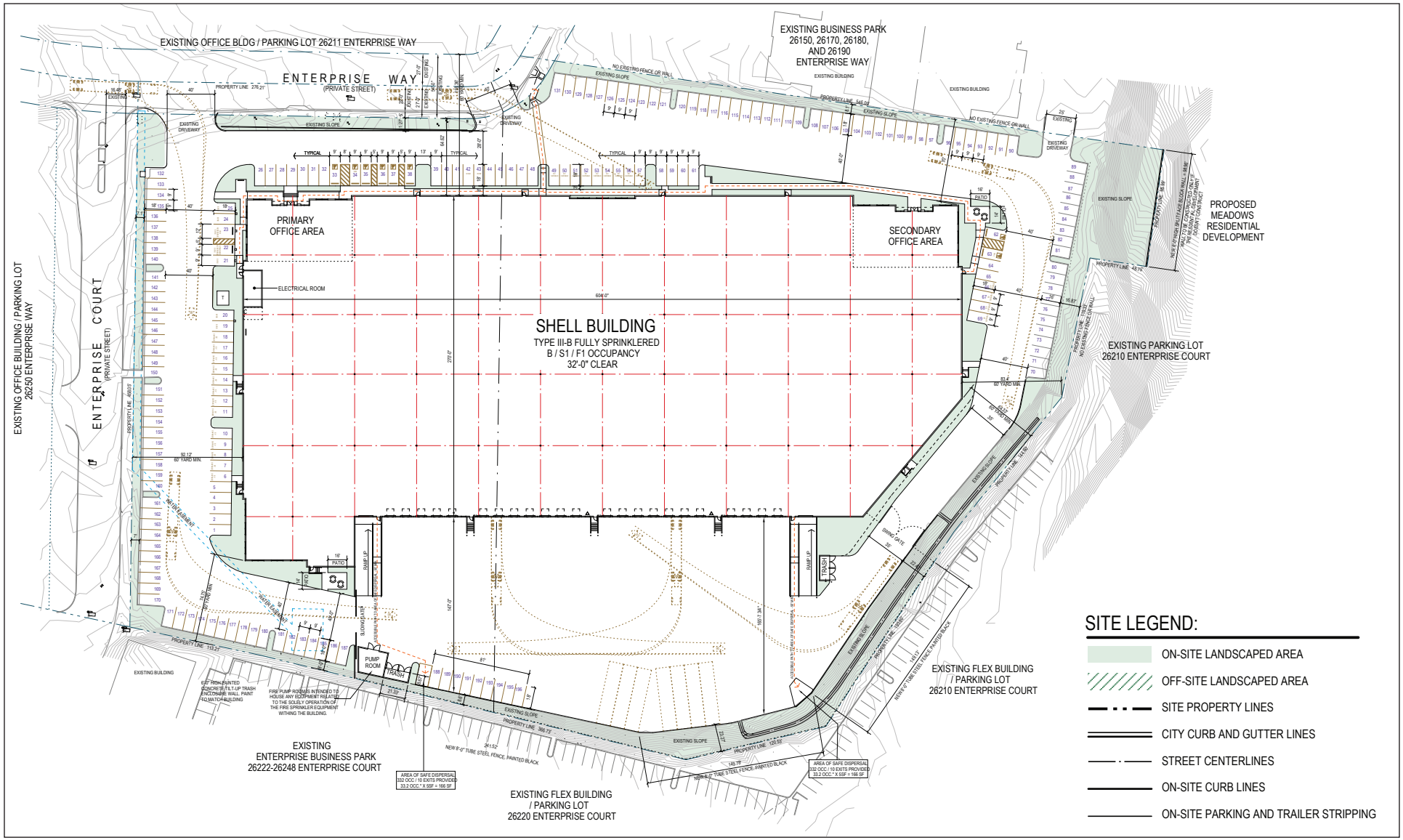

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FIGURE 2.4

NOT TO SCALE

SOURCE: RGA, May 2023

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26200 Enterprise Way New Industrial Building
Conceptual Site Plan

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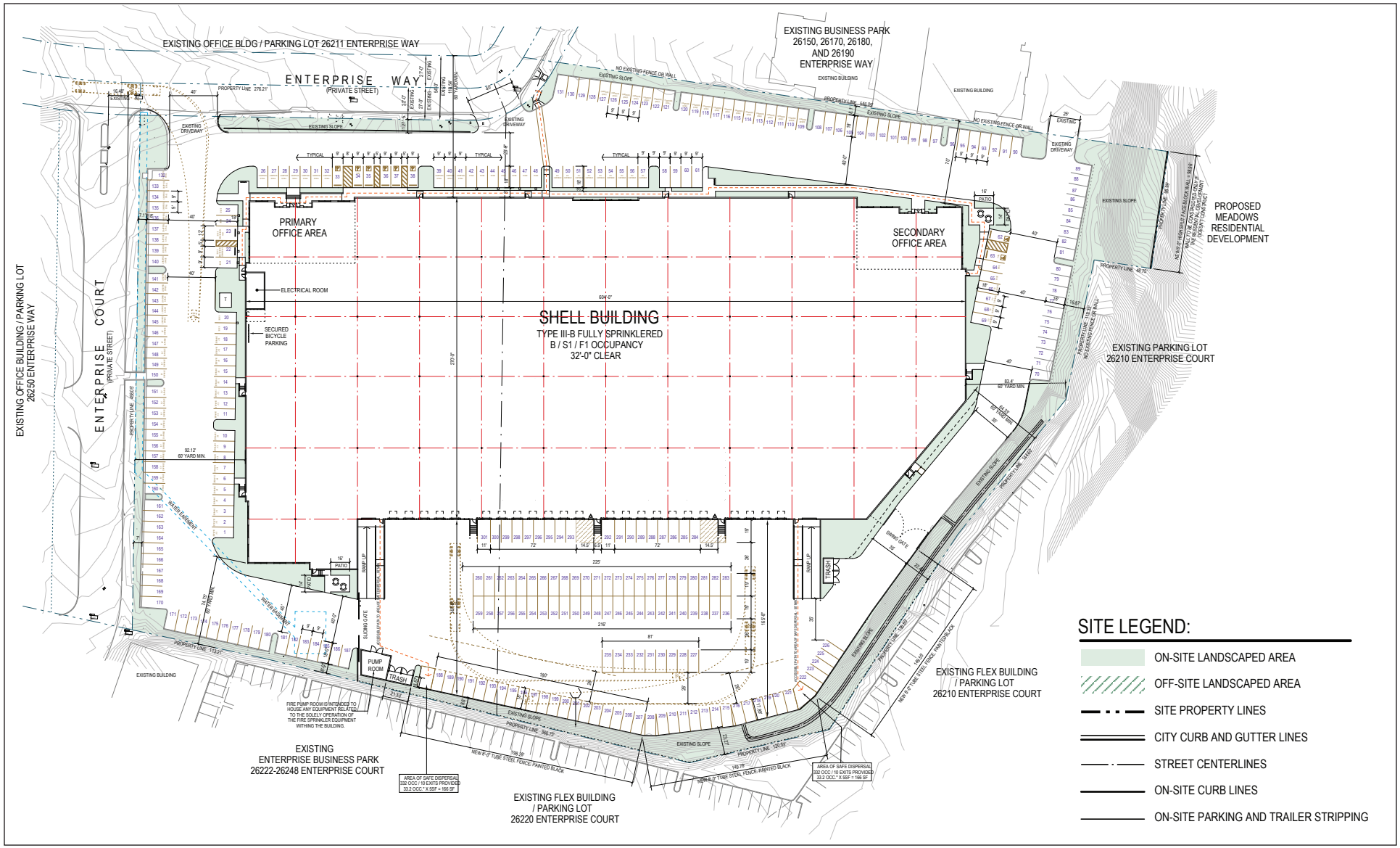

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FIGURE 2.5

NOT TO SCALE

SOURCE: RGA, May 2023

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26200 Enterprise Way New Industrial Building

Alternative Conceptual Site Plan

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and future large truck turning movements: Bake Parkway/Commercentre Drive, Dimension Drive/ Commercentre Drive/Enterprise Way, Rancho Parkway/Lake Forest Drive, Bake Parkway/Dimension Drive, and Dimension Drive/Lake Forest Drive.

2.4 BUILDING AND SITE DESIGN

2.4.1 Architecture

The proposed building is 35-feet tall (maximum) and will be constructed of painted tilt-up concrete panels. The building is proposed to be painted different shades of gray with a blue accent color. The building main entrances are emphasized with vertical and horizontal bands, windows, and decorative light scones. Building articulation is provided at the entrances by changes in the façade planes and height variation in roof line. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The truck doors, which are painted to match the building, are located on the south elevation of the building, and are not visible from the surrounding streets, nor residential properties.

2.4.2 Landscaping

As shown on Figure 2.6, Conceptual Landscape Plan, landscaping on the Project site would be provided in accordance with the requirements outlined in the Pacific Commercentre Planned Community District Regulations and Citywide Design Guidelines. A variety of trees, shrubs, and groundcover surrounding the proposed industrial building is proposed. The existing landscaping around the perimeter of the Project site would remain.

2.4.3 Lighting

Proposed on-site lighting includes, but is not limited to, streetlights, parking lot lights, and accent lighting on buildings. All lighting would be hooded or shielded to focus the light downward and minimize light spillage onto adjacent properties.

2.4.4 Signage

Proposed signage would include future tenant signage on the northern wall of the proposed building facing Enterprise Way. All signage within the Project site would be in accordance with Chapter 9.164, Signs, of the Lake Forest Municipal Code.

2.4.5 Police and Fire Access

Fire and police access would be accommodated by the proposed vehicle access and circulation design and the installation of directional signage. Per Lake Forest Municipal Code Chapter 8.24, California Fire Code, Section 903.2, an automatic sprinkler system would be installed throughout the proposed structures on the Project site. The proposed Project also includes the installation of seven fire hydrants on site. Four of these fire hydrants would replace existing fire hydrants that are being relocated on the site.

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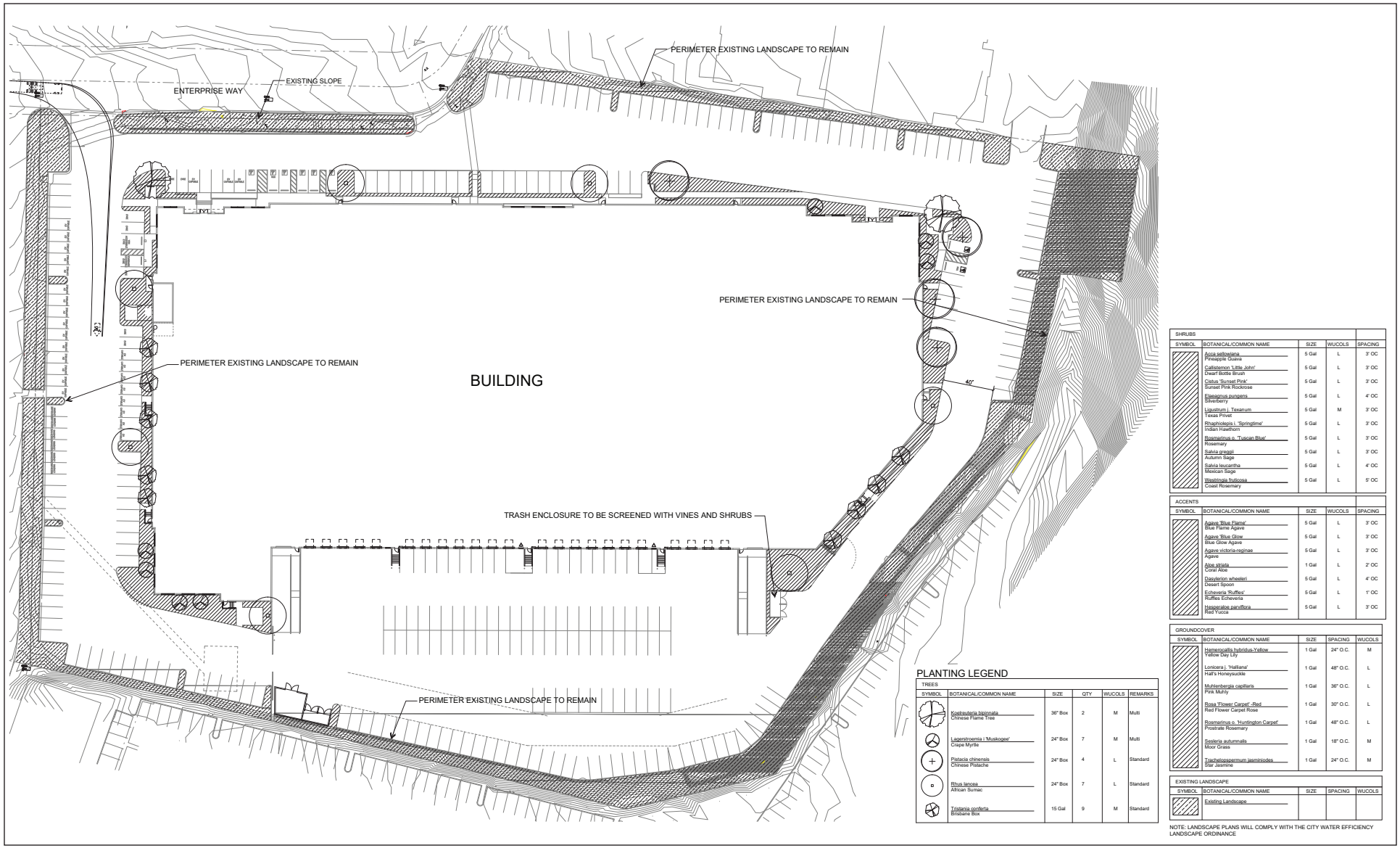

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Koelreuteria bipinnata Chinese Flame Tree	36" Box	2	M	Multi
	Lagerstroemia i 'Muskogee' Crape Myrtle	24" Box	7	M	Multi
	Pistacia chinensis Chinese Pistache	24" Box	4	L	Standard
	Rhus lancea African Sumac	24" Box	7	L	Standard
	Tristania conferta Brisbane Box	15 Gal	9	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	SPACING
	Acca sellowiana Pineapple Guava	5 Gal	L	3' OC
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	L	3' OC
	Cistus 'Sunset Pink' Sunset Pink Rockrose	5 Gal	L	3' OC
	Elaeagnus pungens Silverberry	5 Gal	L	4' OC
	Ligustrum j. Texanum Texas Privet	5 Gal	M	3' OC
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	L	3' OC
	Rosmarinus o. 'Tuscan Blue' Rosemary	5 Gal	L	3' OC
	Salvia greggii Autumn Sage	5 Gal	L	3' OC
	Salvia leucantha Mexican Sage	5 Gal	L	4' OC
	Westringia fruticosa Coast Rosemary	5 Gal	L	5' OC

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	SPACING
	Agave 'Blue Flame' Blue Flame Agave	5 Gal	L	3' OC
	Agave 'Blue Glow Blue Glow Agave	5 Gal	L	3' OC
	Agave victoria-reginae Agave	5 Gal	L	3' OC
	Aloe striata Coral Aloe	1 Gal	L	2' OC
	Dasylirion wheeleri Desert Spoon	5 Gal	L	4' OC
	Echeveria 'Ruffles' Ruffles Echeveria	5 Gal	L	1' OC
	Hesperaloe parviflora Red Yucca	5 Gal	L	3' OC

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS
	Hemerocallis hybridus-Yellow Yellow Day Lily	1 Gal	24" O.C.	M
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L
	Muhlenbergia capillaris Pink Muhly	1 Gal	36" O.C.	L
	Rosa 'Flower Carpet' -Red Red Flower Carpet Rose	1 Gal	30" O.C.	L
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L
	Sesleria autumnalis Moor Grass	1 Gal	18" O.C.	M
	Trachelospermum jasminoides Star Jasmine	1 Gal	24" O.C.	M

EXISTING LANDSCAPE

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS
	Existing Landscape			

NOTE: LANDSCAPE PLANS WILL COMPLY WITH THE CITY WATER EFFICIENCY LANDSCAPE ORDINANCE

LSA

FIGURE 2.6

N

0 60 120

FEET

SOURCE: Hunter Landscape, 2/2023

26200 Enterprise Way New Industrial Building

Conceptual Landscape Plan

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The Orange County Fire Authority (OCFA) provides fire protection and emergency services throughout Lake Forest. OCFA requires all developers to enter into a secured fire protection agreement with OCFA to ensure the availability of adequate fire protection services. The agreements specify a developer's pro-rata fair-share funding for capital improvements necessary to establish and maintain adequate fire protection facilities, equipment, and personnel.

2.5 CIRCULATION, ACCESS, AND PARKING

2.5.1 Vehicular Access

Vehicular access to the Project site would continue to be provided via two existing driveways on Enterprise Way and an existing reciprocal access on the northeast corner of the site to the adjacent property.

Truck circulation would be accommodated from the west and east sides of the building. Loading docks would be located on the southwest side of the proposed building.

2.5.2 Pedestrian Access

There is an existing sidewalk on the north side of Enterprise Way. An existing striped crosswalk on Enterprise Way, located at the northeasterly driveway, has a ramp and walkway on the south side of Enterprise Way that leads to a ramp into the parking lot. A crosswalk is proposed through the parking lot that leads to a paved walkway along the north side of the building, which leads to the primary office area in the northwest corner of the building and the secondary office area in the northeast corner of the building.

2.5.3 Parking

The City's Municipal Code (Chapter 9.168, Off-Street Parking) stipulates parking requirements for industrial uses, and the proposed Project would be subject to the City's parking requirements. The proposed Project includes 196 parking spaces around the perimeter of the proposed structure. In compliance with Municipal Code requirements, bike racks (20 spaces total) would also be provided on site. The alternative site plan includes 301 parking spaces around the perimeter of the proposed structure. In compliance with Municipal Code requirements, the alternative site plan would also provide bike racks (31 spaces total) on site.

2.6 INFRASTRUCTURE IMPROVEMENTS

The Project site is served by all major utilities (e.g., water, wastewater, and electricity) in the existing condition. The proposed Project infrastructure components to be implemented would require connections to existing off-site infrastructure systems. These systems, which consist of water, sanitary sewer, and storm water drains, would be constructed on site and would be fully provided and maintained by the property owner. All on-site systems would connect to existing infrastructure in Enterprise Way. The following infrastructure improvements would serve the future development included in the proposed Project:

- **Water:** The Project site receives domestic and recycled water service from the Irvine Ranch Water District (IRWD). The Project site has an existing private on-site water system that

connects to a 12-inch-diameter water main in Enterprise Way. The existing on-site water distribution system would be removed and replaced with new water lines that would use the existing water connection to the water main in Enterprise Way. All connections to the existing water lines would be reviewed and approved by the City of Lake Forest (City) Public Works Department. New waterlines and the associated water meter(s) would also be approved by IRWD

- **Sewer Service:** As in the existing condition, wastewater from the Project site would be treated by IRWD. The Project site currently has an on-site sewer system that connects with the existing 8-inch-diameter vitrified clay pipe (VCP) sewer in Enterprise Way. The proposed Project would reuse an existing on-site sewer service lateral that connects to the sewer main in Enterprise Way. All connections to the existing wastewater lines would be reviewed and approved by the City's Public Works Department and IRWD, as applicable.

- **Dry Utilities:** The Project site receives electricity service from Southern California Edison (SCE). A new transformer is proposed on the northwest side of the proposed structure next to Enterprise Court. The proposed Project includes the installation of new, on-site underground gas, cable, and telephone utility lines. All electricity improvements would be completed consistent with the requirements of SCE and other applicable dry utility providers.

- **Storm Water Best Management Practices (BMPs):** The proposed Project would include three on-site modular wetland systems placed throughout the site to meet treatment requirements.

- **Drainage System:** The Project proposes to surface drain all runoff to modular wetland systems that will be placed around the site to capture storm water runoff and treat it prior to discharging into the public system. Storm water runoff from 5.772 acres of the 8.523 acres (approximately 68 percent) of the site would be conveyed to three underground detention basins after being treated. Flow from the detention basin would be released in a controlled manner to reduce peak flood flows. The storm drainage would ultimately exit the site at two locations, an existing manhole at the northwest of the site to the main in Enterprise Way and to an existing manhole at the northeast of the building that carries flow to the public system.

2.7 SUSTAINABILITY FEATURES

Future development facilitated by approval of the proposed Project would be consistent with the California Green Building Standards Code (CALGreen) and Assembly Bill 1881 (AB 1881) water efficient landscape requirements.

2.8 PROJECT CONSTRUCTION

2.8.1 Phasing and Staging

Construction activities associated with the proposed Project would include demolition of the existing structure on the Project site, site preparation, grading, building construction, paving, and architectural coating activities. Construction of the proposed Project would tentatively commence in Winter 2023/2024 and is expected to be completed in about 1 year.

The proposed Project would require the demolition of a 144,906 sq ft structure and 5.51 acres of pavement, which is expected to generate approximately 8,889 tons of material for recycling or disposal. Removal of the demolition debris is anticipated to require 879[2] hauling trips.

Construction of the proposed Project would require approximately 13,373 cubic yards (cy) of cut and approximately 13,475 cy of fill, resulting in a net import of approximately 102 cy of material.[3] Grading is expected to require 13 haul trips and demolition is expected to require 879 haul trips.[4] Excavation depths are expected to reach a maximum of 6 feet below ground surface (bgs).[5]

Demolition activities would involve the use of standard demolition equipment (e.g., concrete/ industrial saws, excavators, and dozers). Grading and building construction activities would involve the use of standard earthmoving equipment such as tractors, bulldozers, excavators, cranes, forklifts, scrapers, and other related equipment. Paving activities would require the use of paving equipment, and rollers and architectural coating would require the use of air compressors.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period.

The City's Noise Ordinance (Lake Forest Municipal Code Title 11 Division II, Chapter 11.16.060, Exemptions) governs the time of day that construction work can be conducted. The Noise Ordinance prohibits construction, repair, remodeling, and grading between the hours of 8:00 p.m. and 7:00 a.m. on weekdays and Saturdays, or at any time on Sunday or a legal City of Lake Forest holiday. Construction of the proposed Project may occur on Saturdays but would not occur after 8:00 pm or on Sundays or holidays.

2.9 REQUIRED PERMITS AND APPROVALS

2.9.1 Discretionary Actions

Development of the proposed Project would require discretionary approvals by the City as the Lead Agency. The City's discretionary actions would include the following:

- **Site Development Permit 06-21-5437:** A Site Development Permit is required for new structures within the Light Industrial zoning designation per the requirements of the Pacific Commercentre Planned Community District Regulations.

2.9.2 Probable Future Actions by Responsible Agencies

Ministerial permits/approvals (e.g., grading permits and building permits) (refer to Table 2.A) would be issued by the City or other appropriate agency to allow site preparation, curb cuts (if necessary),

2 Urban Crossroads. 2023a. *Lake Forest Warehouse, Air Quality Impact Analysis, City of Lake Forest.* April 18.
3 RGA. 2023. *26200 Enterprise Use Permit Plan Set.* June 9.
4 Urban Crossroads. 2023a. Op. cit.
5 Southern California Geotechnical. 2021a. *Geotechnical Investigation Proposed Warehouse 26200 Enterprise Way, Lake Forest, California.* November 18.

and connections to the utility infrastructure, paving, landscaping, walls and fences, and other Project features subject to ministerial permits.

Table 2.A: Probable Future Actions by Responsible Agencies

Responsible Agency	Action
Orange County Fire Authority (OCFA)	Approval of Secured Fire Protection Agreement.
State Water Resources Control Board (SWRCB)	Applicant/Developer must submit Permit Registration Documents, including a Notice of Intent, to comply with the National Pollutant Discharge Elimination System (NPDES) North Orange County Permit (Order No. R8-2009-030 as amended by Order No. R8-2010-0062).

Source: Compiled by LSA Associates, Inc. (2023).

3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 3.0.

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

3.1 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 Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature _____ Date _____

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Aesthetic components of a scenic vista generally include: (1) scenic quality, (2) sensitivity level, and (3) view access. While Lake Forest contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in the city. Significant visual resources in Lake Forest include several prominent creeks, including Aliso Creek, Serrano Creek, San Diego Creek, and the Borrego Canyon Wash, and the Eucalyptus groves that surround portions of these lakes. Other prominent visual features throughout the planning area include views of ridgelines, hillsides, and canyons.[6]

The Project site is located in a fully developed area (with the exception of the Meadows Residential Development, which is under construction directly northeast of the Project site) in the northern portion of Lake Forest in Orange County, California. The Project site is located approximately 10 miles northeast of the Pacific Ocean, although the ocean cannot be seen from the Project site due to the intervening San Joaquin Hills to the southwest of the City. The Santa Ana Mountains, which are the highest and most prominent mountains in Orange County, are visible in the east from the Project site and surrounding area. The City's Nature Park (26215 Dimension Drive) is located approximately 391 feet southeast of the Project site. According to the City's Recreation and Resources Element, the Nature Park is a 4.5-acre park with walking trails, picnic tables, and a gazebo

[6] City of Lake Forest. 2019. *Public Draft Environmental Impact Report for the 2040 Lake Forest General Plan, SCH# 2019090102*. November.

picnic area. The Recreation and Resources Element notes that natural resources and open space contribute to the visual quality of the city.

The proposed Project would result in the demolition of an existing 144,906 sq ft two-story office building with a height of approximately 35 feet (based on City records) and the replacement of this structure with a 165,803 sq ft, two-story industrial building with a height of 35 feet. The proposed Project also includes a gated truck loading area, new landscaping, a parking lot, and various off-site improvements at five intersections within the city to enhance public safety and address concerns over pre-existing and future large truck turning movements. The height and mass of the proposed structure would be similar to the existing structure and similar to the surrounding development. Once developed, the proposed Project would not obstruct views of the distant Santa Ana Mountains. Therefore, development of the proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

There are no officially listed or eligible State Scenic Highways in the vicinity of the Project site.[7] The only officially designated State Scenic Highway in Orange County is a portion of State Route 91 (SR-91) that is located approximately 14 miles north of the Project site. The nearest State highways that are eligible for official designation as a State Scenic Highway include a portion of State Route 74 (SR-74) that is located approximately 10 miles southeast of the Project site, and a portion of Pacific Coast Highway (PCH or State Route 1 [SR-1]) that is located approximately 10 mi southwest of the Project site. Due to distance, topography, and intervening development, no portion of the Project site or surrounding area is visible from the officially designated portion of SR-91 or the eligible portion of SR-74 or PCH (SR-1). Therefore, the proposed Project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. **No impact** would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

[7] California Department of Transportation (Caltrans). n.d. California Scenic Highway Mapping System. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed October 25, 2021).

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

The United States Census Bureau designates the Project site as part of an urbanized area because the entire city is within the Mission Viejo-Lake Forest-San Clemente, CA Urbanized Area.[8] As described in *State CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile.[9] Because Lake Forest is located in an urbanized area, the Project site is also located within an urbanized area. The Project site is zoned Light Industrial (LI) within the Pacific Commercentre Planned Community. The Project site's current General Plan land use designation is Light Industrial. The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City of Lake Forest (City) Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I." Permitted uses include a variety of office, retail, manufacturing, and retail uses. The proposed project is in compliance with all the development standards for the LI zoning, including but not limited to the setbacks, building height, landscaping, and parking. Table 4.11.A in Section 4.11, Land Use and Planning, provides a consistency analysis of the Site Development Standards from the LI zoning district in the Pacific Commercentre Planned Community that are applicable to the proposed Project. As stated in Table 4.11.A, the proposed Project would be consistent with all of the applicable Development Standards.

The proposed Project would require a Site Development Permit, which would provide for the review of the physical improvements to the Project site, including the overall building scale, massing, and design to ensure compatibility and compliance with City requirements governing scenic quality. With the approval of a Site Development Permit, the proposed Project would be consistent with the General Plan and zoning designations, and no General Plan Amendment, Specific Plan Amendment, or zone change would be required as part of Project approval.

The visual character and quality of the Project site and surrounding area would be preserved and enhanced through the application of the Citywide Design Guidelines. The Citywide Design Guidelines contribute to the City's Vision by ensuring that new and renovated projects in the City are developed in context with the surrounding areas and designed in a high-quality manner which promotes a positive City Image. The project was designed in compliance with the Citywide Design Guidelines, including but not limited to the following guidelines related to aesthetics:

- The building is located over 150 feet from the closest property line for a single-family residence, and a 60-foot wide (minimum) landscaped slope buffers the industrial project from the adjacent single-family residential community.

[8] United States Census Bureau. 2010. Mission Viejo-Lake Forest-San Clemente, CA Urbanized Area No. 57709. Website: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua57709_mission_viejo--lake_forest--san_clemente_ca/DC10UA57709.pdf (accessed October 25, 2021).

[9] United States Census Bureau. 2010 Census Urban Area FAQs. Website: https://www.census.gov/programs-surveys/geography/about/faq/2010-urban-area-faq.html (accessed July 20, 2023).

- The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building to create visual interest.
- The building architecture features low, medium, and high elevation elements.
- The main building entrance, which faces the Enterprise Way street frontage, are emphasized with vertical and horizontal bands, windows, and decorative light scones. Building articulation is provided at the entrance by changes in the façade planes and height variation in roof line. These architectural features make the main entrance easily identifiable and the architectural focal point of the building.
- The building was designed with a built-in roof top well to screen the roof-top mechanical equipment.
- The vehicular entrances to the site are flanked by landscaping that includes, trees, hedges and landscaped berms.
- The site is maintaining the existing perimeter landscaping around the entire site, which screens the parking areas.

Therefore, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts related to applicable zoning and other regulations governing scenic quality would be **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

Construction. Construction activities would occur only between the hours of 7:00 am and 8:00 pm. Any construction-related illumination during evening and nighttime hours would be used for safety and security purposes only, would be downlit to minimize light spillage onto adjacent properties, and would occur only for the duration required for the temporary construction process. Because any necessary night lighting resulting from construction activities would be minimal, would not spill onto adjacent properties, and would be temporary, it would not substantially impact sensitive uses, substantially alter the character of surrounding uses, or interfere with the performance of off-site activities. In addition, construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Minor glare from sunlight on construction equipment and vehicle windshields is not anticipated to impact visibility in the area because (1) relatively few construction vehicles and pieces of construction equipment would be used on the Project site, and (2) the construction site would be fenced and shielded from pedestrian and vehicular views. In addition, construction vehicles would not be operating at night and thus would not create nighttime sources of glare. Therefore, construction of the proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and light and glare impacts associated with construction would be **less than significant**. No mitigation is required.

Operation. In the existing condition, the Project site produces exterior light and glare from a lighted surface parking area and wall-mounted building lighting. Several light poles exist throughout the

existing surface parking lot and are an existing source of light on the Project site. Existing sources of light in the project vicinity are typical of industrial areas and include vehicle headlights on nearby roadways, building façade and interior lighting, and pole-mounted lighting in the parking areas of adjacent developments. Lighting from existing distant development within Lake Forest also contributes to the background lighting in the project vicinity.

The proposed Project would provide parking lot lights and accent lighting on buildings, which is similar to the type and location of the existing on-site lighting. All lighting would be hooded or shielded to focus the light downward and minimize light spillage onto adjacent properties. All new lighting would comply with applicable regulations of the 2019 State Building Energy Efficiency Standards (Title 24.) Furthermore, the applicant has provided a photometric plan, that shows low illumination at the property lines adjacent to the light industrial areas and no illumination at the property line adjacent to the residential property. The proposed Project would not introduce new sources of light or glare that would adversely affect day or nighttime views in the area.

With adherence to Title 24 and Municipal Code requirements, the proposed Project would have a **less than significant impact** related to new sources of substantial light and glare. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.2 AGRICULTURE AND FORESTRY 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 (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

4.2.1 Impact Analysis

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

The Project site is currently fully developed and is located in an area that supports industrial, commercial, and residential developments. The Project site is not being used for agricultural production and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[10] The Farmland Mapping and Monitoring Program of the California

[10] California Department of Conservation. n.d. Farmland Mapping and Monitoring Program. Website: https://www.conservation.ca.gov/dlrp/fmmp (accessed July 20, 2023).

Resources Agency has categorized the Project site as Urban or Built Out Land. The surrounding area is characterized by commercial, industrial, and residential uses. The proposed Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a non-agricultural use. Therefore, the proposed Project would have **no impact** on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

The Project site is currently zoned Light Industrial (LI) in the Pacific Commercentre Planned Community which allows for a variety of light industrial uses such as offices, retail, manufacturing, and retail uses. An LI zoning designation does not allow for agricultural production, and the Project site is not protected by, or eligible for, a Williamson Act Contract. Implementation of the proposed Project would not conflict with existing zoning for agricultural use, nor would it conflict with a Williamson Act Contract. **No impact** would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

c. Would the project 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))?

The Project site currently has a zoning designation of Light Industrial (LI) in the Pacific Commercentre Planned Community, which allows for a variety of light industrial uses. The Project site is not zoned as forest land (as defined in Public Resources Code [PRC] Section 12220(g)), timberland (as defined by PRC Section 4526), or Timberland Production (as defined by Government Code Section 51104(g)). Therefore, implementation of the proposed Project would not conflict with existing zoning for forest resources. **No impact** would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

The Project site is currently fully developed and is located in an area that supports industrial, commercial, and residential developments. The Project site is not occupied by forest land. Therefore, implementation of the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. **No impact** would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

The Project site currently has a zoning designation of Light Industrial (LI) in the Pacific Commercentre Planned Community, which allows for a variety of industrial uses. The surrounding area is characterized by residential, light industrial, and commercial uses. Because the Project site is already developed and is not located in the vicinity of any existing agricultural land or land zoned for agricultural uses, the proposed Project would not contribute to environmental changes that could result in conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, **no impacts** to farmland or forest land would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Lake Forest Warehouse Air Quality Impact Analysis*[11] and the *Lake Forest Warehouse Mobile Source Health Risk Assessment*[12], which are provided in Appendix A (A-1 and A-2, respectively).

4.3.1 Impact Analysis

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

The Project site is located within Lake Forest, which is part of the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) adopted an Air Quality Management Plan (AQMP). The main purpose of an AQMP is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area in order to bring the area into compliance with federal and State air quality standards. A nonattainment area is considered to have air quality worse than the National Ambient Air Quality Standards (NAAQS) as defined in the federal Clean Air Act. The Basin is in nonattainment for the federal and State standards for ozone (O_3), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition, the Basin is in nonattainment for the State particulate matter less than 10 microns in diameter (PM_{10}) standard, and in attainment/maintenance for the federal PM_{10}, carbon monoxide (CO), and nitrogen dioxide (NO_2) standards.

Chapter 12, Sections 12.2 and 12.3 of the SCAQMD *CEQA Air Quality Handbook* (1993)[13] outlines criteria for determining consistency with the SCAG 2016 AQMP. A project would be consistent with

11 Urban Crossroads. 2023a. *Lake Forest Warehouse Air Quality Impact Analysis*. April 18.
12 Urban Crossroads. 2023e. *Lake Forest Warehouse Mobile Source Health Risk Assessment*. April 18.
13 South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.*

the AQMP if the project (1) would not increase the frequency or severity of an existing air quality violation or cause or contribute to a new violation or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP, and (2) would not exceed the growth assumptions in the AQMP based on the year of Project build out.

As discussed in Responses 4.3.b, 4.3.c, and 4.3.d, below, the proposed Project's emissions would be below the emissions thresholds established in the SCAQMD's *CEQA Air Quality Handbook* and would not be expected to result in significant air quality impacts. Therefore, the proposed Project would not increase the frequency or severity of any air quality standard violation or cause a new air quality standard violation.

The City's General Plan designates the Project site for Light Industrial uses. The Light Industrial designation provides for a variety of light industrial uses that are: nonpolluting; can co-exist with surrounding land uses; and do not create smoke, gas, dust, noise, vibration, soot or glare in their maintenance, assembly, manufacturing or operations that might be obnoxious or offensive to persons residing or conducting business in Lake Forest. Allowable uses include wholesale businesses, light manufacturing and processing, research and development uses, warehousing and storage, distribution and sales, high technology production, ancillary retail sales and related uses. Other uses that are determined to be compatible with the primary uses may also be allowed. The proposed Project would consist of 165,803 sq ft of manufacturing use, which is consistent with the site's land use designation. Since the proposed Project's proposed land uses are consistent with the development intensities allowed within the City's General Plan, the proposed Project would be consistent with the growth assumptions in SCAG's AQMP.

The proposed Project would not conflict or obstruct SCAG's 2016 AQMP because (1) the Project's construction and operational emissions would not exceed the regional or localized significance thresholds or cause or contribute to violations of the NAAQS or California Ambient Air Quality Standards (CAAQS), and (2) the proposed Project is consistent with the current General Plan land use designation on the Project site and with the development intensities allowed within the General Plan. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

b. Would the project 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?

The latest version of the California Emissions Estimator Model (CalEEMod Version 2020.4.0), which is the current air quality and land use emissions model recommended by the CARB for evaluating emissions from land use projects, was used for the proposed Project to determine construction and operational air quality emissions. CalEEMod utilizes summer and winter California Emission Factor Model, version 2017 (EMFAC2017) emission factors in order to derive vehicle emissions associated with Project construction and operation activities, which vary by season.

As described above, the Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the State PM_{10} standard. The Basin is in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the SCAQMD significance thresholds, its emissions are considered to be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction. Air quality impacts could occur during demolition and construction of the proposed project due to soil disturbance and equipment exhaust. Major sources of emissions during demolition, site preparation, grading, building construction, and architectural coating include the following: (1) exhaust emissions from construction vehicles; (2) equipment and fugitive dust generated by construction vehicles and equipment traveling over exposed surfaces; and (3) soil disturbances from site grading and paving. The proposed project includes the construction of a 165, 803 sf industrial building that will include 102 cubic yards (cy) of import related to the grading. The plans for this project were revised during the application process, after the air quality study analysis was completed. The original project was larger at 168,467 sf and included 6,500 cy of import. The air quality study analyzed this larger building with more imported soil and therefore potentially more air quality impacts than the revised project. As such, the air quality study is still acceptable and provides a more conservative estimate of the air quality impacts of the project. The following summarizes construction emissions and associated impacts of the project, as analyzed in the Air Quality study.

Project construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be additional sources of airborne dust after drying. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site. CalEEMod was utilized to calculate fugitive dust emissions resulting from the grading phase. This analysis assumes up to 6,500 cy of import.

The Project site is developed with 144,906 sq ft of general office use within a single building. Demolition of the existing structure would generate approximately 6,666 tons of material. Additionally, it is assumed that approximately 5.51 acres of pavement will also be demolished, which would generate 2,223 tons of demolished material. As such, this analysis conservatively assumes that demolition activities would generate up to 8,889 tons of debris. Construction

emissions for construction worker vehicles traveling to and from the project site, vendor trips, and hauling trips were estimated based on information from CalEEMod defaults. As described in Chapter 2.0, Project Description, construction of the proposed Project would commence in the winter of 2023/2024 and is expected to be completed within approximately one year.

The maximum daily emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_X), sulfur oxides (SO_X), CO, PM_{10}, and $PM_{2.5}$ that would result from construction of the proposed Project are summarized in Table 4.3.A and compared to the SCAQMD regional significance thresholds. As shown in Table 4.3.A, construction emissions associated with the proposed Project would not exceed the significance thresholds established by the SCAQMD for any of the criteria pollutants.

Table 4.3.A: Overall Construction Emissions Summary – Without Mitigation

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2022*	4.54	50.58	23.57	0.07	13.07	6.31
2023*	39.42	29.50	41.44	0.08	4.03	2.00
Winter						
2022*	4.54	50.59	23.23	0.07	13.07	6.31
2023*	39.47	29.61	41.02	0.08	4.03	2.00
Maximum Daily Emissions	**39.47**	**50.59**	**41.44**	**0.08**	**13.07**	**6.31**
SCAQMD Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant Emissions?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Lake Forest Warehouse Air Quality Impact Analysis* (Urban Crossroads 2023a).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

*The Air Quality Study was drafted in 2021 and assumed a construction schedule of April 2022 to March 2023. However, the application process took longer than expected and therefore the construction schedule has been delayed and is estimated to start construction in the winter of 2023/2024. However, as documented in Section 3.4.1 of the Air Quality Study, the construction schedule represents a "worst-case" scenario and emission factors for construction decrease as time passes due to emission regulations becoming more stringent.

As previously discussed, the portion of the Basin in which the Project site is located is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the State PM_{10} standard, and in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards. As shown in Table 4.3.A, emissions from construction of the proposed

Project would not exceed the significance thresholds for O_3, $PM_{2.5}$, or PM_{10}. Therefore, construction of the proposed Project would not exceed the significance thresholds of criteria pollutants for which the project region is nonattainment under the CAAQS or NAAQS.

According to SCAQMD guidance, projects that exceed the significance thresholds are considered by SCAQMD to result in cumulatively considerable air quality impacts. Conversely, projects that do not exceed the significance thresholds are generally not considered to result in cumulatively considerable air quality impacts. Therefore, based on the fact that emissions during construction of the proposed Project would not exceed any of the air quality significance thresholds for any criteria pollutants, the proposed Project would not have a cumulatively considerable air quality impact. Therefore, construction impacts related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable NAAQS or CAAQS would be **less than significant**, and no mitigation is required.

Operation. Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), area sources (e.g., architectural coatings, consumer products, and the use of landscape maintenance equipment), and on-site cargo handling emissions related to the proposed Project.

Area source emissions would be generated from the following sources:

- **Architectural Coating:** Over a period of time the buildings that are part of the proposed Project would require maintenance and would therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings.

- **Consumer Products:** Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds that, when released in the atmosphere, can react to form ozone and other photochemically reactive pollutants.

- **Landscape Maintenance Equipment:** 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 at the Project site.

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (State) or offset through the use of pollution credits (Regional Clean Air Incentives Market [RECLAIM]) for generation within the Basin, criteria pollutant emissions from off-site generation of electricity are generally excluded from the evaluation of significance, and only natural gas use is considered.

The Project-related operational air quality emissions would be derived primarily from vehicle trips generated by the proposed Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the *Lake Forest Warehouses*

(UP 06-21-5437, 06-21-5438 & 07-21-5447) Focused Traffic Analysis (Appendix G-1) were utilized in this analysis. The proposed Project is expected to generate a total of approximately 792 average daily trips, including 714 passenger car trips and 78 truck trips. Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of break and tire wear particulates.

It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. For purposes of analysis, it is assumed that the proposed Project would require on-site operational equipment of up to one 200 horsepower (hp), compressed natural gas or gasoline-powered tractors/loaders/backhoes operating at 4 hours a day for 365 days of the year.

As previously stated, CalEEMod utilizes summer and winter EMFAC2017 emission factors to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized in Table 4.3.B. The Project site is currently occupied with 144,906 sq ft of general office use within a single building. The existing development emissions were subtracted from the proposed Project operational emissions to determine the net emissions from the proposed Project. As shown in Table 4.3.B, the proposed Project's daily regional emissions from ongoing operations would not exceed any of the thresholds of significance.

Table 4.3.B: Proposed Project Peak Operational Emissions

Operational Activities	Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer Scenario						
Area Source	3.84	5.80E-04	0.06	0.00	2.30E-04	2.30E-04
Energy Source	0.10	0.94	0.79	5.64E-03	0.07	0.07
Mobile Source	2.64	14.26	30.83	0.13	9.60	2.67
On-Site Equipment Source	0.11	1.04	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	**6.70**	**16.24**	**32.43**	**0.14**	**9.70**	**2.78**
Existing Emissions	*7.66*	*4.72*	*43.34*	*0.10*	*10.77*	*2.93*
Net Emissions (Project – Existing)	**-0.96**	**11.52**	**-10.91**	**0.04**	**-1.06**	**-0.16**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Scenario						
Area Source	3.84	5.80E-04	0.06	0.00	2.30E-04	2.30E-04
Energy Source	0.10	0.94	0.79	5.64E-03	0.07	0.07
Mobile Source	2.63	14.93	30.25	0.13	9.60	2.67
On-Site Equipment Source	0.11	1.04	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	**6.69**	**16.90**	**31.85**	**0.14**	**9.70**	**2.78**
Existing Emissions	*7.63*	*5.04*	*42.81*	*0.10*	*10.77*	*2.93*
Net Emissions (Project – Existing)	**-0.95**	**11.86**	**-10.96**	**0.04**	**-1.06**	**-0.16**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Lake Forest Warehouse Air Quality Impact Analysis* (Urban Crossroads 2023a).
CalEEMod = California Emissions Estimator Model
CO = carbon monoxide
lbs/day = pounds per day
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
SO_X = sulfur oxides

NO_X = nitrogen oxides VOCs = volatile organic compounds

Therefore, operation of the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS, and impacts would be **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Localized significance thresholds (LSTs) represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. For the proposed Project, LSTs are only applicable to the following criteria pollutants: NO_X, CO, $PM_{2.5}$, and PM_{10}, based on the SCAQMD LST methodology. The following significance thresholds (in pounds per day [lbs/day]) were used for the construction-source LST analysis:

- 197 lbs/day of NO_X
- 1,804 lbs/day of CO
- 13 lbs/day of PM_{10}
- 8 lbs/day of $PM_{2.5}$

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is Saddleback Valley (SRA 19). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. The nearest residential receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ would be the planned Meadows Residential Development, which is located approximately 85 feet (26 meters) northeast of the Project site.

LSTs can also apply to non-sensitive land uses consistent with LST Methodology and SCAQMD Guidance. Per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain on site for a full 24 hours but are typically on site for 8 hours or less. However, LST Methodology explicitly states that "*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours* (37)." As such, the nearest commercial/industrial receptor used for evaluation of localized impacts of NO_X and CO would be the CRC Cloud computer support and services center at 26190 Enterprise Way, which is located approximately 7 feet (2 meters) northwest of the Project site. Therefore, this analysis evaluates the nearest residential sensitive receptor for of PM_{10} and $PM_{2.5}$ impacts and the nearest commercial/ industrial facility for NO_X and CO impacts.

Localized significance is determined by comparing the on-site-only portion of the construction and operational emissions with emissions thresholds derived by SCAQMD to ensure that pollutant concentrations at nearby sensitive receptors would be below the LST threshold established by SCAQMD. As a conservative measure, it is assumed that that the entire Project site would be actively disturbed during construction of the site. As such, the Total Areas Graded (TAG) field in CalEEMod was revised to 88 acres (8.83 acres per day x 10 days) for site preparation and 177 acres (8.83 acres per day x 20 days) for grading.

Table 4.3.C identifies the localized impacts at the nearest receptor location in the vicinity of the Project during construction. The emission sources provided in Table 4.3.C would occur sequentially during the construction process. For analytical purposes, peak emissions associated with each emission source (i.e.g, peak demolition/crushing, peak site preparation, and peak grading activities) are considered for establishing LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown in Table 4.3.C, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Therefore, the proposed Project would have a **less than significant** localized air quality emissions impact during construction activity. No mitigation is required.

Table 4.3.C: Localized Construction Source Emissions

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions				
Demolition	25.72	20.59	4.95	1.72
Site Preparation	50.41	20.01	12.84	6.25
Grading	33.85	15.50	7.37	2.93
SCAQMD LST	**197**	**1,804**	**13**	**8**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: *Lake Forest Warehouse Air Quality Impact Analysis* (Urban Crossroads 2023a).
Note: SRA 17— Central Orange County, 5 acres, receptors at 85 feet (26 meters).
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

Table 4.3.D shows the operational LST analysis results and indicates that operational emissions rates would not exceed the LSTs for sensitive receptors in the vicinity of the Project site. Therefore, the proposed Project would have a **less than significant** localized air quality emissions impact during operational activity. No mitigation is required.

Table 4.3.D: Localized Significance Summary of Operations

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	2.72	3.14	0.59	0.24
SCAQMD LST	**197**	**1,804**	**3**	**2**
Significant Emissions?	**No**	**No**	**No**	**No**

Table 4.3.D: Localized Significance Summary of Operations

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$

Source: *Lake Forest Warehouse Air Quality Impact Analysis* (Urban Crossroads 2023a).
Note: SRA 17— Central Orange County, 5 acres, receptors at 85 feet (26 meters), on-site traffic 5 percent of total.

CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SRA = Source Receptor Area

CO "Hot Spot" Analysis. CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the State 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. Based on the analysis presented below, a CO "hot spot" analysis is not needed to determine whether a change in the level of service (LOS) of an intersection in the vicinity of the project site would have the potential to result in an exceedance of either the CAAQS or the NAAQS.

The analysis prepared for CO attainment in the Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Basin. To establish a more accurate record of baseline CO concentrations affecting the Basin, a CO "hot spot" analysis was conducted by SCAQMD in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. That analysis did not predict any violation of CO standards. The ambient 1-hour and 8-hour CO concentrations within the Project study area were estimated to be 1.7 ppm and 0.8 ppm, respectively. Therefore, even if the traffic volumes of the proposed Project were double or triple that of the traffic volumes generated at the four busy intersections in Los Angeles, coupled with the ongoing improvements in ambient air quality, the project would not be capable of resulting in a CO "hot spot" at any study area intersections. Because the proposed Project would not produce the volume of traffic required to generate a CO "hot spot," and due to the lack of traffic impacts and extremely low level of CO at surrounding intersections, CO emissions from the operation of the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts related to CO hot spots would be **less than significant**, and no mitigation is required.

Health Risk Assessment. A Mobile Sources Health Risk Assessment (HRA) was conducted to evaluate the potential health risk impacts to sensitive receptors (e.g., residents) and adjacent workers associated with the development of the proposed Project, more specifically, health risk impacts as a result of exposure to toxic air contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site.

The residential land use with the greatest potential exposure to Project TAC source emissions is the Meadows Residential Development, which is located approximately 85 feet northeast of the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project TAC source emissions is estimated at 0.36 in 1 million, which is less than the SCAQMD significance threshold of 10 in 1 million. At this same location, non-cancer risks were

estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the Meadows Residential Development site, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations that would cause a significant human health or cancer risk to adjacent residences, and impacts would be **less than significant**. No mitigation is required.

The worker receptor land use with the greatest potential exposure to Project TAC source emissions is the CRC Cloud Computer Support and Services at 26190 Enterprise Way, which is immediately adjacent to the Project site to the northwest. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.11 in 1 million, which is less than the SCAQMD threshold of 10 in 1 million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the CRC Cloud Computer Support and Services, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the proposed Project would not expose adjacent workers to substantial pollutant concentrations that would cause a significant human health or cancer risk, and impacts would be **less than significant**. No mitigation is required.

The school receptor land use with the greatest potential exposure to Project TAC source emissions is the existing Bella Montessori School at 20602 Prism Place, approximately 733 feet southwest of the Project site. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Project at this location is calculated to be an estimated 0.05 in 1 million, which is less than the significance threshold of 10 in 1 million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Any other schools near the Project site would be exposed to less emissions and consequently less impacts than what is disclosed for the MEISC. As such, the Project would not expose school children to substantial pollutant concentrations that would cause a significant human health or cancer risk, and impacts would be **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities.

The proposed Project does not propose land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature, would cease upon completion of the respective phase of construction, and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
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 state or federally protected wetlands (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 native 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?	☐	☐	☐	☒

The information and analysis in this section is based on the *Biological Resources Report*[14] that is provided in Appendix B.

4.4.1 Impact Analysis

a. Would the project 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?

The Project site is fully developed and located in an area that supports industrial, commercial, and residential developments. The Project site is bordered to the north, south, and west by existing multi-tenant office and warehouse buildings. The Meadows Residential Development is to the northeast/east of the Project site; the Meadows Residential Development site is currently being

[14] ELMT Consulting. 2021. *Biological Resources Report for the Proposed Project Located at 26200 Enterprise Way, Lake Forest, Orange County, California*. May 27.

developed. The entire project site is developed and supports an existing commercial building and supporting infrastructure (i.e., parking lot, landscaped medians). There are landscaped areas within the Project site that support nonnative/ornamental plant species.

A literature review and records search were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. In addition to the literature review, a general habitat assessment or field investigation of the project site was conducted to document existing conditions and assess the potential for special-status biological resources to occur within the project site.

According to the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS), 18 special-status plant species have been recorded in the vicinity of the project site within the United States Geological Survey (USGS) *El Toro, California* 7.5-minute quadrangle. No special-status plant species were observed on site during the field investigation. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species at the Project site, the *Biological Resources Report* concluded that the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area, and special-status plant species are therefore presumed to be absent from the Project site. Therefore, the proposed project would not have a substantial adverse effect on any special-status plant species.

According to the CNDDB, 58 special-status wildlife species have been reported in the vicinity of the project site within the El Toro quadrangle. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project site has a low potential to support minimal foraging and stop over habitat for Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), and California gull (*Larus californicus*) within the landscaped trees on site. All remaining special-status wildlife species are presumed to be absent from the project site due to lack of quality habitat. Despite the disturbed condition of the Project site and the lack of vegetation communities, the Project site does have existing landscaping that could provide suitable habitat for nesting birds. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or their eggs). To avoid impacts to nesting birds from implementation of the proposed Project, a pre-construction nesting bird survey would be required prior to removal of any landscaped vegetation, as detailed in Mitigation Measure BIO-1.

With implementation of Mitigation Measure BIO-1, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). Impacts would be **less than significant with mitigation incorporated**.

Significance Prior to Mitigation: Potentially Significant Impact.

Mitigation Measure: BIO-1

BIO-1 **Nesting Bird Clearance Survey.** If construction occurs between February 1st and August 31st, a Qualified Biologist shall conduct a pre-construction clearance survey for nesting birds within 3 days of the start of any vegetation removal to ensure that no nesting birds are disturbed during construction. The Qualified Biologist shall be retained by the Project Applicant. The Qualified Biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests would occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer. The size of the no-disturbance buffer shall be determined by the wildlife biologist and would depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors would be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest would be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel would be instructed on the sensitivity of nest areas. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Significance Determination: Less than Significant with Mitigation Incorporated

b. Would the project 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?

According to the Biological Resources Report completed for the proposed project, no riparian habitat is present at the Project site. According to the CNDDB, 4 special-status plant communities have been reported in the vicinity of the project site within the USGS *El Toro, California* 7.5-minute quadrangle: Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Riparian Scrub, and Southern Sycamore Alder Riparian Woodland. However, none of these special-status plant communities were observed on site during the field investigation. Therefore, the proposed project would not 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 CDFW or USFWS. There would be **no impact**, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

There are three key agencies that regulate activities within State and federally protected wetlands in California. The United States Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. The CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Santa Ana Regional Water Quality Control Board (RWQCB) regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

The National Wetlands Inventory produces and distributes maps and other geospatial data on American wetland and deep-water habitats and monitors changes to these habitats through time. According to the National Wetlands Inventory Wetlands Mapper, there are no State or federally protected wetlands on or around the Project site. No discernible drainage courses, inundated areas, or wetland features that would be considered jurisdictional by the USACE, RWQCB, or CDFW were observed within the limits of the Project site during field investigations. Therefore, implementation of the proposed Project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **No impact** would occur, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The Project site and adjacent areas are entirely developed. Furthermore, there are no riparian corridors, creeks, or useful patches of habitat within or connecting the Project site to any identified wildlife corridors or linkages. Therefore, the proposed project would not interfere with the movement of any wildlife species or with established wildlife corridors. While no active nests or birds displaying nesting behavior were observed during the field investigation, which were conducted during the breeding season, the landscaped areas on the Project site have the potential

to provide minimal foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that area adapted to urban environments. Therefore, the proposed Project would be required to implement Mitigation Measure BIO-1, which includes measures to prevent potential impacts to nesting birds. With implementation of Mitigation Measure BIO-1, the proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites, and impacts would be **less than significant with mitigation incorporated**.

Significance Prior to Mitigation: Potentially Significant Impact

Mitigation Measure: BIO-1

Significance Determination After Mitigation: Less than Significant Impact

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

The City of Lake Forest Municipal Code Chapter 6.20, Regulations Pertaining to Conversion, Maintenance and Removal of Eucalyptus Trees, requires a permit to prune and transport eucalyptus trees during the restricted period (April 1st through October 31st). There are no eucalyptus trees on the Project site. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources. There would be **no impacts** related to conflicts with local policies or ordinances protecting biological resources, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Orange County's NCCP/HCP was approved in 1996 under the State of California's NCCP program. It encompasses a total area of 208,000 acres, with 37,380 acres within its Reserve System, split into Coastal and Central subregions. The reserves additionally contain special linkages, existing use areas, and other open space areas. The primary goal of the NCCP/HCP is to protect and preserve coastal sage scrub (CSS) in the Reserve System, as well as associated habitats and species. This includes three (3) "Target Species," an additional thirty-six (36) "Identified Species," and four (4) habitat types. The Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) specifies that the populations of the Target Species shall be subject to long-term monitoring and that these taxa shall be treated as if they were listed under the California Endangered Species Act (CESA) and Federal Endangered Species Act (FESA).

The Project site is located within the boundaries of the Central Subregion NCCP/HCP; however, it is not located within the Reserve System or any identified special linkages. The closest portion of the

Reserve System is located approximately 1 mile northwest of the project site and is separated from the project site by existing development. Since the proposed Project will be limited to existing developed areas and will not impact any native plant communities (i.e., coastal sage scrub, riparian plant communities) implementation of the proposed Project would be consistent with the rules and regulations of the NCCP/HCP. Therefore, the proposed project would have **no impact** on an adopted Natural Community Conservation Plan, Habitat Conservation Plan, or other approved local, regional, or State habitat conservation plan, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Cultural Resources Assessment* prepared for the proposed project by BCR Consulting on June 28, 2021.[15]

4.5.1 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The term "historical resource" is defined by Section 15064.5 of the *State CEQA Guidelines* as follows:

> (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 (California Register) (Pub. Res. Code §5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
>
> (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
>
> (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852) including the following:

[15] BCR Consulting, LLC. 2021. *Cultural Resources Assessment, 26200 Enterprise Way Project, Lake Forest, Orange County, California*. June 28.

A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

B. Is associated with the lives of persons important in our past.

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possess high artistic values.

D. Has yielded, or may be likely to yield, information important in prehistory or history.

A "substantial adverse change" to a historical resource, according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

On June 16, 2021, a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within 0.5 mile of the Project area at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System at California State University, Fullerton. The SCCIC houses the pertinent archaeological and historic site and survey information necessary to determine whether cultural resources are known to exist within the Project area. The records search included a review of all recorded historic and prehistoric archaeological sites within the 0.5-mile radius of the Project site, as well as a review of known cultural resource survey and excavation reports. The records search revealed that 25 cultural resource studies have taken place, resulting in the recording of 13 cultural resources within a 0.5-mile radius of the Project site. Of the 25 previous studies, 8 have assessed the Project site for cultural resources, and 1 cultural resource has been previously recorded within its boundaries. The previously recorded resource was a prehistoric lithic scatter designated P-30-1062 that was composed of groundstone and chipped lithics on a small knoll. Artifacts included one bifacial mano, two mano fragments, two metate fragments, and three lithic cores. The site was systematically excavated in 1988, and was subject to subsequent construction excavation, which removed the knoll, reducing the elevation from 720 to 700 feet above mean sea level (amsl). The final archaeological site visit prior to the current study indicated that the site was destroyed in 1994.

The Project site is occupied by a modern building and parking lot. The existing building was developed in 1999. The Project site has been subject to overexcavation and compaction that has disturbed sediments beyond depths at which buried cultural resources are likely. Based on these results, the proposed Project would have **no impacts** to historical resources as defined by the California Environmental Quality Act (CEQA).

Neither the Project site nor existing structures qualify as an "historical resource" as defined by CEQA. There are also no known archaeological resources on the Project site that would qualify as "historical resources" as defined by CEQA. Therefore, the proposed Project would have **no impacts** associated with a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

A "substantial adverse change" to a historical resource, according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired." As discussed in Response 4.5.a, on June 16, 2021, a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within 0.5 mile of the Project area was conducted at the SCCIC of the California Historical Resources Information System at California State University, Fullerton. The records search included a review of all recorded historic and prehistoric archaeological sites within the 0.5-mile radius of the Project site, as well as a review of known cultural resource survey and excavation reports. The records search revealed that 25 cultural resource studies have taken place, resulting in the recording of 13 cultural resources within a 0.5-mile radius of the project site. Of the 25 previous studies, 8 have assessed the project site for cultural resources, and 1 cultural resource has been previously recorded within its boundaries. The previously recorded resource was a prehistoric lithic scatter designated P-30-1062 that was composed of groundstone and chipped lithics on a small knoll. It was systematically excavated in 1988, and was subject to subsequent construction excavation, which removed the knoll, reducing the elevation from 720 to 700 feet amsl. The final archaeological site visit prior to the current study indicated that the site was destroyed in 1994.

An archaeological pedestrian field survey of the Project site was conducted on May 13, 2021. During the field survey, archaeologists did not discover any cultural resources (including prehistoric or historic archaeological sites or historic-period buildings) within the Project site. As indicated during the records search, the Project site is occupied by a modern building and parking lot. It has been subject to overexcavation and compaction that has disturbed sediments beyond depths at which buried cultural resources are likely. Based on these results, the *Cultural Resources Assessment* indicated that no additional cultural resources work or monitoring is necessary during proposed activities associated with the development of the Project site. However, in the unlikely event that previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary. In the unlikely event archaeological resources are discovered at any time during construction, those activities would be halted in the vicinity of the find until the find can be assessed for significance by a qualified archaeologist (Mitigation Measure CUL-1). Implementation of Mitigation Measure CUL-1 would reduce any potential impacts to previously undiscovered archaeological resources to a less than significant level.

At the completion of Project construction, the proposed Project would not result in further disturbance of native soils on the Project site. Therefore, operation of the proposed Project would not result in a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the *State CEQA Guidelines*.

With implementation of Mitigation Measure CUL-1, potential project-related impacts to archaeological resources as defined in *State CEQA Guidelines* Section 15064.5 would be **less than significant with mitigation incorporated**.

Significance Determination: Potentially Significant Impact

Mitigation Measure: CUL-1

CUL-1 **Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit , the Director of Community Development or designee shall ensure that this mitigation measure is documented on the grading plans.

Significance Determination after Mitigation: Less than Significant Impact

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

Although no human remains are known to be on the project site or are anticipated to be discovered during project construction, there is always a possibility of encountering unanticipated cultural resources, including human remains, during construction activities. Disturbing human remains could violate the State's Health and Safety Code as well as destroy the resource. In the event that human remains are discovered during construction activities, the Construction Contractor shall implement Mitigation Measure CUL-2, which requires compliance with the State's Health and Safety Code for the treatment of human remains. With implementation of Mitigation Measure CUL-2, the proposed Project would have a **less than significant with mitigation incorporated**.

Significance Determination: Less than Significant Impact

Mitigation Measures: CUL-2

CUL-2 **Human Remains.** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which

would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated grave goods in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Prior to issuance of a grading permit , the Director of Community Development or designee shall ensure that this mitigation measure is documented on the grading plans.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Lake Forest Warehouse Energy Analysis*[16] and Lake Forest Warehouse Supplemental Greenhouse Gas & Energy Memo[17], which are provided in Appendix A-3 and A-5, respectively.

4.6.1 Impact Analysis

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

Construction Energy Use. It is anticipated that construction activities would take approximately 12 months. The proposed Project would require demolition, site preparation, grading, building construction, paving, and architectural coating activities during construction.

Construction of the proposed Project would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building. All or most of this energy would be derived from non-renewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. Construction of the project would not involve the consumption of natural gas because none of the construction-related equipment would be powered by natural gas. In addition, construction of the proposed Project would demand electricity for the on-site power required to construct the warehouse building. The total project construction electricity usage would be the sum of the utility provider's power cost per kilowatt-hour (kWh) of electricity. Power cost is determined by project area in square feet, construction duration, and typical power cost.

The SCE's General Service Rate Schedule was used to determine the Project's electrical usage. As indicated in Table 4.6.A, the total electricity usage from on-site Project construction-related activities is estimated to be approximately 80,028 kWh. The proposed Project would consume the least amount of electricity necessary for project construction. According to the California Energy Commission (CEC), total electricity consumption in Orange County in 2021 was 18,931.8 GWh (18,931,838,624 kWh). Operation of the proposed Project would increase the annual electricity consumption in Orange County by less than 0.01 percent. Therefore, electrical demand associated

[16] Urban Crossroads. 2023b. *Lake Forest Warehouse Energy Analysis*. April 18.
[17] Urban Crossroads. 2023c. *Lake Forest Warehouse Supplemental GHG & Energy Memo.* July 27.

with Project construction would have a negligible impact on total electricity consumption in Orange County. Impacts related to the use of electricity during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available electricity. Therefore, construction activities would not result in the inefficient, wasteful, or unnecessary use of electricity in comparison to other similar developments in the region.

Table 4.6.A: Estimated Annual Energy Use of the Proposed Project

Land Use	Project Construction Electricity Usage (kWh)
Manufacturing	35,026
Parking Lot	16,799
City Park	10,378
Other Asphalt Surfaces	17,825
Total	**80,028**

Source: *Lake Forest Warehouse Energy Analysis* (Urban Crossroads 2023b).
kWh = kilowatt-hour(s)

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered which is consistent with industry standards. As shown in Table 4.6.B, construction equipment used by the Project would result in single event consumption of approximately 40,869 gallons of diesel fuel. Based on fuel consumption obtained from EMFAC2017, approximately 164 million gallons of diesel will be consumed from vehicle trips in Orange County in 2023. Construction of the proposed Project would increase annual diesel fuel consumption in Orange County by less than 0.01 percent. Therefore, Project construction would have a negligible effect on County diesel fuel supplies. Therefore, impacts related to the use of diesel fuel during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available diesel fuel resources. Furthermore, construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. In addition, construction activities would not result in an inefficient use of diesel fuel because diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the Project.

Table 4.6.B: Construction-Related Fuel Consumption

Category	Estimated Total Fuel Consumption (gallons)
Diesel Fuel	
Construction Equipment	40,869
Construction Vendor Trips (MHDT)	3,886
Construction Vendor/Hauling Trips (HHDT)	10,889
Total Diesel Consumption	**55,644**
Gasoline Fuel	

Construction Worker Trips (LDA)	7,778
Construction Worker Trips (LDT1)	4,671
Construction Worker Trips (LDT2)	5,033
Total Gasoline Consumption	**17,482**

Source: *Lake Forest Warehouse Energy Analysis* (Urban Crossroads 2023b).
ETW = equivalent test weight
GVWR = gross vehicle weight rating
HHDT= heavy-heavy duty trucks
LDA= light-duty-auto vehicles
LDT1= light-duty-trucks with a GVWR of less than 6,000 pounds and ETW of less than or equal to 3,750 pounds
LDT2= light-duty-trucks with a GVWR of less than 6,000 pounds and ETW between 3,751 and 5,750 pounds
MHDT= medium-heavy duty trucks

CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. BACMs inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials and/or in response to citizen complaints.

As shown in Table 4.6.B, construction worker trips for full construction of the Project would result in the estimated fuel consumption of 17,482 gallons of fuel. Based on fuel consumption obtained from EMFAC2017, approximately 1,149 million gallons of gasoline will be consumed from vehicle trips in Orange County in 2023. Therefore, construction of the proposed Project would increase the annual gasoline fuel consumption in Orange County by less than 0.01 percent. As such, Project construction would have a negligible effect on County fuel supplies. Impacts related to fuel consumption use during construction would be temporary and relatively small in comparison to Orange County's overall use of the State's available fuel resources. Additionally, fuel consumption from construction vendor and hauling trips (medium-heavy duty trucks [MHDTs] and heavy-heavy duty trucks [HHDTs]) will total approximately 14,775 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2020 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on- and off-road vehicle engines due to more stringent government requirements.[18]

As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Therefore, the proposed project would result in a **less than significant impact** related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction.

Operational Energy Use. Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by resident, employee, and/or patron

[18] California Energy Commission (CEC). 2021. 2020 Integrated Energy Policy Report Update. March. Website: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update (accessed July 20, 2023).

vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

The site is currently occupied with 144,906 sq ft of general office use within a single building. Energy that would be consumed by Project-generated traffic is a function of total vehicle miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site.

As with worker and vendor trips, operational vehicle fuel efficiencies were estimated using information generated within EMFAC2017 developed by CARB. EMFAC2017 was run for the Orange County area for the 2023 calendar year. It should be noted that the existing development energy demands were subtracted from the Project to determine the new energy demands from the proposed Project.

As summarized in Table 4.6.C, the Project would result in 539,280 net annual VMT and an estimated net annual fuel consumption of 109,896 gallons of fuel.

Table 4.6.C: Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption
LDA	1,854,993	55,129
LDT1	200,288	7,083
LDT2	636,227	24,111
MDV	440,440	20,629
MCY	82,944	2,233
LHDT1	160,813	11,593
LHDT2	43,042	3,058
MHDT	232,929	24,775
HHDT	698,899	103,983
Total (All Vehicles)	**4,350,576**	**252,593**
Existing Energy Demands	*3,881,296*	*142,729*
Net Energy Demands	**539,280**	**109,865**

Source: *Lake Forest Warehouse Energy Analysis* (Urban Crossroads 2023b).
kBTU = kilo-British Thermal Unit(s)
kWh = kilowatt-hour(s)

Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the proposed Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) (2017) and CalEEMod. As such, proposed Project operations would not result in excessive and wasteful vehicle trips and VMT or excess and wasteful vehicle energy consumption compared to other industrial uses.

It should be noted that the State strategy for the transportation sector for medium and heavy-duty trucks is focused on making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT reductions and an increase in vehicle efficiency are forecasted to be needed to achieve the overall State emissions reductions goals. Heavy duty trucks involved in goods movement are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy duty trucks are being tested this year, and SCAQMD is looking to integrate this new technology into large-scale truck operations.

Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. The location of the Project site to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. Consistent with the purpose of the California Green Building Standards Code (CALGreen), which is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices, the proposed Project would promote the use of bicycles as an alternative means of transportation by providing short-term and/or long-term bicycle parking accommodations.

Facilitating bicycle access would reduce VMT and associated energy consumption. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

As shown in Table 4.6.D, Project operation would increase natural gas use on the site by 2,185,970 kilo-British thermal units per year (kBTU/yr) of natural gas and decrease electricity use on the site by 533,280 kilowatt-hours per year (kWh/yr) compared to the existing uses on site.

Table 4.6.D: Estimated Annual Energy Use of the Proposed Project

Land Use	Electricity Use (kWh/yr)	Natural Gas Use (kBTU/yr)
Manufacturing	1,393,220	3,497,370
Parking Lot	28,280	0
Total Project Demand	**1,421,500**	**3,497,370**
Existing Energy Demands	1,954,780	1,311,400
Net Demand	**-533,280**	**2,185,970**

Source: *Lake Forest Warehouse Energy Analysis* (Urban Crossroads 2023b).
kBTU/yr = kilo-British thermal units per year
kWh/yr = kilowatt-hours per year

Natural gas would be supplied to the Project site by Southern California Gas Company (SoCalGas), and electricity would be supplied by SCE. The proposed Project consists of conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive, and the energy demands in total would be comparable to other industrial uses of similar scale and configuration.

In addition, the proposed Project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards would ensure that the proposed Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. The proposed project would result in a **less than significant impact** related to wasteful, inefficient, or unnecessary consumption of energy resources during project operation. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

The Project's consistency with the applicable State and local plans is discussed below.

Intermodal Surface Transportation Efficiency Act (ISTEA). Transportation and access to the Project site would be provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.

Transportation Equity Act for the 21st Century (TEA-21). The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The Project site selected for the proposed Project facilitates access, acts to reduce VMT, and takes advantage of existing infrastructure systems. The proposed Project supports the strong planning processes emphasized under TEA-21. The proposed Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Integrated Energy Policy Report (IEPR). Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing State programs and policies. The 2022 IEPR was adopted February 2023, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2022 IEPR introduces a new framework for embedding equity and environmental justice at the California Energy Commission (CEC) and the California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Other topics discussed within the 2022 IEPR include, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources. The 2022 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the analysis in the Energy Report, Project energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Therefore, development of the proposed Project would support the goals presented in the 2022 IEPR.

State of California Energy Plan. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the proposed Project facilitates access and takes advantage of existing infrastructure systems. The proposed Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

California Code Title 24, Part 6, Energy Efficiency Standards. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. It should be noted that the analysis herein assumes compliance with the 2019 Title 24 Standards. It should be noted that the CEC anticipates that nonresidential buildings will use approximately 30 percent less energy compared to the prior code. As such, the CalEEMod defaults for Title 24, Electricity and Lighting Energy, were reduced by 30 percent to reflect consistency with the 2019 Title 24 standard.

Senate Bill 350 (SB 350). The proposed Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the proposed Project would interfere with implementation of SB 350. Additionally, the proposed Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.

As shown above, the proposed Project would not conflict with any of the State or local plans. Therefore, the proposed project would result in **less than significant** impacts related to conflict with

or obstruction of a State or local plan for renewable energy or energy efficiency. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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?	☐	☒	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

4.7.1 Impact Analysis

The discussion and analysis provided in this section is based on the *Geotechnical Investigation*[19] completed for the proposed project, which is attached in Appendix C.

a. Would the project directly or indirectly cause 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.

The Alquist-Priolo Earthquake Fault Zoning Act passed in 1972 and was implemented to mitigate the hazard of surface faulting to structures used for human occupancy. The Act was designed to ensure

[19] Southern California Geotechnical. 2021a. *Geotechnical Investigation Proposed Warehouse 26200 Enterprise Way, Lake Forest, California for Black Creek Group.* November 18.

that construction of habitable buildings are not constructed on top of traces of active faults. Research of available maps indicates that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and Southern California Geotechnical did not identify any evidence of faulting during the geotechnical investigations.[20] Therefore, the proposed Project would have **no impact** associated with potential adverse effects, including the risk of loss, injury or death involving the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

ii. Strong seismic ground shaking?

The Project site is in a seismically active area, where earthquakes have the potential to subject the proposed project to strong seismic ground shaking. The intensity of ground shaking would depend on the characteristics of the fault, distance from the fault, the earthquake magnitude and duration, and site-specific geologic conditions.

The City requires projects to comply with applicable provisions of the California Building Code (CBC) (Title 24 CCR) and the City's Municipal Code (Chapter 8.02), which provide for stringent construction requirements on projects in areas of high seismic risk based on numerous interrelated factors. It is acknowledged that seismic hazards cannot be completely eliminated, even with implementation of advanced building practices. However, the seismic design standards of the CBC are intended to prevent catastrophic structural failure in the most severe earthquakes currently anticipated. Therefore, compliance with the applicable CBC, which is required by both the City and the State, would ensure that the potential impacts associated with ground shaking would be less than significant.

Ground shaking generated by fault movement is considered a potentially significant impact that may affect the proposed Project. Mitigation Measure GEO-1 requires that the Project applicant comply with the recommendations of the Geotechnical Investigation, the most current CBC, and the City Building Code, which stipulates appropriate seismic design provisions that shall be implemented with Project design and construction. With the implementation of seismic design provisions recommended in the Geotechnical Investigation and in required building codes as specified in Mitigation Measure GEO-1, potential Project impacts related to seismic ground shaking would be reduced to a **less than significant with mitigation incorporated**.

GEO-1 **Compliance with Applicable California Building Code and Project-Specific Geotechnical Recommendations.** Prior to the final of the grading permit and the issuance of building permits, the Project Applicant shall provide evidence, including final project plans, to applicable City staff, for review and approval, that the Project, including site preparation and construction of proposed buildings, has been

[20] Southern California Geotechnical. 2021a. *Geotechnical Investigation Proposed Warehouse 26200 Enterprise Way, Lake Forest, California for Black Creek Group*. November 18.

designed and will be constructed in conformance with applicable provisions of the most current California Building Code at the time of City review, the City's Building Code, and the recommendations cited in the *Geotechnical Investigation*, prepared by Southern California Geotechnical, dated November 2021.

During grading, an on-site inspection shall be conducted by the Project Geotechnical Consultant and the City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with geotechnical specifications as incorporated into project plans.

Prior to final of grading permits, the Project geotechnical engineer shall submit a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee.

Prior to the issuance of a Certificate of Occupancy for the new building, the Geotechnical Engineer shall provide a letter regarding contractor compliance with project plans and specifications and with the recommendations of the Geotechnical Investigation and any supplemental recommendations issued during construction. The letter shall be submitted for review to the City of Lake Forest Building Division.

Significance Determination: Less Than Significant Impact

Mitigation Measure: No mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. Liquefaction commonly occurs when three conditions are present simultaneously: (1) high groundwater; (2) relatively loose, cohesion-lacking (sandy) soil; and (3) earthquake-generated seismic waves.

The liquefaction susceptibility of the on-site subsurface soils was evaluated as part of the *Geotechnical Investigation* prepared for the proposed Project. The Earthquake Zones of Required Investigation, El Toro quadrangle map (published by the California Geological Survey [CGS]), indicates that the subject site is not located within a designated liquefaction hazard zone. In addition, the subsurface conditions encountered at the subject site are not considered to be conducive to liquefaction. According to the *Geotechnical Investigation*, groundwater was not encountered during the drilling of any on-site borings. Based on the lack of water within the borings, and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at a depth in excess of 30 feet bgs (below ground surface) at the time of the borings. Based on the conditions encountered at the boring locations and review of the CGS maps, liquefaction is not considered to be a significant design concern for this Project. Therefore, Project-related impacts associated with seismic-related ground failure, including liquefaction, are **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

iv. Landslides?

Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes in areas with significant ground slopes. According to the *Geotechnical Investigation* prepared for the Project, the Earthquake Zones of Required Investigation, the El Toro quadrangle map (published by the CGS), indicates that the subject site is not located within a designated Earthquake Induced Landslide Zone. The Project site is generally flat, and no existing or historic landslides are present on the property. Therefore, there would be **no impacts** associated with the landslides. No mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

During construction of the proposed Project, soil would be exposed and there would be increased potential for soil erosion and siltation compared to existing conditions. During storm events, erosion and siltation could occur at an accelerated rate. To address the potential for erosion, the proposed Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) during construction, which would reduce erosion in accordance with the requirements of the Construction General Permit (refer to Section 4.10). In addition, the proposed Project must also comply with Article XIII of the City's Municipal Code which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention adopted by the City, the City's National Pollutant Discharge Elimination System (NPDES) Permit regulating discharges into and from its Municipal Separate Storm Sewer System (MS4), the Drainage Area Management Plan (DAMP), and any other conditions, requirements, and Water Quality Management Plans (WQMPs) adopted by the City, as detailed in Section 4.10. Compliance with existing regulatory requirements would ensure that construction activities would have a **less than significant** impact related to soil erosion or loss of topsoil. No mitigation is required.During project operations, a majority of the Project site would be covered with impervious surfaces (e.g., asphalt, concrete, a warehouse building), which are not subject to erosion. Compliance with existing regulatory requirements would ensure that the proposed Project would have a **less than significant** impact related to soil erosion or loss of topsoil. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking. A landslide generally occurs on relatively steep slopes and/or on slopes underlain by weak materials. Because the Project site is in a relatively flat area, landslides or other forms of natural slope instability do not represent a significant hazard to the Project or the surrounding area. In addition, as discussed in Response 4.7.a(iv), the site is not within a State-designated hazard zone for seismically induced landslides. Therefore, impacts associated with on- or off-site landslides would be **less than significant**.

Seismically induced lateral spreading involves lateral movement of soils due to ground shaking and is demonstrated by near vertical cracks with predominantly horizontal movement of the soil mass involved. Based on information provided in the *Geotechnical Investigation* combined with the fact that the topography of the Project site is relatively flat, impacts associated with lateral spreading would be **less than significant**.

Subsidence (the sinking of the land surface due to oil, gas, and water production) causes loss of pore pressure as the weight of the overburden compacts the underlying sediments. Minor ground subsidence is expected to occur in the soils below the zone of soil removal, due to settlement and machinery working. Implementation of the proposed Project is anticipated to cause subsidence of up to an 0.1 foot. This is acceptable for grading in areas that are underlain by existing engineered fill soils. No subsidence associated with fluid withdrawal is known to have occurred on or in the vicinity of the Project site and none is expected because neither construction nor operation of the proposed Project would require groundwater dewatering. Impacts associated with subsidence would be **less than significant**.

Based on the subsurface conditions encountered at boring locations on the Project site (groundwater was not encountered above 30 feet bgs), liquefaction is not considered to be a design concern for the proposed Project.

Corrosive soils contain constituents or physical characteristics that attack concrete (water-soluble sulfates) and/or ferrous metals (chlorides, ammonia, nitrates, low pH levels, and low electrical resistivity). Corrosive soils could potentially create a significant hazard to the project by weakening the structural integrity of the concrete and metal used to construct the building and could potentially lead to structural instability. Structural damage and foundation instability caused by corrosive soils is a potentially significant impact. According to the *Geotechnical Investigation*, on-site soils are not corrosive to concrete or copper pipe but are moderately corrosive to ductile iron pipe. Mitigation Measure GEO-2 requires protection of ferrous metals against corrosion. Corrosion protection may include, but is not limited to, sacrificial metal, the use of protective coatings like polyethylene protection, and/or cathodic protection. With implementation of Mitigation Measure GEO-2, potential impacts related to corrosive soils would be reduced to less than significant.

Therefore, with implementation of Mitigation Measure GEO-2, potential impacts related to unstable soils or geologic units that would become unstable as a result of the Project, resulting in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse, would be **less than significant with mitigation incorporated**.

Significance Determination: Potentially Significant Impact

Mitigation Measure: GEO-2

GEO-2 **Corrosive Soils.** Prior to final of the grading permit and issuance of a building permit, the Director of the City of Lake Forest Public Works Department, and/or the Building Official, or designee, shall verify that the Project Applicant/Developer has retained the services of a licensed corrosion engineer to conduct additional site testing and final design evaluation regarding the possible on-site presence of significant volumes of corrosive soils. At a minimum, the corrosion engineer shall (1) verify the soluble sulfate concentrations of the soils that are present at pad grade within the building areas at the completion of rough grading; (2) provide detailed corrosion protection measures for cast iron and/or ductile iron pipes, as necessary; (3) confirm that soluble sulfates and chloride levels in the on-site soils do not warrant specialized concrete mix design; and (4) confirm that nitrates present in the on-site soil do not warrant protection for copper materials. On-site inspection during grading shall be conducted by the Project Geotechnical Consultant and City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with the recommendations of the corrosion engineer as incorporated into Project plans.

Significance Determination after Mitigation: Less than Significant Impact

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

Expansive soils contain types of clay materials that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out. Soils with an expansion index of greater than 20 are classified as expansive for building purposes and therefore have a potentially significant impact. Based on laboratory testing in the *Geotechnical Investigation,* the soils on the Project site were classified to have very low expansion potential (Expansion Index = 12). Therefore, impacts related to expansive soils would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

The proposed Project does not include construction of septic tanks or connections to septic systems or alternative wastewater disposal systems. Therefore, the proposed Project would have **no impacts** related to the soils capability to adequately support the use of septic tanks or alternative wastewater disposal systems, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

In the existing condition, the Project site is developed. There are no unique geological features present on site.

According to the *Geotechnical Investigation*, the Project site is underlain by engineered fill soils and Capistrano Formation sandstone bedrock. The Capistrano Formation sandstone bedrock generally consists of medium dense to very dense, poorly consolidated fine-grained sandstone. While engineered fill soils may contain fossils, these fossils have been removed from their original location and are thus out of stratigraphic context. Therefore, they are not considered sensitive for paleontological resources. The soil of the Capistrano Formation, however, has produced scientifically important paleontological resources and is considered to be sensitive for paleontological resources.

No significant amounts of below-grade construction, such as basements or crawl spaces, are proposed as part of the Project. According to the *Geotechnical Investigation*, based on the assumed topography, cuts and fills of 4 to 6± feet would be necessary to achieve the proposed site grades. While engineered fill soils were encountered at Boring Nos. B-1 and B-4 through B-6, extending to depths of 12 feet to more than 30± feet, the depth at which Capistrano Formation soils were encountered was not uniform across the site. As such, it is possible that ground-disturbing construction activities could impact significant previously undiscovered paleontological resources. To mitigate adverse impacts to unknown buried paleontological resources that may exist on site, Mitigation Measure GEO-3 requires that an Orange County Certified Paleontologist be retained to develop a Paleontological Resources Impact Mitigation Program (PRIMP), that paleontological monitoring occur during ground-disturbing activities in paleontologically sensitive deposits, and that a final paleontological monitoring report be prepared describing the results of the monitoring effort. The PRIMP should follow guidelines developed by the Society of Vertebrate Paleontology and should include, but not be limited to, the methods that will be used to protect paleontological resources that may exist within the Project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. With implementation of Mitigation Measure GEO-3, the proposed Project would have a **less than significant impact with mitigation incorporated** to paleontological resources.

Significance Determination: Potentially Significant Impact

Mitigation Measure: GEO-3

GEO-3 **Paleontological Resources Impact Mitigation Program.** Prior to the issuance of any grading permit, the Project Applicant/Developer shall provide a letter to the Director of Community Development Department, or designee, stating that they have retained a qualified paleontologist (defined as a practicing paleontologist who is recognized in the paleontological community and proficient in vertebrate paleontology) who is listed on the County of Orange list of certified paleontologists.

Additionally, prior to issuance of any grading permit, the paleontologist shall submit to the City, a Paleontological Resources Impact Mitigation Program (PRIMP) for this Project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the Project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology.

Excavation and grading activities in deposits with high paleontological sensitivity shall be monitored by a paleontological monitor following a PRIMP. No monitoring is required for excavations in deposits with no or low paleontological sensitivity (i.e., engineered fill soils).

If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected, and a paleontologist shall be contacted to assess the find for significance.

Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution.

Prior to the issuance of building permits, a report of findings shall be prepared to document the results of the monitoring program. The report shall be provided to the Director of Community Development, or designee.

Significance Determination after Mitigation: Less than Significant Impact

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Lake Forest Warehouse Greenhouse Gas Analysis* [21] and *Lake Forest Warehouse Supplemental Greenhouse Gas & Energy Memorandum* [22], which are provided in Appendix A-4 and Appendix A-5, respectively.

Background. Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2);
- Methane (CH_4);
- Nitrous oxide (N_2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF_6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6, are completely new to the atmosphere.

In October 2008, the SCAQMD released a Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (Draft Guidance Document) that suggested a tiered approach to analyzing GHG emissions in a project-level analysis. In the Draft Guidance Document, the SCAQMD provided numerical thresholds that can be applied to smaller projects (like the proposed Project). The City of Lake Forest has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 metric tons of carbon dioxide equivalent per year (MT CO_2e/yr) to determine if additional analysis is required is an

21 Urban Crossroads. 2023c. Lake Forest Warehouse Greenhouse Gas Analysis. November 15.
22 Urban Crossroads. 2023d. Lake Forest Warehouse Supplemental Greenhouse Gas & Energy Memorandum. July

acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of Lake Forest and numerous cities in the Basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (SCAQMD Interim GHG Threshold). Therefore, if the project emissions are less than the applicable numerical threshold (3,000 MT CO_2e/yr), then the Project's effects related to GHG emissions would be less than significant and the analysis is complete.

4.8.1 Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, the SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, Lead Agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD requires the construction GHG emissions to be amortized over the life of the project (defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

Overall, the following activities associated with the proposed project could directly or indirectly contribute to the generation of GHG emissions:

- **Construction Activities:** Project construction activities would generate CO_2 and CH_4 emissions. The *Air Quality Impact Analysis*[23] (Appendix A-1) contains detailed information regarding Project construction activities. As discussed in the *Air Quality Impact Analysis*, construction-related emissions are expected from demolition, site preparation, grading, and building construction.

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

- **Combustion Emissions Associated with Natural Gas and Electricity:** 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, but the building

[23] Urban Crossroads. 2023a. *Lake Forest Warehouse Air Quality Impact Analysis*. April 18

energy use emissions do not include streetlighting. GHGs are also emitted during the generation of electricity from fossil fuels (these emissions are considered to be indirect emissions).

- **Mobile Source Emissions:** The Project-related GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the *Focused Traffic Analysis*[24] (Appendix G-1) were utilized in this analysis. The proposed Project is expected to generate a total of approximately 804 two-way vehicular trips per day (402 inbound and 402 outbound), which includes 726 two-way passenger car trips per day (363 inbound and 363 outbound) and 78 two-way truck trips per day (39 inbound and 39 outbound).

- **On-Site Cargo Handling Equipment Emissions:** It is common for industrial warehouse buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. For purposes of analysis, it is assumed that the proposed Project would require on-site operational equipment of up to one 200 hp compressed natural gas or gasoline-powered tractors/loaders/ backhoes operating at 4 hours a day, 365 days a year.

- **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 source of the water.

- **Solid Waste:** Industrial land uses would result in the generation and disposal of solid waste. A percentage of this waste will be diverted from landfills by a variety of means (e.g., reducing the amount of waste generated, recycling, and/or composting). The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

Construction GHG Emissions. GHG emissions associated with the proposed Project would occur over the short term from construction activities (consisting primarily of emissions from equipment and vehicle exhaust). The calculation presented below includes construction emissions in terms of CO_2 and annual carbon dioxide equivalent (CO_2e) GHG emissions.

Construction activities produce combustion emissions from various sources such as demolition, site preparation, grading, building construction, architectural coating, paving, on-site construction vehicles, equipment hauling materials to and from the site, and motor vehicles transporting the construction crew. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. Table 4.8.A presents the annual construction emissions based on the CalEEMod emissions estimates. Results indicate that project implementation would generate a total of 679.65 MT CO_2e during the construction period. Per SCAQMD guidance, due to the long-term nature of the GHGs in the atmosphere, instead of determining the significance of construction emissions alone, the total construction emissions are amortized over 30 years (an estimate of the

[24] Urban Crossroads. 2023h. *Lake Forest Warehouses (UP 06-21-5437, 06-21-5438 & 07-21-5447) Focused Traffic Analysis.* June 29.

life of the proposed project) and included in the operations analysis. The combined GHG emissions from the construction and operational analysis are then compared to the SCAQMD's recommended numeric threshold of 3,000 MT CO2e/yr for determining potential impacts on GHG and climate change. Amortized over 30 years, the total construction emissions would generate approximately 22.65 MT CO_2e/yr.

Table 4.8.A: Amortized Annual Construction Emissions

Emissions	Pollutant Emissions (MT/yr)			
	CO_2	**CH_4**	**N_2O**	**CO_2e**
Total Project Construction Emissions	669.22	0.11	0.03	679.65
Amortized Construction Emissions	22.31	3.73E-03	8.53E-04	22.65

Source: *Lake Forest Warehouse Greenhouse Gas Analysis* (Urban Crossroads 2023c).
Note: Numbers in table may not appear to add up correctly due to rounding of numbers.
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = Greenhouse Gas
MT/yr = metric tons per year
N_2O = nitrous oxide

Operational GHG Emissions. Long-term operation of the proposed project would generate GHG emissions from area and mobile sources, on-site equipment, and indirect emissions from stationary sources associated with energy consumption. Project-specific energy utilization rates for electricity and natural gas were entered into CalEEMod.

The Project site is currently occupied with 144,906 sq ft of general office use within a single building. The annual GHG emissions associated with the proposed Project are summarized in Table 4.8.B. The existing development emissions were subtracted from the Project operational emissions to determine the new emissions from the proposed Project. As shown in Table 4.8.B, construction and operation of the Project would generate a net total of approximately 1,254.37 MT CO_2e/yr.

Table 4.8.B: Project Greenhouse Gas Emissions

Emission Source	Pollutant Emissions (MT/yr)			
	CO_2	CH_4	N_2O	CO_2e
Annual construction-related emissions amortized over 30 years	22.31	3.73E-03	8.53E-04	22.65
Area Source	0.02	4.00E-05	0.00	0.02
Energy Source	438.73	0.02	6.00E-03	441.14
Mobile Source	2,298.21	0.16	0.22	2,368.59
On-Site Equipment	50.75	0.02	0.00	51.16
Waste	42.43	2.51	0.00	105.11
Water Usage	105.02	1.28	0.03	146.17
Total CO_2e (All Sources)	**3,134.84**			
Existing Emissions	***1,880.47***			
Net Emissions (Project – Existing)	**1,254.37**			

Source: *Lake Forest Warehouse Greenhouse Gas Analysis* (Urban Crossroads 2023c).
Note: Numbers in table may not appear to add up correctly due to rounding of numbers.
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = Greenhouse Gas
MT/yr = metric tons per year
N_2O = nitrous oxide

As such, the proposed Project would not exceed the SCAQMD's recommended numeric threshold of 3,000 MT CO_2e/yr, which accounts for both construction and operational emissions,and would not have a potential significant direct or indirect impact on GHG and climate change. Therefore, project-level and cumulative GHG emissions would be considered **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

The City, as a Lead Agency, may assess the significance of GHG emissions by determining a project's consistency with a local GHG reduction plan that qualifies under Section 15183.5 of the *State CEQA Guidelines*. The City of Lake Forest has not adopted a GHG reduction plan. Since no other local or regional Climate Action Plan is in place, the project is being assessed for its consistency with the CARB's adopted Scoping Plan.

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan.

Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. In addition, the proposed project is required to comply with CCR Title 24 established by the CEC regarding energy conservation and green building standards. Therefore, the proposed project would result in a **less than significant impact** associated with conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 release of hazardous materials into the environment?	☐	☐	☒	☐
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 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The discussion and analysis provided in this section is based on the *Phase I Environmental Site Assessment*[25], which is provided in Appendix D.

4.9.1 Impact Analysis

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

Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable, reactive, or an irritant or strong sensitizer. Hazardous substances include all chemicals regulated under the U.S. Department of Transportation's "hazardous materials" regulations and the U.S. Environmental Protection Agency's (USEPA) "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials are

[25] Apex Companies, LLC. 2021. *Phase I Environmental Site Assessment conducted on Panasonic Avionics Corporation, 26200 Enterprise Way, Lake Forest, California 92630.* March 11.

affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

The demolition and construction phase of the proposed Project would require the short-term transport, use, and/or disposal of petroleum-based fuels, lubricants, pesticides, and other similar materials required for construction. The routine transport, use, and/or disposal of these hazardous materials could pose a potential hazard to construction workers working at the Project site as they would be handling the hazardous materials and could therefore be exposed through inhalation of vapors, direct contact with skin, or accidental ingestion. Project operations may also require more regular transport, use, and/or disposal of hazardous materials (e.g., solvents, cleaning agents, sanitizing solutions, paints, fertilizers, and pesticides) depending on the type of future industrial use. Although the future tenant and associated operations of the proposed 165,803 sq ft industrial building is unknown at this time, because the proposed Project would include an industrial use, this analysis assumes that future uses would include the regular transport, use, and/or disposal of hazardous materials.

Future activities at the Project site, including both construction and operation, would be subject to existing federal, state, and local regulatory programs for hazardous materials.

Worker health and safety is regulated at the federal level by the US Department of Labor, Occupational Safety and Health Administration (OSHA). OSHA regulations include training requirements for construction workers and a requirement that hazardous materials are accompanied by manufacturer's Safety Data Sheets (SDSs). The Federal Occupational Safety and Health Act of 1970 authorizes states to establish their own safety and health programs with OSHA approval. Worker health and safety protections in California are regulated by the California Department of Industrial Relations (DIR). The DIR includes the Division of Occupational Safety and Health (DOSH), which acts to protect workers from safety hazards through its California OSHA (Cal/OSHA) program. Cal/OSHA regulations include requirements for protective clothing, training, and limits on exposure to hazardous materials. California standards for workers dealing with hazardous materials are contained in California Code of Regulations (CCR) Title 8 and include practices for all industries (General Industrial Safety Orders), and specific practices for construction, and other industries. The routine transport, use, and disposal of hazardous materials at the Project site would be required to comply with a Project Health and Safety Plan (HASP) prepared by the Construction Contractor in accordance with CCR Title 8, which would mitigate potential health hazards for workers related to the routine transport, use, or disposal of hazardous materials to a less-than-significant level.

As detailed in Section 4.10, Hydrology and Water Quality, because construction of the proposed Project would result in soil disturbance greater than 1 acre, management of hazardous materials during construction activities would be subject to the requirements of the Stormwater Construction General Permit (CGP), which requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes hazardous materials storage requirements. For example, construction site operators would be required to store chemicals in watertight containers (with appropriate secondary containment to prevent any spillage or leakage) or in a storage shed (completely enclosed).

The transportation of hazardous materials is subject to United States Department of Transportation (DOT), Resource Conservation and Recovery Act (RCRA), and State regulations. In 1990 and 1994, the federal Hazardous Material Transportation Act was amended to improve the protection of life, property, and the environment from the inherent risks of transporting hazardous material in all major modes of commerce. The USDOT developed hazardous materials regulations, which govern the classification, packaging, communication, transportation, and handling of hazardous materials, as well as employee training and incident reporting. The California Highway Patrol, the California Department of Transportation (Caltrans), and the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) are responsible for enforcing federal and State regulations pertaining to the transportation of hazardous materials. Construction and operation of the proposed Project would result in the generation of various waste materials that would require recycling and/or disposal, including some waste materials that may be classified as hazardous waste. Hazardous wastes would be required to be transported by a licensed hazardous waste hauler and disposed of at facilities that are permitted to accept such materials as required by DOT, RCRA, and state regulations.

The Environmental Health Division of the Orange County Health Care Agency is designated as the Certified Unified Program Agency (CUPA) for the City of Lake Forest, and coordinates the regulation of hazardous materials and hazardous wastes in the City of Lake Forest for construction and operational activities through the following programs:

- Hazardous Materials Disclosure (HMD)
- Business Emergency Plan (BEP)
- Hazardous Waste (HW)
- Underground Storage Tank (UST)
- Aboveground Petroleum Storage Tank (APST)
- California Accidental Release Prevention (CalARP)

The role of a CUPA is to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities associated with the regulation of hazardous materials and hazardous wastes. Businesses that store or use hazardous materials in the City limits of Lake Forest are required to submit chemical and facility information on the California Environmental Reporting System (CERS), which is a statewide web-based system to support CUPAs in electronically collecting and reporting various hazardous materials-related data as mandated by the California Health and Safety Code and 2008 legislation (AB 2286). Chapter 6.95 of Division 20 of the California Health and Safety Code requires a Hazardous Materials Business Plan (HMBP) be submitted to the local CUPA if on-site hazardous materials exceed in aggregate any of the following: 55 gallons for liquids; 500 pounds for solids; or 200 cubic feet of gases at standard temperature and pressure. HMBPs are required to be submitted electronically to the CERS and must include facility information, a Hazardous Materials Inventory Statement, an Emergency Response Plan, and an Emergency Response Training Plan. The HMBP has to be re-certified for completeness and accuracy every year, or updated and revised as necessary.

The CalARP program aims to reduce the likelihood and impact of accidental releases of regulated toxic and flammable substances. Many of these releases could result in adverse off-site consequences.

The program accomplishes these objectives through:

1. Facility evaluations
2. Administrative and operational procedures
3. Emergency preparedness programs, and
4. Facility design requirements

A facility regulated under the CalARP Program must file a written Risk Management Plan (RMP) with the Environmental Health Division of the Orange County Health Care Agency.

Compliance with the existing hazardous materials regulations and programs described above, including requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and DOT, RCRA, and state regulations, would ensure that the proposed Project would not create a significant hazard to the public or the environment from the routine transport, use, or disposal of hazardous materials associated with the proposed Project by ensuring that these materials are properly handled during construction and operation. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials would be **less than significant**. No mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

During Project construction and operation, the public and/or the environment could be affected by the reasonable foreseeable release of hazardous materials into the environment from: 1) the improper handling or use of hazardous substances; 2) a transportation accident; or 3) inadvertent release resulting from an unforeseen event (e.g., fire, flood, or earthquake).

According to the Phase I Environmental Site Assessment (ESA) prepared for the proposed Project site, the Project site was used for agricultural purposes between 1938 and 1952. However, given the length of time since the Project site has been used for agricultural activity and given the fact that the Project site is currently developed and the soils have already been graded and disturbed, there is a low possibility that residual amounts of pesticides or herbicides remain in the soil. Therefore, construction of the proposed project would not require the transport of soil containing pesticides or herbicides or result in a potential release of pesticides or herbicides into the environment during construction. The Phase I ESA did not identify any other recognized environmental conditions, historic recognized environmental conditions, or controlled recognized environmental conditions in

connection with the existing uses on or surrounding the Project site that would result in a potential release of hazardous materials into the environment during construction.

The Project site contains three pad-mounted transformers. These transformers are owned and maintained by SCE, a public utility company. No staining or other evidence of leaks were observed on or around the transformers. Based on the construction date of the subject property (2007), these transformers are unlikely to contain polychlorinated biphenyls (PCBs) because the construction of the subject property was 2007. PCBs were manufactured in the United States between 1930 and 1977. Therefore, construction of the proposed Project would not require the transport of PCBs off site or result in a potential release of PCBs into the environment during construction.

The subject property building utilizes two hydraulic elevators. No concerns were noted in associated equipment rooms. Based on the construction date of the subject property (2000), the hydraulic fluid within the equipment is unlikely to contain PCBs. No other equipment potentially containing PCBs was observed on site. Additionally, based on the construction date of the subject property building (2000), lead-based paint was unlikely to be found at the subject property. Therefore, construction of the proposed Project would not require the transport of PCBs off site or result in a potential release of PCBs into the environment during construction.

Suspect asbestos-containing materials (ACMs) were identified and included roofing materials, vinyl composition tile, and mastic. Therefore, demolition of these structures could result in the release of hazardous materials into the environment. Prior to any activities that could disturb suspect ACMs or presumed asbestos-containing materials (PACM), these and similar materials should be analyzed for possible asbestos content. If these materials are confirmed to contain asbestos, the construction contractor would be required to comply with applicable EPA, Occupational Safety and Health Administration (OSHA), National Emission Standards for Hazardous Air Pollutants (NESHAPS), and State and local regulations. Compliance with federal and State regulations pertaining to the handling of ACMs would ensure the impacts associated with the removal of ACMs or PACMs would be less than significant.

Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials and/or the potential release of hazardous materials during construction of the proposed Project would be **less than significant,** and no mitigation is required.

It is anticipated that the proposed Project could include, but is not limited to, warehouse/distribution, manufacturing, or research and development uses. Although the future use of the proposed Project is not known at this time, existing Federal, State, and local regulations described above under Section 4.9.1.a are intended to prevent the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Should future tenants of the proposed Project use hazardous materials, these existing programs would ensure protection of human health and the environment during operation of the proposed Project. Therefore, compliance with the existing hazardous materials regulations and programs described above, including requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and DOT, RCRA, and state regulations, would ensure that the proposed Project would not result in impacts associated

with the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts associated with the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during project operation would be **less than significant.**

Impacts would be **less than significant**, and no mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

The closest school to the project site is the Bella Montessori School (20602 Prism Place) located approximately 733 feet (0.14 mile) south of the Project site. In addition, there is a proposed school site approximately 1,796 feet northeast (0.34 mile) of the Project site. Although there is a school within 0.25 mile, as discussed in Responses 4.9a and 4.9b, the proposed Project is not anticipated to use, emit, or handle hazardous or acutely hazardous materials, substances, or waste in sufficient quantities to represent a hazard to the public. The proposed project would be required to comply with all regulations listed in Section 4.9a, including requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and DOT, RCRA, and state regulations, which would ensure that the proposed project would not create a significant hazard to the public, such as the nearby schools. Any hazardous materials associated with construction of the proposed Project or future operations on the Project site would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable Federal, State, and local standards and regulations as described above. Therefore, impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would be **less than significant,** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

d. Would the project 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?

According to the Phase I ESA[26] prepared for the Project site, the Project site is not included on any hazardous materials sites pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. There would be **no impacts** associated with the

[26] Apex Companies, LLC. 2021. *Phase I Environmental Site Assessment conducted on Panasonic Avionics Corporation, 26200 Enterprise Way, Lake Forest, California 92630*. March 11.

project site's location on a site that is on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airport is the John Wayne Airport, which is located approximately 13 miles west of the Project site. As a result, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and there would be **no impacts**. No mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

The Project site is not located along an emergency evacuation route.[27] Additionally, the proposed Project would not reduce the number of traffic lanes on any adjacent streets nor alter the existing street grid; therefore, it would not alter or obstruct emergency evacuation routes or a response plan. Therefore, implementation of the Proposed Project would not interfere with the adopted emergency response plan and/or the emergency evacuation plan. **No impact** would occur; no mitigation is required.

The City is a member of the Orange County Operation Area and the Orange County Emergency Management Organization. Both entities provide mutual aid to communities via the Orange County Sheriff's Department, Orange County Fire Authority (OCFA), and the State of California Office of Emergency Services. Emergency response services include fire protection and suppression, inspection services, paramedic emergency medical aid, hazardous materials protection and response, and a variety of public services. The OCFA updated the Orange County Fire Authority Strategic Plan in 2022. This plan addresses: firefighter and public safety; Wildland Urban Interface (WUI) challenges; cost-effective projects to reduce wildfire risks and losses; community preparedness; project prioritization; collaborative partnerships, programs, and projects; and identifying adaptations to reduce wildfire risk.

[27] City of Lake Forest. n.d. Wildfires. Website: https://www.lakeforestca.gov/1042/Wildfires (accessed September 2021).

During short-term construction activities, the proposed Project would not require temporary lane or road closures and therefore would not cause any substantial traffic queuing along Enterprise Way or Dimension Drive. Therefore, construction of the proposed project would not physically impair or otherwise interfere with emergency response or evacuation in the Project vicinity. Therefore, impacts would be **less than significant**, and no mitigation is required.

Similar to existing conditions, access to and from the Project site is available via two existing driveways on Enterprise Way and an existing reciprocal access on the northeast corner of the site to the adjacent property. Implementation of the proposed Project would increase the number of trucks operating near the site and would generate an increase in the amount and volume of traffic on local and regional roadway networks. In accordance with the California Fire Code, the project applicant is required to design, construct, and maintain structures, roadways, and facilities to maintain appropriate emergency/evacuation access to and from the Project site. Entrances and exits to and from parking and loading facilities would be marked with appropriate directional signage. All site access points and driveway aprons would be designed and constructed to adequate widths for public safety pursuant to OCFA. Site design and compliance with standard and emergency OCFA and City requirements, such as the size and location of fire access routes and fire truck turning radii, would allow for proper site evacuation if necessary during warehouse operations. Therefore, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant**. No mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

According to the Lake Forest Very High Fire Hazard Severity Zones (VHFHSZs) in the Local Responsibility Area (LRA)[28] map, the Project site is located within a non-VHFHSZ LRA.[29] The State Fire Hazard Severity Zone (FHSZ) map confirms that the Project Site is located within a non-VHFHSZ.[30] The Project site is bound by multi-tenant office and warehouse buildings on all sides and is not adjacent to wildland areas. The proposed Project includes the demolition of existing on-site uses and construction and operation of a 165,803 sq ft warehouse building. Project construction and operation would not change the characteristics of the Project site in a way that would make the Project site more susceptible to wildland fires. Therefore, the proposed Project would have **no**

[28] An LRA is defined as land on which neither the state nor the federal government has the legal responsibility of providing fire protection.

[29] California Department of Forestry and Fire Protection (CAL FIRE). 2011. Fire and Resource Assessment Program, Lake Forest Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. https://osfm.fire.ca.gov/media/5889/c30_lakeforest_vhfhsz.pdf (accessed July 2023).

[30] California Department of Forestry and Fire Protection (CAL FIRE). n.d. Fire Hazard Severity Zone Viewer. Website: https://egis.fire.ca.gov/FHSZ/ (accessed October 14, 2021).

impacts associated with exposing people or structures to a significant risk of loss, injury, or death involving wildland fires. No mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Preliminary Water Quality Management Plan (WQMP)*[31] and *Preliminary Hydrologic and Hydraulic Drainage Report*[32]*,* which are provided in Appendices E-1 and E-2, respectively.

4.10.1 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The State Water Resources Control Board (SWRCB) and nine RWQCBs regulate the quality of surface water and groundwater bodies throughout California. In Lake Forest, the Santa Ana RWQCB is responsible for implementation of the Water Quality Control Plan (Basin Plan). The Basin Plan establishes beneficial water uses and water quality objectives for waterways and water bodies within the region. Section 303(d) of the federal CWA requires that states identify water bodies,

[31] Kier & Wright. 2023b. *Preliminary Water Quality Management Plan (WQMP). Project Name: Enterprise Business Center, 26200 Enterprise Way.* April 19.

[32] Kier & Wright. 2023a. *Preliminary Hydrologic & Hydraulic Drainage Report for 26200 Enterprise Way, Lake Forest, California, 92630.* April 19.

including bays, rivers, streams, creeks, and coastal areas, that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL establishes limits for pollutant discharges into impaired water bodies.

Storm water from the project site drains to various curb inlets where it enters storm drains that discharge to Serrano Creek, which flows into San Diego Creek Reach 2, which flows into San Diego Creek Reach 1, which flows into Newport Bay, which discharges into the Pacific Ocean.[33] According to the SWRCB Surface Water Quality Assessment 2020-2022 Integrated Report for Clean Water Act Sections 303(d) and 305(b), Serrano Creek is listed as an impaired water body for ammonia (unionized), benthic community effects, indicator bacteria, pH, and toxicity. San Diego Creek Reach 2 is listed as an impaired water body for benthic community effects, indicator bacteria, nutrients, sediment/siltation, and toxicity. San Diego Creek Reach 1 is listed as an impaired water body for benthic community effects, dichlorodiphenyltrichloroethane (DDT), indicator bacteria, malathion, nutrients, sedimentation/siltation, selenium, toxaphene, and toxicity. Upper Newport Bay is listed as an impaired water body for chlordane, copper, DDT, indicator bacteria, malathion, nutrients, PCBs, sedimentation/siltation, and toxicity. Lower Newport Bay is listed as impaired for chlordane, copper, DDT, indicator bacteria, nutrients, PCBs, and toxicity.[34]

Runoff water quality is regulated by the NPDES Program (established through the federal CWA). The NPDES program objective is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the SARWQCB. Construction activities are subject to the SWRCB NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (CGP), Order No. 2022-0057-DWQ, NPDES No. CAS000002. Any construction activity, including grading, that would result in the disturbance of 1 acre or more would require compliance with SWRCB's CGP, which requires preparation of an SWPPP and implementation of Construction BMPs during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Project operations are subject to the NPDES Permit and Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County Within the Santa Ana Region Areawide Urban Storm Water Runoff, Order No. R8-2009-0030, NPDES No. CAS618030 as amended by Order No. R8-2010-0062 (MS4 Permit). Any "Significant Redevelopment" projects that add or replace 5,000 sq ft or more of impervious surface on an already developed site or "New Development" projects that create 10,000 sq ft or more of impervious surface must comply with the requirements of the MS4 Permit. The MS4 permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires

[33] Kier & Wright. 2023a. Op. cit.

[34] State Water Resources Control Board (SWRCB). 2023. *2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)*. Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html (accessed July 2023).

implementation of technology-based standards. The MS4 Permit requires co-permittees to develop and implement standard design and post-development BMP guidance to guide application of Low Impact Development (LID) BMPs to the maximum extent practicable. The MS4 Permit requires that a Final WQMP be prepared for new development and significant redevelopment projects within its jurisdiction. In addition, the NPDES permit includes hydromodification requirements that projects must include management techniques to reduce the potential for impacts, such as a change in runoff and sediment yield because of land use modifications. To address hydromodification requirements with the Santa Ana RWQCB region, the Santa Ana RWQCB developed a Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans.[35]

The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Design BMPs are storm water management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a site. Source Control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into storm water. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in storm water runoff prior to releasing it to receiving waters.

Construction. The proposed project involves the demolition of the existing 144,906 sq ft, two-story commercial and office facility and the construction and operation of a 35-foot-tall, 165,803 sq ft, two-story industrial building. The Project includes a gated truck loading area, new landscaping, and a parking lot. The Project applicant also proposes to install various off-site improvements in order to enhance public safety and address concerns over pre-existing and future large truck turning movements at five intersections within Lake Forest. Construction activities would result in the disturbance of 8.4 acres of soil. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked, and they have the potential to be transported via storm water runoff into receiving waters.

Because construction of the proposed project would disturb greater than 1 acre of soil, the project is subject to the requirements of the CGP, which requires preparation of an SWPPP and implementation of construction BMPs during construction activities. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and

[35] Santa Ana Regional Water Quality Control Board. 2013. *Technical Guidance Document (TGD) for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs). December 20.*

discharge of construction debris and waste into receiving waters. In addition, the proposed Project must comply with Article XIII, Chapter 8.30 of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention adopted by the City, the City's NPDES Permit regulating discharges into and from its MS4, the DAMP, and any other conditions, requirements, and WQMPs adopted by the City.

According to the *Geotechnical Investigation*[36] completed for the proposed project, groundwater was not encountered during explorations to depths of more than 30 feet below the existing grade. Therefore, the groundwater table is expected to exist at a depth in excess of 30 feet at the Project site. The proposed Project will require excavation to a maximum depth of 6 feet below the existing grade. Therefore, it is anticipated that groundwater dewatering would not be required during construction of the proposed project.

Adherence with the CGP and City of Lake Forest Municipal Code, including implementation of the required SWPPP, Construction BMPs, and Erosion Control Plan, would ensure construction impacts related to surface water quality standards, waste discharge requirements, and surface water quality would be less than significant.

Operation. Pollutants of concern from long-term operations include suspended solids/sediment, nutrients, oil and grease, metals, and trash and debris. The proposed project would include three modular wetland systems and three underground detention chambers to reduce site discharge during the 100-year, 24-hour peak runoff rate by 40 percent in accordance with City requirements to reduce flows and associated erosion potential in Serrano Creek. The proposed project would also be required to prepare a Final WQMP, consistent with the requirement of the City's MS4 permit, because the project consists of significant redevelopment that would replace 5,000 sq ft or more of impervious surface. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Therefore, compliance with the requirements of the City and the MS4 Permit would ensure that operation impacts to water quality would be less than significant.

Overall, because the proposed project would be required to comply with existing regulations (including the CGP, the City of Lake Forest Municipal Code, and the MS4 Permit), the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be **less than significant** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

[36] Southern California Geotechnical. 2021a. Op cit.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The Project site is located within the Coastal Plain of the Orange County Groundwater Basin[37]. The basin has a surface area of approximately 224,000 acres (350 square miles) and is located in the northwestern portion of Orange County. The basin is bounded by the Puente and Chino Hills to the north, the Santa Ana Mountains to the east, the San Joaquin Hills to the south, the Pacific Ocean to the southwest, and by a low topographic divide approximated by the Orange County – Los Angeles County line to the northwest. Recharge to the basin is derived from percolation of Santa Ana River flow, infiltration of precipitation, and injection into wells. Groundwater levels are generally lower than the level in 1969, when the basin is considered to have been full. The level in the forebay has generally stabilized, whereas the southern coastal area has declined steadily through time. Average groundwater levels for the Orange County Groundwater Basin have risen about 15 feet since 1990, with average levels in the forebay area rising about 30 feet and average levels in the coastal area dropping a few feet. The total capacity of the Orange County Groundwater Basin is 38,000,000 acre-feet and, as of 1998, the total freshwater stored within the basin was approximately 37,700,000 acre-feet.[38]

Construction. As discussed in Section 4.10.a above, the *Geotechnical Investigation*[39] completed for the proposed Project indicates that groundwater was not encountered during explorations to depths of more than 30 feet below the existing grade. Therefore, the groundwater table is expected to exist at a depth in excess of 30 feet at the Project site. The proposed Project will require excavation to a maximum depth of 6 feet below the existing grade. Therefore, it is anticipated that groundwater dewatering would not be required during construction of the proposed project. Therefore, construction of the proposed project would not substantially decrease groundwater supplies.

Operation. Water service for the proposed project would be provided by Irvine Ranch Water District (IRWD). IRWD water supplies consist of imported water, local groundwater, recycled water, and local surface water. Treated and untreated imported surface water is purchased from the Metropolitan Water District of Southern California (Metropolitan) through the Municipal Water District of Orange County (MWDOC). Potable and non-potable groundwater supplies are extracted from both the Main Orange County Groundwater Basin and the Irvine Sub-Basin. IRWD's local surface water sources are the drainage tributary areas to the Irvine Lake and Harding Canyon Reservoir. Recycled water production at IRWD's Michelson and Los Alisos Water Recycling Plants are primary supplies to IRWD's non-potable distribution system. Therefore, operation of the proposed project would likely involve the use of both surface and groundwater sources for potable water. The 2020 Urban Water Management Plan indicates the IRWD has sufficient water supplies to meet

[37] California Department of Water Resources. n.d. *Groundwater Basin Boundary Assessment Tool.* Website: https://gis.water.ca.gov/app/bbat/ (accessed July 2023).

[38] Division of Water Rights. 2004. *Coastal Plain of Orange County Groundwater Basin, California's Groundwater Bulletin 118.* February 27.

[39] Southern California Geotechnical. 2021a. Op cit.

water demands through 2045, including during multiple dry years. Therefore, the proposed Project's water needs would not contribute to a substantial depletion of groundwater supplies.[40]

Development of the proposed project would result in an increase in impervious surfaces on the Project site from approximately 7.0 to 7.6 acres, which could decrease on-site infiltration. According to the Infiltration Report[41] completed for the proposed Project, infiltration rates at the project site range from 0.1 to 0.3 inch per hour due to the presence of dense engineered fill soils comprised of silty sands and clayey sands that possess very poor infiltration characteristics. Therefore, the project site is not a significant source of groundwater recharge, and the increase in impervious surface area that will result from the development of the proposed project would not significantly decrease groundwater supplies or interfere with groundwater recharge in a manner that may impede sustainable groundwater management.

For the reasons listed above, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be **less than significant,** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

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

i. Result in substantial erosion or siltation on- or off-site;

As previously discussed, storm water from the Project site drains to various curb inlets where it enters storm drains. During construction activities, more than 1 acre of soil would be disturbed. Soil would be exposed and drainage patterns temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. The CGP requires the preparation of an SWPPP to identify construction BMPs to be implemented as part of the proposed Project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. In addition, the proposed Project must comply with Article XIII of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention. With compliance with the requirements in the CGP and City of Lake Forest Municipal Code and implementation of construction BMPs, construction impacts related to on- or off-site erosion or siltation would be **less than significant**.

40 Irvine Ranch Water District (IRWD). 2021. *2020 Urban Water Management Plan.* June.

41 Southern California Geotechnical. 2021b. *Results of Infiltration Testing, Proposed Warehouse, 26200 Enterprise Way, Lake Forest, California.* April 8.

After the completion of Project construction, the proposed Project would not significantly alter the existing drainage pattern of the site. However, operation of the proposed Project would result in an increase in impervious surfaces on the project site from approximately 7.0 to 7.6 acres, which would result in a net increase in stormwater runoff that could lead to downstream erosion in receiving waters. However, as discussed above, the three modular wetland systems and three underground detention chambers included in the project's design would be used for stormwater control and treatment in compliance with the requirements of the MS4 Permit. Due to the incorporation of LID techniques as required by the MS4 Permit, operational impacts related to on- or off-site erosion or siltation would be **less than significant**.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

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

Development of the proposed Project would result in an increase in impervious surfaces on the Project site from approximately 7.0 acres to 7.6 acres which could have the potential to increase the volume and rate of stormwater runoff discharged from the project site. However, as previously discussed, three modular wetland systems and three underground detention chambers included in the Project's design would be used for stormwater control and treatment in compliance with the requirements of the MS4 Permit. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized so that on-site flooding would not occur. Therefore, due to the implementation of LID techniques as required by the MS4 Permit, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Impacts would be **less than significant** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

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

Stormwater Drainage System Capacity. Under existing conditions, stormwater from the Project site drains to various curb inlets where it enters storm drains that discharge to Serrano Creek, which flows into San Diego Creek Reach 2, which flows into San Diego Creek Reach 1, which flows into Newport Bay, which discharges the Pacific Ocean.[42] The proposed Project would include three modular wetland systems and three underground detention chambers to reduce site discharge during the 100-year, 24-hour peak runoff rate by 40 percent. The proposed drainage facilities would be designed in compliance with the MS4 Permit. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized such that drainage facility

[42] Kier & Wright. 2023a. Op. cit.

capacity would not be exceeded during a design storm. Therefore, the proposed Project would not result in an exceedance of planned or existing stormwater drainage systems and impacts would be **less than significant**.

Polluted Runoff. As discussed in Section 4.10.a, pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals, and each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. However, as previously discussed, the proposed Project would be required to comply with the requirements set forth by the CGP, including preparation of an SWPPP, which would specify BMPs to be implemented to control the discharge of pollutants in stormwater runoff as a result of construction activities. In addition, the proposed Project must comply with Article XIII of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention. Therefore, construction-related impacts would be **less than significant** and no mitigation is required.

Expected pollutants of concern from long-term operations include suspended solids/sediment, nutrients, oil and grease, metals, and trash and debris. As previously discussed, compliance with the MS4 Permit, the implementation of LID techniques, and the incorporation of operational BMPs to target pollutants of concern, would ensure that the proposed Project would not discharge substantial sources of polluted runoff from the Project site. Operation-related impacts would be **less than significant** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measure: No mitigation is required.

iv. Impede or redirect flood flows?

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06059C0316J, the project site is located in Zone X, which is identified as an area of minimal flood hazard.[43] The proposed project would not alter the topography of the project site, which is relatively flat, and would not substantially alter drainage patterns. Because the proposed project would not place improvements and structures directly within a 100-year floodplain, the project would not impede or redirect flood flows, and there would be no impact.

Significance Determination: No Impact

Mitigation Measure: No mitigation is required.

[43] Federal Emergency Management Agency (FEMA). 2009. Flood Insurance Rate Map No. 06059C0316J. Map Revised December 3, 2009. Website: https://msc.fema.gov/portal/search?AddressQuery=26200%20enterprise%20way%2C%20lake%20forest%2C%20ca (accessed July 2023).

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

Flooding. According to FEMA FIRM No. 06059C0316J, the project site is located in Zone X, which is identified as an area of minimal flood hazard. Therefore, the proposed Project would not risk release of pollutants due to project inundation due to flood hazard.

Tsunami. The project site is over 10 miles northeast of the Pacific Ocean at an elevation of approximately 700 feet above mean sea level (amsl). Based on the distance from the Pacific Ocean, the project site is not located in a tsunami hazard zone and therefore would not be susceptible to impacts associated with a tsunami.

Seiches. Seiches are waves created in an enclosed body of water (e.g., a bay, lake, or harbor) that go up and down or oscillate and do not progress forward like standard ocean waves. Limited isolated damage to adjacent and down-slope structures has been observed from seiches occurring in swimming pools and in small shallow lakes and ponds. Man-made lakes within Lake Forest are shallow, with limited surface areas, and would not generate devastating seiches.[44] There are no nearby enclosed bodies of water in the vicinity of the Project site. Therefore, the proposed Project would not risk release of pollutants due to project inundation due to seiche.

Dam Inundation. According to the City of Lake Forest General Plan 2040, there are no dam inundation areas in the City of Lake Forest. Therefore, the proposed Project would not risk release of pollutants due to dam inundation.

The Project site is not located within a flood, tsunami, seiche, or dam inundation area. Therefore, implementation of the proposed project would not result in the release of pollutants from a flood, dam inundation, tsunami, or seiche, and impacts would be **less than significant.**

Significance Determination: Less than Significant

Mitigation Measure: No mitigation is required.

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

The project is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB adopted a Basin Plan (January 1995, with amendments effective on or before June 2019) that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As previously discussed, the proposed project would comply with existing NPDES permit requirements, including the CGP and MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff. Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the proposed

[44] City of Lake Forest. 2019. Op. cit.

project would not result in water quality impacts that would conflict with the Basin Plan. Construction and operational impacts related to a conflict with the Basin Plan would be **less than significant**.

The Sustainable Groundwater Management Act (SGMA), which was enacted in September 2014, requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. The SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the groundwater basins. The Project site is in the Coastal Plain of the Orange County Groundwater Basin, which the California Department of Water Resources designates as a medium priority basin.[45] The GSAs identified for the Coastal Plain of the Orange County Groundwater Basin are Orange County Water District, the City of La Habra, and the IRWD.

On January 1, 2017, the Orange County Water District (OCWD), City of La Habra, and IRWD submitted the Basin 8-1 Alternative to the California Department of Water Resources. Elements to be included in GSPs as described in the California Water Code (§10727.2, 10727.4, and 10727.6) have been incorporated into the Basin 8-1 Alternative. The Basin 8-1 Alternative includes four management areas consisting of the La Habra-Brea Management Area, the OCWD Management Area, the South East Management Area, and the Santa Ana Canyon Management Area. The Project site is located within the South East Management Area.[46]

The only groundwater production in the South east management area has historically been from six wells located in Lake Forest, within the IRWD service area. Currently only one well is active with an average production of about 125 acre-feet per year (afy) over the last 10 years. Imported water from the Metropolitan is the primary water supply source for the entire South East Management Area. Groundwater production within the South East Management Area represents less than 2 percent of the potable water supply for IRWD's Lake Forest area and less than 0.2 percent of IRWD's 2015 potable supply. Despite several recent years of significant drought, groundwater production in this area has approximately remained the same. Due to the relatively low yield of the aquifer in the South East Management Area, groundwater production is expected to remain a relatively insignificant water supply source for the area. The sustainability goal for the South East Management Area is to recognize it is a small part of the larger OCWD management area whose groundwater levels and water quality will be monitored to assure that conditions do not lead to significant and unreasonable lowering of groundwater levels, reduction in storage, water quality degradation, inelastic land subsidence or unreasonable adverse effect on surface water resources.[47]

As previously discussed, the *Geotechnical Investigation*[48] completed for the proposed Project indicates the groundwater table is expected to exist at a depth in excess of 30 feet at the Project site. The proposed Project will require excavation to a maximum depth of 6 feet below the existing

45 California Department of Water Resources. 2020. *Sustainable Groundwater Management Act 2019 Basin Prioritization Process and Results.* May.

46 Orange County Water District, City of La Habra, and Irvine Ranch Water District. 2017. *Basin 8-1 Alternative.* January 1.

47 Ibid.

48 Southern California Geotechnical. 2021a. Op. cit.

grade. Therefore, it is anticipated that groundwater dewatering would not be required during construction of the proposed Project. Therefore, construction of the proposed Project would not conflict with or obstruct implementation of the GSP.

As discussed in Section 4.10.b, potable water would be partially obtained from groundwater. However, the 2020 Urban Water Management Plan indicates the IRWD has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Additionally, the GSA has developed management actions to ensure that future development will not significantly impact groundwater resources. As described above in Section 4.10.b, infiltration rates at the project site range from 0.1 to 0.3 inch per hour due to the presence of dense engineered fill soils comprised of silty sands and clayey sands that possess very poor infiltration characteristics. Therefore, the project site is not a significant source of groundwater recharge. As previously discussed, compliance with the MS4 Permit, the implementation of LID techniques, and the incorporation of operational BMPs to target pollutants of concern would ensure that the proposed Project would not discharge substantial sources of polluted runoff from the Project site. For these reasons, the proposed Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Therefore, construction and operational impacts related to conflict with or obstruction of water quality control plans or sustainable groundwater management plans would be **less than significant,** and no mitigation is required.

Significance Determination: Less than Significant

Mitigation Measure: No mitigation is required.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

4.11.1 Impact Analysis

a. Would the project physically divide an established community?

The physical division of an established community typically refers to the construction of a physical feature (e.g., an interstate highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The proposed Project includes the demolition of an existing 144,906 sq ft, two-story commercial and office facility and the construction and operation of a 35-foot-tall, 165,803 sq ft, two-story industrial building. Approximately 155,803 sq ft are planned for warehouse/manufacturing use with the remaining 10,000 sq ft to be utilized as office space. The Project includes a gated truck loading area, new landscaping, and a parking lot. Although the operator is yet to be determined, it is anticipated that the operational use could include, but is not limited to, warehouse/distribution, manufacturing, or research and development. The Project site is primarily surrounded by sites with the same zoning designation (i.e., LI), and the proposed Project would be consistent with the type and intensity of development in the area. Vehicular access to the Project site would continue to be provided via existing driveways on Enterprise Way and an existing reciprocal access on the northeast corner of the site to the adjacent property. The proposed project would not require the construction of any new infrastructure that would divide an established community, and would not remove any means of access. Therefore, the proposed Project would have **no impact** related to physically dividing an established community, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

The main documents guiding development and regulating land uses in Lake Forest are the City's General Plan and Zoning Code. The General Plan is a comprehensive plan intended to guide the physical development of the city and it serves as a blueprint for future growth and development. As a blueprint for the future, the plan contains policies and programs designed to provide decision-makers with a solid basis for decisions related to land use and development. The Project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses. Allowable uses include wholesale businesses, light manufacturing and processing, research and development uses, warehousing and storage, distribution and sales, high technology production, ancillary retail sales, and related uses. The proposed Project is an allowable use that is consistent with the Light Industrial land use designation. Therefore, the proposed Project would be consistent with the General Plan as well as applicable goals and policies.

The City's Zoning Code is the primary implementation tool for its General Plan Land Use Element (2020) and the goals and policies therein. For this reason, the Zoning Map must be consistent with the General Plan Land Use Map. The Project site has a zoning designation of Light Industrial (LI) in the Pacific Commercentre Planned Community, which is consistent with the Light Industrial General Plan land use designation. The property is regulated by the Pacific Commercentre Planned Community and the City's Zoning Code (Title 9 of the Lake Forest Municipal Code). The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City of Lake Forest Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I." Permitted uses include a variety of office, retail, manufacturing, and retail uses. Pursuant to the zoning, the proposed manufacturing/warehouse building is a permitted use and the construction of the building requires a Site Development Permit.

Table 4.11.A provides a consistency analysis of the Site Development Standards from the LI zoning district in the Pacific Commercentre Planned Community that are applicable to the proposed Project. As stated in Table 4.11.A, the proposed Project would be consistent with all of the applicable Site Development Standards.

Table 4.11.A: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
Building Height Limit: No maximum except that building heights shall comply with the provisions of Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. Within the High Technology and Light Industrial Planning Areas, prior to the issuance of any building permit for any structure or buildings which are proposed to be greater than 35 feet above the proposed grade elevation, applicant shall obtain approval of a Use Permit.	The proposed building would be a maximum height of 35 feet and therefore would not require a Use Permit.

Table 4.11.A: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
Building Setbacks: All setbacks shall be measured from the ultimate right-of-way line and interior property lines. ● **Adjacent to Local Street:** Along any local street, buildings shall be set back a minimum of 15 feet from the ultimate right-of-way line, except that unsupported roofs or architectural elements may project 6 feet into the required setback area ● **Adjacent to a Non-Residential Parcel:** Along property lines that separate business park and non-residential uses there shall be no required minimum setback.	The proposed building would be greater than 15 feet from the right-of-way lines for adjacent local streets, including Enterprise Way and Enterprise Court.
Off-Street Parking: Off-street parking shall be provided in accordance with Chapter 9.168 (Off-Street Parking) of the Lake Forest Municipal Code.	The proposed Project includes 196 parking spaces around the perimeter of the proposed structure. In compliance with Municipal Code requirements, bike racks (15 spaces total) would also be provided on site. The alternative site plan includes 306 parking spaces around the perimeter of the proposed structure. In compliance with Municipal Code requirements, bike racks (15 spaces total) would also be provided on site. Parking would be in accordance with Chapter 9.168 of the Lake Forest Municipal Code.
Loading: All loading shall be performed on the site. Loading platforms and areas shall be screened from view from adjacent streets and highways.	The Project includes a gated truck loading area. Loading docks would be located on the southwest side of the proposed building and screened from the adjacent streets.
Trash and Storage Areas: All storage, including cartons, containers, materials, products or trash, shall be shielded from view within a building or area enclosed by a solid masonry wall not less than 6 feet in height.	The proposed Project would include two trash enclosures to shield trash storage. The trash enclosures would be composed of a painted concrete tilt-up wall panel and would be 11.13 feet high with a roof that extends to 13.13 feet.
Streets and Intersections: Screening (including walls and fences) along all streets and boundaries shall have a height of not less than 36 inches nor more than 42 inches within 20 feet of the point of intersection of: ● A vehicular accessway or driveway and a street; ● A vehicular accessway or driveway and a sidewalk and ● Two or more vehicular accessways, driveways or streets.	The proposed Project includes perimeter landscaping that would serve as a screen along all streets and boundaries. Vegetation would be between 36 inches and 42 inches high and within 20 feet of driveway and street intersections.
Mechanical Equipment: Mechanical equipment placed on any roof such as, but not limited to, air conditioning, heating, ventilating ducts, and exhaust shall be screened from view from any abutting street or highway.	Equipment located on the roof of the proposed building would be screened by the building parapet and would be out of the line of sight from the property line.
Landscaping: Landscaping, consisting of evergreen or deciduous trees, shrubs, ground cover, or hardscape shall be installed and maintained subject to the following standards: ● Boundary landscaping along public streets, other than arterial highways, is required to an average depth of 10 feet and a minimum depth of 5 feet.	The proposed Project includes boundary landscaping that would be an average depth of 10 feet and a minimum depth of 5 feet along public streets. Landscaped areas would be separated by a curb at least 6 inches or higher from adjacent vehicular areas. Landscaped areas would be watered using permanent automatic watering facilities and would be maintained in a neat, clean, and healthy condition.

Table 4.11.A: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
• **Separation:** Any landscaped area shall be separated from an adjacent vehicular area by a wall or curb at least 6 inches higher than the adjacent vehicular area or in some manner be protected from vehicular damage. • **Watering:** Permanent automatic watering facilities shall be provided for all landscaped areas. Site development plans shall incorporate provisions for a dual water system utilizing reclaimed wastewater for irrigation purposes, consistent with the requirements of the Irvine Ranch Water District. • **Maintenance:** All landscaping shall be maintained in a neat, clean and healthy condition. This shall include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, replacement of plants when necessary, and the regular watering of all plantings.	
Environmental Control: Any permitted business or light industrial use shall be performed or carried out entirely within a building that is designed and constructed so that the enclosed operations and uses do not cause or produce a nuisance to adjacent sites, such as, but not limited to the following: Radio frequency interference, sound, vibration, electromechanical disturbance, electromagnetic disturbance, radiation, air pollution, dust, odors, fumes, emission of toxic or non-toxic matter, humidity, heat, cold or glare.	As discussed in Sections 4.1 Aesthetics, 4.3 Air Quality, 4.6 Energy, 4.8 Greenhouse Gas Emissions, 4.9 Hazards and Hazardous Materials, and 4.13 Noise, the proposed Project would not cause or produce a nuisance to adjacent sites related to sound, vibration, radiation, air pollution, dust, odors, fumes, emissions of toxic or non-toxic matter, or glare. Additionally, the uses associated with the proposed Project would not result in radio frequency interference, electromechanical disturbance, electromagnetic disturbance, humidity, heat, or cold.

The proposed Project would be consistent with the City's General Plan and Zoning Code and the permitted uses and developed standards of the Pacific Commercentre Planned Community. Therefore, the proposed project would have **no impacts** associated with conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.12 MINERAL RESOURCES

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

4.12.1 Impact Analysis

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

The Surface Mining and Reclamation Act (SMARA) enacted by the California Legislature in 1975 provides guidelines to assist with the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land uses and ownership. SMARA categorizes areas into four Mineral Resource Zones (MRZs):

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits of which their significance cannot be properly evaluated.
- **MRZ-4:** An area where information is not adequate enough to be able to assign to any other MRZ zone.

Of these four categories, lands classified as MRZ-2 are of the greatest importance. Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the State of California Mining and Geology Board as being "regionally significant." Such designations require that a Lead Agency's land use decisions involving designated areas are to be made in accordance with its mineral resource management policies and that it considers the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

Approximately 62 acres of land in the eastern portion of Lake Forest are designated as MRZ-2. The MRZ-2 resource area, previously known as the El Toro Materials Sand and Gravel Operation, in the eastern portion of Lake Forest was previously excavated for sand and gravel materials. However, the El Toro Materials Sand and Gravel Operation is no longer operational. The 62-acre area designated

as MRZ-2 is currently developed with residential uses, a baseball field, and a storm drain basin. As such, the 62-acre area is no longer available for mining. Given that the only known MRZ in Lake Forest has already been mined and then subsequently developed, there is no additional potential for resource extraction from this MRZ. There are no other known mineral deposits or resources within Lake Forest that are of significant value to the region or the State.[49]

There are no known mineral resources in the vicinity of the project site. The MRZ-2 designated area within Lake Forest that is discussed above is located approximately 0.8 mile northeast of the Project site. Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the State, and there would be **no impact**. No mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

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

Please refer to Section 4.12.a. The proposed project would not result in the loss of availability of any known locally-important mineral resource recovery sites, and **no impact** would occur. No mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

[49] City of Lake Forest. 2019. Op. cit.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The discussion and analysis provided in this section are based on the *Lake Forest Warehouse Noise and Vibration Analysis*[50], which is provided in Appendix F.

4.13.1 Discussion

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

A project would normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and goals of the community in which it is located. The City has not adopted any threshold for increases in ambient noise levels. However, in an outdoor environment, noise level changes that are less than the audible range of the human ear are not considered a substantial change. The City's General Plan (Safety and Noise Element) and Municipal Code (Chapter 11.16, Noise Control) establish noise standards for Lake Forest.

General Plan Safety and Noise Element. The City's General Plan Safety and Noise Element requires consideration of the sources and recipients of noise early in the land use planning process in order to develop an effective method of minimizing the impacts of noise on the community's population.

[50] Urban Crossroads. 2023f. *Lake Forest Warehouse Noise and Vibration Analysis*. May 22.

The Public Safety Element specifies the maximum exterior and interior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the Public Safety Element identifies noise standards designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receivers, or degrade quality of life.

The City of Lake Forest General Plan General Plan Public Safety Element Goal PS-6e, Noise, states that a vibration limit of 0.30 inch per second (in/sec) of peak particle velocity (PPV) will be used to minimize the potential for cosmetic damage to buildings of normal conventional construction. Therefore, to determine if the vibration levels due to the operation and construction of the Project, the PPV vibration level standard of 0.30 in/sec is used.

Municipal Code. To analyze noise impacts originating from a designated fixed location or private property such as the proposed Project, stationary-source (operational) noise (e.g., proposed loading dock activity, rooftop air-conditioning units, parking lot vehicle movements, trash enclosure activity, and truck movements) are typically evaluated against standards established under a jurisdiction's Municipal Code. The Project operational noise impacts are governed by City of Lake Forest Municipal Code, Title 11 – Peace and Safety, Division II – Offenses Against Public Peace, Chapter 11.16 – Noise Control. The Municipal Code indicates the Noise Standards outlined in Section 11.16.040(A) shall apply to all residential property. The Noise Standards limit the allowable exterior noise level to 55 dBA during the daytime hours (7:00 a.m. to 10:00 p.m.), and 50 dBA during the nighttime hours (10:00 p.m. to 7:00 a.m.).

Section 11.16.060(D) of the City of Lake Forest Municipal Code indicates that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. and 8:00 p.m. except on Sundays and legal City of Lake Forest holidays. However, neither the City of Lake Forest General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers. Therefore, a numerical construction threshold based on the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts, as discussed below.

Federal Transit Administration (FTA). According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA equivalent continuous sound level (L_{eq}) as a reasonable threshold for noise sensitive residential land use.

Baseline Noise Levels. To assess the existing noise level environment, 24-hour noise level measurements were taken at six locations in the Project study area. Noise level measurements were collected by Urban Crossroads, Inc. on Wednesday, May 17, 2017, and Tuesday, March 30, 2021. To describe the existing noise environment, the hourly noise levels were measured during typical

weekday conditions over a 24-hour period. The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The inclusion of data gathered in 2017 was done to represent conditions in which the daytime noise levels were influenced by temporary construction activities in the area. The noise measurements yielded noise levels ranging from 50.0 to 65.3 dBA L_{eq} during the daytime and from 47.1 to 49.9 dBA L_{eq} during the nighttime.

Sensitive Receiver Locations. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified (see following listing). All distances are measured from the Project site boundary to the outdoor living areas (e.g., private backyards) or at the building façade, whichever is closer to the Project site. The selection of receiver locations is based on Federal Highway Administration (FHWA) guidelines and is consistent with additional guidance provided by the California Department of Transportation (Caltrans) and the FTA.

- **Receiver Location R1:** Receiver Location R1 represents the existing multi-family residential home at 98 Agave, which is approximately 907 feet northwest of the Project site. Receiver R1 was placed at the outdoor living areas (backyards) behind an existing community wall and private backyard wall facing the Project site. A 24-hour noise measurement was taken at Receiver R1 to describe the existing ambient noise environment.

- **Receiver Location R2:** Receiver Location R2 represents the potential future use of Kaneh Bosm Healing Ministry at 26170 Enterprise Way, which is approximately 147 feet northwest of the Project site. Since there are no outdoor living areas (backyards) facing the Project site, Receiver R2 was placed at the building façade. A 24-hour noise measurement was taken at Receiver R2 to describe the existing ambient noise environment. The Kaneh Bosm Healing Ministry did not end up establishing the religious facility at this location.

- **Receiver Location R3:** Receiver Location R3 represents the new constructed single-family residential home (Lot 13 of Tract 18142-Redwoods), which is located approximately 85 feet northeast of the Project site and within the Toll Brothers Meadows Project. A 24-hour noise measurement was taken at Receiver R3 to describe the existing ambient noise environment.

- **Receiver Location R4:** Receiver Location R4 also represents the planned Toll Brothers Meadows residential development located approximately 327 feet east of the Project site. A 24-hour noise measurement was taken at Receiver R4 to describe the existing ambient noise environment.

- **Receiver Location R5:** Receiver Location R5 represents the existing Nature Park at 26215 Dimension Drive, which is approximately 391 feet south of the Project site. A 24-hour noise measurement was taken at Receiver R5 to describe the existing ambient noise environment.

- **Receiver Location R6:** Receiver Location R6 represents the existing Bella Montessori School at 20602 Prism Place, which is approximately 733 feet southwest of the Project site. A 24-hour

noise measurement was taken at Receiver R6 to describe the existing ambient noise environment.

Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

Significance Criteria. Consistent with the City of Lake Forest Public Safety Element Action PS-6d, in making a determination of impact under CEQA, a substantial increase will occur if ambient noise levels have a substantial increase. Generally, a 3 dB increase in noise levels is barely perceptible, and a 5 dB increase in noise levels is clearly perceptible. Therefore, increases noise levels shall be considered to be substantial when the following occurs:

- When existing noise levels are less than 60 dB, a 5 dB increase in noise will be considered substantial.
- When existing noise levels are between 60 dB and 65 dB, a 3 dB increase in noise will be considered substantial.
- When existing noise levels exceed 65 dB, a 1.5 dB increase in noise will be considered substantial.

In addition, these levels of increases and their perceived acceptance are consistent with guidance provided by both the FHWA and Caltrans. Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4.13.A shows the significance criteria summary matrix.

Table 4.13.A: Summary of Noise and Vibration Standards/Significance Criteria

Noise Analysis	Condition(s)	Significance Criteria	
		Daytime	Nighttime
Operational	Exterior Noise Level Standards	55 dBA L_{eq}	50 dBA L_{eq}
	If ambient is < 60 dBA L_{eq}	≥ 5 dBA L_{eq} Project increase	
	If ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA L_{eq} Project increase	
	If ambient is > 65 dBA L_{eq}	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise Level Threshold	80 dBA L_{eq}	N/A
	Vibration Level Threshold	0.30 in/sec PPV	N/A

Source: Table 4-1, *Lake Forest Warehouse Noise and Vibration Impact Analysis* (Urban Crossroads 2023e).
Note: "Daytime" = 7:00 a.m.–10:00 p.m.; "Nighttime" = 10:00 p.m.–7:00 a.m.
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
N/A = Not applicable. Construction during nighttime hours is not permitted. Therefore, no nighttime construction noise level threshold is identified.
PPV = peak particle velocity

4.13.2 Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction. Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

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

To describe peak construction noise activities, the construction noise analysis was prepared using reference noise level measurements published in the Update of Noise Database for Prediction of Noise on Construction and Open Sites by the Department for Environment, Food and Rural Affairs (DEFRA). Using the reference construction equipment noise levels and the CadnaA (Computer-Aided Noise Abatement) noise prediction model,calculations of the Project construction noise level impacts at the nearest sensitive receiver locations were completed. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts for the two noisiest pieces of equipment operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. Consistent with FTA guidance for general construction noise assessment, Table 4.13.B presents the combined noise levels for each stage of construction. As shown in Table 4.13.B, the construction noise levels are expected to range from 42.2 to 68.7 dBA L_{eq}, and the highest construction levels are expected to range from 49.2 to 68.7 dBA L_{eq} at the nearest receiver locations.

Table 4.13.B: Typical Construction Equipment Noise Level Summary

Receiver Location	Construction Noise Levels (dBA L_{eq})						
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels
R1	49.2	55.2	55.2	50.2	50.2	48.2	55.2
R2	53.8	59.8	59.8	54.8	54.8	52.8	59.8
R3	62.7	68.7	68.7	63.7	63.7	61.7	68.7
R4	55.4	61.4	61.4	56.4	56.4	54.4	61.4
R5	43.2	49.2	49.2	44.2	44.2	42.2	49.2
R6	44.3	50.3	50.3	45.3	45.3	43.3	50.3

Source: Table 10-2, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

To evaluate whether the proposed Project would generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA L_{eq} significance threshold during construction activities as shown in Table 4.13.C. Therefore, the noise impacts at all receiver locations due to Project construction noise would be **less than significant**. No mitigation is required.

Table 4.13.C: Typical Construction Noise Level Compliance

Receiver Location	Use	Construction Noise Levels (dBA L_{eq})		
		Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	Residential	56.5	80	No
R2	Church	70.5	80	No
R3	Residential	70.9	80	No
R4	Residential	66.5	80	No
R5	Park	65.1	80	No
R6	School	61.9	80	No

Source: Table 10-3, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

Operational On-Site Noise Impacts. Operational noise impacts from the proposed Project would be associated with the expected typical daytime and nighttime activities at the Project site. The on-site Project-related noise sources are expected to include: loading dock activity, rooftop air-conditioning units, parking lot vehicle movements, trash enclosure activity, and truck movements. Several of these operational noise sources such as air conditioning and parking lot vehicle movements are present with the daytime use of the existing building. Since many of these activities occur with the existing building, this analysis conservatively assumes the Project will operate 24 hours per day, 7 days per week. Exterior operational noise levels from the proposed Project were estimated using a noise prediction model using the CadnaA computer program.

Using the reference noise levels to represent the proposed Project operations that include loading dock activity, rooftop air-conditioning units, parking lot vehicle movements, trash enclosure activity, and truck movements, Urban Crossroads, Inc. calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. The daytime hourly noise levels at the off-site receiver locations are expected to range from 35.4 to 51.5 dBA L_{eq}.

The nighttime hourly noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. at the off-site receiver locations are expected to range from 34.1 to 49.8 dBA L_{eq}. The differences between the daytime and nighttime noise levels are largely related to the duration of noise activity.

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City's exterior noise level standards at the nearest noise-sensitive receiver locations. Table 4.13.D shows the operational noise

levels associated with the proposed Project, which will satisfy the City's exterior noise level standards at all nearby receiver locations with a planned 14-foot-high screen wall on the southwestern boundary of the loading dock as described in Mitigation Measure NOI-1. Therefore, the operational noise impacts at the nearest noise-sensitive receiver locations would be **less than significant with mitigation incorporated**.

Table 4.13.D: Operational Noise Level Compliance

Receiver Location	Project Operational Noise Levels (dBA L_{eq})		Noise Level Standards (dBA L_{eq})		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	32.9	31.1	55.0	50.0	No	No
R2	41.2	39.4	55.0	50.0	No	No
R3	48.8	46.8	55.0	50.0	No	No
R4	43.9	42.5	55.0	50.0	No	No
R5	32.2	29.2	55.0	50.0	No	No
R6	30.7	28.1	55.0	50.0	No	No

Source: Table 9-4, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level

As indicated in Tables 4.13.E and 4.13.F, the proposed Project would generate operational noise level increases ranging from 0.0 to 0.5 dBA L_{eq} at the nearest receiver locations. Project-related operational noise level increases will satisfy the operational noise level increase significance criteria presented in Table 4.13.A. Therefore, the incremental Project operational noise level increase at all receiver locations would be **less than significant**, and no mitigation is required.

Table 4.13.E: Daytime Project Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level (dBA L_{eq})	Measurement Location	Reference Ambient Noise Levels (dBA L_{eq})	Combined Project and Ambient (dBA L_{eq})	Project Increase (dBA L_{eq})	Increase Criteria (dBA L_{eq})	Increase Criteria Exceeded?
R1	32.9	L1	54.8	54.1	0.0	5.0	No
R2	41.2	L6	48.7	49.4	0.7	5.0	No
R3	48.8	L6	48.7	51.8	3.1	5.0	No
R4	43.9	L6	48.7	49.9	1.2	5.0	No
R5	32.2	L5	55.8	55.8	0.0	5.0	No
R6	30.7	L5	55.8	55.8	0.0	5.0	No

Source: Table 9-5, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).

Table 4.13.F: Nighttime Project Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level (dBA L_{eq})	Measurement Location	Reference Ambient Noise Levels (dBA L_{eq})	Combined Project and Ambient (dBA L_{eq})	Project Increase (dBA L_{eq})	Increase Criteria (dBA L_{eq})	Increase Criteria Exceeded?
R1	31.1	L1	45.3	45.5	0.2	5.0	No
R2	39.4	L6	45.7	46.6	0.9	5.0	No
R3	46.8	L6	45.7	49.3	3.6	5.0	No
R4	42.5	L6	45.7	47.4	1.7	5.0	No
R5	29.2	L5	43.0	43.2	0.2	5.0	No
R6	28.1	L5	43.0	43.1	0.1	5.0	No

Source: Table 9-6, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).

Operational Off-Site Traffic Noise Analysis. Traffic generated by the operation of the proposed Project would influence the traffic noise levels in surrounding off-site areas. Utilizing information from the *Focused Traffic Analysis*[51] (Appendix G-1), the off-site traffic noise analysis within the *Noise and Vibration Analysis*[52], which is also shown in Tables 4.13.G and 4.13.H, indicates that an increase of up to 0.4 dBA could occur on roadway segments in the vicinity of the proposed project. It should be noted that the increases in noise level only occur on roadway segments adjacent to non-sensitive uses. An increase in noise of less than 1.0 dBA is not perceptible to the human ear. Therefore, the traffic generated by the operation of the proposed Project is not expected to meaningfully influence the traffic noise levels on nearest roadway segments or at land uses surrounding the off-site areas. Impacts associated with project-related off-site traffic noise would be **less than significant**, and no mitigation is required.

Table 4.13.G: Existing With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use	CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Bake Pkwy.	w/o Commercentre Dr.	Sensitive	80.6	80.6	0.0	1.5	No
2	Bake Pkwy.	e/o Commercentre Dr.	Sensitive	79.8	79.8	0.0	1.5	No
3	Bake Pkwy.	e/o Dimension Dr.	Sensitive	80.3	80.3	0.0	1.5	No
4	Lake Forest Dr.	s/o Dimension Dr.	Sensitive	78.3	78.3	0.0	1.5	No
5	Lake Forest Dr.	n/o Dimension Dr.	Non-Sensitive	79.0	79.0	0.0	1.5	No
6	Lake Forest Dr.	n/o Rancho Pkwy.	Non-Sensitive	77.3	77.3	0.0	1.5	No
7	Dimension Dr.	s/o Bake Pkwy.	Non-Sensitive	72.8	73.0	0.2	1.5	No
8	Dimension Dr.	s/o Commercentre Dr.	Non-Sensitive	75.4	75.5	0.1	1.5	No

Source: Table 7-5, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).
dBA = A-weighted decibels
e/o = east of
n/o = north of
s/o = south of
w/o = west of

51 Urban Crossroads. 2023h. *Lake Forest Warehouses (UP 06-21-5437, 06-21-5438 & 07-21-5447) Focused Traffic Analysis*. June 29.

52 Urban Crossroads. 2023f. *Lake Forest Warehouse Noise and Vibration Analysis*. May 22

Table 4.13.H: Opening Year Cumulative With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use	CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Bake Pkwy.	w/o Commercentre Dr.	Sensitive	81.3	81.3	0.0	1.5	No
2	Bake Pkwy.	e/o Commercentre Dr.	Sensitive	80.4	80.4	0.0	1.5	No
3	Bake Pkwy.	e/o Dimension Dr.	Sensitive	81.1	81.1	0.0	1.5	No
4	Lake Forest Dr.	s/o Dimension Dr.	Sensitive	78.8	78.8	0.0	1.5	No
5	Lake Forest Dr.	n/o Dimension Dr.	Non-Sensitive	79.4	79.5	0.1	1.5	No
6	Lake Forest Dr.	n/o Rancho Pkwy.	Non-Sensitive	77.8	77.8	0.0	1.5	No
7	Dimension Dr.	s/o Bake Pkwy.	Non-Sensitive	73.6	74.0	0.4	1.5	No
8	Dimension Dr.	s/o Commercentre Dr.	Non-Sensitive	76.1	76.2	0.1	1.5	No

Source: Table 7-6, Lake Forest Warehouse Noise and Vibration Analysis (Urban Crossroads 2023e).
dBA = A-weighted decibels s/o = south of
e/o = east of w/o = west of
n/o = north of

Significance Prior to Mitigation: Potentially Significant Impact

Mitigation Measures: NOI-1

NOI-1 Screen Wall. Prior to issuance of a Certificate of Occupancy for the new building,a permanent 14-foot-high screen wall at the loading dock entrance and permanent 11-foot-high screen wall surrounding the diesel fire pump and trash enclosure shall be constructed as shown on Exhibit 9-A of the *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e). The planned screen walls shall be constructed so that the top of each wall and /or berm combination extends to the planned height above the pad elevation. The screen wall shall provide a weight of at least 4 pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways, or a minimum transmission loss of 20 A-weighted decibels (dBA). The screen wall shall be constructed using the following materials:

- Masonry block
- Stucco veneer over wood framing (or foam core), or 1-inch-thick tongue and groove wood of sufficient weight per square foot
- Glass (1/4 inch thick) or other transparent material with sufficient weight per square foot capable of providing a minimum transmission loss of 20 dBA
- Earthen berm
- Any combination of these construction materials

The screen wall shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts shall not be made. All gaps (except for weep holes) should be filled with grout or caulking.

Significance Determination after Mitigation: Less than Significant Impact

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

Construction. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized in Table 4.13.I. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the following vibration assessment methods defined by the FTA. To describe the vibration impacts, the FTA provides the following equation:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

Table 4.13.I: Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec)at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
FTA = Federal Transit Administration
in/sec = inches per second

Table 4.13.J presents the expected Project-related vibration levels at the nearby receiver locations. At distances ranging from 85 to 907 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.000 to 0.014 PPV (in/sec). Based on a maximum acceptable continuous vibration threshold of 0.30 PPV (in/sec), the typical Project construction vibration levels will satisfy the building damage thresholds at all receiver locations. In addition, the typical construction vibration levels at the nearest sensitive receiver locations are unlikely to be sustained during the entire construction period but rather will occur only during the times that heavy construction equipment is operating adjacent to the Project site boundaries. Therefore, impacts associated with construction-related vibration would be **less than significant**, and no mitigation is required.

Table 4.13.J: Construction Equipment Vibration Levels

Receiver	Distance to Construction Activity (feet)	Typical Construction Vibration Levels PPV (in/sec)					Thresholds PPV (in/sec)	Thresholds Exceeded?
		Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Highest Vibration Level		
R1	907	0.000	0.000	0.000	0.000	0.000	0.30	No
R2	147	0.000	0.002	0.005	0.006	0.006	0.30	No
R3	85	0.000	0.006	0.012	0.014	0.014	0.30	No
R4	327	0.000	0.001	0.002	0.002	0.002	0.30	No
R5	391	0.000	0.001	0.001	0.001	0.001	0.30	No
R6	733	0.000	0.000	0.000	0.001	0.001	0.30	No

Source: Table 10-5, *Lake Forest Warehouse Noise and Vibration Analysis* (Urban Crossroads 2023e).
in/sec = inches per second
PPV = peak particle velocity

Long-Term Traffic-Related Vibration Impacts. The proposed Project would not generate vibration levels related to on-site operations. In addition, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 PPV (in/sec), structures greater than 20 feet from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 PPV (in/sec); therefore, vibration levels generated from project-related traffic on the adjacent roadways would be **less than significant**, and no mitigation is required.

Significance Prior to Mitigation: Less than Significant Impact

Mitigation Measures: No mitigation is required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

CEQA Noise Threshold C applies when there are nearby public and private airports and/or air strips and focuses on land use compatibility of the Project to nearby airports and airstrips. The Project site is not located within 2 miles of an airport or airstrip. The closest airport is John Wayne Airport, which is located approximately 11 miles west of the Project site. As such, the Project site would not be exposed to excessive noise levels from airport operations; therefore, there would be **no impacts** associated with people residing or working in the project area being exposed to excessive noise levels. No mitigation is required.

Significance Prior to Mitigation: No Impact

Mitigation Measures: No mitigation is required.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Impact Analysis

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

State CEQA Guidelines Section 15126.2[d] identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment. New employees generated by commercial or industrial development and new population from residential development represent direct forms of growth, which have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

Under CEQA, growth inducement is not in and of itself considered detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered substantial if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies.

The proposed Project includes the demolition of the existing 144,906 sq ft, two-story commercial and office facility and the construction and operation of a 35-foot-tall, 165,803 sq ft, two-story industrial building. The Project includes a gated truck loading area, new landscaping, and a parking lot. Although the operator is yet to be determined, it is anticipated that operational uses could include, but are not limited to, warehouse/distribution, manufacturing, or research and development.

Construction of the proposed Project would provide short-term construction jobs over an approximately 12-month period. Many of the construction jobs would be temporary and would be specific to the variety of construction activities. The workforce would include a variety of construction trade workers (e.g., cement finishers, ironworkers, welders, carpenters, electricians, painters, and laborers). Generally, construction workers are only at a job site for the time frame in which their specific skills are needed to complete that phase of construction. Although the proposed project would increase the number of employees at the project site during construction activities, it

is expected that local and regional construction workers would be available to serve the proposed project's construction needs. Therefore, construction of the proposed Project would not directly or indirectly induce population growth by drawing workers from outside the area on a permanent basis.

The proposed Project would not result in direct population growth because the use proposed is not residential and would not contribute to permanent residency on site. The proposed Project would result in a negligible difference in the number of employees at the Project site compared to existing conditions. It is unlikely that a substantial number of employees would relocate from outside the region to meet the need for employees resulting from implementation of the proposed project. Furthermore, the proposed project would be located within a developed area of Lake Forest that is already served by all utilities. The existing regional infrastructure and the established roadway network would be utilized by employees accessing the proposed project site. The proposed Project would not require the construction of new infrastructure, such as roads or utilities, that would indirectly induce population or growth. Furthermore, the project is consistent with the General Plan land use designation and zoning designation for the site and would not generate growth beyond that anticipated in the General Plan. Therefore, the proposed project would not directly or indirectly induce population growth, and this impact would be considered **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

The proposed Project includes the demolition of the existing 144,906 sq ft, two-story commercial and office facility and the construction and operation of a 35-foot-tall, 165,803 sq ft, two-story industrial building. The proposed Project includes a gated truck loading area, new landscaping, and a parking lot. Under existing conditions, the Project site does not contain any residential uses, and neither construction nor operation of the proposed project would displace existing residents on site or from the nearby residential areas. Therefore, the proposed project would not result in the displacement of people or housing and would not require the construction of replacement housing elsewhere. Therefore, there would be **no impact** and no mitigation is required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of 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:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

4.15.1 Impact Analysis

a. Would the project result in substantial adverse physical impacts associated with the provision of 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:

i. Fire protection?

The OCFA provides fire protection and emergency services throughout the City. The OCFA is a regional fire service agency that provides structure fire protection, emergency medical and rescue services, hazardous materials inspections and response, and public education activities to almost 1.8 million residents in 23 cities and unincorporated areas in Orange County.[53] In the previous decade, OCFA's average response time[54] for emergency calls remained relatively constant at less than 7 minutes per call.[55] The ratio of firefighters to residents has remained steady over the last 3 years, ranging from 5.86 to 5.94 per 10,000 residents. During the past 10-year time frame, the

53 City of Lake Forest. 2019. Op. cit.

54 OCFA defines response time as the time interval between Dispatch Notification and Arrival on Scene. It includes Dispatch time, Turnout time, and Travel time. Response time goals are established through OCFA policy. Response time performance is generally measured for the first unit on scene (Distribution) and for an Effective Response Force (Concentration). Incident response times are impacted by many variables, including availability of first due units, travel distance, traffic, geography, weather, and street networks.

55 Orange County Fire Authority (OCFA). 2022. FY 2022/23 Adopted Budget. Website: https://ocfa.org/Uploads/Transparency/OCFA%202022-2023%20Adopted%20Budget.pdf (accessed July 2023).

emergency call load has increased by 89 percent due in part to the City of Santa Ana joining OCFA in April 2012 and the City of Garden Grove joining in August 2019.[56]

There are three OCFA fire stations that provide service to Lake Forest. The Project site is located in the service area of Fire Station No. 54, which is located approximately 1.2 miles northeast of the Project site at 19811 Pauling Avenue. This fire station's daily staffing includes one captain, one engineer, and two firefighters, and has a total staffing of 12 firefighters. Equipment includes one paramedic assessment unit and one urban search and rescue unit.[57]

In order to meet OCFA standards and to comply with the California Fire Code (in effect at the time of the application for the building permit), the proposed Project would include, but not be limited to, the following safety measures:

- All buildings on the Project site would include automatic fire sprinkler systems (per Lake Forest Municipal Code Section 903.2.8, Group R).

- The proposed Project would include the installation of seven hydrants throughout the Project site.

- Emergency vehicles would be able to enter and exit the Project site via the two existing driveways on Enterprise Way and an existing reciprocal access on the northeast corner of the site to the adjacent property.

Project compliance with requirements set forth in the California Fire Code would provide fire protection for people and structures, as well as emergency medical services on site. In addition, as discussed in Section 4.17, Transportation, the proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system or create a significant design hazard due to a geometric design feature or incompatible use. Therefore, the proposed Project would not impair emergency response vehicles, and average response times in the area would remain within acceptable response time limits.

The proposed Project would not introduce any new residents because there are no present or future residential land uses associated with the Project site. The proposed project is consistent with the site's General Plan designation and does not represent unplanned growth given that the project site would be developed consistent with its land use and zoning designations. Furthermore, the proposed Project is replacing an existing use of similar square footage on the same site and does not represent a new demand for fire services. Additionally, the proposed project would be required to comply with all OCFA access requirements and California Fire Code requirements. Therefore, the proposed project would not delay arrival times for any emergency response vehicles, and average response times in the area would remain within acceptable response time limits. All development projects submitted for review by OCFA must use a fair share approach to mitigate fire service response impacts and facility/equipment needs. Additionally, OCFA has reviewed the site plan. As

[56] Orange County Fire Authority (OCFA). 2022. Op. cit.

[57] Orange County Fire Authority (OCFA). n.d. Fire Station 54. Website: https://www.ocfa.org/AboutUs/Departments/OperationsDirectory/Division5.aspx (accessed July 2023).

part of the review, OCFA has recommended conditions of approval that would ensure all impacts regarding fire protection would be less than significant. Therefore, the proposed project would not require the construction of new fire protection facilities or the upgrade of existing facilities, which could cause significant environmental impacts, to maintain an acceptable service ratio, response times, or other performance objectives for fire protection. Impacts would be **less than significant,** and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

ii. Police protection?

The Orange County Sheriff's Department (OCSD) provides police protection services throughout Lake Forest. According to the OCSD website,[58] the OCSD has nearly 4,000 sworn and professional staff members. The Southwest Operations Division and Southeast Operations Division of the OCSD provide law enforcement services to an area encompassing the entire southern portion of Orange County. The Southeast Operations Division provides law enforcement services to Lake Forest. The Southeast Operations Division deploys 65 patrol cars during each 24-hour period. This requires approximately 223 staff members, of which 168 are sworn peace officers.[59] OCSD personnel are assigned to the City, including 5 sergeants, 3 investigators, 37 deputies, 1 investigative assistant, 5 community service officers, and 1 crime prevention specialist.[60] Services to Lake Forest are provided out of OCSD's Saddleback Station at 20202 Windrow Drive in Lake Forest, which is 0.8 mile east of the Project site. The OCSD/Police Services Department embraces the concept of community-oriented policing, which encompasses the active participation of local government, civic and business leaders, residents, schools, churches, and other public and private agencies.

The OCSD does not use a standard officer-to-population or standard response time objective ratio to measure the adequacy of policing levels in Lake Forest. Instead, the OCSD analyzes demographics, service calls, population, crime trends, and other changing factors to determine the level of police protection services needed. The Federal Bureau of Investigation (FBI) indicates that 1.2 police officers per 1,000 residents is the average ratio for Western-region cities with populations less than 100,000. The current officer-to-resident ratio in Lake Forest is estimated to be 0.62 police officer per 1,000 residents.[61]

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58 Orange County Sheriff's Department (OCSD). n.d. *About OCSheriff*. Website: https://www.ocsheriff.gov/about-ocsheriff (accessed July 2023).

59 Orange County Sheriff's Department (OCSD). n.d. Southeast Operations. Website: http://www.ocsd.org/divisions/fieldops/southeast (accessed July 2023).

60 Orange County Sheriff's Department (OCSD). n.d. Lake Forest. Website: https://www.ocsheriff.gov/patrol-areas/lake-forest (accessed July 2023).

61 According to the Orange County Sheriff's Department, there are 52 officers assigned to Lake Forest. According to the California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2021 with 2010 Census Benchmark City/County Population and Housing Estimates, Lake Forest's population in 2018 was 84,538. Therefore, 52/84.538 = 0.62.

The proposed Project would not introduce any new residents because there are no present or future residential land uses associated with the Project site. The proposed Project is consistent with the site's General Plan designation and does not represent unplanned growth given that the Project site would be developed consistent with its land use and zoning designations. Furthermore, the proposed Project is replacing an existing use of similar square footage on the same site; therefore, the proposed Project does not represent a new demand for police services. The project is not anticipated to result in a significant increase in the demands for police services, nor would the project adversely affect emergency response times. Impacts to police protection services would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

iii. Schools?

The proposed Project is located within the Saddleback Valley Unified School District (SVUSD). SVUSD operates 23 elementary schools, 4 middle schools, 4 comprehensive high schools, and 4 alternative schools.[62] Total enrollment for the 2021–2022 school year was approximately 24,390 students.[63]

The proposed project does not include any residential uses and would not significantly increase Lake Forest's overall population. Therefore, the project would not result in an increased demand for any school facilities or require the construction of new school facilities. Nevertheless, pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. The Project Applicant would be required to pay such fees to reduce any impacts of the proposed industrial development. Pursuant to the provisions of Government Code Section 65995, a project's impact on school facilities is fully mitigated through payment of the requisite school facility development fees current at the time a building permit is issued. Therefore, potential impacts to school services and facilities associated with implementation of the proposed Project would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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62 Saddleback Valley Unified School District. n.d. *All SVUSD Schools.* Website: https://www.svusd.org/schools (accessed July 2023).

63 National Center for Education Statistics. n.d. District Directory Information (2021-2022 School Year), District Name: Saddleback Valley Unified. Website: https://nces.ed.gov/ccd/districtsearch/district_detail.asp?Search=1&details=1&InstName=saddleback&DistrictType=1&DistrictType=2&DistrictType=3&DistrictType=4&DistrictType=5&DistrictType=6&DistrictType=7&DistrictType=8&DistrictType=9&NumOfStudentsRange=more&NumOfSchoolsRange=more&ID2=0633860 (accessed July 2023).

iv. Parks?

The Lake Forest Community Services Department coordinates and manages the planning and design of recreation and community facilities throughout Lake Forest. The City maintains and operates 32 public parks, consisting of approximately 280 acres. In addition, Limestone/Whiting Wilderness Park encompasses 1,101 acres of natural land in Lake Forest. Private parks are also distributed throughout Lake Forest in various Planned Communities. According to the City of Lake Forest General Plan Recreation and Resources Element (2020), the City determines the need for park space based on its population. The City requires 5 acres of park space per 1,000 residents.

Development of the proposed project would not increase or decrease the usage and size of City park space and recreation facilities because the proposed Project does not involve or have any relation to any park space uses. The proposed project does not include any residential uses and would not generate a direct need for additional park space. Park uses associated with the project would be minimal and may include local park visits from warehouse employees during work shifts or on breaks. Therefore, the proposed project would have a **less than significant impact** related to parks. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

v. Other public facilities?

Public Library. The Orange County Public Library (OCPL) has a network of 33 libraries throughout Orange County, and two of the OCPL branches are located in Lake Forest. The El Toro Library is located at 24672 Raymond Way, approximately 3.5 miles south of the Project site. The Foothill Ranch Library is located at 27002 Cabriole Way, approximately 1.2 miles northeast of the Project site.

Because the proposed project includes warehouse/manufacturing uses, it is not expected to induce a significant population growth that would generate an increased need for libraries or any additional public facilities. Therefore, the proposed Project would not result in an increased demand for public facilities, and this impact would be **less than significant.** No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.16 RECREATION

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

4.16.1 Impact Analysis

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

The City currently maintains 32 different parks. The closest park to the project site is the City's Nature Park, which is located approximately 391 feet southeast of the project site. The Recreation and Resources Element of the City's General Plan adopted a standard for park space acreage at 5.0 acres for every 1,000 residents, requiring all new development projects to satisfy this standard.

The proposed Project does not propose any residential uses and therefore would not increase the population or demand related to parks. While it is possible that employees may visit parks and recreational facilities in Lake Forest during lunch breaks or after-work hours, it is unlikely that the use of parks by project employees would increase the use of those parks to a level that would contribute to substantial physical deterioration of those facilities. Therefore, the impact is **less than significant**, and no mitigation would be required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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?

The proposed Project includes the development of a 165,803 sq ft industrial building. Approximately 155,803 sq ft are planned for warehouse use, with the remaining 10,000 sq ft to be utilized as office space. The proposed Project would include the demolition of an existing structure on site.

The proposed Project would not include recreational facilities or develop residential uses that would require the construction or expansion of recreational facilities that might have an adverse effect on the environment. The project does not propose any recreational uses or require the expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore,

there would be **no impacts** related to the construction or expansion of recreational facilities, and no mitigation would be required.

Significance Determination: No Impact

Mitigation Measures: No mitigation is required.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The discussion and analysis provided in this section is based on the *Focused Traffic Analysis*[64] and *Vehicle Miles Traveled (VMT) Screening Evaluation*[65] *(Appendices G-1 and G-2, respectively)*.

4.17.1 Impact Analysis

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

The following includes an evaluation of the proposed project's potential to conflict with applicable programs, plans, ordinances, and policies addressing the circulation system, including the Mobility Element of the Lake Forest General Plan 2040. The section begins with a description of the proposed project's trip generating potential compared to existing conditions, followed by an analysis of potential impacts to transit, bicycle, pedestrian, and roadway facilities.

Trip Generation. Trip generation is the process of estimating the number of vehicles that would likely access the project site. Trips generated by the Project's proposed land uses have been estimated based on trip generation rates published in ITE's *Trip Generation Manual*[66]. To estimate trips for existing conditions, the rates for General Office (ITE Code 710) were used. As shown in Table 4.17.A, the existing office uses (if occupied) would generate 1,572 two-way trips per day, with 220 trips generated during the a.m. peak hour and 208 trips generated during the p.m. peak hour.

64 Urban Crossroads. 2023h. *Lake Forest Warehouses (UP 06-21-5437, 06-21-5438 & 07-21-5477) Focused Traffic Analysis.* June 29.

65 Urban Crossroads. 2023g. *Lake Forest Warehouse Vehicle Miles Traveled (VMT) Screening Evaluation*. May 17.

66 Institute of Transportation Engineers (ITE). 2021. *Trip General Manual, 11th Edition*.

Table 4.17.A: Existing Trip Generation Summary

Existing Land Use	Quantity Units	Daily Trips	Weekday AM Peak Hour			Weekday PM Peak Hour		
			In	Out	Total	In	Out	Total
General Office	144.906 TSF	1,572	194	26	220	35	173	208

Source: Table 4-2, *Lake Forest Warehouses (UP 06-21-5437, 06-21-5438 & 07-21-5447) Focused Traffic Analysis* (Urban Crossroads 2023g).
TSF = thousand square feet

In an effort to conduct a conservative analysis, the proposed Project was evaluated assuming a manufacturing facility. Therefore, the rates for Manufacturing (ITE Code 140) were used to estimate the vehicle trips generated by the proposed project, which are shown in Table 4.17.B. Because the proposed manufacturing use is a truck intensive use, the trip generation has been provided in both actual vehicles and passenger car equivalent (PCE). As shown in Table 4.17.B, the proposed Project is anticipated to generate 792 two-way trips per day with 112 total a.m. peak-hour trips and 121 total p.m. peak-hour trips (actual vehicles). The proposed Project would also generate truck trips. As shown in Table 4.17.B, assuming a PCE of 1.5 for converting trips to passenger vehicle trips for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks, it is estimated that the proposed Project would generate truck trips that are equivalent to 388 PCEs. Therefore, the proposed Project would generate 908 total vehicle trips per day, with 120 vehicle trips occurring during the a.m. peak hour and 129 vehicle trips occurring during the p.m. peak hour. Therefore, the proposed Project would generate fewer trips than the existing office uses, and the proposed project would not conflict with plans, programs, and policies regarding roadways or decrease the performance of such facilities.

Table 4.17.B: Proposed Project Trip Generation Summary

Proposed Land Use	Quantity Units	Daily Trips	Weekday AM Peak Hour			Weekday PM Peak Hour		
			In	Out	Total	In	Out	Total
Actual Vehicles								
Manufacturing	165,803 TSF							
Passenger Cars		714	82	26	108	36	81	117
2-Axle Trucks		*14*	*0*	*0*	*0*	*0*	*0*	*0*
3-Axle Trucks		*16*	*0*	*1*	*1*	*0*	*1*	*1*
4+-Axle Trucks		*48*	*2*	*1*	*3*	*1*	*2*	*3*
Total Truck Trips		*78*	*2*	*2*	*4*	*1*	*3*	*4*
Total Trips (Actual Vehicles)		***792***	***84***	***28***	***112***	***37***	***84***	***121***
Passenger Car Equivalent (PCE)								
Manufacturing	165,803 TSF							
Passenger Cars		714	82	26	108	36	81	117
2-Axle Trucks		*20*	*1*	*0*	*1*	*0*	*1*	*1*
3-Axle Trucks		*32*	*1*	*1*	*2*	*1*	*1*	*2*
4+-Axle Trucks		*142*	*5*	*4*	*9*	*4*	*5*	*9*
Total Truck Trips		*194*	*7*	*5*	*12*	*5*	*7*	*12*
Total Trips (PCE)		***908***	***89***	***31***	***120***	***41***	***88***	***129***

Source: Table 4-3, *Lake Forest Warehouses (UP 06-21-5437, 06-21-5438 & 07-21-5447) Focused Traffic Analysis* (Urban Crossroads 2023g).
PCE = passenger car equivalent
TSF = thousand square feet

Public Transit. The Project site is served by two Orange County Transportation Authority (OCTA) transit routes: OCTA Line 177 and OCTA Line 480. The existing OCTA Line 177 is a community route that runs along Lake Forest Drive between Portola Parkway and Laguna Hills, and terminates at the Laguna Hills Transportation Center. OCTA Line 480 would likely serve the proposed Project because it runs along Dimension Drive and Commercentre Drive with existing bus stops at the intersection of Dimension Drive and Commercentre Drive. OCTA Line 480 connects to the Irvine Metrolink Station and only runs during the weekday rush hour. It runs along Lake Forest Drive, Dimension Drive, Commercentre Drive, and Bake Parkway. The line terminates at the Irvine Metrolink Station.

There are no established standards regarding transit LOS that have been adopted by the City or transit agencies. The proposed Project would not affect any existing or planned bus stops or sidewalks in the study area or otherwise degrade access to public transit facilities. Therefore, implementation of the proposed Project would not conflict with plans, programs, and policies regarding transit facilities or decrease the performance of such facilities. Impacts would be **less than significant**.

Pedestrian and Bicycle Facilities. Roadways that include Class II bike lanes[67] in the vicinity of the Project site include Bake Parkway, Rancho Parkway, and Lake Forest Drive. There is an existing sidewalk on the north side of Enterprise Way. An existing striped crosswalk on Enterprise Way, located at the northeasterly driveway, has a ramp and walkway on the south side of Enterprise Way that leads to a ramp into the parking lot. A crosswalk is proposed through the parking lot that leads to a paved walkway along the north side of the building, which leads to the primary office area in the northwest corner of the building and the secondary office area in the northeast corner of the building. In compliance with Municipal Code requirements, bike racks (a minimum of 15 spaces total) would also be provided on site.

The Mobility Element of Lake Forest General Plan 2040 includes Goal M-5, which is to support and promote the use of pedestrian, bicycle, and equestrian facilities. By including pedestrian walkways that connect to existing nearby crosswalks and sidewalks and bike racks, the proposed Project would support and promote the use of alternate modes of transportation. Implementation of the proposed Project would not conflict with plans, programs, and policies regarding pedestrian and bicycle facilities, or decrease the performance of such facilities. Impacts would be **less than significant**.

Overall, the proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be **less than significant**, and no mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

[67] Class II bikeways are on-road, striped bike lanes.

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

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes include elimination of automobile delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. According to SB 743, these changes are intended to "more appropriately balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

In December 2018, the State Office of Planning and Research (OPR) completed an update to the *State CEQA Guidelines* to implement the requirements of SB 743. The *State CEQA Guidelines* state that VMT must be the metric used to determine significant transportation impacts. The Guidelines require all lead agencies in California to use VMT-based thresholds of significance in CEQA documents published after July 1, 2020.

VMT Screening. The City of Lake Forest Transportation Analysis Guidelines[68] provides details on appropriate "screening criteria" that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact, thereby eliminating the need to conduct a full VMT analysis. The screening criteria applicable to the proposed Project is the Small Project criterion, which screens out projects that generate fewer than 110 additional daily vehicle trips above baseline conditions. Projects that generate fewer than 110 additional daily vehicle trips above baseline conditions are presumed to have a less than significant impact related to VMT because the addition of a nominal level of vehicle trips would not alter the level of VMT attributed to a specific development project. Vehicle trip generation was estimated for the proposed Project and was then compared to the existing uses (i.e., office buildings) located on the Project site. The proposed Project was found to result in a net reduction 672 daily vehicle trips as compared to the existing office building uses. Therefore, the proposed Project meets the VMT screening criteria for Small Projects and is presumed to have a **less than significant impact** related to VMT. No mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

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

Vehicular access to the Project site would continue to be provided via two existing 40-foot-wide driveways on Enterprise Way and an existing 25-foot-wide reciprocal access on the northeast corner of the site to the adjacent property. Both existing driveways on Enterprise Way would provide access for circulation for autos, loading and delivery trucks, waste vehicles, and emergency vehicles. Both existing driveways on Enterprise Way can accommodate trucks and would not require widening to accommodate truck turns. No sight distance or visibility issues were identified at the

68 City of Lake Forest. 2020. *City of Lake Forest Transportation Analysis Guidelines.* July 21.

proposed driveways. The proposed Project would be located near similar uses and would be accessed from roadways where trucks are already common.

As part of the proposed Project, the Project Applicant would install various off-site improvements to enhance public safety and address concerns over pre-existing and future truck turning movements at five intersections within Lake Forest. The Project proposes to install these features as a community benefit at the following five intersections: (1) Bake Parkway/Commercentre Drive, (2) Dimension Drive/Commercentre Drive/Enterprise Way, (3) Rancho Parkway/Lake Forest Drive, (4) Bake Parkway/Dimension Drive, and (5) Dimension Drive/Lake Forest Drive. For each of these intersection improvements, a minimum of 10 feet would be utilized for left-turn lane widths, 11 feet for through lanes, a 12-foot minimum for through lanes adjacent to raised medians, and a 19–20 feet minimum for shared through-right turn lanes (if feasible). Right-turn lanes would be 13 feet wide and bike lanes would be a minimum of 6 feet wide when located between a through lane and a right-turn lane. These improvements would be completed prior to Certificate of Occupancy and are considered Project Design Features (PDFs) to enhance public safety and address concerns associated with existing and post-Project truck turning movements.

The proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be **less than significant**, and no mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

d. Would the project result in inadequate emergency access?

The proposed Project would provide emergency access to the Project site via two existing driveways on Enterprise Way. All structures and internal circulation paths within the Project site would be developed in accordance with City and OCFA emergency access standards, which would ensure adequate access to, from, and on site for emergency vehicles. Site design and compliance with standard and emergency OCFA and City requirements (e.g., the size and location of fire access routes and fire truck turning radii) would allow for proper emergency access and site evacuation if necessary during warehouse operations. Therefore, the proposed Project would not result in inadequate emergency access, and impacts would be **less than significant**. No mitigation is required.

Significance Determination: Less Than Significant Impact

Mitigation Measures: No mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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:				
i. 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	☐	☐	☒	☐
ii. 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.	☐	☐	☒	☐

4.18.1 Impact Analysis

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:

i. 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

ii. 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.

Chapter 532, Statutes of 2014 (i.e., Assembly Bill 52 [AB 52]), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

Also, per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

The NAHC was contacted by BCR Consulting, and a Sacred Lands File (SLF) was requested for the Project, as was a list of potential Native American contacts for consultation. The NAHC responded on May 20, 2021, to say that the SLF search was negative for the Project area. The City contacted the following six tribe representatives for the purpose of AB 52 consultation:

- Charles Alvarez, Gabrielino-Tongva Tribe
- Joyce Perry, Tribal Manager, Juaneño Band of Mission Indians-Acjachemen Nation
- Michael Mirelez, Cultural Resources Coordinator, Torres Martinez Desert Cahuilla Indians
- Gene Whitehouse, Chairman, United Auburn Indian Community of the Auburn Rancheria
- Jason Camp, Preservation Officer, United Auburn Indian Community of the Auburn Rancheria
- Marcos Guerrero, United Auburn Indian Community of the Auburn Rancheria

The City sent letters for the purpose of AB 52 consultation to the individuals listed above on October 5, 2021. No responses were received by the City regarding AB 52 consultation. No requests for AB 52 consultation were received for the proposed project, and no information regarding specific known tribal cultural resources on the project site was provided to the City.

In summary, no tribes requested consultation or provided information regarding tribal cultural resources on the project site, no tribal cultural resources listed or eligible for listing in the California Register or in a local register exist within the project site, and there are no known tribal cultural resources on the project site. Therefore, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource defined as a site, feature, place, or 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 listed or eligible for listing in the California Register or in a local register of historical resources as defined in PRC Section 5020.1(k). Impacts associated with Tribal Cultural Resources would be **less than significant**, and no mitigation is required.

Level of Significance after Mitigation: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

4.19.1 Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water. The IRWD provides domestic and recycled water service through an existing 12-inch-diameter domestic water main in Enterprise Way. The existing on-site water distribution system would be removed and replaced with new water lines that would use the existing water connection to the water main in Enterprise Way. All connections to the existing water lines would be reviewed and approved by the City's Public Works Department and IRWD, as applicable. The proposed Project would increase demand for water, and on-site infrastructure is required for the proposed Project to be completed. A discussion of water use during construction and operation of the proposed Project is included below.

Construction. Short-term demand for water may occur during demolition, excavation, grading, and construction activities on site. Water demand for soil watering (fugitive dust control), cleanup, masonry, painting, and other activities would be temporary and would cease at Project build out. Overall, short-term demolition and construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. Therefore, impacts associated with short-term demolition and construction activities would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, and construction of the proposed Project would

not require the need for new or expanded water entitlements. Construction impacts associated with new or expanded water facilities would be **less than significant**, and no mitigation is required.

Operation. The proposed Project includes the replacement of the existing on-site water system with new water lines that would use the existing water connection to the water main in Enterprise Way. These improvements would be funded and constructed by the developer, built to IRWD standards, and offered for dedication to IRWD.

A decrease in long-term demand for water is anticipated to occur during operation of the proposed Project. According to water demand factors included in the CalEEMod emissions model, the proposed Project is estimated to demand approximately 110,490 gallons per day (gpd) or 123.76 afy of potable water, which is approximately 3,321 gpd or 3.72 afy less than the existing uses on the project site (i.e., 113,811 gpd or 127.48 afy). Because the proposed project would decrease water use on site, the proposed Project would not necessitate new or expanded water entitlements. Therefore, operation impacts associated with new or expanded water facilities would be less than significant, and no mitigation is required.

Wastewater. Wastewater collection for the proposed Project would be provided by the IRWD, and treatment of wastewater generated by the proposed Project would be provided by IRWD's Michelson Water Recycling Plant (MWRP), which is located approximately 9.5 miles southwest of the Project site. The proposed project would reuse an existing on-site sewer service lateral connecting to the sewer main in Enterprise Way.

Construction. No significant increase in wastewater flows is anticipated as a result of construction activities on the Project site. Sanitary services during construction would be provided by portable toilet facilities, which transport waste off site for treatment and disposal. Therefore, during construction, potential impacts to wastewater treatment and wastewater conveyance infrastructure would be **less than significant**, and no mitigation is required.

Operation. The proposed Project is expected to result in a decrease in wastewater generation during operation. According to wastewater generation factors included in the CalEEMod emissions model, the proposed project is anticipated to generate approximately 106,736 gpd or 119.56 afy of wastewater, which is approximately 36,173 gpd or 40.52 afy less than the existing uses on the project site (i.e., 70,563 gpd 79.04 afy). Therefore, the proposed project would not result in a significant contribution to the capacity of IRWD's MWRP. The wastewater generated by the proposed Project is anticipated to be accommodated within the existing design capacity of the MWRP.

The installation of sewer facilities sufficient to serve a proposed Project is a standard condition for development projects. Therefore, the proposed Project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities other than those facilities to be constructed on site. Therefore, impacts related to the construction of wastewater treatment or collection facilities and the capacity of the wastewater treatment provider are **less than significant**, and no mitigation is required.

Electricity. The Project site is within the service territory of SCE, which provides services through a grid of transmission lines and related facilities. A transformer is proposed on the southwest side of the proposed structure next to Enterprise Court. The proposed Project includes the installation of new, on-site underground utility lines. All electricity improvements would be completed consistent with the requirements of SCE.

Construction. Short-term construction activities would be limited to providing power to the staging area and portable construction equipment and would not substantially increase demand for electricity. The heavy equipment used for construction is primarily powered by diesel fuel. Temporary electric power would be provided via existing utility boxes and lines on the project site. Given the limited nature of potential demand for electricity during construction and the availability of existing power lines on the site, there would not be a need to construct new or alter existing electric transmission facilities. Impacts to local regional supplies of electricity would be less than significant, and no mitigation is required.

Operation. Operation of the proposed project would decrease on-site electricity demand compared to existing conditions. CalEEMod 2020.4.0 was used to calculate the approximate annual electricity demand of the proposed project. Based on the CalEEMod outputs, the proposed project is estimated to consume a total of 1,421,500 kWh of electricity per year, approximately 533,280 kWh less than existing conditions (i.e., 1,954,780 kWh). Additionally, the proposed project would be required to comply with Title 24 energy efficiency measures and sustainability features of the CBC.

Total electricity consumption in Orange County in 2020 was approximately 19,733,139,603 kWh.[69] The electricity demanded from the proposed project would be less than the existing uses. Service providers utilize projected demand forecasts in order to provide an adequate supply or plan for surplus in their service areas. As discussed in Section 4.6, Energy, there are sufficient planned electricity supplies in the SCE service area for estimated net increases in energy demands through 2030. Because the proposed project would result in decreased demand for electricity on the project site, the project would meet Title 24 requirements, and there would be sufficient electricity supplies available, energy demand for the proposed project would be less than significant.

The supply and distribution network within the area surrounding the project site would remain essentially the same as currently exists, with the exception of on-site improvements to reconfigure existing infrastructure to serve the proposed Project. The proposed Project would not increase electrical demand beyond existing projections from the local electricity provider, and the Project site is within a developed service area with existing demand. Therefore, the proposed Project would not require the construction of any physical improvements related to the provision of electricity service that would result in significant environmental impacts, and the proposed project's impacts would be **less than significant**. No mitigation is required.

[69] California Energy Commission (CEC). 2020a. Electricity Consumption by County. Webpage: https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed October 2021).

Natural Gas. SoCalGas is the natural gas service provider for the Project site. The proposed Project includes the installation of new, on-site underground gas lines. The developer will be responsible for construction connections to these distribution facilities and the backbone distribution systems for the Project.

Construction. Short-term construction activities would not result in demand for natural gas since construction activities/equipment would not require accessing existing adjacent natural gas facilities. Therefore, construction activities would not impact natural gas services, and the proposed Project would not require new or physically altered gas transmission facilities.

Operation. Operation of the proposed Project would result in increased demand for natural gas due to natural gas use on the Project site. Based on the CalEEMod output in the *Greenhouse Gas Analysis*[70], the natural gas usage on the Project site is assumed to be 1,311,400 kBTU/yr (13,117 therms/year) for the existing office uses. The estimated natural gas demands of the proposed Project as provided in Section 4.6, Energy, is 3,497,370 kBTU/yr (34,982 therms/year). Therefore, the proposed Project would require an increase of approximately 2,185,970 kBTU/yr (21,865 therms/year) of electricity compared to existing conditions.

Total natural gas consumption in Orange County in 2020 was 594.6 million therms.[71] Therefore, natural gas demand associated with the proposed Project would be approximately 0.01 percent of Orange County's total natural gas demand. The estimated increase in natural gas demand associated with the proposed Project would represent a very small fraction of the natural gas demand in Orange County and the proposed Project would be required to comply with Title 24 requirements.

Service providers utilize projected demand forecasts in order to provide an adequate supply or plan for surplus in the service area. As discussed in Section 3.6, Energy, it is anticipated that SoCalGas would be able to meet the natural gas demand in its service area through 2035. Because the proposed Project would only represent a small fraction of natural gas demand in Orange County, the proposed Project would meet Title 24 requirements and there would be sufficient natural gas supplies available, natural gas demand for the proposed Project would be **less than significant**. No mitigation would be required.

The supply and distribution network within the area surrounding the Project site would remain essentially the same as exists today except for standard on-site improvements, and level of service to off-site users would not be adversely affected. Existing gas transmission and distribution services maintained by SoCalGas would provide natural gas service to the proposed Project. The proposed Project would not increase natural gas demand beyond existing projections from the local natural gas provider, and the Project site is within a developed service area with existing demand. Therefore, the proposed Project would not require the construction of any physical improvements related to the provision of natural gas service that would result in

[70] Urban Crossroads. 2023d. *Lake Forest Warehouse Greenhouse Gas Analysis*. November 15.

[71] California Energy Commission (CEC). 2020b. Gas Consumption by County. Webpage: https://ecdms.energy.ca.gov/gasbycounty.aspx (accessed October 2021).

significant environmental impacts, and the Project's potential impacts would be **less than significant**.

Telecommunications Facilities. Telephone, cable, and internet services existing along Enterprise Way would serve the proposed Project. Internal to the Project, the Project Developer will be responsible for constructing adequate telecommunication facility extensions within the Project site. The construction and expansion of these facilities would occur on site during the site preparation and earthwork phase and are not expected to impact any telephone, cable, or internet services offsite that serve the surrounding areas. Additionally, telecommunication facilities are generally installed concurrently with utility expansions, and impacts associated with the expansion of telecommunications facilities are already considered in the air quality, noise, and construction traffic analysis. Therefore, the proposed impacts associated with the relocation or construction of new or expanded telecommunication facilities and impacts would be **less than significant**. No mitigation would be required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

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

As discussed previously, the IRWD would provide water services to the project site and would connect the proposed project to the existing 12-inch-diameter domestic water main in Enterprise Way.

According to water demand factors included in the CalEEMod emissions model, the proposed project is estimated to demand approximately 110,490 gpd or 123.76 afy of potable water, approximately 3,321 gpd or 3.72 afy less than the existing uses on the project site (113,811 gpd or 127.48 afy). Additionally, the proposed project would be required to comply with all State laws for water conservation measures.

The proposed Project does not require the preparation of a Water Supply Assessment pursuant to California PRC Section 21151.9, because the proposed project does not meet the definition of a "project" as set forth in Section 10912 of the Water Code.

Because the proposed Project would decrease water use on site, the proposed Project would not necessitate new or expanded water entitlements, and the IRWD would be able to accommodate the proposed Project's demand for potable water. Therefore, impacts to water supplies would be **less than significant**. No mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed above, wastewater collection for the proposed Project would be provided by the IRWD, and treatment of wastewater generated by the proposed Project would be provided by IRWD's MWRP, which is located approximately 9.5 miles southwest of the Project site. The proposed Project would reuse an existing on-site sewer service lateral connecting to the sewer main in Enterprise Way.

According to wastewater generation factors included in the CalEEMod emissions model, the proposed project is anticipated to generate approximately 106,736 gpd or 119.56 afy of wastewater, approximately 36,173 gpd or 40.52 afy less than the existing uses on the project site (i.e., 70,563 gpd 79.04 afy). Therefore, the proposed Project would not result in a significant contribution to the capacity of IRWD's MWRP. The wastewater generated by the proposed Project is anticipated to be accommodated within the existing design capacity of the MWRP. Additionally, fees required by the IRWD would sufficiently offset potential impacts generated by the proposed Project. Therefore, the proposed Project would result in **less than significant impacts** related to the wastewater treatment capacity, and no mitigation measures are required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The Project site is located within the OC Waste & Recycling (OCWR) service area. OCWR owns and operates three landfills in Orange County that accept municipal solid waste: (1) Frank R. Bowerman Landfill in Irvine, which accepts commercial waste only; (2) Olinda Alpha Landfill in Brea, which accepts both public and commercial waste; and (3) Prima Deshecha Landfill in San Juan Capistrano, which also accepts both public and commercial waste. All three landfills are Class III and only accept nonhazardous municipal solid waste.

Regular trash pickup is provided by the City of Lake Forest through a contract with CR&R, Inc. CR&R provides and manages hazardous waste collection facilities at several locations throughout Orange County and collects solid waste, green waste (i.e., grass, tree, and shrub clippings), and items for recycling. The company provides three different carts for automated collection of waste, recyclables, and green waste.

The Frank R. Bowerman Landfill is the closest OCWR landfill to the proposed Project site, approximately 3 miles west of the Project site, and would be expected to provide solid waste disposal for the construction and operation of the proposed Project. The Frank R. Bowerman Landfill, which is permitted to receive a daily maximum of 11,500 tons per day (tpd), receives an

average of approximately 8,500 tpd. The landfill has enough projected capacity to serve residents and businesses until approximately 2053.[72]

The closest household waste collection center location to the Project site is in Irvine, approximately 5 miles west of the Project site. Any waste considered unacceptable at the Frank R. Bowerman Landfill would be hauled to the household waste collection center.

Based on the CalEEMod outputs, the proposed project is estimated to generate approximately 1,145 pounds of solid waste per day during operation, which is approximately 406 pounds more than existing conditions (738 lbs/day). The increase in solid waste generated by the proposed Project would constitute approximately 0.01 percent of the remaining average daily capacity (3,000 tpd) at the Frank R. Bowerman Landfill. Therefore, solid waste generated by the proposed project would not cause the capacity at the Frank R. Bowerman Landfill to be exceeded. As such, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate its solid waste disposal needs. Therefore, the proposed Project would result in a **less than significant impact** related to solid waste and landfill facilities, and no mitigation is required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Solid waste disposal practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations ensuring that landfill operations minimize impacts to public health and safety and the environment. The project site is located within OCWR's service area. An important part of OCWR's mission is to apply sound environmental practices to ensure compliance with these regulations. Additionally, OCWR has an adopted Countywide Integrated Waste Management Plan (CIWMP) that requires countywide facilities to meet the 15-year capacity requirements. OCWR is also obligated to obtain a Solid Waste Facilities Permit, a Storm Water Discharge Permit, and permits to construct and operate gas management systems and meet Waste Discharge Requirements. The Local Enforcement Agency (LEA), the SCAQMD, and the RWQCB enforce landfill regulations related to health, air quality, and water quality, respectively. The proposed project would not inhibit OCWR's compliance with the requirements of each of the governing bodies.

Additionally, the proposed Project would comply with Assembly Bill 341 (AB 341), which went into effect on July 1, 2012. AB 341 requires businesses and multifamily residential dwelling units of five units or more that generate four or more cubic yards of commercial solid waste per week to implement recycling programs. Compliance with federal, State, and local statutes and regulations related to solid waste, including OCWR's CIWMP and agency permits, and AB 341 would ensure that

[72] OC Waste & Recycling (OCWR). 2021. Frank R. Bowerman Landfill. Website: https://oclandfills.com/landfills/active-landfills/frank-r-bowerman-landfill (accessed October 2021).

impacts associated with regulations related to solid waste would be **less than significant**, and no mitigation would be required.

Significance Determination: Less than Significant Impact

Mitigation Measures: No mitigation is required.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

4.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

According to CAL FIRE VHFHSZ and the LRA map for Lake Forest, the Project site is in a non-VHFHSZ. The nearest VHFHSZs are located approximately 0.6 miles southwest of the Project site in the undeveloped area east of the intersection of Bake Parkway and Crescent Bay Drive and 0.8 mi northeast of the Project site along Serrano Creek and terminates near the SR-241 center median. As discussed in Section 3.15, the Orange County Sheriff's Department and OCFA are the local agencies that would oversee emergency response and emergency evacuation at the Project site.

Construction. The Project site is near a VHFHSZ, but is not located in or near an SRA, as defined by CAL FIRE. The City of Lake Forest General Plan Public Safety Element (2022) does not officially designate any specific evacuation routes within the City. Roads that are used as response corridors and evacuation routes usually follow the most direct path to or from various parts of the community. For the Project site, the main corridors utilized would be Enterprise Way, Dimension Drive, Bake Parkway, and Lake Forest Drive, which provide access to I-5 and SR-241 , which can be used to depart from the area in the event of an emergency. The proposed Project does not include any emergency facilities, nor would it serve as an emergency evacuation route. Construction activities would be confined to the Project site. Project construction would not require full or partial road closures or detours. All large construction vehicles entering and exiting the site would be guided by the use of personnel using signs and flags to direct traffic. Therefore, construction activities would not impact vehicle flow. Because proposed Project does not include any emergency facilities, does not serve as an emergency evacuation route, and construction activities would not impact the use of roadways near the Project site, the proposed project would not physically impair

or otherwise interfere with emergency response or evacuation in the Project vicinity. Therefore, construction of the proposed Project would have a **less than significant** impact associated with impairments to an adopted emergency response plan or emergency evacuation plan. No mitigation would be required.

Operation. As noted above, the Project site is near a VHFHSZ, but is not located in or near an SRA, as defined by CAL FIRE. The proposed Project includes the demolition of an existing 144,906 sf, two-story commercial and office facility and the development of a 165,803 sf two-story industrial building. According to the Traffic Assessment (Urban Crossroads 2023g), the proposed Project is anticipated to generate fewer trips than the existing office uses onsite. Therefore, the proposed Project is not anticipated to result in any substantial traffic queuing along Enterprise Way or Dimension Drive, or on the Project site during project operation.

The proposed Project would provide emergency access to the Project site via two existing driveways on Enterprise Way. All structures and internal circulation paths within the Project site would be developed in accordance with City and OCFA emergency access standards. The proposed Project would also be required to comply with all applicable codes and ordinances for emergency vehicle access, which would ensure adequate access to, from, and on site for emergency vehicles.

The City of Lake Forest General Plan Public Safety Element (2022) does not officially designate any specific evacuation routes within the City. Roads that are used as response corridors and evacuation routes usually follow the most direct path to or from various parts of the community. For the Project site, the main corridors utilized would be Enterprise Way, Dimension Drive, Bake Parkway, and Lake Forest Drive, which provide access to I-5 and SR-241, which can be used to depart from the area in the event of an emergency. The proposed Project does not include any emergency facilities, nor would it serve as an emergency evacuation route.

Because the Project site is not located in a VHFHSZ or in or near an SRA, and does not service as an emergency evacuation route, potential impacts associated with emergency access described above would more likely be associated with an urban fire or other emergency situations than a wildfire evacuation. Therefore, operation of the proposed Project would have a **less than significant impact** associated with an impairment of an adopted emergency response plan or emergency evacuation plan. No mitigation would be required.

Significance Determination: Less than Significant.

Mitigation Measures: No mitigation is required.

b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Topography influences the movement of air, thereby directing a fire course. For example, if the percentage of uphill slope doubles, the rate of spread in wildland fire will likely double.[73] Wind events magnify the risks of wildfire and have the potential to expose inhabitants of the City to elevated pollutant concentrations from a wildfire and the uncontrolled spread of wildfire from open space areas in the foothills of the Santa Ana Mountains in the northeastern areas of Lake Forest.

As stated previously, the Project site is not located in a VHFHSZ or in an SRA. The nearest VHFHSZ is 0.8 mi northeast of the Project site. The area surrounding the Project site contains suburban development, but is characterized by hilly areas containing vegetative fuel and the increasingly steep slopes of the Santa Ana Mountains to the northeast. The Project site is located in a developed portion of Lake Forest. The proposed Project would replace an existing development on site. The Project site nor the immediate project vicinity is prone to wildfires. The Project site is relatively flat, however, the eastern and southern boundaries of the site possess north and west facing slopes. These slopes ascend 10 to 15 feet from the Project site to the adjacent property. The topography of the site does not constitute significant slopes, and there are no significant slopes within the vicinity of the site.

As previously stated, the Project site is not located in a VHFHSZ, given its location in a densely developed area, there is a low likelihood that wildfires would spread to the Project site. Furthermore, adjacent roadways, including Bake Parkway, Enterprise Way, and Lake Forest Drive, surround the Project site and would serve as fire breaks in the unlikely event of the uncontrolled spread of a wildfire. Additionally, SR-241 separates the Project site from the nearest VHFHSZ area to the northeast. Furthermore, the proposed Project would adhere to applicable building and fire codes, which would reduce the wildfire risk at the Project site.

As stated previously, the Project site is not located in a VHFHSZ or in an SRA. Despite the VHFHSZ to the northeast of the Project site, the uncontrolled spread of a wildfire in the vicinity of the Project site is unlikely due to existing non-combustible development and roadways, specifically SR-241. Impacts of downwind pollutant concentrations from a wildfire to occupants as a result of the Project would be negligible. Therefore, due to slope, prevailing winds, location, and other factors, the proposed Project would not exacerbate wildfire risks. Impacts would be **less than significant** and no mitigation is required.

Significance Determination: Less than Significant Impact.

Mitigation Measures: No Mitigation is required.

[73] County of Orange & Orange County Fire Authority. 2015. *Local Hazard Mitigation* Plan. Website: https://www.smwd.com/DocumentCenter/View/2193/APPENDIX-H_OC-HMP-Final (accessed October 26, 2021).

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

As described above, the proposed Project is not located in a VHFHSZ or in an SRA. The proposed Project includes development of an industrial building, surface parking lot, on-site utility infrastructure, and landscaping. In the absence of any significant potential for on-site or adjacent wildfire hazard, the proposed Project would not need to incorporate fire protection infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other non-existing utilities) that may themselves exacerbate fire risk.

Utility and infrastructure improvements included as part of the Project are described in Section 2.0, Project Description. These improvements include the replacement of the existing on-site water distribution system, the installation of new on-site underground gas, cable, and telephone utility lines, and the installation of underground detention basins.

The Project does not include any changes to public or private roadways that would exacerbate fire risk or that would result in impacts to the environment. Although utilities, including water facilities, sewer facilities, storm drain lines, and power lines would be modified and/or extended throughout the Project site, these improvements would be underground and would not exacerbate fire risk. All utility lines, pipes, utility junction boxes, and transformers would be located underground. Project design and implementation of utility improvements would be reviewed and approved by the City's Public Works Department as part of the Project approval process to ensure the proposed Project is compliant with all applicable fire codes, design standards, and regulations.

Because the installation of all Project-related utility improvements would be implemented in an urbanized setting in accordance with the current California Building Code, California Fire Code, and applicable local ordinances, impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact.

Mitigation Measures: No Mitigation is required.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Landslides. Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. According to the *Geotechnical Investigation* (2021), there is no evidence of landslides in the Project vicinity. Additionally, the Project site does not lie

within a designated Landslide Hazard Zone.[74] Further, as stated previously, the Project site is not located in a VHFHSZ, or in or near an SRA. In the extremely unlikely event that a wildfire should spread to the Project site, it would not expose any on-site slopes to erosion and potential failure because the Project site does not contain any steep slopes that are prone to landslide. The proposed Project would not expose people or structures to significant risks, including downslope landslides, as a result of runoff, post-fire slope instability, or drainage changes. There would be **no impact** to project occupants or nearby residents or workers related to post-wildfire landslide risks, and no mitigation would be required.

Flooding. According to the FEMA Flood Hazard Map, the Project site is located within Zone X (Area with Minimal Flood Hazard) (FEMA 2009). Zone X designates areas of minimal flood risk, and are the areas between the limits of the base flood and the 0.2 percent annual chance flood, or 500-year flood. Existing development surrounds the Serrano Creek Channel on both sides. Northeast of SR-241, Serrano Creek runs throughout a VHFHSZ.[75] A fire northeast of the Project site could trigger increased downstream sediment movement, which could raise the elevation of potential flooding along Serrano Creek in the vicinity of the Project site. In the event that the upper Serrano Creek watershed were to experience a major fire, it is expected that the County would implement emergency Best Management Practices (BMPs) in Whiting Ranch Wilderness Park (wattles, sandbags, etc.) to limit the amount of additional sedimentation that enters Serrano Creek. Such measures would allow Serrano Creek to hydraulically convey any minor increases in sediment loads without increasing the risk of flooding on the Project site.

In the unlikely event that a wildfire should spread to the Project site, it is not expected that the Project would contribute any additional runoff or sedimentation to Serrano Creek or other downstream drainages. This is due to the lack of steep slopes that are prone to landslide or erosion on the Project site and the fact that the Project's drainage improvements would manage the rate and volume on-site runoff and reduce the potential for flooding conditions in downstream storm drain facilities. Therefore, downslope or downstream flooding as a result of runoff, post-fire slope instability, or drainage changes are unlikely to expose occupants or structures to significant risks. Impacts to project occupants related to post-wildfire flooding risks would be **less than significant**, and no mitigation is required.

Significance Determination: Less than Significant Impact.

Mitigation Measures: No Mitigation is required.

[74] California Department of Conservation. 2022. Geologic Hazards Map Viewer, Landslide Inventory and Deep-Seated Landslide Susceptibility. Website: https://maps.conservation.ca.gov/cgs/lsi/ (accessed January 2, 2022).

[75] California Department of Forestry and Fire. 2022. Fire Protection Resource Assessment Program. Fire Hazard Severity Zone Viewer. Website: https://egis.fire.ca.gov/FHSZ/ (accessed January 2, 2022).

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially 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 viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

4.21.1 Impact Analysis

a. Does the project have the potential to substantially 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, substantially 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?

The Project site does not contain suitable habitat for any federal or state-listed plant, animal, or aquatic species. Additionally, the Project site does not contain any sensitive habitats, including any USFWS designated Critical Habitat for any federally-listed species, or CDFW special-status natural communities. However, the onsite landscaping could support nesting birds. Implementation of a pre-construction nesting bird survey as specified in **Mitigation Measure BIO-1** would reduce potential project-related impacts to nesting birds. With implementation of **Mitigation Measure BIO-1**, potential impacts to biological resources would be **less than significant with mitigation incorporated**.

Based on the results of the cultural records search, 25 cultural resource studies have taken place resulting in the recording of 13 cultural resources within a half-mile radius of the project site. One cultural resource, a prehistoric lithic scatter composed of groundstone and chipped lithics, has been previously recorded within the Project site's boundaries. However, the cultural site was destroyed in 1994.

The existing building was developed in 1999, and is therefore, does not qualify as an "historical resource" as defined by CEQA. Therefore, implementation of the proposed Project would not result

in impacts to historical resources. However, in the unlikely event that archaeological resources are discovered during excavation, grading, or construction activities, **Mitigation Measure CUL-1** would be implemented to reduce potential impacts to unknown archaeological resources. Additionally, in the unlikely event that fossils of any sort are discovered during grading/earthmoving activities, **Mitigation Measure GEO-3** would be implemented to reduce potential impacts to paleontological resources. With implementation of **Mitigation Measures CUL-1 and GEO-3** potential impacts associated with important examples of the major periods of California history or prehistory would be **less than significant with mitigation incorporated**.

With incorporation of mitigation measures, the proposed Project would not substantially 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, substantially 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 and impacts would be **less than significant with mitigation incorporated**.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Based on the analysis provided throughout this IS/MND, the proposed Project would have either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Furthermore, due to the limited scope of direct physical impacts to the environment associated with the proposed Project, the proposed Project's impacts are primarily project-specific in nature. With incorporation of the mitigation measures and standard conditions prescribed throughout this IS/MND, the proposed Project would not contribute to environmental effects that are individually limited, but cumulatively considerable. Impacts would be **less than significant** with mitigation incorporated.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Based on the analysis provided throughout this IS/MND, with incorporation of mitigation measures and standard conditions, the proposed Project would not result in any environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on human beings would be **less than significant** with mitigation incorporated.

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