

ATTACHMENT 1

EXHIBIT B



Environmental Analysis

2021-2029 Housing Element Update

October 2021

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INTRODUCTION

The following pages provide an analysis of the proposed 2021-2029 Housing Element (Project) with respect to the Project's consistency with the 2040 Lake Forest General Plan (2040 General Plan) and the analysis contained in the 2040 Lake Forest General Plan Final Environmental Impact Report (2040 General Plan FEIR) State Clearinghouse No. 2019090102.

As explained in the following pages, the proposed Project is consistent with the 2040 General Plan, for which an EIR was prepared and certified, and there are no impacts associated with the proposed Project that have not been fully addressed in a previous environmental document. The findings presented below demonstrate that no additional environmental analysis is required under the California Environmental Quality Act (CEQA) prior to approval of the proposed Project.

DESCRIPTION OF THE PROPOSED PROJECT

BACKGROUND

The Housing Element is a State-mandated element of the General Plan. The City of Lake Forest must update its Housing Element every eight years. Updates to the Housing Element must meet the requirements of California Government Code Sections 65580-65589. The purposes of the Housing Element are to identify the community's housing needs; to state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs; and to define the policies and programs that the community will implement to achieve the stated goals and objectives.

State law requires that the City accommodate its "fair share" of regional housing needs, which are assigned by the Southern California Association of Governments (SCAG) for all jurisdictions in the SCAG region. SCAG established the 2021-2029 Regional Housing Needs Plan (RHNP) to assign each city and the unincorporated county in the region its fair share of the regional housing need based on a number of factors established by State law (Government Code Section 65584) and regional housing burdens and needs. The objectives of the Regional Housing Needs Allocation (RHNA) are:

- Increase housing supply and the mix of housing types;
- Promote infill, equity, and environment;
- Ensure jobs housing balance and fit;
- Promote regional income equity; and
- Affirmatively further fair housing.

Beyond the income-based housing needs established by the RHNA, the Housing Element must also address special needs groups; such as seniors, persons with disabilities including developmental disabilities, single female parents, large families, farm workers, and homeless persons.

PROJECT LOCATION AND SETTING

The City of Lake Forest is located in southern Orange County, nestled within Saddleback Valley, southwest of the Santa Ana Mountains. Lake Forest is bordered by the cities of Irvine and Mission Viejo, and is within 7 miles (northeast) of the Pacific Ocean. Interstate 5, 405 Freeway, and California State Route 241 provide regional access. Lake Forest has a population of 84,711 (Department of Finance, 2020) and is approximately 16.6 square miles in size. The City incorporated in 1991 and expanded its city limits in 2000 to include the master planned developments of Foothill Ranch and Portola Hills. Although Lake Forest is a relatively new city, the community has a rich history dating back to the mid-1800s.

Lake Forest has the feel of a small community, but with the amenities of a large city. The City provides a diverse range of employment, lifestyle, and housing opportunities, all complemented by the surrounding natural environment. As such, the community has become a desirable place to live, offering lake-front homes, condominiums, town homes, mobile home parks, retirement communities, and affordable housing. Lake Forest's family-oriented atmosphere is especially appealing to those with younger children. The City is served by quality public schools for grades K-12, several preschools, and private elementary schools.

The 2040 General Plan Land Use and Design Element designates the general distribution and intensity of residential, commercial, industrial, open space, public/semi-public, and other categories of public and private land uses throughout the City. It also identifies high-level community design objectives for the City of Lake Forest, including the relationship between the public and private realm, streetscapes, best site planning practices, and placemaking strategies. The Land Use and Design Element is primarily implemented by the City's Zoning Ordinance, which specifies districts and performance standards for various types of land uses described in the 2040 General Plan. The zone districts specify the permitted uses for each category and applicable development standards. The City is currently preparing an update to its Zoning Ordinance to create new mixed-use zones to implement the mixed-use land use designations included in the 2040 General Plan; this update is expected to be completed in 2022.

The Land Use and Design Element includes the Land Use Map, which identifies land use designations for each parcel in the City Limits and Planning Area (Figure LU-1 of the Land Use and Design Element). Table 1 Land Use Development Potential Summary, summarizes the expected development capacity for residential uses within Lake Forest based on reasonable density assumptions for the City and SOI.

TABLE 1: LAKE FOREST LAND USE DEVELOPMENT POTENTIAL SUMMARY

Land Use Designation	Acres (1)	Allowed Density and/or Intensity	Assumed Density and/or Intensity (2)	Units	Population (3)	Non-Residential Square Feet	Jobs (4)
RESIDENTIAL LAND USES							
Very Low Density	-	0-2 du/ac	1 du/ac	-	-	-	-
Low Density	2,499	2-7 du/ac	6.8 du/ac	17,023	50,559	-	-
Low-Medium Density	880	7-15 du/ac	10.9 du/ac	9,589	28,481	-	-
Medium Density	361	15-25 du/ac	22 du/ac	7,931	23,555	-	-
High Density	16	25-43 du/ac	38 du/ac	620	1,840	-	-
Residential Subtotal	3,756			35,163	104,435	-	-
NON-RESIDENTIAL LAND USES							
Commercial	341	1.0:1 FAR	0.25 FAR	-	-	3,718,616	8,263
Professional Office	12	1.2:1 FAR	0.30 FAR	-	-	156,816	522
Business Park	298	1.0:1 FAR	0.35 FAR	-	-	4,545,819	7,576
Light Industrial	627	0.60:1 FAR	0.35 FAR	-	-	9,565,602	15,943
Public Facility	373	1.2:1 FAR	0.05 FAR	-	-	811,508	812
Non-Residential Subtotal	1,651			-	-	18,798,361	33,116
MIXED-USE LAND USES							
Mixed-Use 32	49	32 du/ac 1.0:1 FAR	32 du/ac; 0.25 FAR	1,570	4,663	534,327	1,186
Mixed-Use 43	312	43 du/ac 1.2:1 FAR	36 du/ac (2); 0.40 FAR	8,179	24,290	5,429,287	12,067
Mixed-Use Office	24	1.5:1 FAR	0.50 FAR	-	-	513,715	1,284
Urban Industrial 25	95	25 du/ac 1.0:1 FAR	22 du/ac; 0.40 FAR	2,090	6,207	1,655,280	2,758
Urban Industrial 43	22	43 du/ac 1.2:1 FAR	36 du/ac; 0.40 FAR	792	2,352	323,328	539
Mixed-Use Subtotal	502			12,631	37,512	8,455,937	17,834
LIMITED DEVELOPMENT LAND USES							
Community Park/Open Space	249	0.40:1 FAR	0.0025 FAR	-	-	27,148	27
Regional Park/Open Space	1,939	0.10:1 FAR	0.0001 FAR	-	-	8,448	8
Open Space	877	0.40:1 FAR	-	-	-	-	-
Lake	58	-	-	-	-	-	-
Transportation Corridor	30	0.20:1 FAR	-	-	-	-	-
Right-of-Way	1,681	-	-	-	-	-	-
Limited Development Subtotal	4,834			-	-	35,596	36
Totals	10,742			47,794	141,947	27,289,894	50,986

1. Acres are given as adjusted gross acreages, which do not include the right-of-way for major roadways, flood control facilities, or railroads.
2. Density/intensity includes both residential density, expressed as dwelling units per acre, and nonresidential intensity, expressed as floor area ratio (FAR), which is the amount of building square feet in relation to the size of the lot. Historically, citywide buildout levels do not achieve the maximum allowable density/intensity on every parcel, and are, on average, lower than allowed by the General Plan. Accordingly, the projections in this General Plan do not assume buildout at the maximum density or intensity but are adjusted downward to account for variations in development.
3. Estimates of population are based on average household size of 2.97, as identified by the California Department of Finance, 2018.
4. Estimates of jobs by land use designation are based on employment generation rates derived from the Longitudinal Employer-Household Dynamics (2015) Report.

CHARACTERISTICS OF PROPOSED PROJECT REVISIONS/ADDITIONS

The project analyzed herein involves the 2021-2029 Housing Element Update. The proposed update would not modify the 2040 General Plan Land Use Map, land use designations, or intensities/densities identified within the 2040 General Plan Land Use and Design Element. No changes to the maximum development potential approved for the 2040 General Plan and analyzed in the 2040 General Plan FEIR would occur with the proposed Project.

In compliance with State Housing Element Law requirements, the City of Lake Forest has prepared the 2021-2029 Housing Element (Project) to:

- Provide goals, policies, quantified objectives and scheduled programs to preserve, improve and develop housing
- Identify and analyze existing and projected housing needs for all economic segments of the community
- Identify adequate sites that are zoned and available within the 8-year housing cycle to meet the City's fair share of regional housing needs at all income levels
- Affirmatively further fair housing
- Be certified (approved) by the State Department of Housing and Community Development (HCD) as complying with State law
- Be internally consistent with other parts of the General Plan

HOUSING ELEMENT ORGANIZATION

The proposed Housing Element Update covers the October 15, 2021 through October 15, 2029 planning period and is comprised of the following components:

Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan", which includes the goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments which comprise Lake Forest. To this end, the Housing Plan focuses on:

- 1) Encouraging housing diversity and opportunities;
- 2) Maintaining, preserving, and conserving existing residential neighborhoods;
- 3) Increasing opportunities for home ownership;
- 4) Promoting equal opportunity for all residents to reside in the housing of their choice.

The Housing Plan includes only minor modifications to the City's current Housing Element Goals and Policies. The Housing Plan includes a number of new programs to address State housing law including future required updates to the Lake Forest Zoning Ordinance, new programs to support affirmatively furthering fair housing, and tracking and reporting requirements for Housing Sites.

Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the “Background Report” which identifies the nature and extent of Lake Forest’s housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. The Background Report comprehensively updates the background context and conditions identified in the City’s current Housing Element.

Appendix A: Housing Sites Inventory

The Housing Element must include an inventory of land suitable and available for residential development to meet the City’s regional housing need by income level. The California Department of Housing and Community Development (HCD) requires that the Housing Sites Inventory be prepared using a State-approved format, included as Appendix A. No land use changes are proposed to accommodate the City’s Regional Housing Needs Allocation (RHNA); future residential development is expected to occur in those areas already identified for residential uses including land within mixed-use areas identified in the 2040 General Plan. All sites identified in the City’s Housing Sites Inventory are currently identified for new development consistent with the potential development capacities identified in Appendix A.

Appendix B: Public Engagement Summary

As part of the Housing Element Update process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Public participation played an important role in the refinement of the City’s housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public’s input also helped to validate and expand upon the contextual information included in Part 2: Background Report. The City’s efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.

CAPACITY TO MEET REGIONAL HOUSING NEEDS

As determined by SCAG, the City of Lake Forest’s fair share allocation (RHNA) is 3,236 new housing units during this planning cycle. This includes: 956 units affordable to extremely/very low income households; 543 units affordable to low income households; 559 units affordable to moderate income households; and 1,178 units affordable to above moderate income households. State Income Limits which are used to determine affordability levels are set annually by the California Department of Housing and Community Development.

Progress Towards the RHNA

RHNA uses June 30, 2021 as the baseline for growth projections for the 2021-2029 planning period. Jurisdictions may count toward the RHNA housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2021. Since this time, 755 housing units have been developed, are under construction, or have received their building permits in Lake Forest. Jurisdictions may also count projects that are approved/entitled but not yet built or under construction; 753 units in multiple income categories, have been approved/entitled and are expected to be developed within the planning period. With these units taken into account, Lake Forest has a remaining RHNA of 1,846 units (848 extremely low/very low income units, 445 low income units, 553 moderate income units); a surplus of 118 unit occurs within the above-moderate income units.

TABLE 2: REMAINING 6TH CYCLE RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	956	543	559	1,178	3,236
Constructed, Under Construction/Permits Issued (Since 6/30/2021)	1	1	1	752	755
Units Approved/Entitled	107	97	5	544	753
Remaining Allocation	848	445	553	0 (with surplus of 118 units)	1,846*

Source: City of Lake Forest, 2021, Southern California Association of Governments, 2021

*The total remaining allocation is the remaining allocation of extremely low/very low, low, and moderate income units (848, 445, and 553, respectively). This results in a remaining allocation of 1,846 units. The surplus of above moderate-income units (118) cannot be deducted from the remaining allocation, which is based on the remaining allocation by income level.

Residential Sites Inventory to Accommodate Remaining RHNA

The City has sufficient land appropriately zoned for residential uses throughout the community to accommodate its remaining RHNA (1,846 units) for the 2021-2029 planning period. The City of Lake Forest's 6th Cycle residential sites fall into three categories:

- 1) *Accessory dwelling units.* ADUs are allowed on any lot that is zoned for single-family or multifamily dwelling residential use. In 2020 the City updated its ADU ordinance to encourage the production of ADUs throughout the community. The City approved two ADUs in 2018, three ADUs in 2019, and seven ADUs in 2020. The City continues to promote ADUs as a way to expand the City's housing stock and anticipates production to continue at or above 2020 levels for the duration of the planning period. The City has assumed production of ADUs at a rate of 4 units per year for the 8 year planning period, resulting in an assumed production of 32 ADUs from 2021-2029.

- 2) *Underutilized residential sites.* As part of this Housing Element update, the City has identified two properties currently designated for residential development as suitable for accommodating a portion of the City's moderate and above moderate-income RHNA allocation. These vacant properties have the potential to yield 382 units, assuming each parcel is developed at 80% of its maximum capacity.
- 3) *Underutilized sites in mixed-use areas.* As described in the City's Land Use Element, new residential growth is anticipated to occur in mixed-use focus areas located throughout the City. As part of the City's General Plan Update, over 383 acres were designated for mixed-use development allowing for densities of at least 30 du/ac. The Housing Element only relies on 123 acres of the 383 acres designated for such development, or just over 32%. Only 50% of the development potential at mixed-use sites has been allocated to accommodate the City's RHNA allocation, to account for potential mixed-use and non-residential development on portions of the sites. Based on this methodology, underutilized sites in mixed-use areas have the potential to yield 2,965 units.

TABLE 3: COMPARISON OF RHNA CANDIDATE SITES REALISTIC CAPACITY AND RHNA

Status	Extremely Low/Very Low	Low	Moderate	Above Moderate	TOTAL
Remaining 6th Cycle RHNA	848	445	553	0 (with a surplus of 118 units)	1,846
ADUs	8	14	9	1	32
Underutilized Residential Sites*	0	0	187	195	382
Underutilized Sites in Mixed-Use Areas*	1,167	608	979	218	2,965
Total	+327 (surplus)	+177 (surplus)	+622 (surplus)	+532 (surplus)	+1,658 (surplus)

Notes: *The realistic capacity analysis of underutilized residential land assumes that only 80% of the potential capacity would be realized. The realistic capacity analysis of underutilized sites in mixed-use areas assumes that only 50% of the potential capacity of development would be realized. If the sites develop closer to their maximum capacity, which has been realized as part of past projects, the City's surplus of units affordable to lower-income households would be significantly higher.

SUMMARY OF HOUSING ELEMENT MODIFICATIONS

As previously noted, State law requires that the Housing Element be reviewed and updated not less than every eight years, in order to remain relevant and useful, and reflect a community's changing housing needs. The proposed Housing Element Update involves minor changes/additions to the Housing Element and environmental conditions under which it would be implemented. The following summarizes the modifications to the Housing Element, as compared to the 2013-2021 Housing Element:

Goals, Policies, and Programs (Part 1: Housing Plan)

The City made minor modifications to the Policies included in the Housing Element to reflect the City's current housing needs and State mandates.

The Housing Plan revises existing policies to better reflect state law regarding the provision of special needs housing, removing governmental and nongovernmental constraints, and affirmatively furthering fair housing. Revised goals and policies include:

- Policy 2.1: Quality and Conditions of Existing Housing Stock
- Policy 2.3: Rehabilitation and Home Improvement Funding
- Policy 2.6: Rental and Homeownership Opportunities
- Policy 3.2: State and Federal Funding Sources for Fair Home Purpose Options
- Policy 4.3: Enforcement of Fair Housing Laws

The Housing Plan includes new policy direction, consistent with state law, related to maintaining adequate capacity to accommodate the City's RHNA at all income levels for the duration of the planning period, the reuse of sites identified in prior Housing Elements, and reducing impacts associated with nongovernmental constraints. New policies include:

- Policy 1.7: Maintain Adequate Capacity
- Policy 1.8: By-Right Approval for Qualified Sites Identified in Past Inventories

The Housing Plan includes numerous revisions to existing programs to better reflect the community's housing needs. Revised programs include:

- Program 1: Land Use Policy, Entitlements and Development Capacity
- Program 2: Monitor Residential Capacity (No Net Loss)
- Program 5: Facilitate Affordable and Special Needs Housing Construction
- Program 6: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws
- Program 9: Sites for Homeless Shelters/Homeless Prevention and Assistance Services
- Program 10: Transitional/Supportive and Affordable Housing
- Program 11: Coordination with Social Service Agencies
- Program 14: Rental Assistance
- Program 15: Conservation of Existing Affordable Units
- Program 16: Housing Rehabilitation Loan Program
- Program 17: Code Enforcement and Neighborhood Preservation
- Program 20: Homebuyer Assistance Programs
- Program 21: Fair Housing Services

The Housing Plan includes new programs consistent with state law and the goals and policies included in the City's Housing Element. New programs include:

- Program 3: Public Property Conversion to Housing Program
- Program 4: Replacement of Affordable Units
- Program 7: Zoning Code Amendments – Housing Constraints
- Program 8: Accessory Dwelling Units
- Program 12: California Accessibility Standards Compliance Program
- Program 13: Density Bonus Implementation Program
- Program 18: Energy Conservation and Energy Efficiency Opportunities
- Program 19: Lead Based Paint Education and Reduction Program
- Program 22: Affirmatively Furthering Fair Housing Outreach and Coordination Program
- Program 23: Economic Displacement Risk Analysis

All other Goals, Policies and Programs are reflective of the City's current Housing Element with limited or no modifications to reflect current conditions.

Background Information (Part 2: Background Report)

The Background Report of the Housing Element has been comprehensively updated to include current information. This section of the Housing Element includes: Introduction, Accomplishments Under 5th Cycle Housing Element, Housing Needs Assessment, Constraints, Housing Resources, and Affirmatively Furthering Fair Housing Analysis.

Appendix A: Housings Sites Inventory

The City has updated its Housing Sites Inventory to demonstrate capacity to accommodate its 2021-2029 RHNA. The Housing Sites Inventory includes a list of sites appropriate to accommodate the RHNA at the appropriate densities and income levels and includes sites identified in the Current Housing Element and other sites designated for residential development consistent with the City's 2040 General Plan. No land use changes are proposed as part of the 2021-2029 Housing Element.

Appendix B: Public Engagement Summary

The public engagement program conducted as part of the Housing Element Update project is summarized in Appendix B.

PREVIOUS ENVIRONMENTAL ANALYSES APPLICABLE TO THE PROPOSED PROJECT

In June 2020, the Lake Forest City Council considered and certified the Final EIR (State Clearinghouse No. 2019090102) for the 2040 Lake Forest General Plan. The 2040 General Plan FEIR evaluated the anticipated development that could occur within the Planning Area based upon land use densities and intensities proposed as part of the 2040 General Plan.

The proposed Project would be consistent with the development densities established by the 2040 General Plan policies for which the 2040 General Plan FEIR was certified. Residential development consistent with the 2040 General Plan, including cumulative impacts, were fully addressed in the 2040 General Plan FEIR.

CEQA GUIDELINES SECTION 15183

The Housing Element Update is a Project under CEQA and was analyzed in the 2040 General Plan FEIR. California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. As noted below, the proposed Project is consistent with the land use designations and densities established by the 2040 General Plan, for which an EIR was certified. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

15183. Projects Consistent with a Community Plan or Zoning

- (a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.
- (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
 - (1) Are peculiar to the project or the parcel on which the project would be located,
 - (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
 - (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or

- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.
- (c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.
- (d) This section shall apply only to projects which meet the following conditions:
- (1) The project is consistent with:
- (A) A community plan adopted as part of a general plan,
- (B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
- (C) A general plan of a local agency, and
- (2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.
- (e) This section shall limit the analysis of only those significant environmental effects for which:
- (1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and
- (2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.
- (f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found

within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.

- (g) Examples of uniformly applied development policies or standards include, but are not limited to:
 - (1) Parking ordinances.
 - (2) Public access requirements.
 - (3) Grading ordinances.
 - (4) Hillside development ordinances.
 - (5) Flood plain ordinances.
 - (6) Habitat protection or conservation ordinances.
 - (7) View protection ordinances.
 - (8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.
- (h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.
- (i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.
 - (1) “Community plan” is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.
 - (2) For purposes of this section, “consistent” means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the

general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

- (j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.

PROJECT ENVIRONMENTAL REVIEW CONCLUSION

A comprehensive environmental evaluation has been completed for the Project as documented in the attached Environmental Analysis. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density established by the 2040 General Plan, as analyzed by the 2040 General Plan FEIR, and all required findings can be made. The proposed Project would not result in: 1) a peculiar impact that was not identified as a significant impact under the 2040 General Plan FEIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the 2040 General Plan FEIR.

ENVIRONMENTAL ANALYSIS

This section of the Environmental Analysis incorporates the most current Appendix "G" Environmental Checklist Form contained in the CEQA Guidelines. Impact questions and responses are included in narrative formats for each of the environmental topic areas.

I. AESTHETICS

The 2040 General Plan FEIR determined that impacts to aesthetic resources would be less than significant through the implementation of policies and actions in the 2040 General Plan.

While the Lake Forest Planning Area contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in the Planning Area. Additionally, there are no officially designated scenic highways located in the vicinity of Lake Forest. Significant visual resources in the Planning Area include several prominent creeks, including Aliso Creek, Serrano Creek, San Diego Creek, and the Borrego Canyon Wash, and the Eucalyptus groves that surround portions of the lakes. Other prominent visual features throughout the Planning Area include views of ridgelines, hillsides, and canyons.

Implementation of the 2040 General Plan could lead to new and expanded urban and suburban development throughout the City. This new development may result in changes to the skyline throughout the Planning Area, which may obstruct or interfere with views of visual features surrounding the Planning Area. Furthermore, buildout under the 2040 General Plan and implementation of the 2040 General Plan Land Use Map has the potential to result in new and expanded development along highway corridors with high scenic values, even though these corridors are not officially designated as State Scenic Highways. Additionally, expanded development could occur alongside roadways within the City of Lake Forest considered landscape corridors by the Orange County General Plan, which include El Toro Road and a portion of Santa Margarita Parkway. This is considered a potentially significant impact, which would be mitigated to a less than significant level through the implementation of the policies and actions in the 2040 General Plan.

Zoning and other regulations governing scenic quality applicable to the City of Lake Forest include the Lake Forest Citywide Design Guidelines, the El Toro Redevelopment Project Area Design Guidelines, the Light Industrial Design Guidelines. Policies in the 2040 General Plan are intended to complement and further the intent of these provisions regulating scenic quality and resources, and any development occurring under the 2040 General Plan would be subject to compliance with these guidelines, as well as the applicable regulations set forth in the Lake Forest Municipal Code. The 2040 General Plan would therefore not substantially degrade the existing visual character or quality of public views of the Sphere of Influence and its surroundings. Scenic quality-related impacts associated with the 2040 General Plan implementation would thus be less than significant.

The primary sources of daytime glare are generally sunlight reflecting from structures and other reflective surfaces and windows. Implementation of the 2040 General Plan would introduce new

sources of daytime glare into previously developed areas of the Planning Area and increase the amount of daytime glare in existing urbanized areas. The primary sources of nighttime lighting are generally from exterior building lights, street lights, and vehicle headlights. Nighttime lighting impacts would be most severe in areas that do not currently experience high levels of nighttime lighting. Increased nighttime lighting can reduce visibility of the night sky, resulting in fewer stars being visible and generally detracting from the quality of life in Lake Forest. This is considered a potentially significant impact, which would be mitigated to a less than significant level through the implementation of the policies and actions in the 2040 General Plan.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the City. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to aesthetic resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies protecting aesthetic and visual resources. The 2040 General Plan includes policies and programs to reduce potential impacts to scenic vista resources and to reduce impacts associated with light and glare as a result of new development.

The revisions to the Housing Element would not result in new aesthetic impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to aesthetics as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no aesthetic impacts peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

The 2040 General Plan FEIR determined that impacts to agriculture and forestry resources would be less than significant through the implementation of policies and actions in the 2040 General Plan.

There are approximately 140.3 acres of Important Farmlands located within the City, including 0.2 acres of Prime Farmland and 140.1 acres of Unique Farmland. The Prime Farmland area is currently developed with residential uses (Shea/Baker Ranch Project). The Unique Farmland is located in two nearby areas in the center of the City: one area west of Alton Parkway and south of State Route 241 (adjacent to the 0.2 acres of Prime Farmland), and one area east of Bake Parkway and south of Rancho Parkway. The Unique Farmland area west of Alton Parkway and south of State Route 241 is currently developed with residential uses (Shea/Baker Ranch

Project). The Unique Farmland area east of Bake Parkway and south of Rancho Parkway is known as the Nakase site, which is currently being developed with residential and public uses.

There are no lands within the Lake Forest Planning Area that are currently under a Williamson Act contract. As such, 2040 General Plan implementation would result in no impact to Williamson Act contracts.

There are 521.45 acres of land throughout the Planning Area that are zoned for agricultural use. The City has one zoning district for agricultural uses: A1, Agriculture District. The A1 District is established to provide for agriculture, outdoor recreational uses, and those low intensity uses which have a predominately open space character. It is also intended that this district may be used as an interim zone in those areas which the 2040 General Plan may designate for more intensive urban uses in the future. The majority of the land zoned A1 is currently developed with urban uses or is currently designated for urban uses by both the existing and proposed Land Use Maps. There are some areas in Lake Forest zoned A1 that are not urbanized, but rather, are designated for Regional Park/Open Space uses on the Land Use Map. As previously described, all of the land within the Planning Area is planned for urban development in one form or another, with the exception of areas designated for Open Space or Regional Park/Open Space uses. It is assumed that the land within the City zoned A1 and not designated for Open Space or Regional Park/Open Space uses will eventually be developed with urban land uses, consistent with the proposed Land Use Map. Given the purpose, intent, and flexibility of the established A1 Zoning District, the 2040 General Plan FEIR determined the proposed Land Use Map would not conflict with existing agricultural zoning in the City of Lake Forest.

There are no forest lands or timber lands located within the Lake Forest Planning Area. There are also no parcels that are currently zoned as forest land, timber, or timber production. Therefore, implementation of the 2040 General Plan would have no impact on forest land, timber, or timber production.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or affect any parcels under a Williamson Act contract. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to agricultural and forestry resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies protecting agricultural and forestry resources.

The revisions to the Housing Element would not result in new agricultural or forestry resource impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to agriculture and forestry

resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to agriculture and forestry resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

III. AIR QUALITY

The 2040 General Plan FEIR determined that impacts to air quality would be significant and unavoidable.

Future development in the City of Lake Forest that is consistent with the 2040 General Plan would increase vehicle trips and vehicle miles traveled (VMT) that would result in emissions of ozone precursors and particulate matter. Individual projects under the 2040 General Plan would be required to undergo subsequent environmental review pursuant to CEQA, and would be required to demonstrate compliance with the Air Quality Management Plan (AQMP). Individual projects would also be required to demonstrate compliance with the South Coast Air Quality Management District (SCAQMD) rules and regulations governing air quality. The City of Lake Forest continues to coordinate with the SCAQMD and the Southern California Association of Governments (SCAG) to ensure citywide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. Therefore, the operation of the 2040 General Plan would not conflict with or obstruct the implementation of the applicable air quality plan and impacts are less than significant.

Construction of the growth anticipated by the 2040 General Plan has the potential to temporarily emit criteria air pollutant emissions, and construction-related daily emissions would exceed the SCAQMD significance thresholds for VOCs. Future operations associated with growth anticipated by the 2040 General Plan would generate criteria air pollutant emissions from project-generated vehicle trips traveling within the City, energy sources such as natural gas combustion, and area sources such as landscaping equipment and consumer products usage. The exact level of construction emissions from the development anticipated by the 2040 General Plan cannot be quantified without full detail of the development projects to be implemented and the extent to which mitigation can be applied. Individual projects anticipated by the 2040 General Plan will be required to implement their own environmental review. The proposed policies and actions of the 2040 General Plan would potentially reduce emissions, which could potentially address impacts related to conflicts with an applicable air quality plan. With respect to operational emissions, future development under the 2040 General Plan would be required to comply with AQMP, SIP, CARB, SCAQMD regulations, Title 24 energy efficiency standards, and the proposed project policies and actions. However, as there is no way to determine the effectiveness of such regulations, policies, and actions for individual projects, it is impossible to determine if potential impacts would be reduced to below regulatory thresholds. While implementation of the 2040 General Plan policies and actions would reduce criteria pollutant emissions, the extent to which the impacts would have to be determined on a project-by-project basis, as necessary. Therefore, the 2040 General Plan FEIR determined this impact would be significant and unavoidable.

Criteria air pollutant emissions have the potential to result in health impacts on sensitive receptors located near new development within the 2040 General Plan Planning Area. With respect to local air quality emissions, toxic air contaminant emissions, and health impacts, future development under the 2040 General Plan would be required to comply with AQMP, SIP, CARB, SCAQMD regulations, Title 24 energy efficiency standards, and the 2040 General Plan policies and actions. Implementation of the 2040 General Plan policies and actions would mitigate and reduce such emissions. However, the exact location, type, nature, and size of future projects that may expose sensitive receptors to pollutant concentrations cannot be calculated at this time, as the details of potential future projects are not currently known. As such, there is no way to determine the extent to which these regulations will be, or need to be, implemented, and it is impossible to determine if potential impacts would be reduced to below regulatory thresholds. Additionally, there are no feasible mitigation measures beyond the policies and actions. Therefore, the 2040 General Plan FEIR determined localized operational impacts, construction and operational health and toxic air impacts would remain significant and unavoidable.

With respect to other emissions, future development under the 2040 General Plan would be required to comply with AQMP, SIP, CARB, SCAQMD regulations, Title 24 energy efficiency standards, and the 2040 General Plan policies and actions. Implementation of the 2040 General Plan policies and actions would mitigate and reduce such emissions. However, the exact location, type, nature, and size of future projects that may expose sensitive receptors to pollutant concentrations cannot be calculated at this time, as the details of potential future projects are not currently known. As such, there is no way to determine the extent to which these regulations will be, or need to be, implemented, and it is impossible to determine if potential impacts would be reduced to below regulatory thresholds. Additionally, there are no feasible mitigation measures beyond the policies and actions listed below. Therefore, the 2040 General Plan FEIR determined localized operational impacts, construction and operational health and toxic air impacts would remain significant and unavoidable.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce impacts to air quality and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies related to air quality.

The revisions to the Housing Element would not result in new air quality impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to air quality as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as

such, there are no impacts to air quality peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

IV. BIOLOGICAL RESOURCES

The 2040 General Plan FEIR determined that impacts to biological resources would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Implementation of the 2040 General Plan and Land Use Map would allow and facilitate future development in Lake Forest, which could result in adverse impacts to special-status plant and wildlife species, as well as sensitive natural habitat or wildlife movement corridors. While future development has the potential to result in significant impacts to protected special status plants and animals, including habitat, riparian habitat, wetlands and waters of the U.S. and wildlife movement corridors, the 2040 General Plan FEIR determined implementation of the policies and actions in the 2040 General Plan, as well as Federal and State regulations, would reduce impacts to these resources to a less than significant level.

The City of Lake Forest is a participant in the Orange County Central-Coastal Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP). The 2040 General Plan Land Use Map does not re-designate any land currently designated for open space or habitat protection. As such, the 2040 General Plan and the Land Use Map are consistent with the adopted HCP/NCCP in terms of land uses and habitat protection. Implementation of the 2040 General Plan would not conflict with the provisions of an adopted HCP/NCCP, or other approved local, regional, or State habitat conservation plan. Future projects that do not comply with the Orange County Central-Coastal NCCP/HCP could result in potentially significant impacts, which would be mitigated to a less than significant level through the implementation of 2040 General Plan Action RR-5b.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to biological resources and implement mitigation measures, as appropriate. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce impacts to biological resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies protecting biological resources.

The revisions to the Housing Element would not result in new biological resource impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to biological resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040

General Plan, and as such, there are no impacts to biological resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

V. CULTURAL RESOURCES

The 2040 General Plan FEIR determined that impacts to cultural and tribal cultural resources would be less than significant through the implementation of policies and actions in the 2040 General Plan.

While the 2040 General Plan does not directly propose any adverse changes to any historic or archaeological resources, future development allowed under the 2040 General Plan could affect known historical and archaeological resources or unknown historical and archaeological resources which have not yet been identified. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the City's 2040 General Plan, Municipal Code, and other applicable State and local regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. The 2040 General Plan includes policies and actions that would reduce impacts to cultural, historic, and archaeological resources, as well as policies and actions for the conservation of cultural, historic, and archaeological resources, which would ensure that adverse effects on significant historic and archaeological resources are reduced to a less than significant level.

Excavation and construction activities allowed under the 2040 General Plan may yield human remains that may not be marked in formal burials. Future projects may disturb or destroy buried Native American human remains, including those interred outside of formal cemeteries. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the City's 2040 General Plan, Municipal Code, and other applicable State and local regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. Implementation of the policies and actions in the 2040 General Plan ensures that potential adverse impacts to human remains would be less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to historic and archeological resources and human remains, including Native American artifacts. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to cultural resources and implement mitigation measures, as appropriate. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies protecting cultural resources.

The revisions to the Housing Element would not result in new cultural resource impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to cultural resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to cultural resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

VI. ENERGY

The 2040 General Plan FEIR determined that impacts to energy would be less than significant through the implementation of policies and actions in the 2040 General Plan. This topical area is addressed in the 2040 General Plan FEIR's Greenhouse Gas Emissions and Energy section.

Buildout of the 2040 General Plan would use energy resources for the operation of buildings (electricity and natural gas), for on-road vehicle trips (e.g. gasoline and diesel fuel), and from off-road construction activities (e.g. diesel fuel) associated with buildout of the 2040 General Plan. Developers of individual projects within the Planning Area would be responsible for conserving energy, to the extent feasible, and would rely heavily on reducing per capita energy consumption to achieve this goal, including through Statewide and local measures. Buildout of the 2040 General Plan would be in compliance with all applicable federal, state, and local regulations regulating energy usage. As a result, the 2040 General Plan would not result in any significant adverse impacts related to project energy requirements, energy use inefficiencies, and/or the energy intensiveness of materials by amount and fuel type for during 2040 General Plan buildout, including during construction, operations, maintenance, and/or removal. The City of Lake Forest would comply with all existing energy standards, and would not result in significant adverse impacts on energy resources. Buildout of the 2040 General Plan would not be expected cause an inefficient, wasteful, or unnecessary use of energy resources nor conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to energy resources. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts to energy resources. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies addressing energy resources.

The revisions to the Housing Element would not result in new energy resource impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no

new significant or significantly different impacts to energy resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to energy resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

VII. GEOLOGY AND SOILS

The 2040 General Plan FEIR determined that impacts to geology and soils would be less than significant through the implementation of policies and actions in the 2040 General Plan.

There are no known active or potentially active faults, or Alquist-Priolo Earthquake Fault Zones, located within the Planning Area. However, there are numerous faults located in the region. As a result, future development in the City of Lake Forest may expose people or structures to potential adverse effects associated with a seismic event, including strong ground shaking and seismic-related ground failure. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the California Building Standards Commission (CBSC), 2040 General Plan, Zoning Ordinance, and other regulations. Subsequent development and infrastructure would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. In addition to the requirements associated with the CBSC and the Municipal Code, the 2040 General Plan includes policies and actions to address potential impacts associated with seismic activity. With the implementation of the policies and actions in the 2040 General Plan, as well as applicable State and City codes, potential impacts associated with a seismic event, including rupture of an earthquake fault, seismic ground shaking, liquefaction, and landslides would be less than significant.

The 2040 General Plan would allow development and improvement projects that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the CBSC, 2040 General Plan, Zoning Ordinance, and other regulations. In addition to compliance with City standards and policies, the Regional Water Quality Control Board will require a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area of one acre or larger. The 2040 General Plan includes a range of policies and one action related to best management practices, National Pollutant Discharge Elimination System (NPDES) requirements, and minimizing discharge of materials (including eroded soils) into the storm drain system. With the implementation of the policies and actions in the 2040 General Plan, as well as applicable State and City requirements, potential impacts associated with erosion and loss of topsoil would be less than significant.

Development allowed under the 2040 General Plan could result in the exposure of people and structures to conditions that have the potential for adverse effects associated with ground instability or failure. Soils and geologic conditions in the Lake Forest Planning Area have the

potential for landslides, lateral spreading, subsidence, liquefaction, or collapse. As future development and infrastructure projects are considered by the City of Lake Forest, each project will be evaluated for conformance with the CBSC, the 2040 General Plan, Zoning Ordinance, and other regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. Future development and improvement projects would be required to have a specific geotechnical study prepared and incorporated into the improvement design, consistent with the requirements of the State and City codes. In addition to the requirements associated with the CBSC and the Municipal Code, the 2040 General Plan includes policies and actions to ensure that development projects address potential geologic hazards, at-risk buildings and infrastructure is evaluated for potential risks, and site-specific studies are completed for area subject to liquefaction. With the implementation of the policies and actions in the 2040 General Plan, as well as applicable State and City codes, potential impacts associated with ground instability or failure would be less than significant.

The majority of the City of Lake Forest has low potential for expansive soils, including most of the developed land. The areas with moderate to high expansive soils represent only a small portion of the City of Lake Forest, and would require special design considerations due to shrink-swell potentials. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the CBSC, 2040 General Plan, Zoning Ordinance, and other applicable regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. Consistency with the 2040 General Plan policies will require identification of geologic hazards and risk inventory of existing at-risk buildings and infrastructure. Design criteria and specifications set forth in the design-level geotechnical investigation will ensure impacts from problematic soils are minimized. There are no additional significant adverse environmental impacts that are anticipated to occur associated with expansive soils. Therefore, this impact is considered less than significant.

There will be no septic tanks or alternative waste water disposal systems utilized for new development planned under the 2040 General Plan. Therefore, 2040 General Plan implementation does not have the potential to have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; this impact is considered less than significant.

It is possible that undiscovered paleontological resources could be encountered during ground-disturbing activities. This is considered a potentially significant impact, which would be mitigated to a less than significant level through the implementation of the policies and actions in the 2040 General Plan.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning

Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts associated with geology and soils. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with geology and soils, including preparation of site-specific geotechnical analysis and required compliance with the Lake Forest Municipal Code. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies regarding geology and soils.

The revisions to the Housing Element would not result in new impacts to geology and soils beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to geology and soils as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to geology and soils peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

VIII. GREENHOUSE GAS EMISSIONS

The 2040 General Plan FEIR determined that impacts to greenhouse gas (GHG) emissions would be less than significant through the implementation of policies and actions in the 2040 General Plan.

The City has developed the 2040 General Plan to achieve local per capita GHG emissions levels that would be consistent with the statewide reduction targets established by Assembly Bill (AB) 32, Senate Bill (SB) 32 and the CARB's 2017 Scoping Plan. The 2040 General Plan's approach to GHG reductions is consistent with the framework established by ICLEI – Local Governments for Sustainability, through the "Five Milestones Framework," which offers a systematic approach for analyzing baseline GHG emissions, developing an emissions reduction target, developing and implementing a climate action plan, and monitoring emissions reduction progress. Upon adoption of the 2040 General Plan, and implementation of the policies and actions, the City of Lake Forest would not exceed the per capita GHG emission targets established to ensure compliance with SB 32 and other California legislation for future year 2030 and 2040 General Plan buildout year 2040. Therefore, the 2040 General Plan would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. There is a less than significant impact following adoption and implementation of the policies and actions in the 2040 General Plan.

As future development projects are received and reviewed by the City in subsequent years, those projects will be reviewed for consistency with the 2040 General Plan and all relevant State-level programs and requirements. All future projects must implement the most current version of the Title 24 energy efficiency requirements, as required by State law. Consistency with the 2040

General Plan and other mandatory State-level programs would ensure that future project-level contributions to global climate change would be less than significant.

The 2040 General Plan would be consistent with the CARB's 2017 Scoping Plan, and thus all current statewide GHG reduction laws (i.e. AB 32 and SB 32) relevant to the 2040 General Plan that have been adopted to reduce GHG emissions. The 2040 General Plan would reduce emissions to below the per capita thresholds through buildout of the 2040 General Plan (i.e. for years 2030 and 2040), which ensures that the 2040 General Plan is consistent with all GHG reduction targets established for the state. Therefore, the 2040 General Plan would not conflict with the State of California's GHG reduction goals and targets. The 2040 General Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and impacts would be less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce GHG emission impacts as a result of new development.

The revisions to the Housing Element would not result in new GHG emission impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to GHG emissions as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to GHG emissions peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

The 2040 General Plan FEIR determined that impacts to hazards and hazardous materials would be significant and unavoidable through the implementation of policies and actions in the 2040 General Plan.

Future development, infrastructure, and other projects allowed under the 2040 General Plan may involve the transportation, use, and/or disposal of hazardous materials. Accidental release of hazardous materials that are used in the construction or operation of a project may occur. There is also the potential for accidental release of pre-existing hazardous materials, associated with previous activities on a site. All future projects allowed under the 2040 General Plan would be required to comply with the provisions of Federal, State, and local requirements related to hazardous materials. As future development and infrastructure projects are considered by the City, each project would be evaluated for potential impacts, specific to the project, associated with hazardous materials as required under CEQA. In addition, the 2040 General Plan includes policies and actions to address potential impacts associated with hazardous materials among other

issues. These policies and actions in the 2040 General Plan would ensure that potential hazards are identified on a project site, that development is located in areas where potential exposure to hazards and hazardous materials can be mitigated to an acceptable level, and that business operations comply with Federal and State regulations regarding the use, transport, storage, and disposal of hazardous materials. The 2040 General Plan also includes policies and actions to ensure that the City has adequate emergency response plans and measures to respond in the event of an accidental release of a hazardous substance. Therefore, implementation of the 2040 General Plan policies and actions, as well as Federal and State regulations, would ensure that potential impacts associated with the routine use, transport, storage, or disposal or accidental release of hazardous materials would be reduced to a less than significant level.

The 2040 General Plan is not anticipated to directly lead to the establishment of new businesses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste because the 2040 General Plan does not approve any specific development project. However, given the unknown nature of future business establishments within the commercial and industrial use areas, the potential for hazardous materials is present. Nevertheless, all hazardous materials would be required to be handled in accordance with Federal, State, and County requirements, which would limit the potential for a project to expose nearby uses, including schools, to hazardous emissions or an accidental release. Hazardous emissions are monitored by the SCAQMD, Regional Water Quality Control Board (RWQCB), Department Toxic Substances Control (DTSC) and the local Certified Unified Program Agency (CUPA). In the event of a hazardous materials spill or release, notification and cleanup operations would be performed in compliance with applicable Federal, State, and local regulations and policies, including hazard mitigation plans. As part of the development review process, the City's 2040 General Plan also requires projects that may result in significant risks associated with hazardous materials to include measures to address and reduce the risks to an acceptable level such that surrounding uses are not exposed to hazardous materials in excess of adopted state and federal standards, and also requires the submittal of information regarding hazardous materials manufacturing, storage, use, transport, and/or disposal by existing and proposed businesses and developments to the Orange County Fire Authority. Compliance with all existing regulations as well as 2040 General Plan policies and actions related to land use compatibility and hazardous materials would ensure that the impact is less than significant.

There are no hazardous materials release sites compiled pursuant to Government Code Section 65962.5 located in the 2040 General Plan Planning Area. There are: three locations with a Lake Forest address that are listed in the Envirostor database; 52 locations within Lake Forest (i.e. with a Lake Forest address) that are listed in the GeoTracker database; and two solid waste facilities listed in the SWIS database. These sites are subject to various Federal and State laws and regulatory agencies, including the CERCLA, EPA, DTSC, and RWQCB. Development allowed by the 2040 General Plan could create a hazard to the public or the environment through a disturbance or release of contaminated materials if the development occurs on or adjacent to contaminated sites without appropriate measures to contain or mitigate the existing contamination. Federal and State regulations ensure that existing hazards, including those associated with known

hazardous materials sites, are addressed prior to development. Additionally, before accepting as complete an application for any development project, the Local Guidelines for Implementing the California Environmental Quality Act Section states that the City shall consult lists compiled by the Secretary for Environmental Protection of the California EPA pursuant to Government Code Section 65962.5 listing hazardous waste sites and other specified sites located in the City's boundaries. When acting as Lead Agency, the City shall notify an applicant for a development project if the project site is located on such a list and not already identified. The 2040 General Plan includes policies that are intended to ensure cleanup sites are identified, reviewed, and if needed, remediated, to prevent inappropriate release of hazardous materials. Additionally, compliance with Federal and State regulations and review requirements included in the City's "Local Guidelines for Implementing the California Environmental Quality Act" would ensure that potential impacts associated with the hazardous conditions on sites listed pursuant to Government Code Section 65962.5 would be less than significant.

There are no airport facilities located within the 2040 General Plan Planning Area. The nearest airport facility within the vicinity of the Planning Area is the John Wayne Airport (SNA): SNA is located to the west of the City, in the City of Santa Ana, in the northern part of Orange County. Lake Forest does not lie within the Runway Protection Zone, Inner/Outer Safety Zones, Inner Turning Zone, Sideline Safety Zone, or Traffic Pattern Zone for this airport. None of the Planning Area lies within the land use compatibility zones for nearby airports. In relation to airplane noise 2040 General Plan Policy PS-6.10 states that the City will maintain communication with John Wayne Airport and other relevant air transportation agencies to ensure that all future plans have limited impacts to the community of Lake Forest. However, the 2040 General Plan does not include any policies or actions that would impact air hazards or safety. Implementation of the 2040 General Plan would have a less than significant impact with regard to this issue.

The 2040 General Plan would allow a variety of new development, including residential, commercial, industrial, and public projects, which would result in increased jobs and population in Lake Forest. Future development and infrastructure projects are not anticipated to remove or impede any established evacuation routes within the City. Furthermore, the 2040 General Plan does not include land uses, policies, or other components that conflict with adopted emergency response or evacuation plans. However, given that the type, location, and size of future development and infrastructure projects is not known at this time, there is the potential that the City could receive a development proposal that could potentially interfere with an established emergency evacuation route or plan. The 2040 General Plan ensures that the City's emergency access routes, emergency contact lists, and public information regarding designated facilities and routes are regularly reviewed to ensure that up to date information is available to the City and the public in the event of an emergency. Important new critical facilities would be located to ensure resiliency in the event of a natural disaster. Implementation of the 2040 General Plan policies and actions listed below would reduce this potential impact to a less than significant level.

Wildfires are a potential hazard to development and land uses located in the foothill and forested areas of the city. Local Responsibility Areas (LRA) are concentrated in the incorporated areas of Lake Forest. The eastern portions of the city are categorized as a "Very High" Fire Hazard Severity Zone (FHSZ) by CalFire. State Responsibility Areas just outside the Planning Area are found to the east in the hilly terrain of the Foothills. Specifically, this includes the areas that are outside the city limits. The hilly terrain in this State Responsibility Area is categorized as a "High" FHSZ. Development under the 2040 General Plan would allow development to place people and/or structures in currently developed areas that are identified as having a significant risk of wildland fires. All future projects allowed under the 2040 General Plan would be required to comply with the provisions of Federal, State, and local requirements related to wildland fire hazards, including State fire safety regulations associated with wildland-urban interfaces, fire-safe building standards, and defensible space requirements. As future development and infrastructure projects are considered by the City, each project would be evaluated for potential impacts, specific to the project, associated with wildland fire hazards as required under CEQA. However, even with the policies regulations and standards, given that existing and limited future development in Lake Forest would be allowed in areas identified as having a very high risk of wildfire, there will always be a risk of loss of life and property as a result of wildland fires within populated areas of the City. Therefore, impacts related to this topic would remain significant and unavoidable. Implementation of the 2040 General Plan policies and actions, combined with local and state requirements discussed previously, would ensure that potential wildland fire hazards to people and structures is mitigated to the greatest extent feasible. However, the City cannot state with certainty that this impact would be reduced to a less than significant level. There is no additional feasible mitigation available that would reduce this potential impact to a less than significant level.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts due to hazards or hazardous materials.

The revisions to the Housing Element would not result in new hazards and hazardous materials impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to hazards and hazardous materials as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to hazards and hazardous materials peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

X. HYDROLOGY AND WATER QUALITY

The 2040 General Plan FEIR determined that impacts to hydrology and water quality would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Grading, excavation, removal of vegetation cover, and loading activities associated with future construction activities could temporarily increase runoff, erosion, and sedimentation. Construction activities also could result in soil compaction and wind erosion impacts that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas. The 2040 General Plan sets policies and actions for build-out of the City, but it does not envision or authorize any specific development project. Because of this, the site-specific details of potential future development projects are currently unknown and analysis of potential impacts of such projects is not feasible and would be speculative. However, each future project must include detailed project specific drainage plans that control storm water runoff and erosion, both during and after construction. The RWQCB will require a project specific SWPPP to be prepared for each future project that disturbs an area one acre or larger. The SWPPPs will include project specific best management measures that are designed to control drainage and erosion.

Due to future development and infrastructure projects, the overall volume of runoff in Lake Forest could be increased compared to existing conditions. Future increases in impervious surfaces would result in increased urban runoff, pollutants, and first flush roadway contaminants, as well as an increase in nutrients and other chemicals from landscaped areas. Additionally, if the City's drainage system is not adequately designed, 2040 General Plan buildout could result in localized higher peak flow rates.

The City manages local storm drain facilities and the Orange County Flood Control District (OCFCD) is responsible for regional flood control planning within the County. Provision of stormwater detention facilities as needed would reduce runoff rates and peak flows. The implementation of the 2040 General Plan includes policies aimed to enhance stormwater quality and infiltration as well as actions to review development projects to identify potential stormwater and drainage impacts and require development to include measures to ensure off-site runoff is not increased beyond pre-development levels. Existing regulatory requirements that manage water quality include requirements to obtain approval from the RWQCB for NPDES permits, other discharge permits, WQMPs, SWPPPs, and to implement Best Management Practices. These regulatory requirements are intended to ensure that water quality does not degrade to levels that would violate water quality standards. Through implementation of the 2040 General Plan policies and actions, implementation of the Lake Forest Municipal Code requirements, compliance with mandatory Federal and State regulations, and compliance with the existing regulations for the San Diego Creek and Aliso Creek Watersheds would ensure that impacts to drainage patterns and water quality would be mitigated to a less than significant level.

The City of Lake Forest is underlain by the Orange County Groundwater Basin. The City of Lake Forest does not directly provide water service to its residents. Rather, three separate, independent utility districts provide this service to residents within the City. The majority of the

City of Lake Forest's residents are provided water, wastewater collection, and wastewater treatment services by the Irvine Ranch Water District (IRWD). Residents located along the southwest edge of the City are provided these utility services by El Toro Water District (ETWD). Finally, a small portion of residents in the northeastern section of the City are serviced by Trabuco Canyon Water District (TCWD). IRWD is projected to have significantly more supply than demand in 2035 (the furthest projected year). ETWD's projected 2035 supply is equal to the demand.

Subsequent development projects under the 2040 General Plan, such as residential, commercial, industrial, and roadway projects would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge. However, the majority of the developable areas within the city are currently developed with urban uses. The majority of open undeveloped lands within the city are designated for parks and open space uses. The 2040 General Plan Land Use Map does not re-designate any areas currently designated for open spaces uses to urban uses. Given that implementation and future buildout of the 2040 General Plan would not appreciably add to the volume of impervious surfaces in Lake Forest, when compared to the overall size of the regional groundwater basin recharge area, and that there are adequate water supplies (including groundwater) to serve the projected buildout demand of the 2040 General Plan, this potential impact would be less than significant. Additionally, the 2040 General Plan includes policies that support water conservation, the use of permeable surfaces and the use of recycled water for non-potable uses and coordination with local water districts when planning for adequate capacity to accommodate future growth. The 2040 General Plan and development codes are consistent with the Groundwater Management Plan. Implementation of the following 2040 General Plan policies, combined with allocation standard for water producers set by the OCWD Groundwater Management Plan Basin Production Percentage (BPP), would further ensure that the 2040 General Plan would have a less than significant impact.

2040 General Plan implementation has the potential to impact the Planning Area's storm drainage system. The potential impacts would be primarily derived from development in what are now underdeveloped and/or underutilized areas. The 2040 General Plan sets policies and actions for build-out of the City, but it does not envision or authorize any specific development project. Because of this, the site-specific details of potential future development projects are currently unknown and analysis of potential impacts of such projects is not feasible and would be speculative. Future project applicants would be required to obtain permits from the Army Corps of Engineers and the Department of Fish and Wildlife if any work is performed within a waterway. Each future development project must also include detailed project specific floodplain and drainage studies that assess the drainage characteristics and flood risks so that an appropriate storm drainage plan can be prepared to control storm water runoff, both during and after construction. The drainage plan will ultimately include project specific best management measures that are designed to allow for natural recharge and infiltration of stormwater. Construction of storm drainage improvements would occur as part of an overall development or infrastructure project, and is considered in the environmental impacts associated with project construction and implementation as addressed throughout this EIR. Through implementation of

the 2040 General Plan policies and actions, implementation of the Lake Forest Municipal Code requirements, compliance with mandatory Federal and State regulations, and compliance with the existing regulations for the San Diego Creek and Aliso Creek Watersheds would ensure that impacts related to increased flooding or water quality impacts associated with increased runoff would be mitigated to a less than significant level.

The Planning Area is subject to limited flooding problems along the natural creeks, drainages, and lakes in the Planning Area. Only a small area within Lake Forest is located within a mapped portion of either the 100-year or 500-year FEMA flood zones. The 2040 General Plan would allow development and improvement projects that would involve some land clearing, grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. As required by the Clean Water Act, each subsequent development project or improvement project will require an approved SWPPP that includes best management practices for grading and preservation of topsoil. In addition to complying with the NPDES programs and WQMP stormwater requirements, the 2040 General Plan contains policies to reduce impacts associated with stormwater and drainage including policies to maintain sufficient levels of storm drainage service, improvements to flood control facilities and channel segments, and other best practices in order to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic. The implementation of the 2040 General Plan would result in a less than significant impact

There are no dam inundation areas in the City of Lake Forest. As such, the City is not at significant risk from a dam failure. In addition, limited isolated damage to adjacent and down-slope structures has been observed from seiches occurring in swimming pools and in small shallow lakes and ponds. Man-made lakes within the Planning Area are shallow with limited surface areas, and would not generate devastating seiches. The City of Lake Forest is not within a tsunami hazard area and would not be subject to substantial impacts from seiche events. This is a less than significant impact.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with hydrology and drainage. The 2040 General Plan includes policies and programs to reduce potential impacts to hydrology and water quality, increase water supply, decrease pollutants, and increase groundwater quality to reduce potential impacts.

The revisions to the Housing Element would not result in new hydrology and water quality impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the

recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to hydrology and water as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to hydrology and water quality peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XI. LAND USE AND PLANNING

The 2040 General Plan FEIR determined that impacts to land use and planning would be less than significant through the implementation of policies and actions in the 2040 General Plan.

The 2040 General Plan establishes the City's vision for future growth and development. New development and redevelopment projects would be designed to complement the character of the existing community and neighborhoods and provide connectivity between existing development and new development. The 2040 General Plan does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities. Therefore, the 2040 General Plan would have a less than significant impact associated with the physical division of an established community.

The 2040 General Plan would not remove or conflict with City plans, policies, or regulations adopted for environmental protection. The 2040 General Plan would require modifications to the City's Zoning Ordinance to provide consistency between the 2040 General Plan and zoning; however, these modifications will not remove or adversely modify portions of the Lake Forest Municipal Code that were adopted to mitigate an environmental effect. Subsequent development and infrastructure projects would be required to be consistent with all applicable policies, standards, and regulations, including those land use plans, policies, and regulations adopted to mitigate environmental effects by the City as well as those adopted by agencies with jurisdiction over components of future development projects. Any potential environmental impact associated with conflicts with land use requirements would be less than significant.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use plan and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with land use policies and programs. The 2040 General Plan includes policies and programs to reduce potential impacts resulting from new development and intensification of land uses.

The revisions to the Housing Element would not result in new land use and planning impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to land use and planning as a

result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to land use and planning peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XII. MINERAL RESOURCES

The 2040 General Plan FEIR determined that impacts to mineral resources would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Within the 2040 General Plan Planning Area, mineral resources include sand and gravel. The 62-acre area designated as MRZ-2 is currently developed with residential uses, a baseball field, and a storm drain basin. Given that the only known MRZ in Lake Forest has already been mined and then subsequently developed, there is no additional potential for resource extraction from this MRZ. There are no other known mineral deposits or resources within Lake Forest that are of significant value to the region or the state. As such, implementation of the 2040 General Plan would have a less than significant impact.

The Planning Area does not contain a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The proposed project would not result in loss of a mineral resource. Therefore, this impact is considered less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to mineral resources as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in new mineral resources impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to mineral resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to mineral resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XIII. NOISE

The 2040 General Plan FEIR determined that impacts to noise would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Buildout of the 2040 General Plan would not result to an exceedance of the City's transportation noise standards and/or result in significant increases in traffic noise levels at existing sensitive receptors; this is a less than significant impact.

Future development located along railroad lines could be exposed to unacceptable exterior noise levels. However, implementation of the 2040 General Plan policies and actions would ensure that development allowed under the 2040 General Plan is not exposed to noise levels associated with railroad operations in excess of the City's established standards. This is a less than significant impact.

Implementation of the 2040 General Plan could result in the future development of land uses that generate noise levels in excess of applicable City noise standards for non-transportation noise sources. While the 2040 General Plan does not specifically propose any new noise generating uses, the Land Use Map includes industrial land use designations, which may result in new noise sources. Specific land uses that would be located in the City are not known at this time. The 2040 General Plan includes policies and actions that are intended to reduce noise associated with stationary sources. Implementation of the proposed policies and actions of the 2040 General Plan will reduce noise impacts from stationary noise sources to a less than significant level.

New development, maintenance of roadways, and installation of public utilities and infrastructure generally require construction activities. The 2040 General Plan includes policies and actions that are intended to reduce noise associated with construction noise. Implementation of the proposed policies and actions of the 2040 General Plan will reduce noise impacts from construction noise to a less than significant level.

Construction activities facilitated by the 2040 General Plan may include demolition of existing structures, site preparation work, excavation of below grade levels, foundation work, pile driving, and new building erection, and may potentially generate substantial vibration in the immediate vicinity. 2040 General Plan Action PS-6e would ensure administrative controls such as notifying neighbors of scheduled construction activities and scheduling construction activities with the highest potential to produce perceptible vibration to hours with the least potential to affect nearby businesses, in order to ensure that perceptible vibration can be kept to a minimum, and as such would not result in a significant impact with respect to perception.

Development facilitated by the 2040 General Plan could expose persons to excessive groundborne vibration levels attributable to trains. The 2040 General Plan includes Action PS-6f requires that individual development projects undergo project-specific environmental review and address potential vibration impacts associated with railroad operations. If project-level significant vibration impacts are identified, specific mitigation measures will be required under CEQA. The implementation of this policy would limit potential groundborne vibrations associated with railroad operations to a less than significant level.

The City of Lake Forest is not located within any adopted airport land use plan, there are no private airstrips in the vicinity of the City, and there are no public airports located within two miles of the City. As such, there are no impacts related to private airports, public airports, airstrips, or adopted airport land use plans.

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. Therefore, the 2040 General Plan would have a less than cumulatively considerable impact relative to traffic noise.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with noise. The 2040 General Plan includes policies and programs to reduce potential impacts to ambient noise levels as a result of groundborne vibration or exposure to excessive noise levels.

The revisions to the Housing Element would not result in noise impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to noise as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to noise peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XIV. POPULATION AND HOUSING

The 2040 General Plan FEIR determined that impacts to population and housing would be less than significant through the implementation of policies and actions in the 2040 General Plan. This topical area is addressed in the 2040 General Plan FEIR's Land Use Planning and Population/Housing section.

The 2040 General Plan accommodates future growth in Lake Forest that may increase the city's population by approximately 70,574 residents and 14,202 employees compared to the existing condition. With implementation of 2040 General Plan policies and actions intended to guide growth to appropriate areas and provide services necessary to accommodate growth, the land uses allowed under the 2040 General Plan, the infrastructure anticipated to accommodate proposed land uses, and the goal and policy framework would not induce growth that would exceed adopted thresholds, beyond those disclosed and analyzed throughout the 2040 General Plan EIR. Therefore, population and housing growth associated with the 2040 General Plan would result a less than significant impact, as there are no additional potential environmental impacts that would result from growth accommodated by the 2040 General Plan.

The majority of developed land in the Planning Area is comprised of residential uses, which are not anticipated to undergo significant land use changes under the Proposed Project. The

Proposed Project focuses infill development opportunities in vacant and underutilized areas in Lake Forest, as well as areas currently developed with commercial uses which may transition to mixed uses in the future. The 2040 General Plan Land Use Map was developed to preserve existing neighborhoods throughout the City. Throughout the Planning Area, the Proposed Project is projected to increase the overall number of dwelling units and provide housing to serve the diverse needs of the community at various socioeconomic levels. Therefore, impacts of the 2040 General Plan on the displacement of people or housing are considered less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. Future housing development, consistent with the 2040 General Plan, would be reviewed for consistency with policies and programs aimed to reduce potential impacts associated with substantial unplanned population growth and displacement.

The revisions to the Housing Element would not result in housing and population impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to population and housing as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to population and housing peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XV. PUBLIC SERVICES

The 2040 General Plan FEIR determined that impacts to public services would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Development accommodated under the 2040 General Plan would result in additional residents and businesses in the City, including new residential, industrial, office, and commercial uses. Development and growth facilitated by the 2040 General Plan would result in increased demand for public services, including fire protection, law enforcement, schools, parks, libraries, and other public and governmental services. The 2040 General Plan includes policies and actions to ensure that public services are provided at acceptable levels and that the City will maintain and implement public facility master plans, in collaboration with appropriate outside service providers and other agencies, to ensure compliance with appropriate regional, state, and federal laws and to provide efficient public facilities and services to Lake Forest.

The 2040 General Plan does not propose or approve actual development projects, or the physical expansion of public facilities. As future development and infrastructure projects (including new governmental facilities) are considered by the City, each project will be evaluated for conformance with the 2040 General Plan, Municipal Code, and other applicable regulations. Such development and infrastructure projects would also be analyzed for potential environmental

impacts, consistent with the requirements of CEQA. Any future expansion of public facilities required by growth in the City would be required to be reviewed for site-specific impacts. The 2040 General Plan includes a range of policies and actions to ensure that public services are provided in a timely fashion, are adequately funded, are coordinated between the City and appropriate service agency, and that new development funds its fair share of services. The specific impacts of providing new and expanded facilities cannot be determined at this time, as the 2040 General Plan does not propose or authorize development nor does it designate specific sites for new or expanded public facilities. However, the facilities would be primarily provided on sites with land use designations that allow such uses and the environmental impacts of constructing and operating the governmental facilities would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the 2040 General Plan. Therefore, impacts related to the provisions and need for public facilities are less than significant.

Growth accommodated under the 2040 General Plan would include a range of uses that could increase the population of the City and also attract additional workers and tourists to the City. Such growth would result in increased demand for parks and recreation facilities. The 2040 General Plan does not propose or approve any development nor does it designate specific sites for new or expanded parks and recreational facilities. The 2040 General Plan includes a range of policies and actions to ensure that parks and recreational facilities are adequately funded, and that new development funds its fair share of services needed to meet 2040 General Plan objectives. New development is required to participate in the provision and expansion of public services, recreational amenities, and facilities, and is also required to demonstrate that the City's public services and facilities can accommodate the increased demand for said services and facilities associated with future projects during the entitlement process. Any new parks or recreational facilities that may be constructed in the future would be primarily provided on sites with land use designations that allow such uses and the environmental impacts of constructing and operating the parks and recreational facilities would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the 2040 General Plan. Therefore, impacts related to the provisions and need for park and recreational facilities are less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. Potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses. The 2040 General Plan includes policies and programs to reduce potential impacts to public services as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in public services impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to public services as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General

Plan, and as such, there are no impacts to public services peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XVI. RECREATION

The 2040 General Plan FEIR determined that impacts to recreation would be less than significant through the implementation of policies and actions in the 2040 General Plan. This topical area is addressed in the 2040 General Plan FEIR's Public Services and Recreation section. As discussed above and in the 2040 General Plan FEIR, impacts related to the provisions and need for park and recreational facilities are less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to parks and recreation facilities as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in parks and recreation facilities impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to recreation as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to recreation peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XVII. TRANSPORTATION

The 2040 General Plan FEIR determined that impacts to transportation would be less than significant through the implementation of policies and actions in the 2040 General Plan.

The 2040 General Plan is not expected to increase vehicle miles traveled (VMT) per person above No Project conditions. Therefore, the VMT-related impacts of the Plan would be considered less than significant.

The Orange County Transit Authority's (OCTA's) Congestion Management Program (CMP) designates three CMP intersections; all three are expected to operate acceptably (Level of Service E or better) under Cumulative (2040) Plus Plan (2040 General Plan) conditions. Therefore, the impacts of the 2040 General Plan to CMP facilities would be considered less than significant.

As noted previously, there are no airport facilities located within the 2040 General Plan Planning Area. John Wayne Airport is located approximately 10 miles northwest of Lake Forest. The nature of the 2040 General Plan as a local plan for residential and commercial development (including mixed-used development) within the City of Lake Forest is such that it would not result in a change in air traffic patterns. Lake Forest itself has no existing or planned airport facilities, and

potential development within the Planning Area would have no effect on the John Wayne Airport approach or departure zones. Development attributable to the 2040 General Plan would be expected to have no impact to air traffic.

Lake Forest maintains improvement standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Development and infrastructure projects in Lake Forest would be required to comply with the 2040 General Plan, Municipal Code, and applicable State and local regulations. Further, the 2040 General Plan does not contain any provisions that would increase hazards due to design features of incompatible uses. Therefore, this impact is less than significant.

Implementation of the 2040 General Plan would result in increased development which would result in new roadways and would increase the number of users on the city's transportation system. The 2040 General Plan is a programmatic-level document, and emergency accessibility is typically assessed at the project-level. Adequacy of emergency access associated with future development projects would be analyzed and evaluated in detail through the environmental review process. Additionally, the Mobility Element developed as part of the 2040 General Plan contains policies in support of emergency access along local roads. As a result, the 2040 General Plan's impacts to emergency circulation and access are considered to be less than significant.

Implementation of the 2040 General Plan could lead to increases in the city's population and employment that would increase the demand for transit services offered by OCTA, Metrolink, and Amtrak. The 2040 General Plan includes policies that support transit-oriented development patterns, strengthen ties between the pedestrian and bicycle networks to transit, promote enhancements to transit facilities, and support increased transit coverage and frequencies in Lake Forest. The Mobility Element developed as part of the 2040 General Plan contains several policies that support access to and the performance of transit, bicycle, and pedestrian facilities. Further, the Plan includes mixed-use development that is supportive of non-automotive modes. Overall, the impact of the Plan with respect to access to and performance of transit, bicycle, and pedestrian impacts would be considered less than significant,

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts to the circulation system as a result of new development and intensification of land uses.

The revisions to the Housing Element would not result in transportation impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to transportation as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General

Plan, and as such, there are no impacts to transportation peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XVIII. TRIBAL CULTURAL RESOURCES

The 2040 General Plan FEIR determined that impacts to tribal cultural resources would be less than significant through the implementation of policies and actions in the 2040 General Plan. This topical area is addressed in the 2040 General Plan FEIR's Cultural Resources section.

As discussed above, impacts from future development could impact unknown archaeological resources including Native American artifacts and human remains. Impacts would be reduced to a less-than-significant level with implementation of 2040 General Plan policies and actions and local review guidelines. Compliance with the 2040 General Plan policies and actions, as well as State and local guidelines would provide an opportunity to identify, disclose, and avoid or minimize the disturbance of and impacts to a tribal resource through tribal consultation and CEQA review procedures. Therefore, impacts related to tribal resources as a result of 2040 General Plan implementation would be considered less than significant.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts related to tribal cultural resources. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies protecting tribal cultural resources.

The revisions to the Housing Element would not result in new tribal cultural resource impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts to tribal cultural resources as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to tribal cultural resources peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

The 2040 General Plan FEIR determined that impacts to utilities and service systems would be less than significant through the implementation of policies and actions in the 2040 General Plan.

Implementation of the 2040 General Plan would result in increased population and employment growth within the Planning Area, and a corresponding increase in the demand for additional water supplies. As described above, when the net impact to potable water demand is compared to the supply available to the two water Districts, it can be seen that both Districts have ample water supply to account for buildout of the 2040 General Plan. Given that projected water

demands associated with 2040 General Plan buildout would not exceed the projected available water supplies, and that the 2040 General Plan includes a comprehensive set of goals and policies to ensure an adequate and reliable source of clean potable water, impacts associated with water supplies are less than significant.

Development and growth in the City under the 2040 General Plan would result in increased demand for water supplies, including water conveyance and treatment infrastructure. The 2040 General Plan includes policies and actions to ensure that water supplies are provided at acceptable levels and to ensure that development and growth does not outpace the provision of available water supplies. Future development in the Planning Area would be required to connect to existing water distribution infrastructure in the vicinity of each site, pay the applicable water system connection fees, and pay the applicable water usage rates. Future projects may be required to implement site specific and limited off-site improvements to the water distribution system in order to connect new project sites to the existing water infrastructure network. The specific impacts of providing new and expanded water distribution infrastructure cannot be determined at this time, as the 2040 General Plan does not propose or authorize any specific development projects or include details on any future development projects. However, any future improvements to the existing water distribution infrastructure would be primarily provided on sites with land use designations that allow for urbanized land uses, and the environmental impacts of constructing and operating the new water distribution infrastructure would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the 2040 General Plan. Therefore, this impact is considered less than significant.

As with the water system, the City's sewer services are divided up by three utility districts, IRWD, ETWD, and TCWD. As Lake Forest continues to develop in the future, there will be an increased need for water and wastewater services, including a reliable source of recycled water. These needs have been addressed in the three utility districts' master plans and will require that the districts, in coordination with the City, continue to implement phased improvements to some pump stations, sewer mains, and the various wastewater treatment plants when triggered by growth. While full buildout of the development contemplated in the 2040 General Plan would slightly increase the existing treatment demand at the districts' treatment plants, the 2040 General Plan includes a range of policies designed to ensure an adequate wastewater treatment capacity for development. Given that projected wastewater generation volumes associated with 2040 General Plan buildout would not exceed the projected wastewater generation volumes described in the IRWD Master Plan and ETWD Master Plan, this impact would be less than significant.

Development contemplated under the 2040 General Plan would result in increased wastewater flows, resulting in the need for additional or expanded wastewater treatment facilities and conveyance infrastructure, as described above. The infrastructure and facilities necessary to serve new growth would involve development of some facilities on new development sites, some facilities off-site, such as at existing wastewater treatment facilities, on appropriately designated land, and may also involve improvements to other existing facilities and disturbance of existing

rights-of-way. The specific impacts of providing new and expanded facilities cannot be determined at this time, as the 2040 General Plan does not propose or approve development nor does it designate specific sites for new or expanded public facilities. Wastewater treatment and conveyance facilities would be evaluated at the project-level in association with subsequent development projects. However, the facilities would be primarily provided on sites with land use designations that allow such uses and the environmental impacts of constructing and operating the facilities would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the 2040 General Plan. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the 2040 General Plan, Municipal Code, and other applicable regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. As such, this impact would be less than significant.

Development under the 2040 General Plan would result in increased areas of impervious surfaces throughout the Planning Area, resulting in the need for additional or expanded stormwater drainage, conveyance, and retention infrastructure. Stormwater drainage and conveyance facilities would be evaluated at the project-level in association with subsequent development projects. However, the facilities would be primarily provided on sites with land use designations that allow such uses and the environmental impacts of constructing and operating the facilities would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the 2040 General Plan. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the 2040 General Plan, Municipal Code, and other applicable regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. As such, this is a less than significant impact.

The City's projected increase in solid waste generation associated with future buildout of the 2040 General Plan is well within the permitted capacity of the Frank R. Bowerman Sanitary Landfill, where the City disposes of the vast majority of its solid waste. Future projects within the Planning Area would be required to comply with applicable state and local requirements including those pertaining to solid waste, construction waste diversion, and recycling. While there is adequate permitted landfill capacity to accommodate future growth, the 2040 General Plan includes actions to further reduce the project's impact on solid waste services. The 2040 General Plan would not exceed the permitted capacity of the landfill serving the city, and the 2040 General Plan complies with regulations related to solid waste. This is a less than significant impact.

The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan

includes policies and programs to reduce potential impacts to utilities and service systems as a result of new development and intensification of land uses. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies addressing utilities and service systems.

The revisions to the Housing Element would not result in new utilities and service systems impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to utilities and service systems as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to utilities and service systems peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.

XX. WILDFIRE

The 2040 General Plan FEIR determined that impacts to wildfire would be less than significant through the implementation of policies and actions in the 2040 General Plan.

The 2040 General Plan would allow a variety of new development, including residential, commercial, industrial, and public service projects, which would result in increased jobs and population in Lake Forest. Future projects are not anticipated to remove or impede evacuation routes, and the 2040 General Plan does not include land uses, policies, or other components that conflict with adopted emergency response or evacuation plans. The 2040 General Plan is a policy document that does not include any site specific designs or proposals and does not propose any entitlements for development that would have the potential to impair or conflict with an adopted emergency response or evacuation plan. Any future development projects that would implement the 2040 General Plan, including buildout of uses contemplated under the proposed Land Use Map, would be subject to all applicable City regulations, reviews, and requirements pertaining to emergency response, emergency access, and maintaining emergency evacuation routes, as well as further CEQA analysis of project-specific impacts. The 2040 General Plan ensures that the City's emergency access routes, emergency contact lists, and public information regarding designated facilities and routes are regularly reviewed to ensure that up to date information is available to the City and the public in the event of an emergency. Important new critical facilities would also be located to ensure resiliency and functionality in the event of a natural disaster. Implementation of the 2040 General Plan would have a less than significant impact with regard to this issue.

Development under the 2040 General Plan would allow development to place people and/or structures in currently developed areas that are identified as having a significant risk of wildland fires. Any future development projects that would implement the 2040 General Plan including buildout of uses allowed under the proposed Land Use Map would be subject to all applicable City regulations, reviews, and requirements pertaining to emergency response, emergency access, and maintaining emergency evacuation routes, as well as being subject to all applicable

building code and fire code requirements as well as further CEQA analysis of project-specific impacts for individual development projects. Nothing in the 2040 General Plan will substantially alter the slope, prevailing winds, or other factors that would increase exposure to Lake Forest residents, employees or visitors to increased pollutant concentrations from wildfire or result in the uncontrollable spread of a wildfire. 2040 General Plan implementation would not exacerbate wildfire risks in Very High Fire Hazard Severity Zones (VHFHSZs); therefore, these impacts would be less than significant.

Development in or near fire hazard severity zones would require the construction and installation of infrastructure, including roads water and sewer and power lines. Development of such infrastructure may increase wildfire risks in the affected areas. Infrastructure required to serve development allowed under the 2040 General Plan would generally be located in and along established City roadways and would be located in areas that are already urbanized and are currently served by infrastructure. As such, implementation of the 2040 General Plan would not exacerbate wildfire risks.

The potential for future projects to impact environmental resources to meet compliance with fire development standards (such as fuel breaks and clearance requirements) would require site-specific environmental review under CEQA to identify any site-specific impacts. As demonstrated throughout the EIR, implementation of the various policies and actions contained in the 2040 General Plan would reduce potential impacts associated with the construction and expansion of infrastructure. Implementation of the 2040 General Plan policies and actions listed below, combined with local and state requirements, as discussed previously, would ensure that potential wildland fire hazards would not be exacerbated by local infrastructure, and this impact would be reduced to a less than significant level.

Expansion of man-made developments into fire-prone wildlands has created situations where fast-moving, highly destructive debris flows triggered by intense rainfall are one of the most dangerous post-fire hazards. The 2040 General Plan would allow development and improvement projects that would involve some land clearing, grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the California Building Code, Zoning Ordinance, and other regulations. In addition to compliance with City standards and policies, the Regional Water Quality Control Board will require a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area of one acre or larger. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. While the City cannot state with certainty that future risks associated with post-fire flooding and debris flow would not occur in Lake Forest, implementation of the 2040 General Plan would not exacerbate this risk. Implementation of Action PS-2a would reduce this risk to the greatest extent feasible, resulting in an impact that is less than significant.

The Project does not propose site-specific development, but is rather an update to a policy document to comply with new laws and reinforce existing policy direction. The Housing Element Update proposes housing policies that would encourage housing production within the Planning Area. However, potential development of vacant and underutilized sites to accommodate the City's RHNA would be consistent with the adopted land use policy and would not result in any changes to existing land uses or allow for greater development than what was analyzed in the 2040 General Plan FEIR. The 2040 General Plan includes policies and programs to reduce potential impacts due to wildfires. The Housing Element policies and programs would not have an impact on existing 2040 General Plan policies addressing wildfire.

The revisions to the Housing Element would not result in new wildfire impacts beyond those identified in the 2040 General Plan FEIR. Following compliance with the recommended 2040 General Plan FEIR mitigation measures and 2040 General Plan Policies, there would be no new significant or significantly different impacts related to wildfire as a result of the proposed Project. The Housing Element Update has been prepared to be consistent with the 2040 General Plan, and as such, there are no impacts to wildfire peculiar to the Housing Element that have not been fully addressed in the 2040 General Plan EIR.