



FINAL
ENVIRONMENTAL IMPACT REPORT

FOR THE

2040 LAKE FOREST GENERAL PLAN
(SCH: 2019090102)

APRIL 2020

Prepared for:

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

Prepared by:

De Novo Planning Group
108 E. Main Street, Suite 108
Tustin, CA 92780
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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



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FINAL EIR

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INTRODUCTION

The City of Lake Forest (City) has determined that a program-level environmental impact report (EIR) is required for the proposed 2040 General Plan (2040 General Plan, General Plan, or project) pursuant to the requirements of the California Environmental Quality Act (CEQA). CEQA requires the preparation of an EIR prior to approving any project, which may have a significant impact on the environment. For the purposes of CEQA, the term "Project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

A Program EIR is an EIR which examines the environmental impacts of an agency plan, policy, or regulatory program, such as a general plan update. Program EIRs analyze broad environmental impacts of the program, with the acknowledgement that site-specific environmental review may be required for particular aspects of the program, or particular development projects that may occur in the future.

Lake Forest circulated a Notice of Preparation (NOP) of an EIR for the proposed project on September 5, 2019 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on September 24, 2019 at the City of Lake Forest City Hall.

Subsequently, Lake Forest published a public Notice of Availability (NOA) for the Draft EIR on November 8, 2019, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2019090102) and was published in the Orange County Register pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from November 8, 2019 through December 23, 2019. The Public Draft 2040 General Plan was also available for public review and comment during this time period.

In light of comments received during the 45-day public comment period on the Draft EIR, the City elected to conduct additional technical analysis of potential GHG impacts, provide further clarity and supporting information regarding the methodology used in the analysis, and provide the public and interested agencies with an opportunity to comment on this revised and expanded GHG analysis documentation.

In accordance with State CEQA Guidelines, section 15088.5, the City recirculated the revised Draft EIR Greenhouse Gases, Climate Change, and Energy chapter, with associated appendix, to provide the public and agencies with ample opportunity to review and comment on the updated analysis and new project information. Lake Forest published a Notice of Availability for the Recirculated Draft EIR on March 2, 2020 inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2019090102) and was published in the Orange County Register pursuant to the public noticing requirements of CEQA. The Recirculated Draft EIR was available for public review from March 2, 2020 through April 16, 2020. The Public Draft 2040 General Plan was also available for public review and comment during this time period.

This Final EIR was prepared to address comments received in response to the Draft EIR and Recirculated Draft EIR. The City has prepared a written response to the Draft EIR and Recirculated Draft EIR comments, and made textual changes to the Draft EIR and Recirculated Draft EIR where warranted. The responses to the comments are provided in this Final EIR in Section 2.0, and all changes to the text of the Draft EIR and Recirculated Draft EIR are summarized in Section 3.0. Responses to comments received during the comment period for the Recirculated Draft EIR do not involve any new significant impacts or “significant new information” that would require another recirculation of the Draft EIR or Recirculated Draft EIR pursuant to CEQA Guidelines Section 15088.5.

PROJECT DESCRIPTION

The 2040 Lake Forest General Plan is the overarching policy document that guides land use, housing, transportation, open space, public safety, community services, and other policy decisions throughout Lake Forest. The General Plan includes the seven elements mandated by State law, to the extent that they are relevant locally, including: Circulation, Conservation, Housing, Land Use, Noise, Open Space, and Safety. The City may also address other topics of interest; this General Plan includes elements related to Public Facilities (including infrastructure), Economic Development, and Health and Wellness. The General Plan sets out the goals, policies, and actions in each of these areas, serves as a policy guide for how the City will make key planning decisions in the future, and guides how the City will interact with Orange County, surrounding cities, and other local, regional, State, and Federal agencies.

The General Plan contains the goals and policies that will guide future decisions within the City. It also identifies implementation programs, in the form of actions, that will ensure the goals and policies in the General Plan are carried out. As part of the Lake Forest General Plan Update, the City and the consultant team prepared several support documents that serve as the building blocks for the General Plan and analyze the environmental impacts associated with implementing the General Plan.

Refer to Section 2.0 (Project Description) of the Draft EIR for a more comprehensive description of the details of the proposed project.

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed project. The alternatives analyzed in this EIR are briefly described as follows:

- **Alternative 1: No Project Alternative.** Under Alternative 1, the City would not adopt the General Plan Update. The existing Lake Forest General Plan would continue to be implemented and no changes to the General Plan, including the Land Use Map, Circulation Diagram, goals, policies, or actions would occur. Subsequent projects, such as amending

the Municipal Code (including the zoning map), would not occur. The existing General Plan Land Use Map is shown on Figure 3.10-3 of the Draft EIR.

- **Alternative 2: Reduced Mixed Growth Alternative.** Alternative 2 continues to provide for a balance of job-creating and residential development land uses in mixed-use focus areas throughout the City, but at residential densities and nonresidential intensities lower than those reflected in the proposed General Plan. Figure 5.0-1 of the Draft EIR depicts the Land Use Map proposed for Alternative 2. This alternative was developed to potentially reduce the severity of significant impacts associated with air quality, and hazards, as well as the potential further reduction in less than significant impacts related to aesthetics, and public services and utilities.
- **Alternative 3: High Density Residential Alternative.** Alternative 3 would revise the General Plan Land Use Map to place more emphasis on identifying specific areas for high density residential land uses, allowing for densities up to 43 du/ac, in mixed-use and non-mixed-use configurations, such as MU-43 and High Density Residential (HDR). Figure 5.0-2 of the Draft EIR depicts the Land Use Map proposed for Alternative 3. This alternative emphasizes high density residential development and de-emphasizes commercial development and business expansion, with the goal of achieving a jobs-housing balance closer to 1.0. This alternative was developed to potentially reduce the severity of less than significant impacts related to aesthetics, noise, public services and utilities.

Alternatives are described in detail in Section 5.0 of the Draft EIR. As summarized in Table 5.0-5 of the Draft EIR, Alternative 2 is the environmentally superior alternative because it provides the greatest reduction of potential impacts in comparison to the other alternatives.

COMMENTS RECEIVED

The Draft EIR addresses environmental impacts associated with the proposed project that were known to the City, raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. The Draft EIR discusses potentially significant impacts associated with aesthetics/visual resources, agricultural/forest resources, air quality, biological/natural resources, cultural/tribal resources, geology/soils/minerals, greenhouse gases/energy, hazards, hydrology/water quality, land use/population, noise, public services/recreation, transportation/circulation, utilities, wildfires, and cumulative impacts.

NOP Comments

During the NOP process, the City received comments from the following public agencies, organizations, or individuals:

- City of Laguna Beach
- Native American Heritage Commission
- California Department of Transportation (Caltrans)

- Orange County Transportation Authority (OCTA)

Draft EIR Comments

During the Draft EIR review process, the City received comments from the following public agencies, organizations, or individuals:

- Scott Shelly, Branch Chief, Regional-IGR-Transit Planning, District 12, California Department of Transportation (Caltrans)
- Livia B. Beaudin Coast Law Group on behalf of Climate Action Campaign
- Sean Matsler, Cox, Castle & Nicholson, LLP, on behalf of El Toro Mini-Partners LP
- Richard Fell, El Toro Mini-Partners LP
- Christa Johnson, Assistant City Manager City of Laguna Beach
- Randy Johnson
- Michelle Sugimoto
- Michael Davison
- Jeff Dill, President, Prothero Enterprises, Inc.

Recirculated Draft EIR Comments

The City did not receive any public or agency comments on the Recirculated Draft EIR during the 45-day comment period.

Acting as lead agency, the City of Lake Forest has prepared a response to the Draft EIR comments. The responses to the comments are provided in this Final EIR in Section 2.0 (Comments on Draft EIR and Responses) and all changes to the text of the Draft EIR and Recirculated Draft EIR are summarized in Section 3.0 (Errata).

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Lake Forest is the lead agency for the environmental review of the 2040 Lake Forest General Plan (General Plan, General Plan Update, or Project) and has the principal responsibility for approving the project. This FEIR assesses the expected environmental impacts resulting from approval and adoption of the 2040 Lake Forest General Plan and responds to comments received on the Draft EIR and Recirculated Draft EIR.

The 2040 Lake Forest General Plan is the overarching policy document that guides land use, housing, transportation, open space, public safety, community services, and other policy decisions throughout Lake Forest. The General Plan includes the seven elements mandated by State law, to the extent that they are relevant locally, including: Circulation, Conservation, Housing, Land Use, Noise, Open Space, and Safety. The City may also address other topics of interest; this General Plan includes elements related to Public Facilities (including infrastructure), Economic Development, and Health and Wellness. The General Plan sets out the goals, policies, and actions in each of these areas, serves as a policy guide for how the City will make key planning decisions in the future, and guides how the City will interact with Orange County, surrounding cities, and other local, regional, State, and Federal agencies.

The General Plan contains the goals and policies that will guide future decisions within the City. It also identifies implementation programs, in the form of actions, that will ensure the goals and policies in the General Plan are carried out. As part of the Lake Forest General Plan Update, the City and the consultant team prepared several support documents that serve as the building blocks for the General Plan and analyze the environmental impacts associated with implementing the General Plan.

Refer to Section 2.0 (Project Description) of the Draft EIR for a more comprehensive description of the details of the proposed project.

1.1 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR A FINAL EIR

This FEIR for the 2040 Lake Forest General Plan has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that an FEIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft, which in this case also includes the Recirculated Draft EIR;
- comments and recommendations received on the Draft EIR and Recirculated Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR and Recirculated Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and

1.0 INTRODUCTION

- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR and Recirculated Draft EIR are incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed projects, and obligates them to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City of Lake Forest, as the lead agency, has prepared this Final EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval and implementation of the 2040 General Plan. Responsible and trustee agencies that may use the EIR are identified in Chapter 1.0 of the Draft EIR.

The environmental review process enables interested parties to evaluate the proposed project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potential adverse impacts, and to consider a reasonable range of alternatives to the project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the proposed project. Subsequent actions that may be associated with the proposed project are identified in Chapter 2.0 (Project Description) of the Draft EIR. This EIR may also be used by other agencies within Orange County, including the Orange Local Agency Formation Commission (LAFCO), which may use this EIR during the preparation of environmental documents related to annexations, Municipal Service Reviews, and Sphere of Influence decisions in the Lake Forest Planning Area.

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION

The City of Lake Forest circulated a Notice of Preparation (NOP) of an EIR for the proposed project on September 5, 2019 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on September 24, 2019 at the City of Lake Forest City Hall. No

public or agency comments on the NOP related to the EIR analysis were presented or submitted during the scoping meeting. However, during the 30-day public review period for the NOP, which ended on October 4, 2019, four written comment letters were received on the NOP. A summary of the NOP comments is provided in Section 1.8 of the Draft EIR. The NOP and all comments received on it are presented in Appendix A of the Draft EIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

The City of Lake Forest published a public Notice of Availability (NOA) for the Draft EIR on November 8, 2019, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2019090102) and was published in the Orange County Register pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from November 8, 2019 through December 23, 2019. The Public Draft 2040 General Plan was also available for public review and comment during this time period.

The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

NOTICE OF AVAILABILITY AND RECIRCULATED DRAFT EIR

In light of comments received during the 45-day public comment period on the Draft EIR, the City elected to conduct additional technical analysis of potential GHG impacts, provide further clarity and supporting information regarding the methodology used in the analysis, and provide the public and interested agencies with an opportunity to comment on this revised and expanded GHG analysis documentation.

In accordance with State CEQA Guidelines, section 15088.5, the City recirculated the revised Draft EIR Greenhouse Gases, Climate Change, and Energy chapter, with associated appendix, to provide the public and agencies with ample opportunity to review and comment on the updated analysis and new project information. Lake Forest published a Notice of Availability for the Recirculated Draft EIR on March 2, 2020 inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2019090102) and was published in the Orange County Register pursuant to the public noticing requirements of CEQA. The Recirculated Draft EIR was available for public review from March 2, 2020 through April 16, 2020. The Public Draft 2040 General Plan was also available for public review and comment during this time period.

RESPONSE TO COMMENTS/FINAL EIR

The City of Lake Forest received nine comment letters regarding the Draft General Plan and Draft EIR from public agencies, organizations, and members of the public during the initial 45-day review period.

The City received no comment letters regarding the Draft General Plan and the Recirculated Draft EIR from public agencies, organizations, and members of the public during the subsequent 45-day review period.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR and Recirculated Draft EIR. The Final EIR also contains minor edits to the Draft EIR and Recirculated Draft EIR, which are included in Chapter 3.0 (Errata). This document and the Draft EIR and Recirculated Draft EIR, as amended herein, constitute the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Lake Forest City Council will review and consider the Final EIR. If the City Council finds that the Final EIR is "adequate and complete," then it may certify it in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the Lake Forest City Council may take action to approve, revise, or reject the project. A decision to approve the 2040 Lake Forest General Plan, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093.

Policies and actions to mitigate potential environmental impacts have been incorporated into the project, to the extent feasible. No additional mitigation is feasible or available, as described in Chapters 3.1 through 4.0 of the Draft EIR and Chapter 3.7 of the Recirculated Draft EIR. The annual report on general plan status required pursuant to the Government Code will serve as the monitoring and reporting program for the project.

1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

CHAPTER 2.0 – COMMENTS ON DRAFT EIR AND RESPONSES

Chapter 2.0 provides a list of commenters, copies of written comments made on the Draft EIR (coded for reference), and responses to those written comments.

CHAPTER 3.0 – ERRATA

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments on the Draft EIR. The revisions to the Draft EIR do not change the intent or content of the analysis or mitigation.

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2.1 INTRODUCTION

As noted in the previous chapter of this Final EIR, in light of comments received during the 45-day public comment period on the Draft EIR, the City elected to conduct additional technical analysis of potential GHG impacts, provide further clarity and supporting information regarding the methodology used in the analysis, and provide the public and interested agencies with an opportunity to comment on this revised and expanded GHG analysis documentation.

Beyond this revised GHG analysis, which was included in the Recirculated Draft EIR, no new significant environmental impacts or issues, beyond those already covered in the Draft Environmental Impact Report (Draft EIR) for the 2040 Lake Forest General Plan Update, were raised during the comment period. Responses to comments received during the comment periods for both the Draft EIR and the Recirculated Draft EIR do not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Chapters 2.0 and 3.0 of this Final EIR include information that has been added to the EIR since the close of the public review periods in the form of responses to comments and errata.

2.2 LIST OF COMMENTERS

Table 2-1 lists the comments on the Draft EIR that were submitted to the City during the 45-day public review period. The assigned comment letter number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. As noted previously, the City did not receive any comments during the 45-day review period for the Recirculated Draft EIR.

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

TABLE 2-1: LIST OF COMMENTERS

<i>RESPONSE LETTER</i>	<i>INDIVIDUAL OR SIGNATORY</i>	<i>AFFILIATION</i>	<i>DATE</i>
A	Scott Shelly, Branch Chief, Regional-IGR-Transit Planning, District 12	California Department of Transportation (Caltrans)	12-19-19
B	Livia B. Beaudin	Coast Law Group on behalf of Climate Action Campaign	12-23-19
C	Sean Matsler	Cox, Castle & Nicholson, LLP, on behalf of El Toro Mini-Partners LP	11-22-19
D	Richard Fell	El Toro Mini-Partners LP	1-29-20
E	Christa Johnson, Assistant City Manager	City of Laguna Beach	10-2-19
F	Randy Johnson		11-15-19
G	Michelle Sugimoto		12-19-20
H	Michael Davison		12-19-19
I	Jeff Dill, President	Prothero Enterprises, Inc.	12-5-19

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR (and Recirculated Draft EIR) that regard an environmental issue. The written response must address the significant environmental issue raised and be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies only need to respond to significant environmental issues associated with the project and do not need to provide all of the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204(a)).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the 2014 Lake Forest General Plan Update Draft EIR and Recirculated Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Each comment letter is lettered (i.e., Letter A), each comment within each letter is numbered (i.e., Comment A-1, Comment A-2, etc.), and each response is numbered correspondingly (i.e., Response A-1, Response A-2, etc.).

Where changes to the Draft EIR text result from the response to comments, those changes are included in the response and identified with revisions marks (underline for new text, ~~strike-out~~ for deleted text).

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
 1750 EAST FOURTH STREET, SUITE 100
 SANTA ANA, CA 92705
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www.dot.ca.gov



Making Conservation
 a California Way of Life.

Letter A

December 19, 2019

Gayle Ackerman
 25550 Commercentre Drive, Suite 100
 Lake Forest, CA 92630

File: IGR/CEQA
 SCH#: 2019090102
 12-ORA-2019-01263
 SR 241
 I-5

Dear Ms. Ackerman,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the General Plan Update for the City of Lake Forest. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

A-1

The General Plan update is expected to be completed in 2020 and will guide the City's development and conservation for the next 20 years to 2040. The City of Lake Forest is in proximity to the State Highway System (SHS). Caltrans is a responsible/commenting agency on this project and upon review, we have the following comments:

Traffic Operations

1. Caltrans Traffic Operations does not feel the traffic volumes and Levels of Service for the intersections of El Toro Road and the Northbound I-5 Off-Ramp, Avenida De La Carlota and Southbound I-5 off-ramp, and El Toro Road and Avenida De La Carlota shown in the report represent in the current traffic conditions that exist today.
2. In addition, there should be a foot note which includes the intersections anticipated to increase upon completion of the Five Lagunas Residential development.

A-2

A-3

Environmental

3. Caltrans Environmental Branch agrees that Alternative 2 is the environmentally superior alternative as it is the most effective in terms of superior alternative as it is the most effective in terms of overall reduction of impacts compared to the proposed General Plan and all other alternatives. The analysis presented is adequate.

A-4

*"Provide a safe, sustainable, integrated and efficient transportation system
 to enhance California's economy and livability"*

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4. Alternative 3 would revise the General Plan Land Use Map to place more emphasis on identifying specific areas for high density residential land uses. This alternative deemphasizes commercial development and business expansion. **A-5**

5. As mentioned in Alternative 3, the alternative was developed to potentially reduce the severity of less than significant impacts related to Aesthetics, Noise, Public Services and Utilities. The alternative should consider the potential impact to Transportation and Traffic. **A-6**

Stormwater Compliance

6. In the Draft EIR document, Section 3.9 Hydrology and Water Quality, on page 3.9-14, the correct permit number is San Diego Regional Water Quality Control Board adopted Order No. R9-2009-0002, NPDES No. CA S018740 **A-7**

7. The General Plan should state when a Water Quality Management Plan (WQMP) must be prepared and approved by the City Engineer in the event of milestones such as grading plan approval. **A-8**

Freight

8. Please consider incorporating designated areas/parking for freight delivery, package, and transportation network company's pickup and drop-off, as stated in our previous comment letter submitted on October 3rd during the Notice of Preparation review period. Our letter can be found in Appendix A of the Draft Environmental Impact Report document. **A-9**

Encroachment Permits

9. Please be advised that any project work proposed in the vicinity of the State Highway System (SHS) will require an Encroachment Permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans' requirements, additional documentation would be required before the approval of the Encroachment Permit. For specific details for Encroachment Permits procedure, please refer to the Caltrans' Encroachment Permits Manual. The latest edition of the Manual is available on the web site:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/> **A-10**

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

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Please continue to keep us informed of this project and any future developments which could potentially impact the SHS. If you have any questions, please do not hesitate to contact Joseph Jamoralin, at (657) 328-6276 or Joseph.Jamoralin@dot.ca.gov.

Sincerely,



SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
District 12

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Response to Letter A: Scott Shelly, Branch Chief, Caltrans District 12

Response A-1: The commenter provides introductory remarks and notes that Caltrans is a responsible/commenting agency on this project. This comment is noted and has been forwarded to the Planning Commission and City Council for their consideration. The commenter has not addressed the adequacy of the Draft EIR and, as such, no changes to the Draft EIR are warranted.

Response A-2: The commenter states that Caltrans Traffic Operations does not feel the traffic volumes and Levels of Service for the intersections of El Toro Road and the Northbound I-5 Off-Ramp, Avenida De La Carlota and Southbound I-5 off-ramp, and El Toro Road and Avenida De La Carlota shown in the Draft EIR represent in the current traffic conditions that exist today. The commenter does not provide any additional details or supporting information related to this assertion.

This comment refers to the following intersections which were analyzed for the weekday morning and evening (AM and PM) peak hours in the Transportation Impact Analysis (TIA) included as Appendix F of the DEIR:

- #37 - Paseo De Valencia & Avenida De La Carlota
- #38 - El Toro Road & Bridger Road/I-5 NB Ramps
- #39 - El Toro Road & Avenida De La Carlota

For the analysis conducted in the TIA, vehicle turning movement data at the study intersections was collected on a typical weekday in April 2018 when schools were in session, during the morning (7:00 AM to 9:00 AM) and evening (4:00 PM to 6:00 PM) peak periods. From this data, weekday AM and PM peak hour level of service (LOS) was assessed for all intersections in the study area utilizing the Intersection Capacity Utilization (ICU) methodology – this is the standard methodology used by the City of Lake Forest. The ICU methodology calculates an LOS grade (A to F) using a volume/capacity (V/C) ratio for the intersection. As such, the LOS is only based on the intersection geometry (i.e., the number of lanes provided for each movement) and volumes entering the intersection; signal phasing and timing are not accounted for in the analysis.

To confirm the analysis prepared for the TIA, the traffic conditions at these three locations were compared to recent data published by the Orange County Transportation Authority (OCTA). For the intersections of El Toro Road & Bridger Road/I-5 NB Ramps and El Toro Road & Avenida De La Carlota, the TIA's results were compared to intersection-level data available in OCTA's *2019 Orange County*

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

Congestion Management Program (CMP) (November 2019).¹ Given that the CMP does not include intersection-level data for the intersection of Paseo De Valencia & Avenida De La Carlota, volumes at each leg of that intersection were compared to segment-level traffic volumes published by OCTA.

For the intersections of El Toro Road & Bridger Road/I-5 NB Ramps and El Toro Road & Avenida De La Carlota, the V/C ratios and LOS grades were compared to 2019 data calculated by OCTA in its 2019 CMP. For its analysis, OCTA collected weekday AM/PM peak period counts on three separate mid-week days during regular conditions and utilized the ICU methodology to assign LOS grades. The TIA's and OCTA's V/C ratios for these two intersections are shown in Table A-1. As shown in the table, the TIA's results are similar to those developed by OCTA.

Table A-1: Existing Intersection Level of Service Comparison

Intersection		Peak	TIA		CMP		Difference
			V/C	LOS	V/C	LOS	
38	El Toro Road & Bridger Road/I-5 NB Ramps	AM	0.63	B	0.58	A	-0.05
		PM	0.66	B	0.71	C	0.05
39	El Toro Road & Avenida De La Carlota	AM	0.37	A	0.47	A	0.10
		PM	0.56	A	0.47	A	-0.09

Source: Kittelson & Associates, Inc., 2019; Orange County Transportation Authority, 2019.

The weekday PM peak hour traffic volumes for the north, west, and south legs of Paseo De Valencia & Avenida De La Carlota (intersection #37) are shown in Table A-2. These are compared to 24-hour daily volumes collected for those segments as shown on OCTA's *2019 Traffic Flow Map*.² As shown in the table, the weekday PM peak hour volumes collected at the intersection for the TIA represent between 6% and 14% of the daily volumes collected by OCTA. These percentages represent a reasonable relationship for peak hour volumes compared to daily traffic levels. For example, roadway segment volumes that were collected for the TIA at two nearby locations (Rockfield Boulevard north of El Toro Road and El Toro Road west of Rockfield

¹ <https://www.octa.net/pdf/2019CMP.pdf?n=201911>

² <https://www.octa.net/pdf/2019-ADT.pdf>

Boulevard) showed that PM peak hour volumes were between 7% and 9% of daily volumes.

Table A-2: Paseo De Valencia & Avenida De La Carlota Traffic Volumes

Intersection Leg	PM Peak Hour Volume	Daily Volume	Percentage
North leg (Avenida De La Carlota)	1,665	15,000	11%
West leg (Paseo De Valencia)	954	17,000	6%
South leg (Avenida De La Carlota)	2,288	16,000	14%

Source: Kittelson & Associates, Inc., 2019; Orange County Transportation Authority, 2019.

Overall, the volumes and the associated analysis for the intersections of El Toro Road & Bridger Road/I-5 NB Ramps, El Toro Road & Avenida De La Carlota, and Paseo De Valencia & Avenida De La Carlota are consistent with other approved documents and provide an accurate assessment of existing conditions for use in the EIR analysis. As such, no changes to the analysis and findings are required to address this comment.

Response A-3: The commenter states that there should be a foot note which includes the intersections anticipated to increase upon completion of the Five Lagunas Residential Development.

It is noted that the previously-approved project known as Five Lagunas has been revised, and is now known as The Village at Laguna Hills. In March of 2016, the City of Laguna Hills approved a plan for the renovation of the Laguna Hills Mall which included approximately 880,000 square feet of new and renovated commercial retail space, movie theaters, restaurants, and 988 residential units. The approved plan was known as Five Lagunas. In 2019, the property owner of Five Lagunas informed Laguna Hills City staff that they could not move forward with the approved 2016 plan. On November 1, 2019, the property owner submitted a development application to the City of Laguna Hills to replace the Five Lagunas project approved in 2016. Renamed, "The Village at Laguna Hills", the revised development proposal is a proposed mixed-use development in place of the existing Laguna Hills Mall in the city of Laguna Hills, located at the southwestern quadrant of the intersection of El Toro Road & Avenida De La Carlota within the City of Laguna Hills. The updated plan sets proposed the following uses (including the demolition of the current shopping center):

- Between 225,000 and 300,000 square feet of retail uses

- A 125-room hotel
- Between 390,000 and 520,000 square feet of office uses
- Between 1,200 and 1,500 residential dwelling units

The applicant for the Village at Laguna Hills project will be working with the City of Laguna Hills to proceed with finalizing the proposed land uses and densities and to conduct the appropriate environmental reviews. The proposed project density has yet to be finalized and approved and environmental analysis has yet to be conducted. In addition, the project site plans have not been finalized; as such, the location of driveways and their percentage of traffic are not currently known. Therefore, an accurate estimate of the traffic effects of the Village at Laguna Hills project (both in terms of locations and level effected) is not feasible at this time.

The Orange County Transportation Analysis Model (OCTAM), which was used to develop the baseline traffic forecasts for the TIA, does include development at the proposed Village at Laguna Hills project site. As such, future conditions at the study intersections and roadway segments would account for the projected growth in activity at the proposed Village at Laguna Hills project site in addition to other sites in and around the City of Lake Forest.

The proposed General Plan includes policies and actions calling for the City of Lake Forest to continue to monitor conditions at intersections within the City that are forecast to operate unacceptably (for example, Policies M-2.1, 2.2, 2.3, and 2.4; as well as Action M-1e). The City can then determine the appropriate timing and/or level of improvement along these facilities. The proposed General Plan also policies that call for the City to monitor unacceptable intersections that are outside of its jurisdiction and coordinate with relevant jurisdictions for improvements as necessary (Policies M-1.4, 1.5 and 1.7, as well as Actions M-1d and M-1e).

The potential concerns raised by the commenter have been adequately addressed in the Draft EIR, and the proposed General Plan includes a range of policies and actions that ensure ongoing monitoring of local and regional traffic conditions associated with new development in adjacent jurisdictions. This comment has been forwarded to the Planning Commission and City Council for their review and consideration, but no changes to the Draft EIR analysis are warranted or required.

Response A-4: The commenter expresses their agreement that Alternative 2 is the environmentally superior alternative and notes that the analysis of this alternative in the Draft EIR is adequate. No further response is required.

- Response A-5:** The commenter states that Alternative 3 would place more emphasis on identifying specific areas for high density residential land uses and deemphasizes commercial development and business expansion. No further response is required.
- Response A-6:** The commenter states that Alternative 3 was developed to potentially reduce the severity of less than significant impacts related to Aesthetics, Noise, Public Services and Utilities. The commenter states that this alternative should consider the potential impact to Transportation and Traffic. This comment is noted. The commenter is directed to page 5.0-26 of the Draft EIR, which includes an analysis of Alternative 3's comparative impacts related to this topic. As noted on page 5.0-26, Alternative 3 would have slightly increased impacts related to per capita vehicle miles travelled (VMT). This issue has been adequately addressed in the Draft EIR and no further analysis is warranted.
- Response A-7:** The commenter states that in Section 3.9, Hydrology and Water Quality, on page 3.9-14, the correct permit number is San Diego Regional Water Quality Control Board adopted Order No. R9-2009-0002, NPDES No. CA S018740.
- The following change is made on page 3.9-14 of the Draft EIR:
- On May 19, 2009, the Santa Ana Regional Water Quality Control Board adopted Order No. R8- 2009-0030, NPDES No. CAS618030. On December 16, 2009, the San Diego Regional Water Quality Control Board adopted ~~Order No. R9-200-0002, NPDES No. CAS018740.~~ Order No. R9-2009-0002, NPDES No. CA S018740. These Municipal NPDES Permits require the permittees to continue to implement stormwater quality management programs and develop additional programs in order to control pollutants in stormwater discharges.*
- This correction to the referenced permit number in no way changes or alters the analysis or conclusions contained in the Draft EIR. This correction has been made, and no further analysis or response is warranted.
- Response A-8:** The commenter states that the General Plan should state when a Water Quality Management Plan (WQMP) must be prepared and approved by the City Engineer in the event of milestones such as grading plan approval. This comment is noted. The comment does not address the adequacy of the environmental analysis contained in the Draft EIR. This comment has been forwarded to the Planning Commission and City Council for their review and consideration. No additional analysis or further response is warranted.
- Response A-9:** The commenter suggests incorporating designated areas/parking for freight delivery, package, and transportation network company's pick-up and drop-off and references the commenter's letter submitted in connection with the Notice of Preparation which

also raised this issue. This comment is noted. The comment does not address the adequacy of the environmental analysis contained in the Draft EIR. This comment has been forwarded to the Planning Commission and City Council for their review and consideration. No additional analysis or further response is warranted.

Response A-10: The commenter provides information related to Encroachment Permits for any project work proposed in the vicinity of the State Highway System. This comment is noted. The comment does not address the adequacy of the environmental analysis contained in the Draft EIR. The City is aware of Caltrans' Encroachment Permit requirements and procedures, and will continue to comply with all applicable regulations related to future project work in the vicinity of the State Highway System. No additional response or analysis is warranted.



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Letter B

December 23, 2019

Gayle Ackerman, AICP, Director of Community Development
25550 Commercentre Drive, Suite 100
505 S. Vulcan Avenue
Lake Forest, CA 92630

Via Electronic Mail
GAckerman@lakeforestca.gov

Re: City of Lake Forest General Plan Update Draft EIR
Climate Action Campaign Comments

Dear Ms. Ackerman:

Please accept the following comments on behalf of our client Climate Action Campaign (CAC) regarding the City of Lake Forest (City) General Plan (General Plan or Project) Draft Environmental Impact Report (EIR). CAC's aim is to make climate action a number one priority for policymakers everywhere until its mission of stopping climate change is achieved.

As the first Orange County General Plan update in recent history, the Project presents an opportunity for the City to show leadership in land use planning and climate resiliency. In lieu of developing a stand-alone Climate Action Plan (CAP), the City has elected to incorporate a greenhouse gas (GHG) reduction plan into the General Plan. Unfortunately, the City's attempts have fallen far short of both the spirit and letter of the law. The City's failure to disclose the assumptions and modeling information which form the foundation of its GHG emissions analysis, coupled with its lack of meaningful local GHG reduction measures, undermine the DEIR's informational purpose. As detailed below, the City's approach is inconsistent with the California Environmental Quality Act (CEQA).

B-1

A. The DEIR Fails to Disclose the Basis for Its "Legislative-Adjusted BAU Project Scenario"

The City's General Plan concludes the City's GHG emissions will be less than significant with no local measures. (DEIR, p. 3.7-29 ["However, as described above, after accounting for Federal and State GHG reducing actions in future years, City of Lake Forest community per capita emissions in years 2030 and 2040 would be below the per capita targets established consistent with the CARB's 2017 Scoping Plan."]). Remarkably, despite an almost doubling of population by 2040, the City anticipates reducing its emissions by more than 10 percent – by taking no GHG reduction measures.

The DEIR's lack of information to support this fantastical claim is not only suspect but also undermines the informational purpose of the document. "CEQA requires an EIR to reflect a good faith effort at full disclosure..." (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1046; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 228 ["We further agree with plaintiffs that DFV's failure to provide substantial evidentiary support for its no significant impact conclusion was prejudicial, in that it deprived decision makers and the public of substantial relevant information about the project's likely impacts."]).

B-2

For example, the City's continued downward trend in most emissions categories despite limitations of new standards (especially those applicable only to new construction) is neither explained nor substantiated.¹

¹ "Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (Pub. Resources Code § 21082.2(c); see also, CEQA Guidelines §15384).

Climate Action Campaign Comments
 City of Lake Forest General Plan
 December 23, 2019
 Page 2

Notably, other agencies undergoing similar planning have provided much more information than that contained in the instant DEIR and appendices.² Therefore, to serve its informational purpose, the DEIR must provide additional information, including but not limited to, more detailed emissions inventories and reduction categories, any modifications to the model inputs based on state and federal measures, the number of days included in its VMT analysis, and additional modeling assumptions (such as number of miles driven by EVs).

**B-2
Cont**

B. The General Plan Policies and Actions that Purportedly Mitigate Potential Impacts are Impermissibly Vague and Unenforceable

As a purported qualified greenhouse gas reduction plan, the City's General Plan must meet the requirements for all first-tier documents and impose effectively enforceable requirements and measures with defined performance standards. (See, *California Riverwatch v. County of Sonoma et. al.*, Superior Court for the County of Sonoma Case No. SCV-259242, Order Granting Writ, p. 11 [enclosed herewith]). Because future discretionary projects will rely on the General Plan, and any "group of measures, including performance standards" to achieve the specified reductions and forgo further CEQA GHG emissions analysis, the General Plan's reduction measures must be considered mitigation measures for purposes of CEQA and must therefore comply with CEQA requirements. (See, *Id.* at p. 20). However, the General Plan's reduction measures are not only vague and unenforceable, they fail to set forth any real performance standards.

B-3

Because the City relies wholly on state and federal measures to reduce its GHG impacts, its local measures are all voluntary, vaguely-defined aspirational measures. Should the City fail to meet its GHG reduction goals despite federal and state measures, it will have no measures in place to address its shortfall. The City must therefore explore additional reduction strategies tied to development and incorporate them into a meaningful, enforceable GHG reduction plan. (Pub. Res. Code §§21002.1(a), 21061). The EIR must be updated to include such real, verifiable, enforceable reduction strategies. In light of the City's goal to tier from the DEIR for future, specific developments, these enforceable mitigation measures must be incorporated into the approval process.

B-4

Unless the City updates its DEIR with the aforementioned GHG emissions analysis and incorporates adequate mitigation measures, the Project's CEQA analysis will remain fatally flawed.

B-5

Thank you in advance for your consideration of our comments.

Sincerely,

COAST LAW GROUP LLP

Livla B. Beaudin
 Attorneys for CAC

² See, <https://www.coronaca.gov/government/departments-divisions/planning-division/general-plan-update>

<https://www.coronaca.gov/home/showdocument?id=17286>

<https://www.coronaca.gov/home/showdocument?id=17290>

<https://www.coronaca.gov/home/showdocument?id=17292>

Response to Letter B: Livia B. Beaudin, Coast Law Group, on behalf of Climate Action Campaign

Response B-1: The commenter provides introductory remarks noting that they represent the Climate Action Campaign (CAC) and that the General Plan update presents an opportunity for the City to show leadership in land use planning and climate resiliency. The commenter states that the City has failed to disclose assumptions and modeling information which form the foundation of the Draft EIR's greenhouse gas (GHG) analysis. The commenter further states that the General Plan lacks meaningful GHG reduction measures.

The commenter is referred to the analysis contained in Section 3.7 of the Recirculated Draft EIR. The Recirculated Draft EIR was prepared and circulated for public review and comment in response to this comment letter. The Recirculated Draft EIR, and the associated technical appendix, provides extensive information regarding the assumptions and modeling information used in the GHG analysis. The Recirculated Draft EIR also provides extensive detail regarding the wide range of GHG reduction measures and strategies that have been incorporated throughout the General Plan in order to reduce GHG emissions. The Recirculated Draft EIR provides a full and detailed analysis of potential GHG emissions associated with adoption and implementation of the 2040 General Plan, and fully meets the requirements of CEQA.

Response B-2: The commenter states that the GHG analysis in the Draft EIR does not provide adequate supporting information and evidence to support the less than significant impact determination. As noted above, the Recirculated Draft EIR GHG analysis was prepared in order to address these concerns raised by the commenter. The commenter is referred to this revised GHG analysis, which includes substantial supporting evidence of the City's GHG impact determinations, and provides extensive additional detail regarding the assumptions, methods, and modeling that support the City's determination of a less than significant impact. As requested by the commenter, the Recirculated Draft EIR includes additional information, including but not limited to, more detailed emissions inventories and reduction categories, modifications to model input based on state and federal measures, supporting detail regarding the VMT analysis, and all additional relevant modeling assumptions. The commenters concerns have been fully and adequately addressed in the Recirculated Draft EIR, which is incorporated by reference into this Final EIR.

Response B-3: The commenter states that the General Plan does not meet the requirements of a "qualified greenhouse gas reduction plan." The commenter is referred to the analysis

contained in Section 3.7 of the Recirculated Draft EIR, which includes a detailed analysis of the various policies and actions contained within the General Plan that would collectively reduce GHG emissions and result in less than significant cumulative impact. The Recirculated Draft EIR does not assert that the 2040 General Plan is a “qualified GHG reduction plan.” As such, future projects in Lake Forest, which are subject to CEQA, would be required to conduct a GHG analysis as part of their environmental review, prior to approval. The issues raised by this comment have been fully addressed in the Recirculated Draft EIR.

Response B-4: The commenter states that the City relies wholly on state and federal measures to reduce its GHG impacts and that local measures are voluntary and vaguely-defined. The commenter states that the City must explore additional reduction strategies to reduce GHG emissions. This comment is noted, and the commenter is referred to the analysis contained in Section 3.7 of the Recirculated Draft EIR, which includes a detailed analysis of the various policies and actions contained within the General Plan that would collectively reduce GHG emissions and result in less than significant cumulative impact. As noted in the Recirculated Draft EIR, the City of Lake Forest has taken a comprehensive and holistic approach to GHG reductions, and has included numerous policies and actions throughout most elements of the General Plan to reduce GHG emissions associated with buildout of the General Plan. The commenter’s concerns have been fully and adequately addressed in the Recirculated Draft EIR, which is incorporated by reference into this Final EIR.

Response B-5: The commenter states that unless the City updates the GHG emissions analysis the project’s CEQA analysis will remain flawed. This comment is noted, and the commenter is referred to the analysis contained in Section 3.7 of the Recirculated Draft EIR. The commenter’s concerns have been fully and adequately addressed in the Recirculated Draft EIR, which is incorporated by reference into this Final EIR.



Cox, Castle & Nicholson LLP
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Letter C

Sean T. Matsler
 949.260.4652
 smatsler@coxcastle.com

Matter No. 083992

November 22, 2019

[VIA E-MAIL: GACKERMAN@LAKEFORESTCA.GOV]

Ms. Gayle Ackerman
 Director of Community Development
 25550 Commercentre Drive, Suite 100
 Lake Forest, CA 92630

Re: 2040 General Plan Draft EIR

Ms. Ackerman:

This Firm represents El Toro Mini-Partners LP and its manager Richard Fell in connection with the property located at 20941 Canada Road (APN 610-151-29) (“Property”). The Property currently operates as the “American Mini Storage” self-storage business. American Mini Storage is a low-intensity use that benefits the residents of Lake Forest by providing them with safe, secure, and convenient self-storage space. The use does not generate adverse noise, traffic, light, or other impacts. It has quietly been operating at the Property for 31 years.

C-1

The Draft Environmental Impact Report (“EIR”) for the 2040 General Plan identifies the Property’s proposed land use designation as “Mixed-Use 43” (“MU 43”). The MU 43 designation is intended for “mixtures of commercial, office, and residential uses in the same building, on the same parcel of land, or within the same area.” (Draft 2040 General Plan, Land Use Element, Page LU-6.) The entire Property is dedicated to one industrial use: American Mini Storage. As such, Mr. Fell is concerned that in the event the City adopts the Draft 2040 General Plan, the current use of the Property would potentially not be considered to be compatible with the MU 43 land use designation. Mr. Fell would strongly prefer that the long-standing self-storage use of the Property be incorporated as a recognized, permitted use in the 2040 General Plan rather than being formalized as a non-conforming use.

C-2

Given the potential legal implications of the proposed Draft 2040 General Plan on his Property, my client respectfully makes the following requests of the City:

1. **Adopt DEIR Alternative 2, the Reduced Mixed Growth Alternative.** Alternative 2 designates the Property as Urban Industrial (“UI”) 25. The UI 25 designation allows for “a mix of light industrial and commercial uses.” (Draft 2040 General Plan, Land Use Element, Page LU-7.) Based on the description of

C-3

November 22, 2019

Page 2

the UI 25 designation in the Draft 2040 General Plan Land Use Element, it appears that American Mini Storage would be a permitted use.

C-3
Cont

2. **Add “warehousing and storage uses” to the list of permitted uses on Page LU-7 of the 2040 General Plan Land Use Element under the description of the UI 25 designation.** We understand that the City has not yet developed the Zoning Regulation that would implement the UI 25 designation. However, we respectfully request that, when the City does so, that said zoning likewise include “warehousing and storage uses” as permitted uses.

C-4

Thank you for your careful consideration of this important matter.

Sincerely,



Sean Matsler

of COX, CASTLE & NICHOLSON LLP

cc: Richard Fell (via e-mail: rfell@fellcapital.com)

Response to Letter C: Sean Matsler, Cox, Castle & Nicholson, LLP, on behalf of El Toro Mini-Partners LP

- Response C-1:** The commenter provides introductory remarks and notes that they represent a business operating as American Mini Storage.
- Response C-2:** The commenter notes that the proposed General Plan Land Use Map identifies the subject property as Mixed-Use 43. The commenter expresses concern that the existing onsite business may become a non-conforming use. The commenter expresses preference for a land use designation that retains the existing business as a permitted use. The commenter is correct that the existing use on the subject property would likely become a non-conforming use upon adoption of the General Plan and Land Use Map. However, it is noted that the more detailed list of allowed and conditionally allowed uses on the subject property would continue to be determined by the City's Zoning Code. The commenter does not address the adequacy of the Draft EIR. Whether or not an existing use would become a non-conforming use is not in and of itself a topic that is subject to review and analysis under CEQA, as there is no CEQA threshold related to this question. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.
- Response C-3:** The commenter requests that the City adopt Draft EIR Alternative 2, which identifies the subject property as Urban Industrial 25 (UI-25) on the Land Use Map. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.
- Response C-4:** The commenter requests that "warehousing and storage uses" be added to the list of permitted uses under the UI-25 land use designation. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.



**AMERICAN
MINI STORAGE**

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January 29, 2020

[VIA E-MAIL: GACKERMAN@LAKEFORESTCA.GOV]

Ms. Gayle Ackerman
Director of Community Development
25550 Commercentre Drive, Suite 100
Lake Forest, CA 92630

Letter D

Re: 2040 General Plan EIR

Ms. Ackerman:

On behalf of El Toro Mini-Partners LP, I want to thank you for the opportunity to provide additional input on the City's 2040 General Plan Update EIR following the December 19, 2019 City Council Study Session.

As you may recall from our November 22, 2019 letter (attached), El Toro Mini-Partners LP owns property at 20941 Canada Road (APN 610-151-29) ("Property"). The Property currently operates as "American Mini Storage" self-storage, a low-intensity use that has been quietly operating for 31 years. In our November 22nd letter, we requested that the City adopt EIR Alternative 2, the Reduced Mixed Growth Alternative, which designates the Property as Urban Industrial ("UI") 25.

We were pleased to see that at the December 19, 2019 Study Session, the Council voiced strong support for Alternative 2. While we understand that a final vote awaits, we want to thank staff and the Council for taking our comments into consideration, and want to thank the Mayor and Councilmembers for their positive comments on Alternative 2. We would like to again express our strong support for Alternative 2. Thank you for your careful consideration of this important matter.

Sincerely,

Richard M. Fell
El Toro Mini-Partners LP

RMF/si

cc: Mayor Moatazedi (via e-mail: nmoatazedi@lakeforestca.gov)
Mayor Pro Tem James (via e-mail: mjames@lakeforestca.gov)
Councilmember Tetterer (via e-mail: mtetterer@lakeforestca.gov)
Councilmember Voigts (via e-mail: svoigts@lakeforestca.gov)
Councilmember Robinson (via e-mail: drobinson@lakeforestca.gov)

*

Dana Point

*

Lake Forest

*

Norco

*

D-1

Response to Letter D: Richard Fell, El Toro Mini-Partners LP

Response D-1: The commenter references a previously-submitted comment letter (shown as Letter C, above), and again expresses a desire for the UR-25 designation on the commenter's subject property. The commenter is referred to Responses C-2 and C-3. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.



October 2, 2019

VIA E-MAIL AND U.S. MAIL

Letter E

Gail Ackerman, Director of Development Services
 City of Lake Forest
 25550 Commercentre Drive, Suite 100
 Lake Forest, CA 92630
 E-mail: gackerman@lakeforestca.gov

Re: Request for Notice of City of Lake Forest Projects Subject to CEQA Near SR 73, Lake Forest Drive, and/or El Toro Road

Dear Ms. Ackerman,

The City of Laguna Beach hereby requests timely written notice of all proposed projects within the City of Lake Forest, near SR 73, Lake Forest Drive, and/or El Toro Road, for which an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration will be prepared. This request for notice also applies to the currently pending Lake Forest General Plan Update environmental review and adoption process for which a Notice of Preparation of a Draft EIR was recently released.

As an agency with jurisdiction over major local arterials that may be significantly impacted by development activities, Laguna Beach seeks inter-agency consultation with Lake Forest concerning each of the above-referenced proposed projects, pursuant to the CEQA statute and consistent with Lake Forest's Local Guidelines for Implementing CEQA.¹ More specifically, this request for notice and timely consultation is made pursuant to Public Resources Code, sections 21083.9, 21092.2, and 21092.4. Even though annual renewal of requests for notice is ordinarily required under Lake Forest's Local Guidelines for Implementing CEQA, because inter-agency consultation is required, please consider this request perpetual. Please confirm that annual renewal of this request is not necessary under the circumstances.

Pursuant to Public Resources Code, section 21092.2(a), such notice may be provided via e-mail, addressed to both me and Greg Pfost, Director of Community Development. Our respective e-mail addresses are: cjohnson@lagunabeachcity.net and gpfofost@lagunabeachcity.net. In addition, please send a hard copy of such notice to:

City Manager's Office
 City of Laguna Beach
 505 Forest Avenue
 Laguna Beach, CA 92651

¹ See Local Guidelines for Implementing CEQA, pp. 7-3, 7-8 – 7-10.

Request for Notice of City of Lake Forest Projects
October 2, 2019
Page 2 of 2

Please let me know if you have any questions or concerns regarding this request for notice and consultation. Thank you in advance for your cooperation.

Sincerely,



Christa Johnson
Assistant City Manager

Response to Letter E: Christa Johnson, Assistant City Manager, City of Laguna Beach

Response E-1: The commenter requests timely notification of all proposed projects within the City of Lake Forest near SR 73, Lake Forest Drive, and/or El Toro Road for which a CEQA document will be prepared. This request also applies to the ongoing General Plan Update. The City appreciates this comment and will continue to provide timely notification of relevant CEQA projects, including the General Plan Update, to the City of Laguna Beach. The commenter has not addressed the Draft EIR or identified any alleged inadequacies in the Draft, and no further response is required.



The Lake Forest General Plan
 Draft Environmental Impact Report
 Comment Form
Letter F

RECEIVED

NOV 15 2019
 CITY OF LAKE FOREST
 COMMUNITY DEVELOPMENT

Overview

This form may be used to provide comments regarding the Draft Environmental Impact Report (Draft EIR). Comments should raise important environmental issues related to implementation of the General Plan Project or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the General Plan Project on the environment pursuant to CEQA. Comments that address policy issues, personal opinions, or other topics beyond the purview of the Draft EIR or CEQA shall be collected and noted as such for the public record. It is important to be as clear as possible in your comments. No specific development projects are proposed as part of the General Plan Update; however, the General Plan will accommodate future growth in Lake Forest, including new businesses, expansion of existing businesses, and new residential uses.

How to Provide Comments

Comments must be received by Monday December 23, 2019 at 6:00 PM. To ensure all comments are accurately recorded and responded to, oral comments will not be accepted. Comments must be provided in writing in one of three ways:

1. **Submitted in person** to the City of Lake Forest Community Development Department at 25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630.
2. **Submitted in writing**, through regular postal service, to Gayle Ackerman, AICP, Director of Community Development, City of Lake Forest, 25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630.
3. **Submitted via email**, to GAckerman@lakeforestca.gov.

Your Name: Randy Johnson
 Your Email or Address: ixrandy@hotmail.com

Your Comments:
I am very concerned about the general plan's impact on traffic on El Toro Rd north end south of Rockfield. That is already the most congested part of the city. Adding more residential will only compound the problem. Monitor traffic on a Saturday around El Toro + Rockfield today. It is absolutely horrendous. Plus, if you consider the 800 apartments planned at Laguna Hill mall - it would be a total disaster for our city. The environmental Report has no real solution for the traffic problem. I oppose more residential properties around El Toro + Rockfield.

F-1

Response to Letter F: Randy Johnson

Response F-1: The commenter expresses concern over potential increases in traffic and congestion that may occur as a result of subsequent development under the proposed General Plan, specifically near the intersection of El Toro Road and Rockfield Boulevard. The commenter states that the Draft EIR provides no real solutions for traffic congestion. This comment is noted. The commenter is referred to Table 12 in Appendix F of the Draft EIR (the General Plan Traffic Impact Analysis). As shown in Table 12, upon full buildout of the proposed General Plan under 2040 cumulative conditions, the AM peak hour LOS at this intersection would decrease from A to D, while the PM peak hour LOS would decrease from B to C.

The proposed General Plan includes a wide range of policies and actions that would assist in maintaining acceptable traffic operations throughout the City. The Draft EIR includes a detailed analysis of potential traffic impacts that are subject to CEQA. As noted in the Draft EIR, level of service (LOS) impacts are no longer subject to CEQA review and analysis. However, potential impacts to LOS associated with General Plan buildout were analyzed as part of the Traffic Impact Analysis for the proposed General Plan, which is included as Appendix F to the Draft EIR. The LOS analysis was included for informational purposes, and may be used by the City to identify future roadway and intersection improvements needed in order to maintain acceptable levels of service and traffic operations. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.

December 19, 2019

Attn: Gayle Ackerman

Re: Draft EIR

Ms. Ackerman:

Letter G

I have been studying The Lake Forest General Plan Draft Environmental Impact Report. The Benchmark Plan, which I believe to be EIR Alternative 3: High Density Residential, would rezone significant areas of Lake Forest Districts 1 and 5 from Commercial to Mixed-Use “where new housing opportunities can be located near desirable goods, services, and jobs.” Included in these rezoned areas are businesses which are essential to the lifestyle of the residents of Lake Forest. Once these areas are developed as housing, there is no way to recover the lost commercial capacity.

G-1

Businesses in the areas designated to be rezoned Mixed-Use in District 5 include McDonald’s, Taco Bell, Lake Forest Lanes, Harbor Freight, Home Depot, and Green Thumb Nursery. These businesses are all used frequently by area residents and add tremendously to our quality of life. If, as a result of an economic downturn in the next 40 years, this capacity was lost through the sale and redevelopment of these parcels, the community would lose the conveniences that make day-to-day life bearable. What inducement would there be for someone to occupy housing in an area that lacks basic conveniences? If the aim is to produce low income housing, it would be better to keep the commercial capacity to support the lifestyles of future tenants. Consideration would also need to be given to increased needs for parking and traffic. Parking is already at a premium in the Lake Forest Gateway. Sometimes I need to circle for quite awhile to find a spot.

G-2

Businesses in the areas designated to be rezoned Mixed-Use in District 1 include the Regal Foothill Towne Center Movie Theater and associated food court, Target, Walmart, JoAnn’s, the new Hoag Health Center, Soup Plantation, Outback Steakhouse, and other community assets. The same problem applies here as in District 5: if this capacity was lost through the sale and redevelopment of these parcels, the community would lose businesses essential to our way of life. Target and Walmart offer some of the only options in the city for moderately priced clothing, furniture, and housewares. The theater provides entertainment. Most of the “Shop and Dine Lake Forest” dining options are here. As a resident, how far would I need to go to get these services if I could not get them here? Where else would I have to spend my money? Why would I choose to live somewhere that forces me to go elsewhere for day-to-day conveniences?

G-3

EIR Alternative 3 is crafted to support an increase of at least 14,300 units, 42,600 people, 1.24M nonresidential square feet, and 3200 jobs. EIR Alternative 2: Reduced Mixed Growth does almost as well while preserving most of the commercial capacity that is essential to the way of life of the average citizen residing in Lake Forest. EIR Alternative 2 supports an increase of at least 11,000 units, 33,000 people, 1.27M nonresidential square feet, and 2,700 jobs. EIR Alternative 2 allows for growth while preserving our way of life. I urge you to select EIR Alternative 2.

Sincerely,

Michelle Sugimoto

Response to Letter G: Michelle Sugimoto

- Response G-1:** The commenter (incorrectly) states that the Benchmark Plan (which is the preferred Land Use Map) is analyzed as Alternative 3 in the Draft EIR. For clarification, it is noted that the Benchmark Plan is analyzed as the Proposed Project (not an alternative) in the Draft EIR. The commenter further states Alternative 3 (the High Density Residential Alternative) may result in the conversion of commercial uses to residential uses. The commenter does not address the adequacy of the Draft EIR. To the extent that the comment references alleged “lost commercial capacity,” alleged economic effects “shall not be treated as significant effects on the environment.” (CEQA Guidelines § 15131(a).) This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.
- Response G-2:** The commenter expresses concern over the potential conversion of existing businesses and commercial uses to residential uses. The commenter does not address the adequacy of the Draft EIR. The comment also references alleged social and economic issues, which “shall not be treated as significant effects on the environment.” (CEQA Guidelines § 15131(a).) This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.
- Response G-3:** The commenter expresses support for EIR Alternative 2. The commenter does not address the adequacy of the Draft EIR. The comment also references alleged social and economic issues, which “shall not be treated as significant effects on the environment.” (CEQA Guidelines § 15131(a).) This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.



The Lake Forest General Plan
Draft Environmental Impact Report
Comment Form

Letter H

Overview

This form may be used to provide comments regarding the Draft Environmental Impact Report (Draft EIR). Comments should raise important environmental issues related to implementation of the General Plan Project or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the General Plan Project on the environment pursuant to CEQA. Comments that address policy issues, personal opinions, or other topics beyond the purview of the Draft EIR or CEQA shall be collected and noted as such for the public record. It is important to be as clear as possible in your comments. No specific development projects are proposed as part of the General Plan Update; however, the General Plan will accommodate future growth in Lake Forest, including new businesses, expansion of existing businesses, and new residential uses.

How to Provide Comments

Comments must be received by Monday December 23, 2019 at 6:00 PM. To ensure all comments are accurately recorded and responded to, oral comments will not be accepted. Comments must be provided in writing in one of three ways:

1. **Submitted in person** to the City of Lake Forest Community Development Department at 25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630.
2. **Submitted in writing**, through regular postal service, to Gayle Ackerman, AICP, Director of Community Development, City of Lake Forest, 25550 Commercentre Drive, Suite 100, Lake Forest, CA 92630.
3. **Submitted via email**, to GAckerman@lakeforestca.gov.

Your Name: Michael Davison

Your Email or Address: miked@intech-lasers.com

Your Comments:

Drainage issue due to current and ongoing development.

With all the development up-slope from the Serrano Park community, the runoff has increased during heavy rains. This is creating a heavier load on the drainage troughs on the slope behind Avenida Ampola. As up-slope development continues, these troughs need to be upgraded. We are already seeing slope failures during heavy rain.

H-1



The Lake Forest General Plan Draft Environmental Impact Report Comment Form

Overview

This form may be used to provide comments regarding the Draft Environmental Impact Report (Draft EIR). Comments should raise important environmental issues related to implementation of the General Plan Project or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the General Plan Project on the environment pursuant to CEQA. Comments that address policy issues, personal opinions, or other topics beyond the purview of the Draft EIR or CEQA shall be collected and noted as such for the public record. It is important to be as clear as possible in your comments. No specific development projects are proposed as part of the General Plan Update; however, the General Plan will accommodate future growth in Lake Forest, including new businesses, expansion of existing businesses, and new residential uses.

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3. **Submitted via email**, to GAckerman@lakeforestca.gov.

Your Name: Michael Davison

Your Email or Address: miked@intech-lasers.com

Your Comments:

Reclaimed Water:

The plan calls for converting to reclaimed water for as much outdoor use as possible. As we grow, this becomes more important since drinkable water is limited. However, we do not have the infrastructure to support conversion of older communities to reclaimed water. This limits our ability to support increasing tree canopies and protecting trees during droughts.

The plan needs to include expanding the availability and ease of connection of older areas to reclaimed water. Serrano Park has 32 acres of 40 year old green belts containing about 2000 trees we would like to convert to reclaimed water irrigation but the cost is too high to connect most of this area. As such, we lost a lot of trees to drought-related insect and disease damage in the last drought. This was not an issue when the trees were originally planted.

H-2



**The Lake Forest General Plan
Draft Environmental Impact Report
Comment Form**

Overview

This form may be used to provide comments regarding the Draft Environmental Impact Report (Draft EIR). Comments should raise important environmental issues related to implementation of the General Plan Project or pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the General Plan Project on the environment pursuant to CEQA. Comments that address policy issues, personal opinions, or other topics beyond the purview of the Draft EIR or CEQA shall be collected and noted as such for the public record. It is important to be as clear as possible in your comments. No specific development projects are proposed as part of the General Plan Update; however, the General Plan will accommodate future growth in Lake Forest, including new businesses, expansion of existing businesses, and new residential uses.

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3. **Submitted via email**, to GAckerman@lakeforestca.gov.

Your Name: Michael Davison

Your Email or Address: miked@intech-lasers.com

Your Comments:

Street Tree Issues:

The plan calls for increasing our tree canopy and use of street trees. The problem is in implimentation.

We have too narrow of a planting area left for street trees. As the trees age, the sidewalks are cracked and the trees can easily suffer stress from over pruning.

We need to have a plan that adresses this. Some communities are installing root barriers along sidewalks for all new street trees. Recycled rubber sidewalks don't crack from the roots. Or we need to go back to much wider parkways that give the trees more room.

Whatever we do, we need a plan that allows for mature street trees that are compatible with streets and sidewalks.

H-3

Response to Letter H: Michael Davison

Response H-1: The commenter notes concerns related to increased stormwater runoff from new development areas and areas upslope from developed areas. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.

Response H-2: The commenter notes the importance of using reclaimed water for landscape irrigation and expresses support for expansions to the reclaimed water distribution infrastructure in Lake Forest. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.

Response H-3: The commenter identifies existing concerns related to street trees and expresses support for plans that accommodate a mature street tree network without compromising sidewalk integrity. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.

Late Letter
@ PC Dias
12/5/19

December 05, 2019

Letter I

Mr. Jeff Dill
Prothero Enterprises, Inc.
23462 Zandra Drive
Mission Viejo, CA 92691
tel: 949-680-0799

Chairman Thomas Ludden
City of Lake Forest, Planning Commission
25550 Commercentre Drive
Suite # 100
Lake Forest, CA 92630

Re: General Plan Update – Benchmark Land Use Plan – Orange Tree Shopping Center – El Toro Rd.

Chairman Ludden:

I am contacting you today as a representative of *Prothero Enterprises, Inc.* ("Prothero") who is the fee owner of the property located at 23516 – 23562 El Toro Road, Lake Forest, CA 92630, and commonly known as the *Orange Tree Plaza Shopping Center* ("Orange Tree"). With this letter it is my intention to inform the Planning Commission of our position regarding the adoption of the *2040 General Plan* and the *Benchmark Land Use Plan*.

As Lake Forest continues to grow, we understand the city's requirement to plan for a community with a higher density. And, as a company whose roots in the Saddleback Valley go back over 135 years, we understand the reasoning behind the reclassification of certain properties in order to meet that goal.

In regard to this matter, obviously Prothero's main interest is centered around the *Orange Tree Plaza Shopping Center* that is currently zoned commercial. It is our understanding that upon the adoption of the current planning proposals, Orange Tree would be re-zoned to Mixed-Use-32 ("MU-32"). However, per our discussion with Director Ackerman, it is also our understanding that while the Orange Tree property may be re-zoned, it would not lose its ability to operate as a commercial retail center into the future, and the new zoning would preserve Prothero's ability to build a new center, or reconstruct or rehabilitate any of the current structures. Furthermore, the MU-32 classification would actually allow for a dual use of the property as either commercial or mixed-use, or a combination of the two.

I-1

Allowing for this flexibility seems like prudent planning to us, as we obviously do not know exactly what the future holds. As such, please allow this correspondence to serve as Prothero's vote of support for the *2040 General Plan* and the *Benchmark Land Use Plan* and to applaud the good work that the city has done over the recent years.

I-1
Cont

Sincerely,



Jeff Dill
President
Prothero Enterprises, Inc.

Response to Letter I: Jeff Dill, President, Prothero Enterprises, Inc.

Response I-1: This comment was not submitted during the public comment period and as such CEQA does not require a written response. The commenter expresses support for the proposed General Plan Land Use map. The commenter does not address the adequacy of the Draft EIR. This comment is noted, and has been forwarded to the Planning Commission and City Council for their review and consideration.

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This chapter includes minor edits to the EIR. These modifications resulted from responses to comments received during the Draft EIR public review period.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. Changes are provided in revision marks with underline for new text and ~~strike-out for deleted text~~.

3.1 REVISIONS TO THE DRAFT EIR

EXECUTIVE SUMMARY

No changes were made to the Executive Summary of the Draft EIR (DEIR).

1.0 INTRODUCTION

No changes were made to Chapter 1.0 of the DEIR.

2.0 PROJECT DESCRIPTION

No changes were made to Chapter 2.0 of the DEIR

3.1 AESTHETICS AND VISUAL RESOURCES

No changes were made to Section 3.1 of the DEIR.

3.2 AGRICULTURAL AND FOREST RESOURCES

No changes were made to Section 3.2 of the DEIR.

3.3 AIR QUALITY

No changes were made to Section 3.3 of the DEIR.

3.4 BIOLOGICAL RESOURCES

No changes were made to Section 3.4 of the DEIR.

3.5 CULTURAL AND TRIBAL RESOURCES

No changes were made to Section 3.5 of the DEIR.

3.6 GEOLOGY

No changes were made to Section 3.6 of the DEIR.

3.7 GREENHOUSE GAS EMISSIONS AND ENERGY

3.0 ERRATA

It is noted that Section 3.7 of the Draft EIR was significantly revised and included in the Recirculated Draft EIR. No changes were made to Section 3.7 of the Recirculated DEIR.

3.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Section 3.8 of the DEIR.

3.9 HYDROLOGY AND WATER QUALITY

The following change is made on page 3.9-14 of the Draft EIR:

On May 19, 2009, the Santa Ana Regional Water Quality Control Board adopted Order No. R8-2009-0030, NPDES No. CAS618030. On December 16, 2009, the San Diego Regional Water Quality Control Board adopted ~~Order No. R9-200-0002, NPDES No. CAS018740.~~ Order No. R9-2009-0002, NPDES No. CA S018740. These Municipal NPDES Permits require the permittees to continue to implement stormwater quality management programs and develop additional programs in order to control pollutants in stormwater discharges.

3.10 LAND USE PLANNING AND POPULATION/HOUSING

No changes were made to Section 3.10 of the DEIR.

3.11 MINERAL RESOURCES

No changes were made to Section 3.11 of the DEIR.

3.12 NOISE

No changes were made to Section 3.12 of the DEIR.

3.12 PUBLIC SERVICES AND RECREATION

No changes were made to Section 3.12 of the DEIR.

3.14 TRANSPORTATION

No changes were made to Section 3.14 of the DEIR.

3.15 UTILITIES AND SERVICE SYSTEMS

No changes were made to Section 3.15 of the DEIR.

3.16 WILDFIRE

No changes were made to Section 3.16 of the DEIR.

4.0 CUMULATIVE/OTHER CEQA-REQUIRED TOPICS

The following change is made to page 4.0-17. This change does not alter the analysis or significance determination of this cumulative noise impact discussion. This change corrects a typo in the impact heading.

NOISE

Impact 4.12: Cumulative impacts related to noise (Less than Cumulatively Considerable) (~~Considerable Contribution and Significant and Unavoidable~~)

Tables 3.12-15 and 3.12-16 show the existing and cumulative noise levels associated with traffic on the local roadway network, including projects within the Planning Area. Cumulative conditions include traffic due to buildout of the General Plan in addition to pass-through traffic from other jurisdictions. The tables also show the estimated noise level increases which may occur under cumulative conditions.

As shown in the above-referenced tables, cumulative conditions would not contribute to an exceedance of the City's transportation noise standards and would not result in significant increases in traffic noise levels at existing sensitive receptors.

General Plan Policies PS-6.1 through PS-6.10, and Actions PS-6a through PS-6d, are intended to minimize exposure to excessive noise, including noise associated with traffic. Specifically, Policies PS-6.1 and PS-6b support noise-compatible land uses in the vicinity of traffic noise sources and require that new development and infrastructure projects be reviewed for consistency with the noise standards established in Tables PS-1 and PS-2. The proposed General Plan standards required under Policy PS-6.1 and PS-6b, for exposure to traffic noise shown in Table 3.12-15 and Table 3.12-16, do not exceed the noise level standards of the adopted General Plan shown in Table 3.12-10. Policy PS-6.4 and Actions PS-6b and PS-6c would ensure that new development mitigates potential noise impacts through incorporating the noise control treatments necessary to achieve acceptable noise levels. Action PS-6d sets criteria for evaluating future increases in traffic noise levels. Action PS-6a would ensure that the Municipal Code, including the updated noise ordinance, is consistent with the noise standards established in the General Plan. Policy PS-6.6 would encourage working with Caltrans to ensure that adequate noise studies are prepared and that noise mitigation measures are considered in State transportation projects. As described in Impact 3.12-1, implementation of the proposed policies and actions of the General Plan will reduce noise and land use compatibility impacts from vehicular traffic noise sources and would ensure that new development is designed to include noise-attenuating features. As shown in Table 3.12-15 and Table 3.12-16, the traffic noise increases associated with the proposed General Plan do not exceed the applicable noise exposure criteria. Therefore, the proposed General Plan would have a **less than cumulatively considerable** impact relative to traffic noise.

3.0 ERRATA

5.0 ALTERNATIVES

No changes were made to Chapter 5.0 of the DEIR.

6.0 REPORT PREPARERS

No changes were made to Chapter 6.0 of the DEIR.

7.0 REFERENCES

The following references are added to Section 7.0 of the DEIR:

BloombergNEF. 2019. Electric Vehicle Outlook 2019. Available at: <https://about.bnef.com/electric-vehicle-outlook/#toc-viewreport>

California Air Pollution Control Officers Association (CAPCOA). 2010. Quantifying Greenhouse Gas Mitigation Measures. August 2010.

California Air Resources Board. 2017. California's Advanced Clean Cars Midterm Reviews. Appendix A: Analysis of Zero Emission Vehicle Regulation Compliance Scenarios: Estimated minimum 1.2 million ZEVs and PHEVs by 2025. Available at: <https://ww2.arb.ca.gov/resources/documents/2017-midterm-review-report>

California Air Resources Board. 2018. EMFAC2017 Volume III – Technical Documentation (version 1.0.2). July 20, 2018.

CalRecycle. 2020. Facility Reports. Report Type: Jurisdiction of Origin Waste Disposal. Available at: <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Origin/FacilitySummary>

County of Orange, OC Waste & Recycling. 2020. Landfill Information. Available at: <http://www.oilandfills.com/landfill>

Irvine Ranch Water District. 2012. Energy and GHG Master Plan. Available at: <https://www.irwd.com/images/pdf/doing-business/energy-programs/IRWD%20Energy%20%20GHG%20Summary%20Report%20v12.pdf>

Southern California Edison. 2019. Usage Report for Lake Forest (kWh) for 2015, 2016, and 2017.

Southern California Gas Company. 2019. Usage Report for Lake Forest (therms) for 2015, 2016, and 2017.

State of California, Governor's Office of Planning and Research. 2017. General Plan Guidelines: 2017 Update. Available at: <http://opr.ca.gov/planning/general-plan/guidelines.html>

University of South Florida. 2004. Ashish Agarwal. A Comparison of Weekend and Weekday Travel Behavior Characteristics in Urban Areas. Available at: <https://scholarcommons.usf.edu/cgi/viewcontent.cgi?referer=https://www.google.com/&httpsredir=1&article=1935&context=etd>

U.S. Environmental Protection Agency. 2017. Emission Factors for Greenhouse Gas Inventories. Available at: U.S. Environmental Protection Agency. 2004. Air Toxics Risk Assessment Reference Library, Volume 1 Technical Resource Manual. April 2004. p. 2-1.

Victoria Transport Policy Institute. 2010. Transportation Management Programs. Updated March 2016. Available at: <http://www.vtpi.org/tdm/tdm42.htm>.