

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant impacts of the project, and evaluate the comparative merits of the alternatives” (*State CEQA Guidelines*, Section 15126.6). This chapter identifies potential alternatives to the Nakase Nursery/Toll Brothers Project (proposed Project), evaluates the potential impacts of each alternative, and compares the potential impacts of each alternative against the proposed Project’s impacts, as required by CEQA.

Key provisions of the *State CEQA Guidelines* on alternatives (Section 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (15126.6[b]).
- The specific alternative of ‘no project’ shall also be evaluated along with its impact (15126.6[e][1]). The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).

- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the proposed Project is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides:

1. A description and analysis of impacts for each of the alternatives considered;
2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed Project, e.g., agricultural and greenhouse gas (GHG) emissions (the purpose of this analysis is to determine whether alternatives are capable of eliminating or reducing the significant environmental impacts of the project to a less than significant level); and
3. Conclusions regarding the alternative's: (1) ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) ability to attain the project objectives (as stated below); and (3) merits compared to the merits of the proposed Project.

5.2 PROPOSED PROJECT

5.2.1 Project Objectives

As discussed in Section 3.10, Project Objectives, of this EIR, the following project objectives have been established to aid decision-makers in their review of the proposed Project and its associated environmental impacts:

- Provide a comprehensive plan for development of the Nakase's Property that implements the goals and policies of the Lake Forest General Plan.
- Provide a site design that is sensitive to the existing natural features, including Serrano Creek.
- Provide a balanced mix of single-family and attached senior affordable homes, open space, and active public and private uses.
- Accommodate public uses by incorporating a new elementary school site conveniently located within easy walking distance for Project site residents.
- Provide an exceptional trail system and on-site parks that enhance the quality of life of the larger community.

- Reduce vehicular traffic and peak-hour trips through thoughtful site planning that emphasizes connectivity, access, and mobility.
- Provide for logical, attractive, and safe pedestrian and bicycle connections within the community.
- Create high-quality residential homes and distinct, identifiable neighborhoods with a range of specifically targeted single-family product types.

5.2.2 Significant Adverse Unavoidable impacts of the Proposed Project

The following discussion focuses on alternatives that would reduce or avoid the significant adverse unavoidable impacts of the Proposed Project. The following is a summary of the impacts that are considered significant, adverse, and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures.

5.2.2.1 Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures.

Agricultural Resources. The proposed Project would conflict with the existing A-1 zoning and would convert 119.2 acres (ac) of Unique Farmland to non-agricultural uses, which would result in a significant impact to agricultural resources. Mitigation was considered to reduce the impact of the conversion of 119.2 ac of Unique Farmland to non-agricultural uses. However, the mitigation measures were not considered feasible; therefore, impacts pertaining to the conversion of Unique Farmland to a non-agricultural use from implementation of the proposed Project would be significant and unavoidable.

Greenhouse Gas Emissions. The proposed Project would be designed in compliance with adopted regulations aimed at reducing GHG emissions. Specifically, the project would meet the 2019 Building Energy Efficiency Standards (California Code of Regulations [CCR] Title 24) and the California Green Building Standards Code (CALGreen). Although compliance with CCR Title 24 and CALGreen would help to reduce the proposed Project's GHG emissions, the overall emissions attributable to the proposed Project are expected to exceed the South Coast Air Quality Management District (SCAQMD) thresholds of 3.84 million tons of carbon dioxide equivalent per Service Population per year (MT CO₂e/SP/yr) for 2025 and 2.88 MT CO₂e/SP/yr for 2030. Therefore, the proposed Project would result in a significant unavoidable project impact and significantly contribute to an unavoidable cumulative impact related to GHG emissions and conflict with an applicable GHG reduction plan, policy, or regulation.

5.3 ALTERNATIVES INITIALLY CONSIDERED BUT REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *State CEQA Guidelines* suggests that EIRs identify any alternatives that were considered by the Lead Agency but were rejected during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. In evaluating an appropriate range

of alternatives to the proposed Project, a number of alternatives were considered and rejected for differing reasons by the City of Lake Forest (City).

The following is a discussion of the development alternatives considered during the environmental review process and the reasons they were not selected for detailed analysis in this Draft EIR.

5.3.1 Alternative Sites

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project. The key question and first step in the analysis is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (*State CEQA Guidelines*, Section 15126.6[f][2][A]). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (*State CEQA Guidelines*, Section 15126.6[f][2][B]).

No alternative locations to undertake the proposed Project are analyzed in the Draft EIR. The proposed Project involves development of the Nakase Property Area Plan (Woodley Architectural Group 2019) (hereafter referred to as the Area Plan) on the Project site. There is no other property in Lake Forest that would support a development similar to the proposed Project. The surrounding area is highly urbanized, and no land is currently available for development that is large enough (approximately 122 ac) to develop the proposed Project. In addition, the Project Applicant/Developer does not own or control any other property within Lake Forest or in the vicinity of the Project site that would be suitable for development of the Area Plan. Moreover, the Project Applicant/Developer cannot reasonably acquire or control an alternative site in a timely fashion that would allow for the implementation of a project with similar uses and square footage.

In addition, development of the proposed Project at an alternative site (assuming one was available) could potentially result in some environmental impacts that were similar to or greater than those of the proposed Project's environmental impacts, depending on the proximity of the alternate site to sensitive uses. Conversely, given that the Project site is located in a highly urbanized area, it is unlikely that relocating the proposed Project to another site would substantially lessen any of its impacts. The exception to this would be impacts related to agricultural resources. The City currently contains 18 parcels that are occupied by agricultural uses (general agricultural uses, horse ranches, nurseries, and other agriculture), totaling 192 ac of which 122 ac are the Project site. Because of the limited number of agricultural parcels in the City, development of the proposed Project on an alternative site could reduce or avoid impacts to agricultural resources.

Nevertheless, no alternative sites were considered feasible because the Project Applicant/Developer does not own or control another Project site in Lake Forest, no suitable alternative site is available that would achieve the underlying purpose and objectives of the proposed Project, and development

of the proposed Project on an alternative site would likely result in many of the same environmental impacts as development of the proposed Project on the Project site. Therefore, this alternative was rejected from further consideration.

5.3.2 No Project/No Development

This alternative would have assumed that the proposed Project site would remain in the same condition as it was at the time the Notice of Preparation (NOP) was published and no new development of any kind would occur on the Project site. This alternative was deemed infeasible as the current owners of the Project site—the Nakase Family—have indicated their intention to close the nursery and sell the property. As shown on Figure 3.5, General Plan Land Use and Business Development Overlay, the Project site is designated for Business Park uses on the City’s General Plan Land Use Map. The Business Park designation is intended to provide a mix of uses as allowed under the Commercial, Professional Office, and Light Industrial designations. Therefore, in the absence of the proposed Project, it could be reasonably assumed that Business Park uses would be developed on the Project site. Development of Business Park uses on the Project site is evaluated as Alternative 1 below.

5.3.3 Public Park

As shown on Figure 3.5, General Plan Land Use and Business Development Overlay, the Project site is designated for Business Park uses on the City’s General Plan Land Use Map. The Business Park designation is intended to provide a mix of uses as allowed under the Commercial, Professional Office, and Light Industrial designations. Development of a public park on the Project site would require a General Plan Amendment and Zone Change. It would also require acquisition of the Project site by the City of Lake Forest.

Development of park uses on the Project site would result in the same impact to Unique Farmland (i.e., conversion of 119.2 ac of Unique Farmland to non-agricultural uses) as the proposed Project. The primary source of GHG emissions associated with a public park would be vehicle trips. Because vehicle trips would likely be the same or less than the vehicle trips associated with the existing nursery, it is likely that GHG impacts would be less than that of the proposed Project.

Nevertheless, this alternative was deemed infeasible as the City recently developed the Lake Forest Sports Park and has not (1) designated the Project site for park uses in the General Plan; or (2) set aside funding for the acquisition of the land and development of park uses. In addition, development of a public park on the Project site would not achieve any of the intended Project objectives.

5.3.4 Community Garden/Farm

As shown on Figure 3.5, General Plan Land Use and Business Development Overlay, the Project site is designated for Business Park uses on the City’s General Plan Land Use Map. The Business Park designation is intended to provide a mix of uses as allowed under the Commercial, Professional Office, and Light Industrial designations. Development of a community garden/farm on the Project

site would require a General Plan Amendment.¹ It would also require acquisition of the Project site by the City of Lake Forest or another entity capable of developing and managing a community garden or farm on the Project site.

Development of a community garden/farm would avoid potential impacts to Important Farmland because the 119.2 ac of Unique Farmland on the Project site would not be converted to non-agricultural use. The primary source of GHG emissions associated with a community garden/farm would be vehicle trips. Because vehicle trips would likely be the same or less than the vehicle trips associated with the existing nursery, it is likely that GHG impacts would be less than that of the proposed Project.

This alternative was deemed infeasible because the City recently developed the Lake Forest Sports Park and has not (1) designated the Project site for agricultural uses in the General Plan; or (2) set aside funding for the acquisition of the land and development of park uses. In addition, there are no pending applications for development or operation of a community garden/farm on the Project site, and any such project would not achieve any of the Project objectives.

5.4 ALTERNATIVES UNDER CONSIDERATION

Section 21100 of the Public Resources Code (PRC) and Section 15126 of the *State CEQA Guidelines* require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed Project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. Based on the criteria listed above, the following four alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed Project but that may avoid or substantially lessen any of the significant impacts of the proposed Project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1 – No Project Alternative:** CEQA requires analysis of a “No Project” Alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Because the current owners of the Project site have indicated their intent to close the nursery and sell the property, it is unlikely the Project site would continue to be used as a commercial nursery. As shown on Figure 3.5, General Plan Land Use and Business Development Overlay, the Project site is designated for Business Park uses on the City’s General Plan Land Use Map. For this reason, under Alternative 1, it is assumed that while the proposed Area Plan would not be developed, the Project site would not remain in the existing condition, and the Project site would be developed to the maximum intensity allowed under the existing General Plan

¹ The existing Lake Forest General Plan does not include any agricultural land use designations.

designation of Business Park. The Business Park designation is intended to provide a mix of uses as allowed under the Commercial, Professional Office, and Light Industrial designations. Alternative 1 would include 1,841,700 square feet (sf) of Business Park use.

- **Alternative 2 – Urban Industrial/Residential:** The Project site would be developed in accordance with the Urban Industrial-Residential land use designation, which is a new land use designation being considered in the Lake Forest General Plan update. The Urban Industrial-Residential land use designation allows for a mix of light industrial and commercial uses at a density of 25 residential units per acre and a maximum floor-to-area ratio (FAR) of 1.0:1. Alternative 2 includes: 592 residential units; 89 senior affordable rental units; 4 acres (ac) of commercial/industrial uses; a 11.5 ac school; 21.41 ac of parks, open space, and habitat restoration area; and a 5.6 ac community garden.
- **Alternative 3 – No School Alternative:** Alternative 3 includes: development of up to 675 single-family residential units; 101 senior affordable rental units; 21.41 ac of parks, open space, and habitat restoration area; and a 3.5 ac community garden.
- **Alternative 4 – Reduced Project:** Alternative 4 includes: development of 600 single-family residential units; 90 senior affordable rental units; 11.5 ac elementary school; a 2 ac community garden; and 19.41 ac of parks, open space, and habitat restoration area.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. The Alternatives are further described below and their potential impacts compared to those of the proposed Project.

5.4.1 Alternative 1: No Project Alternative

5.4.1.1 Description

For Alternative 1, the Area Plan would not be approved, and the land use designation on the Project site would remain Business Park and Business Development Overlay (BDO), as designated in the current City of Lake Forest General Plan (dated June 1994, revised September 2016). The Business Park designation allows for a mixture of all uses allowed under Commercial, Professional Office, and Light Industrial land use designations.^{1,2} The Business Park designation allows for a maximum FAR of 1.0:1. Alternative 1 would develop the Project site to the maximum intensity allowed under the current General Plan designation of Business Park and BDO. As such, Alternative 1 would include 1,841,700 sf of Business Park use. Because of the proximity to the Project site, it is assumed Alternative 1 would also include an Open Space & Habitat & Restoration Area along Serrano Creek.

¹ Professional office allows for single-tenant or multi-tenant offices, including legal, medical, general financial, administrative, corporate, and general business offices as well as supportive commercial uses.

² Light Industrial allows for a mixture of light industrial uses, wholesale businesses, light manufacturing and processing, storage, distribution and sales, research and development, warehousing and storage, high technology production, retail sales, and related uses.

5.4.1.2 Environmental Analysis

Aesthetics. The Project site is located in a fully developed area (with the exception of the Project site) in the northern portion of Lake Forest. Although the proposed Project would obstruct some views of the Santa Ana Mountains and some views from the Serrano Creek Trail, most views would be preserved; therefore, the proposed Project would result in less than significant impacts related to scenic vistas. The proposed Project would not impact a State Scenic Highway because none are located in the vicinity of the Project site. The visual character and quality of the Project site and its surrounding area would be preserved and enhanced through application of the architectural and landscape design guidelines outlined in the Area Plan. Therefore, the proposed Project would neither substantially degrade the visual character of the Project site nor conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant. The Project site is currently developed with few structures, and the majority of the Project site is not illuminated at night. The proposed Project would add lighting to the Project site that could result in impacts related to light and glare. However, the proposed Project includes mitigation measures that require preparation of a comprehensive lighting plan and a photometric survey to demonstrate that no spill lighting or glare would occur in sensitive areas. With implementation of mitigation, impacts related to light and glare would be less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would fully develop the Project site, although the use would differ from the proposed Project. Alternative 1 would likely result in similarly scaled development. Additionally, the overall visual changes to the Project site would be similar to those associated with the proposed Project because both projects would add an urban use to a site that is currently used as a nursery. Therefore, the Alternative 1 impacts to scenic vistas, degradation of the visual character of the Project site, and conflict with applicable zoning and other regulations governing scenic quality would be less than significant and similar to the proposed Project. Alternative 1 would not impact a State Scenic Highway because there are none in the vicinity of the Project site.

Alternative 1 would require nighttime lighting, similar to the proposed Project. Because Alternative 1 would introduce nighttime lighting to a Project site that is not currently illuminated at night on the majority of the site, Alternative 1 would result in potentially significant impacts related to new sources of nighttime light. The mitigation measures would be the same as the proposed Project, would require preparation of a comprehensive lighting plan and photometric survey, and would reduce potential impacts related to lighting and glare to less than significant.

In summary, Alternative 1 would result in a potentially significant impact related to nighttime lighting, which would be reduced to less than significant with mitigation. No impact to State Scenic Highways would occur. Other potential impacts related to aesthetics would be less than significant. Alternative 1 would result in a project of similar scale although the use would be different than the proposed Project and therefore would result in aesthetic impacts that are similar to the proposed Project.

Agricultural Resources. According to the California Department of Conservation (DOC), 119.2 ac of the approximately 122 ac Project site is designated as Unique Farmland. The Project site is currently

being used as a retail nursery with all products grown and/or sold in pots. The proposed Project would permanently convert 119.2 ac of Unique Farmland to a non-agricultural use, which would result in a significant and unavoidable impact. The Project site has an agricultural district zoning designation; however, the Project Applicant/Developer is seeking a zoning classification amendment. Once the zone change is approved, the future use of the Project site would be consistent with the City's zoning designation, and impacts pertaining to conflicts with existing agricultural zoning would be less than significant. The Project site is not currently under a Williamson Act contract; therefore, the proposed Project would not conflict with an existing Williamson Act contract. The proposed Project would not involve other changes in the existing environment, which due to the location or nature, could result in conversion of farmland to a non-agricultural use. Mitigation measures were considered for the proposed Project in order to reduce the significant impact of converting Unique Farmland on the Project site to non-agricultural uses; however, none of the mitigation measures were feasible in large part because there is a lack of land designated as Important Farmland in Lake Forest or Orange County that could be used to offset the agricultural land conversion impact from the proposed Project.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park land use designation. Alternative 1 would change the use on the Project site, and would convert 119.2 ac of Unique Farmland to a non-agricultural use. Impacts pertaining to conflict with existing agricultural zoning associated with Alternative 1 would be less than significant. Alternative 1 would not conflict with an existing Williamson Act contract and would not involve other changes in the existing environment that, due to the location or nature, could result in conversion of farmland to a non-agricultural use. The conversion of 119.2 ac of Unique Farmland to a non-agricultural use would result in a significant and unavoidable impact for which there are no feasible mitigation measures to address. Therefore, the agricultural impacts of Alternative 1 would be comparable to the agricultural impacts of the proposed Project. Alternative 1 would not reduce or avoid a significant unavoidable impact of the proposed Project.

Air Quality. Air quality emissions associated with construction and operation of the proposed Project would not exceed SCAQMD significance thresholds. Therefore, impacts of the proposed Project related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable national ambient air quality standards (NAAQS) or California ambient air quality standards (CAAQS) would be less than significant. The proposed Project is consistent with the SCAQMD Final 2016 Air Quality Management Plan (AQMP) because (1) the construction and operation emissions of the proposed Project would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although the proposed Project would not be consistent with the land use designations of the Project site, the proposed Project is expected to generate less emissions as compared to the existing land use designation. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. The same grading footprint and similar construction would be required under Alternative 1 compared to the proposed Project; therefore, construction emissions would be similar and less than significant. According to the *Nakase Property Trip*

Generation Evaluation (Urban Crossroads 2018), the existing General Plan land use for the Project site would generate 14,122 more trip-ends per day than the proposed Project. The additional trip-ends would generate more operational emissions than trips associated with the proposed Project. The operational emissions of Alternative 1 were calculated as part of the *Air Quality Impact Analysis* (Urban Crossroads 2019a) and are summarized in Table 4.3.E of this EIR. Emissions generated during operation of Alternative 1 would exceed the SCAQMD thresholds for volatile organic compounds (VOCs), oxides of nitrogen (NO_x), and particulate matter less than 10 microns in size (PM₁₀). The portion of the South Coast Air Basin (Basin) in which the Project site is proposed is in nonattainment of the NAAQS for ozone (O₃) (1-hour and 8-hour), particulate matter less than 2.5 microns in size (PM_{2.5}) and is in nonattainment of the CAAQS for O₃ (1-hour and 8-hour), PM_{2.5}, and PM₁₀. As such, Alternative 1 would result in a cumulatively considerable net increase of criteria pollutants for which the region is nonattainment. Although Alternative 1 would be consistent with the land use designation of Business Park and BDO, operation of Alternative 1 would exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations. Therefore, Alternative 1 would not be consistent with the SCAQMD Final 2016 AQMP. Therefore, operational impacts of the No Project Alternative would be significant and greater than the proposed Project.

Biological Resources. No special-status plants are present on the Project site; therefore, the proposed Project would not impact special-status plant species. The proposed Project would remove 119.77 ac (115.26 ac permanently, 4.51 ac temporarily) of low-quality potential foraging habitat for two special-status bats: the western red bat and the western mastiff bat. The proposed Project would impact a small (0.28 ac) patch of Maritime Succulent Scrub/Southern Cactus Scrub (Coastal Sage Scrub) that is highly disturbed in nature and would not require mitigation because of its small size and degraded nature. While burrowing owls were not detected on the Project site during focused surveys, the proposed Project includes mitigation to ensure that the species has not moved onto the site between the dates the survey was performed and construction commences through implementation of a pre-construction survey prior to ground disturbance, per California Department of Fish and Wildlife (CDFW) survey guidelines. Bats have the potential to roost and possibly breed in Serrano Creek; therefore, mitigation would be implemented to reduce indirect impacts to bats during construction. Bat roosting/nursery exit counts and acoustic surveys would be conducted prior to the start of any construction activities, and a Bat Management Plan would be prepared, if required based on the results of the survey. Project construction has the potential to introduce and spread nonnative species; therefore, mitigation would be implemented to ensure the proposed landscaping would not include invasive exotic plants. Additionally, indirect impacts to Serrano Creek would be reduced through mitigation measures that require installation of construction fencing and implementation of Best Management Practices (BMPs). Additionally, a Habitat Management Plan (HMP) would be prepared, and the Open Space & Habitat & Restoration Area would be placed in a permanent conservation easement to avoid impacts to sensitive riparian habitat associated with Serrano Creek. The proposed Project would impact the on-site drainage that transverses the Project site and contains potential CDFW, United States Army Corps of Engineers (ACOE), and RWQCB jurisdiction. Mitigation measures for jurisdictional waters includes coordination with the ACOE, CDFW, and RWQCB regarding potential jurisdictional areas and the associated permitting processes and enhancement, and the establishment or re-establishment of jurisdictional areas on off-site conserved lands. Finally, compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503 would reduce construction impacts to nesting birds,

including Cooper's hawk and red-tailed hawk in Serrano Creek. In summary, compliance with the mitigation summarized above and existing regulatory requirements (e.g., the MBTA) would reduce potentially significant impacts of the proposed Project to biological resources to less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Because Alternative 1 would involve development on the same Project site and would include an Open Space & Habitat & Restoration Area along Serrano Creek, impacts of Alternative 1 would essentially be the same as the proposed Project. Because the potential biological impacts of Alternative 1 would be comparable to those associated with the proposed Project, the same mitigation measures would be required. After implementation of mitigation, impacts to biological resources would be less than significant and comparable to the proposed Project.

Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. The proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Due to the number of cultural resources recorded within 0.5 mi of the Project site and the location of the proposed Project site in the archaeologically sensitive Aliso Creek and Foothill areas (as identified in the City's General Plan), there is potential for ground-disturbing construction activities to impact archaeological resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and to reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts of the proposed Project to a less than significant level.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 1 would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Because the Project site is in an area of archaeological sensitivity, there is potential that ground-disturbing construction activities would impact archaeological resources. Alternative 1 would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and to reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce the potential impacts of Alternative 1 related to cultural resources to a less than significant level.

In summary, Alternative 1 would result in no impacts to historical resources and less than significant impacts with mitigation incorporated for archaeological resources and human remains. Alternative 1 would result in comparable cultural resources impacts compared to the proposed Project because both alternatives include ground-disturbance on the Project site.

Energy. Construction of the proposed Project would require energy for activities such as the manufacture and transportation of building materials, demolition and grading activities, and building construction. Total diesel fuel consumption would be 118,339 gallons from construction truck trips. Total gasoline consumption would be 1,084,438 gallons from construction worker vehicle trips. During operation, electricity demand would be 6,140,783 kilowatt-hours (kWh) per year, and natural gas demand would be 116,020.6 therms per year compared to the existing nursery use. The proposed Project would be constructed to CALGreen standards and appliances would be energy efficient, which would help to reduce energy and natural gas consumption. The proposed Project is estimated to generate approximately 5,948,016 vehicle miles traveled (VMT) for the elementary school, 1,086,584 VMT for the retirement community, and 19,064,105 VMT for the single-family residential uses annually, which would result in annual fuel consumption of 54,189 gal of gasoline and 758 gal of diesel. Although Project construction and operation would require use of energy, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency; therefore, impacts would be less than significant.

Alternative 1 would develop the Project site with business park uses consistent with the existing Business Park and BDO land use designation. The same grading footprint and similar construction would be required under Alternative 1 compared to the proposed Project; therefore, energy use during construction would be comparable to the proposed Project. Alternative 1 would likely result in a similarly scaled project overall, and the buildings would be required to be constructed to CALGreen standards to reduce energy use. Therefore, natural gas and electricity consumption during operation would be comparable to the proposed Project. However, according to the *Nakase Property Trip Generation Evaluation* (Urban Crossroads 2018), the currently adopted General Plan land use for the Project site would generate 14,122 more trip-ends per day than the proposed Project, which would result in a greater consumption of fuel during operation.

In summary, energy demand of Alternative 1 would be comparable to the proposed Project during construction and greater than the proposed Project during operation. Although construction and operation would require using energy, and operational energy demand would be greater than the proposed Project during operation, Alternative 1 would not result in the wasteful, inefficient, or unnecessary consumption of energy resources nor would it conflict with or obstruct a State or local plan for renewable energy or energy efficiency; therefore, impacts would be less than significant.

Geology and Soils. The proposed Project would not result in any impacts related to subsidence. Potential impacts related to expansive soils would be less than significant, and no mitigation is required. Impacts related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), and corrosive soils are considered potentially significant, and mitigation is required. The mitigation measures require compliance with the recommendations in a *Final Geotechnical Evaluation* and compliance with the California Building Code (CBC). With implementation of mitigation, the proposed buildings would be designed and constructed to current safety standards, and all potentially significant impacts related to soils and geology would be less than significant. The proposed Project would increase erosion and loss of topsoil during construction; however, Erosion Control and Sediment Control BMPs would be implemented during construction in compliance with the requirements of the Construction General

Permit to ensure that impacts related to erosion would be less than significant. The Project site is in an area previously determined as sensitive for paleontological resources; therefore, it is possible that ground-disturbing construction activities could impact significant previously undiscovered paleontological resources. A Paleontological Resources Impact Mitigation Program (PRIMP) would be prepared and implemented to reduce potentially significant impacts to paleontological resources to less than significant.

Alternative 1 would develop the Project site with business park uses consistent with the existing Business Park and BDO land use designation. The same grading footprint and similar construction would be required compared to the proposed Project. Additionally, Alternative 1 would likely result in a similarly scaled project overall as the proposed Project. The required grading and construction activities would result in the same or similar impacts related to geology and soils as the proposed Project. While some construction specifications would be different for the No Project Alternative compared to the proposed Project, the overall risks related to seismic ground shaking, erosion, slope stability, unsuitable (corrosive) soils, expansive soils, and paleontological resources would be comparable. Therefore, it is anticipated that the No Project Alternative would result in impacts related to geology and soils similar to the proposed Project, and the same mitigation measures would be required.

In summary, Alternative 1 would result in potentially significant impacts related to geology, soils, and paleontological resources. These impacts would be less than significant with implementation of mitigation measures. Alternative 1 would result in impacts related to geology, soils, and paleontological resources that would be comparable to those of the proposed Project.

Greenhouse Gas Emissions. The proposed Project would result in 4.91 MT CO₂e/SP/yr of GHG emissions in 2025 and 4.42 MT CO₂e/SP/yr in 2030. The total GHG emissions of the proposed Project would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030; therefore, the proposed Project would result in a potential significant impact related to generation of GHG emissions. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. More than 73 percent of all mobile-source emissions in 2025 and 66 percent of all mobile-source emissions in 2030 (by weight) would be generated by the proposed Project's mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features included as part of the proposed Project. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the proposed Project's mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to generation of GHG emissions would remain significant and unavoidable.

Alternative 1 would develop the Project site with business park uses consistent with the existing Business Park and BDO land use designation. According to the *Nakase Property Trip Generation Evaluation* (Urban Crossroads 2018), the currently adopted General Plan land use for the Project site would generate 14,122 more trip-ends per day than the proposed Project, which would result in a greater GHG emissions. Therefore, Alternative 1 would result in greater GHG impacts than the proposed Project. Therefore, Alternative 1 would result in significant and unavoidable impacts

related to generation of GHG emissions. Alternative 1 would not reduce or avoid a significant unavoidable impact of the proposed Project.

Hazards and Hazardous Materials. The proposed Project may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of asbestos-containing materials (ACMs), lead-based paint, mercury, and polychlorinated biphenyls (PCBs) cannot be ruled out in the existing structure that is proposed to be demolished. Mitigation would be implemented that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with routine maintenance of residential and school facilities. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities, which would include a school. In order to gain approval for development of a school at the Project site that would receive State funding, previous Phase I and II Environmental Site Assessments (ESAs) prepared for the Project would need to be submitted to the Department of Toxic Substances Control (DTSC) for review. The DTSC would determine whether or not additional sampling and analysis, preparation of a Preliminary Endangerment Assessment (PEA), site remediation, and public review of reports are required in order to obtain a finding of "No Further Action". Coordination with the DTSC is included as mitigation to reduce impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school. With implementation of the mitigation discussed above, impacts related to hazardous waste would be less than significant.

Alternative 1 would develop the Project site with business park uses consistent with the existing Business Park and BDO land use designation. Alternative 1 would not include a school, so no impact related to hazardous emissions or hazardous materials within 0.25 mi of a school would occur. Alternative 1 would involve demolition of the existing structure, grading, and construction of new buildings that would result in similar impacts related to hazardous waste and materials compared to the proposed Project. Alternative 1 may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented similar to the proposed Project, which includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with routine maintenance of the businesses. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. In summary, with implementation a Demolition Plan, impacts related to hazardous waste would be less than significant and comparable to that of the proposed Project.

Hydrology and Water Quality. The proposed Project would develop the Project site with a new use and would increase impervious surface area on the Project site, which would increase stormwater runoff and change the pollutants of concern in stormwater runoff. The proposed Project would implement a comprehensive Water Quality Management Plan (WQMP) and BMPs to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. In addition, the proposed Project includes drainage infrastructure and BMPs to minimize development impacts to the site hydrology in compliance with hydromodification requirements. The hydrology and water quality impacts of the proposed Project would be less than significant upon compliance with existing plans, programs, and policies in place to ensure compliance with National Pollutant Discharge Elimination System (NPDES) regulations.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would change the use on the Project site, increase impervious surface area, increase stormwater runoff, and change the pollutants of concern in stormwater runoff. Alternative 1 would be required to implement BMPs and drainage infrastructure to reduce pollutants of concern on the Project site and reduce stormwater runoff in compliance with NPDES and hydromodification requirements.

With compliance with adopted regulations, Alternative 1 would result in less than significant impacts related to hydrology and water quality. The hydrology and water quality impacts of Alternative 1 would be comparable to the hydrology and water quality impacts of the proposed Project with implementation of BMPs and drainage infrastructure in compliance with adopted regulations.

Land Use and Planning. The proposed Project would be consistent with the Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan (RCP) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (2016a) by siting residential uses near commercial/industrial uses and major transportation corridors and transit stops, providing new housing, and providing an open space and habitat restoration area. The proposed Project would require a General Plan Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High-Density Residential, Public Facility, Neighborhood Parks, and Open Space and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, the proposed Project would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. The proposed Project would not result in noise, air quality, or aesthetic impacts that conflict with adjacent land uses and would not conflict with the Orange County Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Impacts related to land use and planning would be less than significant, and no mitigation is required.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would be consistent with the SCAG 2008 RCP and RTP/SCS (2016a) by siting commercial uses near residential development, focusing growth near major transportation corridors and transit stops, and providing an open space and habitat restoration area. However, Alternative 1 would not meet the SCAG goal of providing new housing

opportunities. Alternative 1 would be consistent with the existing Business Park and BDO land use designation and would not require a General Plan Amendment. However, a Zone Change would be required to change the zoning from General Agriculture (A-1) to Community Commercial. Upon the approval of the Zone Change request by the City Council, Alternative 1 would be consistent with the land use designations contained in the City's Municipal Code and zoning. Alternative 1 would not result in noise, air quality, or aesthetic impacts that conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant and comparable to those of the proposed Project.

Noise. Construction noise levels would range from 53.3 to 65.2 dBA L_{eq} (equivalent continuous sound level measured in A-weighted decibels) at sensitive receiver locations. Construction vibration velocity levels are expected to range from 0.002 to 0.008 inches/second (in/sec) peak particle velocity (PPV). During operation, off-site traffic-associated trips generated from the proposed Project would increase noise levels by 0.1 to 0.72 dBA CNEL (Community Noise Equivalent Level measured in A-weighted decibels) on the study area roadway segments. Operational noise generated from the on-site uses would range from 17.9 to 32.5 dBA L_{50} (median noise level measured in A-weighted decibels) at the sensitive off-site receiver locations. The construction noise, construction vibration, off-site traffic, or on-site operational noise levels would not exceed City noise level standards or California Department of Transportation (Caltrans) construction vibration standards, and impacts would be less than significant. Operation would not generate excessive ground-borne vibration or ground-borne noise, and impacts would be less than significant. Adjacent traffic noise from nearby roadways and freeways would not exceed the City's exterior noise standards at the proposed outdoor uses on the Project site with the planned 6-foot (ft) high noise barriers, and impacts would be less than significant. Additionally, interior noise levels within the proposed residences and school, which would be constructed to meet ventilation standards and include dual-paned glass, are not anticipated to exceed the City's interior noise standards. However, a final Noise Study would be required to verify the design and building performance, which is included as mitigation to ensure interior noise levels are reduced to less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would generate similar noise levels during the construction period because the scale of the development would be similar. Alternative 1 would include business park uses and would likely not include the outdoor park uses that generate most of the operational noise for the proposed Project. Therefore, operational noise impacts at nearby sensitive receivers from on-site uses would be less than the proposed Project. Alternative 1 would generate 14,122 more vehicle trip-ends per day than the proposed Project. Therefore, Alternative 1 would result in greater off-site traffic noise compared to the proposed Project, but would be anticipated to be less than significant. Alternative 1 would not require mitigation for interior noise levels because business uses are not considered sensitive uses; therefore, a final Noise Study would not be required for Alternative 1.

In summary, Alternative 1 would result in less than significant impacts at off-site sensitive receivers. Alternative 1 would generate similar construction noise, less on-site operation noise, and greater off-site operational traffic noise compared to the proposed Project.

Population and Housing. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units, which would serve a total of approximately 2,274 residents. Because the Project site is designed as Business Park and BDO, residential uses were not envisioned on the Project site and the population increase from the proposed Project would not have been accounted for in the City's projected population growth. While the proposed Project would result in population growth, the growth attributable to the proposed Project would not be substantial in relation to the current or projected conditions in the City. The addition of new affordable housing units also supports the affordable housing goals of the City. Although the proposed Project would provide short-term construction jobs and the proposed school would employ 60 workers, up to 249 nursery employees would also be displaced. However, given the availability of jobs in the region, it is anticipated that workers would find employment elsewhere. Although the Project may contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities, the overall increase in housing compared to employment is not of sufficient magnitude to negatively affect the forecasted jobs-housing ratio. The proposed Project would result in less than significant impacts related to population, housing, and employment growth.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would not include housing and would not induce substantial population growth because the majority of employees at the business park would likely already live in the region. However, Alternative 1 would not support the affordable housing goals of the City. Alternative 1 would displace the 249 nursery employees; however, Alternative 1 also would provide employment opportunities at the businesses that would occupy the business park, which would offset the displacement. Alternative 1 would increase the jobs-housing ratio by adding additional job opportunities within the City, which would help achieve the City's goal of achieving a better balance between jobs and housing.

The No Project Alternative would result in less than significant impacts related to population, housing, and employment growth. However, because Alternative 1 would not include housing and would achieve a better balance between jobs and housing, this alternative would have less impact related to population and housing than the proposed Project.

Public Services. Public service impacts related to fire and police protection services would be potentially significant; however, implementation of a Construction Traffic Management Plan (CTMP) would reduce construction impacts to less than significant, and a secured fire protection agreement and establishment of a Neighborhood Watch Program would reduce operational impacts to less than significant. The proposed Project includes the construction of a public elementary school on the Project site. The Project Applicant/Developer would include an elementary school to reduce impacts on school services from the additional students generated by the proposed Project; therefore, potential impacts related to the provision of school services for construction of the proposed Project would be less than significant. With the provision of on-site private parks and amenities, the proposed Project would not require the construction of new or an expansion of existing construction, or the expansion of existing recreational facilities or parks to maintain acceptable service ratios or performance objectives. Based on the City's library demand ratio, the population growth that would result from the proposed Project would not require the expansion of

existing library facilities in Lake Forest in order to maintain acceptable service ratios. Finally, the Orange County Transportation Authority (OCTA) would be able to provide adequate transit services to the proposed Project. Therefore, with implementation of the mitigation described above for fire and police service impacts, impacts to public services would be less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. The new business park use on the Project site would increase demand for fire and emergency medical services; however, the Orange County Fire Authority (OCFA) requires all developers to enter into a secured fire protection agreement with OCFA to ensure the availability of adequate fire protection services. Alternative 1 does not include construction of housing and therefore would not increase population within Lake Forest. Therefore, Alternative 1 would not substantially increase demand for police protection, library, park, school, or transit services.

In summary, with implementation of the mitigation described above for fire and police service impacts, impacts of Alternative 1 to public services would be less than significant. Alternative 1 would not result in additional population that would increase demand for other public services; therefore, impacts to public services would be less than the proposed Project.

Recreation. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable housing, which would increase the population in Lake Forest by approximately 2,274 persons. The increase in population would result in potentially significant impacts to existing neighborhood and regional parks and other recreational facilities. The proposed Project includes both private and public recreational uses on site. The City Municipal Code requires dedicating land equivalent to 5 ac per 1,000 residents or payment of in-lieu fees to reduce impacts to parklands. The proposed Project would meet the City's public park requirement of 11.37 ac by including approximately 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public parks. Additionally, the proposed Project includes mitigation that requires on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would not include housing and would not increase the population in Lake Forest. Employees of the business park would be reasonably expected to utilize parks near their home; therefore, Alternative 1 would not substantially increase the use of existing parks in the vicinity of the Project site. Alternative 1 would therefore result in less than significant impacts to existing neighborhood and regional parks and recreational facilities. Because Alternative 1 would not increase the population in Lake Forest, impacts to park and recreational facilities would be less than that of the proposed Project.

Transportation/Traffic. The proposed Project would increase VMT to 26,098,705 from the 2,698,384 VMT generated by the existing nursery. The proposed Project would not be inconsistent with *State CEQA Guidelines* Section 15064.3(b) because the City has not established thresholds for assessing VMT impacts; therefore, traffic impacts were assessed based on level of service (LOS). The

proposed Project is anticipated to generate a total of approximately 8,789 trip-ends per day, which would contribute to an impact at the Bake Parkway/Jeronimo Road intersection that is currently operating at an unacceptable LOS. The proposed Project would mitigate the impact at this location to acceptable levels through a combination of fee payments to the City pursuant to a Fair Share Agreement or construction of specific improvements. All construction equipment would be staged on site, and mitigation would be implemented to require that large construction equipment be delivered during off-peak times to reduce travel during peak travel periods so that construction would not result in incompatible uses that increase on-road hazards. Mitigation measures also require a distance analysis to be prepared for all Project intersections to determine limited use areas (e.g., low height landscaping), on-street parking restrictions (e.g., red curb), if necessary, and any turning restrictions (e.g., right-in/right-out). With implementation of mitigation, project construction and operation would not result in incompatible uses that increase on-road hazards, and impacts would be reduced to less than significant. Preparation of a CTMP is required as mitigation to ensure that emergency vehicles would be able to navigate through streets adjacent to the Project site that may experience congestion due to construction activities. Impacts related to emergency access during construction would be reduced to less than significant with implementation of mitigation. The Area Plan meets or exceeds the OCFA requirements to not hinder fire and emergency access; therefore, operational impacts related to emergency access would be considered less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would generate similar traffic impacts during the construction period because the scale of the development would be similar. A CTMP would be required for Alternative 1 to reduce impacts to emergency access during construction. According to the *Traffic Impact Analysis* (Urban Crossroads 2019c) prepared for the Project, Alternative 1 would generate 14,122 more vehicle trip-ends per day than the proposed Project, which would result in greater impacts compared to the proposed Project. The No Project Alternative would mitigate traffic impacts through a Fair Share Agreement or construction of specific improvements, similar to the mitigation included for the proposed Project. Alternative 1 would be required to meet or exceed the OCFA requirements to not hinder fire and emergency access.

In summary, Alternative 1 would result in less than significant impacts related to traffic after implementation of mitigation measures similar to those of the proposed Project. Alternative 1 would result in comparable traffic impacts during construction and greater traffic impacts during operation compared to the proposed Project.

Tribal Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. No previously recorded cultural resources were identified in the Project site, and no specific information regarding tribal cultural resources was received during the Native American consultation. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register of Historical Resources (California Register) or a local register. Based on the results of Native American consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The proposed Project would

incorporate mitigation measures to reduce potentially significant impacts to previously undiscovered significant tribal cultural resources through Native American monitoring and evaluation of archaeological resources by the Native American monitor, and reduce potentially significant impacts to Native American buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation, and would require ground-disturbing construction activities during the development. Similar to the proposed Project, Alternative 1 would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the Project site during the records search or during the Native American consultation. Based on the results of the Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. Alternative 1 would be required to incorporate the same mitigation measures as the proposed Project that require Native American monitoring and evaluation of archaeological resources by the Native American monitor, and compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, Alternative 1 would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. Alternative 1 would result in comparable tribal cultural resources impacts compared to the proposed Project because both alternatives include ground-disturbance on the Project site.

Utilities and Service Systems. Utilities and service systems include water, wastewater, electricity, natural gas, telecommunication, solid waste, and storm drain facilities. The proposed Project would increase demand for these services; however, there is sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Alternative 1 would increase demand for these services; however, it is anticipated that there would be sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant and comparable to the proposed Project.

Wildfire. The Project site is designated as a non-very high fire hazard severity zone (non-VHFHSZ) and it is not located in or near a State Responsibility Area (SRA). However, the Project site is in the vicinity of a VHFHSZ. The proposed Project would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk. The proposed Project would result in less than significant impacts related to impairment of an adopted emergency response or

evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks.

Alternative 1 may require temporary lane closures on nearby local roadways during construction; however, these closures would be anticipated to be implemented consistent with the *California Temporary Traffic Control Handbook* (California Inter-Utility Coordinating Committee 2018). Although Alternative 1 would increase traffic trips on study area roadways, this alternative would not be expected to impair an adopted emergency response or evacuation plan because any traffic impacts would be mitigated through payment pursuant to a Fair Share Agreement or construction of specific improvements. Therefore, construction and operation of Alternative 1 would not substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site is not located in a VHFHSZ. Despite the VHFHSZ to the northeast of the Project site, the uncontrolled spread of a wildfire in the vicinity of the Project site is unlikely due to the density of existing non-combustible development and roadways, specifically State Route 241 (SR-241) and Rancho Parkway. Due to the lack of steep slopes, prevailing winds, location, and other factors, Alternative 1 would not exacerbate wildfire risks or expose people or structures to post-fire risks.

The build out of the Project site consistent with the current land use designation would be expected to include installation of utilities and an on-site roadway network. The installation of Project-related utilities and an on-site roadway network would not exacerbate fire risk due to the Project site's location in an urban and built-out area outside of a designated fire hazard zone. Therefore, Alternative 1 would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.

In summary, Alternative 1 would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk and less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks. Alternative 1 would result in similar wildfire impacts compared to the proposed Project because both alternatives include development of the Project site from a nursery to an urban use.

5.4.1.3 Project Objectives

Alternative 1 would be potentially consistent with the following two project objectives:

- Provide a comprehensive plan for development of the Nakase Property that implements the goals and policies of the Lake Forest General Plan.
- Provide a site design that is sensitive to the existing natural features, including Serrano Creek.

Alternative 1 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. As such, this alternative would include construction of a business park and would not include housing or a school. Therefore, the No Project Alternative would not be consistent with the following six project objectives:

- Provide a balanced mix of single-family and attached senior affordable homes, open space, and active public and private uses.
- Accommodate public uses by incorporating a new elementary school site conveniently located within easy walking distance for Project site residents.
- Provide an exceptional trail system and on-site parks that enhance the quality of life of the larger community.
- Provide for logical, attractive, and safe pedestrian and bicycle connections within the community.
- Create high-quality residential homes and distinct, identifiable neighborhoods, with a range of specifically targeted single-family product types.
- Reduce vehicular traffic and peak-hour trips through thoughtful site planning that emphasizes connectivity, access, and mobility.

5.4.2 Alternative 2: Urban Industrial/Residential

5.4.2.1 Description

Alternative 2 assumes that the Project site would be developed in accordance with the Urban Industrial-Residential land use designation, which is a newly proposed land use designation being considered in the City's General Plan update. The Urban Industrial/Residential land use designation in the General Plan update (the Lake Forest General Plan 2040) would allow for a mix of light industrial and commercial uses, including manufacturing and production (e.g., food, beverage, apparel, design, furniture, custom, or small run manufacturing). Live-work units and home-based businesses are envisioned to be located in this designation. The intent of the Urban Industrial-Residential designation is to promote creation of a vibrant mixed-use workplace environment with employment and living opportunities located in proximity. The maximum intensity allowed under this designation is 25 residential units per acre and a maximum FAR for commercial/industrial uses of 1.0:1.

Alternative 2 would include a mix of residential and commercial/industrial uses in Planning Area 1 and a community garden in Planning Area 2. Total uses for Alternative 2 include 592 residential units, 89 senior affordable rental units, 4 ac of commercial/industrial uses, a 11.5 ac school, a 5.6 ac community garden, and 21.41 ac of parks, open space, and habitat restoration area. Table 5.A summarizes the uses assumed on the Project site for Alternative 2.

Table 5.A: Land Use Statistics for Alternative 2 (Urban Industrial/Residential)

Land Use	Planning Area	Maximum DU/ac	Acreage	Maximum # of Units
Residential	1	25	8.8	220
	2	N/A	5.6	0
	3	11.4	12.3	141
	4	10.4	13	135
	5	13.2	7.3	96
Commercial/ Industrial	1	1:1 FAR	4	174,240
School	Elementary School Site	N/A	11.5	N/A
Affordable Housing	Senior Affordable Housing	4.2 (high density)	2.6	89
Parks and Open Space	Community Garden/Farm (Planning Area 2)	N/A	5.6	N/A
	Central Park/Private Recreation Center	N/A	4.8	N/A
	Neighborhood Mini-Parks	NA	2.62	N/A
	Neighborhood Park	N/A	3.59	N/A
	Open Space & Habitat & Restoration Area	N/A	10.4	N/A
Utilitarian	Street Medians & Parkways	N/A	12.5	N/A
	Roads	N/A	22.8	N/A

Note: Grey highlighted rows show how Alternative 2 differs from the proposed Project.

DU/ac = dwelling units per acre

FAR = floor-to-area ratio

N/A = not applicable

5.4.2.2 Environmental Analysis.

Aesthetics. The Project site is located in a fully developed area (with the exception of the Project site) in the northern portion of Lake Forest. Although the proposed Project would obstruct some views of the Santa Ana Mountains and some views from the Serrano Creek Trail, most views would be preserved; therefore, the proposed Project would result in less than significant impacts related to scenic vistas. The proposed Project would not impact a State Scenic Highway because there are none in the vicinity of the Project site. The visual character and quality of the Project site and surrounding area would be preserved and enhanced through the application of the architectural and landscape design guidelines outlined in the Area Plan. Therefore, the proposed Project would not substantially degrade the visual character of the Project site or conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

The Project site is currently developed with few structures, and the majority of the Project site is not illuminated at night. The proposed Project would add lighting to the Project site, which could result in impacts related to light and glare. However, the Project includes mitigation measures that require preparation of a comprehensive lighting plan and a photometric survey to demonstrate that no spill lighting or glare would occur in sensitive areas. With implementation of mitigation, impacts related to light and glare would be less than significant.

Since Alternative 2 would result in a similarly scaled project overall, the overall visual changes to the site would be similar to those associated with the proposed Project. Therefore, the impacts of Alternative 2 to scenic vistas, degradation of the visual character of the Project site, and conflict with applicable zoning and other regulations governing scenic quality would be less than significant and similar to the proposed Project. Alternative 2 would not impact a State Scenic Highway because there are none in the vicinity of the Project site.

Alternative 2 would require nighttime lighting similar to that required for the proposed Project. Because Alternative 2 would introduce nighttime lighting to a Project site that is not currently illuminated at night over the majority of the site, Alternative 2 would result in potentially significant impacts related to new sources of nighttime light. The mitigation measures would be the same as the proposed Project, would require preparation of a comprehensive lighting plan and photometric survey, and would reduce potential impacts related to lighting and glare to less than significant.

In summary, Alternative 2 would result in a potentially significant impact related to nighttime lighting, which would be reduced to less than significant with mitigation. No impact to State Scenic Highways would occur. Other potential impacts related to aesthetics would be less than significant. Alternative 2 would result in a similar project overall and therefore would result in aesthetic impacts similar to those of the proposed Project.

Agricultural Resources. According to the DOC, 119.2 ac of the approximately 122 ac Project site is designated as Unique Farmland. The Project site is currently being used as a retail nursery with all products grown and/or sold in pots. The proposed Project would permanently convert 119.2 ac of Unique Farmland to a non-agricultural use, which would result in a significant and unavoidable impact. The Project site has an agricultural district zoning designation; however, the Project Applicant/Developer is seeking a zoning classification amendment. Once the change to the zoning designation is approved, the future use of the Project site would be consistent with the City's zoning designation, and impacts pertaining to conflicts with existing agricultural zoning would be less than significant. The Project site is not currently under a Williamson Act contract; therefore, the proposed Project would not conflict with an existing Williamson Act contract. The proposed Project would not involve other changes in the existing environment that, due to the location or nature, could result in conversion of farmland to a non-agricultural use. Mitigation measures were considered for the proposed Project in order to reduce the significant impact of converting Unique Farmland on the Project site to non-agricultural uses; however, none of the mitigation measures were feasible in large part because there is a lack of land designated as Important Farmland in Lake Forest or Orange County that could be used to offset the agricultural land conversion impact from the proposed Project.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would also include a 5.6 ac community garden. Alternative 2 would change the use of the Project site and convert 113.6 ac of Unique Farmland to a non-agricultural use while retaining 5.6 ac for gardening. Impacts pertaining to conflict with existing agricultural zoning associated with Alternative 2 would be less than significant. Alternative 2 would not conflict with an existing Williamson Act contract and would not involve other changes in the existing environment

that, due to the location or nature, could result in conversion of farmland to a non-agricultural use. In addition, Alternative 3 would retain the agricultural character on a portion of the Project site in recognition that the Project site has been in agricultural production since 1938 and is a large percentage of the City's remaining agricultural land. Alternative 2 would convert fewer acres of Unique Farmland than the proposed Project. However, the reduction in agricultural conversion amounts to approximately 5 percent of the Unique Farmland converted by the proposed Project. This reduction is not sufficient to reduce significant and unavoidable impacts associated with converting agricultural land to non-agricultural use to a less than significant impact.¹ There are no feasible mitigation measures to address the conversion of 113.6 ac of Unique Farmland to a non-agricultural use and thereby reduce the significant impacts to agricultural resources. Therefore, the agricultural impacts of Alternative 2 would be comparable to the agricultural impacts of the proposed Project.

Air Quality. Air quality emissions associated with construction and operation of the proposed Project would not exceed SCAQMD significance thresholds. Therefore, impacts of the proposed Project related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable NAAQS or CAAQS would be less than significant. The proposed Project is consistent with the SCAQMD Final 2016 AQMP because: (1) the construction and operation emissions of the proposed Project would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although the proposed Project would not be consistent with the land use designations of the Project site, the proposed Project is expected to generate a net decrease in emissions as compared to the currently adopted land use designation. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant.

Alternative 2 would include a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would include 592 residential units, 89 senior affordable rental units, and 4 ac of commercial/industrial uses. The same grading footprint and similar construction would be required for Alternative 2 as would be for the proposed Project; therefore, construction emissions would be similar to the proposed Project and less than significant. Alternative 2 would include fewer housing units but additional acres of commercial/industrial uses that would be anticipated to generate an amount of vehicle trips similar to the proposed Project. Therefore, emissions generated during operation of Alternative 2 would not be anticipated to exceed the SCAQMD thresholds, and Alternative 2 would not result in a cumulatively considerable net increase of criteria pollutants for which the Project region is nonattainment. The proposed Project would be consistent with the SCAQMD Final 2016 AQMP because: (1) the construction and operation emissions would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) Alternative 2 would be consistent with the land use designations of the Project site once the General Plan update is approved. Therefore, impacts related to conflict or obstruction of implementation of

¹ The California Department of Conservation has indicated that the Project site would lose its Important Farmland designation if the remaining agricultural use is less than 10 ac (e-mail communication with Troy Dick, Research Analyst II, California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, July 19, 2019).

the applicable air quality plan would be less than significant. For these reasons, the Alternative 2 air quality impacts would be less than significant and similar to the proposed Project.

Biological Resources. No special-status plants are present on the Project site; therefore, the proposed Project would not impact special-status plant species. The proposed Project would remove 119.77 ac (115.26 ac permanently, 4.51 ac temporarily) of low-quality potential foraging habitat for two special-status bats: the western red bat and the western mastiff bat. The proposed Project would impact a small patch (0.28 ac) of Maritime Succulent Scrub/Southern Cactus Scrub (Coastal Sage Scrub) that is highly disturbed in nature and would not require mitigation because of its small size and degraded nature. While burrowing owls were not detected on the Project site during focused surveys, the Project includes mitigation to ensure the species has not moved onto the site between the dates the survey was performed and construction commences through a pre-construction survey prior to ground disturbance, per CDFW survey guidelines. Bats have the potential to roost and possibly breed in Serrano Creek; therefore, mitigation would be implemented to reduce indirect impacts to bats during construction. Bat roosting/nursery exit counts and acoustic surveys would be conducted prior to the start of any construction activities, and a Bat Management Plan would be prepared, if required, based on the results of the survey. Project construction has the potential to introduce and spread nonnative species; therefore, mitigation would be implemented to ensure that the proposed landscaping would not include invasive exotic plants. Additionally, indirect impacts to Serrano Creek would be reduced through mitigation measures that require installation of construction fencing and implementation of BMPs. Additionally, an HMP would be prepared and the Open Space & Habitat & Restoration Area placed in a permanent conservation easement to avoid impacts to sensitive riparian habitat associated with Serrano Creek. The proposed Project would impact the on-site drainage that transverses the Project site and contains potential CDFW, ACOE, and RWQCB jurisdiction. Mitigation measures for jurisdictional waters include coordination with ACOE, CDFW, and RWQCB regarding potential jurisdictional areas and the associated permitting processes and enhancement, re-establishment, or establishment of jurisdictional areas on off-site conserved lands. Finally, compliance with the MBTA and California Fish and Game Code Section 3503 would reduce construction impacts to nesting birds, including Cooper's hawk and red-tailed hawk, in Serrano Creek. In summary, compliance with the mitigation summarized above and existing regulatory requirements such as the MBTA would reduce potentially significant impacts to biological resources to less than significant.

Alternative 2 would develop the Project site with business park use consistent with the existing Business Park and BDO land use designation. Because Alternative 2 would involve development on the same Project site and would include an Open Space & Habitat & Restoration Area along Serrano Creek, Alternative 2 impacts would be essentially the same as the proposed Project. Because the potential biological impacts of Alternative 2 would be comparable to those associated with the proposed Project, the same mitigation measures would be required. After implementation of mitigation, Alternative 2 impacts to biological resources would be less than significant and comparable to the proposed Project.

Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. The proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously

recorded historical resources were identified in the Project site. Due to the number of cultural resources recorded within 0.5 mi of the Project site and the location of the proposed Project site in the archaeologically sensitive Aliso Creek and Foothill areas (as identified in the City's General Plan), there is potential that ground-disturbing construction activities would impact archaeological resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 2 would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Because the Project site is in an area of archaeological sensitivity, there is potential that ground-disturbing construction activities would impact archaeological resources. Alternative 2 would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to cultural resources to a less than significant level.

In summary, Alternative 2 would result in no impacts to historical resources and less than significant impacts with mitigation incorporated for archaeological resources and human remains. Alternative 2 would result in cultural resources impacts comparable to those of the proposed Project because both alternatives include ground disturbance on the Project site.

Energy. Construction of the proposed Project would require energy for activities such as the manufacture and transportation of building materials, demolition and grading activities, and building construction. Total diesel fuel consumption would be 118,339 gal from construction truck trips. Total gasoline consumption would be 1,084,438 gal from construction worker vehicle trips. During operation, electricity demand would be 6,140,783 kWh per year, and natural gas demand would be 116,020.6 therms per year compared to the existing nursery use. The proposed Project would be constructed to CALGreen standards and appliances would be energy efficient, which would help to reduce energy and natural gas consumption. The proposed Project is estimated to generate approximately 5,948,016 VMT for the elementary school, 1,086,584 VMT for the retirement community, and 19,064,105 VMT for the single-family residential uses annually, which would result in an annual fuel consumption of 54,189 gal of gasoline and 758 gal of diesel. Although Project construction and operation would require the use of energy, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Alternative 2 would include a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would include 592 residential units, 89 senior affordable rental units, and 4 ac of commercial/industrial uses. The same grading footprint and similar construction would be required for Alternative 2 as would the proposed Project; therefore, energy use during construction would be comparable to the proposed Project. Alternative 2 would likely result in a similarly scaled project overall, and the building would be required to be constructed to CALGreen standards to reduce energy use. Alternative 2 would include fewer housing units but additional acres of commercial/industrial uses that would be anticipated to generate a similar amount of vehicle trips as the proposed Project. Therefore, energy use during operation would be comparable to the proposed Project. Although construction and operation would require the use of energy, the operational energy demand would be similar to that of the proposed Project and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, Alternative 2 impacts related to energy use would be less than significant.

Geology and Soils. The proposed Project would not result in any impacts related to subsidence. Potential impacts related to expansive soils would be less than significant, and no mitigation is required. Impacts related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), and corrosive soils are considered potentially significant, and mitigation is required. The mitigation measures require compliance with the recommendations in the *Final Geotechnical Evaluation* and compliance with the CBC. With implementation of mitigation, the proposed buildings would be designed and constructed to current safety standards, and all potentially significant impacts related to soils and geology would be less than significant. The proposed Project would increase erosion and loss of topsoil during construction; however, Erosion Control and Sediment Control BMPs would be implemented during construction in compliance with the requirements of the Construction General Permit to ensure that impacts related to erosion would be less than significant. The Project site is in an area previously determined as sensitive for paleontological resources; therefore, it is possible that ground-disturbing construction activities could impact significant previously undiscovered paleontological resources. A PRIMP would be prepared and implemented to reduce potentially significant impacts to paleontological resources to less than significant.

Alternative 2 would include a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. The same or similar grading footprint and similar construction as the Proposed Project would be required. Additionally, Alternative 2 would likely result in a similarly scaled project overall as the proposed Project. The required grading and construction activities would result in the same or similar impacts related to geology and soils as the proposed Project. While some construction specifications would be different for Alternative 2 when compared to the proposed Project, the overall risks related to seismic ground shaking, erosion, slope stability, unsuitable (corrosive) soils, expansive soils, and paleontological resources would be comparable. Therefore, it is anticipated that Alternative 2 would result in similar impacts related to geology and soils as the proposed Project, and the same mitigation measures would be required.

In summary, Alternative 2 would result in potentially significant impacts related to geology and soils. These impacts would be less than significant with implementation of mitigation measures. Alternative 2 would result in impacts related to geology and soils that would be comparable to those of the proposed Project.

Greenhouse Gas Emissions. The proposed Project would result in 4.91 MT CO₂e/SP/yr of GHG emissions in 2025 and 4.42 MT CO₂e/SP/yr in 2030. The total GHG emissions of the proposed Project would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030; therefore, the proposed Project would result in a potentially significant impact related to GHG emissions generation. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. More than 73 percent of all mobile-source emissions in 2025 and 66 percent of all mobile-source emissions in 2030 (by weight) would be generated by the proposed Project's mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features included as part of the proposed Project. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the proposed Projects mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to the generation of GHG emissions would remain significant and unavoidable.

Alternative 2 would include a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would include fewer housing units but additional acres of commercial/industrial uses that would be anticipated to generate a similar amount of vehicle trips as the proposed Project. Emissions would likely be similar to the proposed Project. Therefore, the total GHG emissions of Alternative 2 would likely exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030; therefore, Alternative 2 would result in a potentially significant impact related to GHG emissions generation. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. A majority of the GHG emissions would be generated by the mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features that would be included in Alternative 2. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, Alternative 2's mobile-source emissions alone would likely still exceed the threshold of significance. Therefore, Alternative 2 impacts related to the generation of GHG emissions would remain significant and unavoidable but similar to that of the proposed Project.

Hazards and Hazardous Materials. The proposed Project may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small

quantities of hazardous materials or wastes associated with routine maintenance of residential and school facilities. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. The proposed Project would include a school. In order to gain approval for development of a school at the Project site that would receive State funding, previous Phase I and II ESAs prepared for the Project would need to be submitted to the DTSC for review. The DTSC would determine whether or not additional sampling and analysis, preparation of a PEA, site remediation, and public review of reports are required in order to obtain a finding of “No Further Action”. Coordination with DTSC is included as mitigation to reduce impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school. With implementation of the mitigation measures discussed above, impacts related to hazardous waste would be less than significant.

Alternative 2 would include a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would involve demolition of the existing structure, grading, and construction of new buildings that would result in similar impacts related to hazardous waste and materials as the proposed Project. Alternative 2 may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented similar to the proposed Project, which includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with routine maintenance of the residents, businesses, and school. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. Alternative 2 would include a school, and impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school could occur; therefore, a finding of “No Further Action” would be required from the DTSC. With implementation a Demolition Plan and a finding of “No Further Action”, impacts related to hazardous waste would be less than significant and comparable to that of the proposed Project.

Hydrology and Water Quality. The proposed Project would develop the Project site with a new use and would increase the impervious surface area on the Project site, which would increase stormwater runoff and change the pollutants of concern in stormwater runoff. The proposed Project would implement a comprehensive WQMP and BMPs to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. In addition, the proposed Project includes drainage infrastructure and BMPs to minimize development impacts to the site hydrology in compliance with hydromodification requirements. Hydrology and water quality impacts of the proposed Project would be less than significant upon compliance with existing plans, programs, and policies in place to ensure compliance with NPDES regulations.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan

update. Alternative 2 would change the use on the Project site, increase impervious surface area, increase stormwater runoff, and change the pollutants of concern in stormwater runoff. Alternative 2 would be required to implement BMPs and drainage infrastructure to reduce pollutants of concern on the project site and reduce stormwater runoff in compliance with NPDES and hydromodification requirements.

With compliance with adopted regulations, Alternative 2 would result in less than significant impacts related to hydrology and water quality. With implementation of BMPs and drainage infrastructure in compliance with adopted regulations, the hydrology and water quality impacts of Alternative 2 would be comparable to that of the proposed Project.

Land Use and Planning. The proposed Project would be consistent with the SCAG 2008 RCP and RTP/SCS by siting residential uses near commercial/industrial uses, near major transportation corridors and transit stops, providing new housing, and providing an open space and habitat restoration area. The proposed Project would require a General Plan Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Neighborhood Parks, and Open Space, and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, the proposed Project would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. The proposed Project would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant, and no mitigation is required.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would be consistent with the SCAG 2008 RCP and RTP/SCS by siting commercial uses near residential development, providing new housing opportunities that focus growth near major transportation corridors and transit stops, and providing an open space and habitat restoration area. Alternative 2 would be consistent with the Urban Industrial/Residential land use designation when the General Plan Update is approved in 2020 and would not require a General Plan Amendment. However, a Zone Change would be required to change the zoning from General Agriculture (A-1) to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Neighborhood Parks, Open Space, and Community Commercial. Upon the approval of the Zone Change request by the City Council, Alternative 2 would be consistent with the land use designations contained in the City's Municipal Code and zoning. Alternative 2 would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant and comparable to those of the proposed Project.

Noise. Construction noise levels would range from 53.3 to 65.2 dBA L_{eq} at the sensitive receiver locations. Construction vibration velocity levels are expected to range from 0.002 to 0.008 in/sec PPV. During operation, off-site traffic-associated trips generated from the proposed Project would increase noise levels by 0.1 to 0.72 dBA CNEL on the study area roadway segments. Operational

noise generated from the on-site uses would range from 17.9 to 32.5 dBA L₅₀ at the sensitive off-site receiver locations. The construction noise, construction vibration, off-site traffic, on on-site operational noise levels would not exceed City noise level standards or Caltrans construction vibration standards, and impacts would be less than significant. Operation would not generate excessive ground-borne vibration or ground-borne noise, and impacts would be less than significant. Adjacent traffic noise from nearby roadways and freeways would not exceed the City's exterior noise standards at the proposed outdoor uses on the Project site with the planned 6 ft high noise barriers, and impacts would be less than significant. Additionally, interior noise levels within the proposed residences and school, which would be constructed to meet ventilation standards and include dual-paned glass, are not anticipated to exceed the City's interior noise standards. However, a final Noise Study would be required to verify the design and building performance, which is included as mitigation to ensure that interior noise levels are reduced to less than significant.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would generate similar noise levels during the construction period because the scale of the development would be similar. Alternative 2 would include fewer housing units but additional acres of commercial/industrial uses that would be anticipated to generate a similar amount of vehicle trips as the proposed Project. Therefore, Alternative 2 would generate similar operational noise levels as the proposed Project. It is not anticipated that any heavy landscaping or farming equipment would be used in the community garden; therefore, this use would not generate excessive noise. Therefore, similar to the proposed Project, a final Noise Study would be required to demonstrate that the interior noise levels within the proposed buildings would be less than the City's interior noise.

In summary, Alternative 2 would result in less than significant impacts at off-site sensitive receivers. On-site noise levels would be less than significant after mitigation (i.e., preparation of a final Noise Study). Alternative 2 would generate construction and operational noise similar to that of the proposed Project.

Population and Housing. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units that would serve approximately 2,274 residents. Because the Project site is designed as Business Park and BDO, residential uses were not envisioned on the Project site and the population increase from the proposed Project would not have been accounted for in the City's projected population growth. While the proposed Project would result in population growth, the growth attributable to the proposed Project would not be substantial in relation to the current or projected conditions in Lake Forest. The addition of new affordable housing units also supports the affordable housing goals of the City. Although the proposed Project would provide short-term construction jobs and the proposed school would employ 60 workers, up to 249 nursery employees would also be displaced. However, given the availability of jobs in the region, it is anticipated that workers would find employment elsewhere. Although the Project may contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities, the overall increase in housing compared to employment is not of a sufficient magnitude to negatively affect the forecasted jobs-

housing ratio. The proposed Project would result in less than significant impacts related to population, housing, and employment growth.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Although Alternative 2 would include fewer housing units and serve fewer residents than the proposed Project, the increased population of 1,996 persons resulting from the alternative would not have been accounted for in the City's projected population. While Alternative 2 would result in population growth, the growth attributable to the alternative would not be substantial in relation to the current or projected conditions in Lake Forest. Additionally, Alternative 2 would support the affordable housing goals of the City by providing senior affordable housing. Alternative 2 would displace the 249 nursery employees; however, Alternative 2 would also provide short-term construction jobs, and the proposed school and commercial/industrial uses would employ workers. Alternative 2 may contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities. However, because Alternative 2 includes fewer residential units and more job opportunities than the proposed Project, the decline in the jobs-housing ratio would be less than that of the proposed Project.

In summary, Alternative 2 would result in less than significant impacts related to population, housing, and employment growth. However, because Alternative 2 would include fewer housing units and more job opportunities than the proposed Project, it would result in less of a decline in the balance between jobs and housing. Therefore, Alternative 2 would have a reduced impact related to population and housing when compared to the proposed Project.

Public Services. Public service impacts related to fire and police protection services would be potentially significant; however, implementation of a CTMP would reduce construction impacts to less than significant, and a secured fire protection agreement and establishment of a Neighborhood Watch Program would reduce operational impacts to less than significant. The proposed Project includes the construction of a public elementary school on the Project site, and the Project Applicant/Developer would include an elementary school to reduce impacts on school services from the additional students generated by the proposed Project. Therefore, potential impacts related to the provision of school services for construction of the proposed Project would be less than significant. With the provision of on-site private parks and amenities, the proposed Project would not require constructing new or expanding existing construction, or expanding existing recreational facilities or parks to maintain acceptable service ratios or performance objectives. Based on the City's library demand ratio, the population growth that would result from the proposed Project would not require expanding existing library facilities in Lake Forest in order to maintain acceptable service ratios. Finally, OCTA would be able to provide adequate transit services to the proposed Project. Therefore, with implementation of the mitigation described above for fire and police service impacts, impacts to public services would be less than significant.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would include fewer housing units and would result in less population growth than the proposed Project. The increased population from Alternative 2 would increase demand for

fire and emergency medical services, police protection, library, park, school, and transit services, although the increased demand would be less than the proposed Project. Alternative 2 would include mitigation similar to that of the proposed Project, including implementation of a CTMP, establishment of a Neighborhood Watch Program, and payment of development fees. Additionally Alternative 2 would include a school, parks, and open space to reduce demand for schools and parks. Therefore, with implementation of mitigation, impacts to public services would be less than significant.

In summary, with implementation of the mitigation described above, Alternative 2 impacts to public services would be less than significant. Alternative 2 would result in less of an increase in population; therefore, impacts to public services would be less than the proposed Project.

Recreation. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable housing that would increase the population in Lake Forest by approximately 2,274 persons. The increase in population would result in potentially significant impacts to existing neighborhood and regional parks and other recreational facilities. The proposed Project includes both private and public recreational uses on site. The City Municipal Code requires dedication of land equivalent to 5 ac per 1,000 residents or payment of in-lieu fees to reduce impacts to parklands. The proposed Project would meet the City's public park requirement of 11.37 ac by including approximately 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public parks. Additionally, the proposed Project includes mitigation that requires on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would increase the population within the City by 1,996 persons, which is a public park requirement of 9.98 ac using the City's standard of 5 ac of recreational space per 1,000 residents. Alternative 2 would include 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public parks. Alternative 2 would include mitigation similar to the proposed Project, which would require on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation. Alternative 2 would result in impacts to parks and recreational facilities comparable to those of the proposed Project because both alternatives would offset impacts by dedicating parkland through construction of on-site parks.

Transportation/Traffic. The proposed Project would increase VMT to 26,098,705 from the 2,698,384 VMT generated by the existing nursery. The proposed Project would not be inconsistent with *State CEQA Guidelines* Section 15064.3(b) because the City has not established thresholds for assessing VMT impacts; therefore, traffic impacts were assessed based on LOS. The proposed Project is anticipated to generate a total of approximately 8,789 trip-ends per day, which would contribute to an impact at the Bake Parkway/Jeronimo Road intersection, which is currently operating at an unacceptable LOS. The proposed Project would mitigate the impact at this location to acceptable levels through a combination of fee payments to the City pursuant to a Fair Share

Agreement or construction of the specific improvements. All construction equipment would be staged on site, and mitigation would be implemented to require that large construction equipment be delivered during off-peak times to reduce travel during peak travel periods so that construction would not result in incompatible uses that increase on-road hazards. Mitigation measures also require a distance analysis to be prepared for all Project intersections to determine limited use areas (e.g., low height landscaping), and on-street parking restrictions (e.g., red curb), if necessary, and any turning restrictions (e.g., right in/right-out). With implementation of mitigation, project construction and operation would not result in incompatible uses that increase on-road hazards, and impacts would be reduced to less than significant. Preparation of a CTMP is required as mitigation to ensure emergency vehicles would be able to navigate to the Project site through adjacent streets that may experience congestion due to construction activities. Impacts related to emergency access during construction would be reduced to less than significant with implementation of mitigation. The Area Plan meets or exceeds OCFA requirements to not hinder fire and emergency access; therefore, operational impacts related to emergency access would be considered less than significant.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would generate similar traffic impacts during the construction period because the scale of the development would be similar. A CTMP would be required for Alternative 2 to reduce impacts to emergency access during construction. Alternative 2 would include fewer housing units but additional acres of commercial/industrial uses, which would be anticipated to generate a similar amount of vehicle trips as the proposed Project. Therefore, traffic impacts would be similar compared to the proposed Project. Alternative 2 would mitigate traffic impacts through a Fair Share Agreement or construction of specific improvements, similar to the mitigation included for the proposed Project. Alternative 2 would be required to meet or exceed OCFA requirements to not hinder fire and emergency access.

In summary, Alternative 2 would result in less than significant impacts related to traffic after implementation of mitigation measures similar to those of the proposed Project. Alternative 2 would result in comparable traffic impacts during construction and operation compared to the proposed Project.

Tribal Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. No previously recorded cultural resources were identified in the Project site and no specific information regarding tribal cultural resources was received during the Native American consultation. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register. Based on the results of Native American consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to previously undiscovered significant tribal cultural resources through Native American monitoring and evaluation of archaeological resources by the Native American monitor, and reduce potentially significant impacts to Native American buried human

remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 2 would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the Project site during the records search or during the Native American consultation. Based on the results of Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. Alternative 2 would be required to incorporate the same mitigation measures as the proposed Project that require Native American monitoring and evaluation of archaeological resources by the Native American monitor, and compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, Alternative 2 would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. Alternative 2 would result in comparable tribal cultural resources impacts compared to the proposed Project because both alternatives include ground disturbance on the Project site.

Utilities and Service Systems. Utilities and service systems include water, wastewater, electricity, natural gas, telecommunication, solid waste, and storm drain facilities. The proposed Project would increase demand for these services; however, there are sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant.

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would increase demand for these services; however, it is anticipated that there would be sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant and comparable to the proposed Project.

Wildfire. The Project site is designated as a non-VHFHSZ and is not located in or near an SRA. However, the Project site is in the vicinity of a VHFHSZ. The proposed Project would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk. The proposed Project would result in less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks.

Alternative 2 may require temporary lane closures on nearby local roadways during construction; however, these closures would be anticipated to be implemented consistent with the *California Temporary Traffic Control Handbook* (California Inter-Utility Coordinating Committee 2018). Study area intersections would be expected to either operate at acceptable LOS if the Project site was developed consistent with the Urban Industrial/Residential land use designation, or the Project would be required to mitigate for any intersection impacts. Therefore, construction and operation of Alternative 2 would not substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site is not located in a VHFHSZ. Despite the VHFHSZ to the northeast of the Project site, the uncontrolled spread of wildfire in the vicinity of the Project site is unlikely due to the density of existing non-combustible development and roadways, specifically SR-241 and Rancho Parkway. Due to the lack of steep slopes, prevailing winds, location, and other factors, Alternative 2 would not exacerbate wildfire risks or expose people or structures to post-fire risks.

Build out of the Project site consistent with the Urban Industrial/Residential land use designation would be expected to include installation of utilities and an on-site roadway network. The installation of Project-related utilities and an on-site roadway network would not exacerbate fire risk due to the Project site's location in an urban and built-out area outside of a designated fire hazard zone. Therefore, Alternative 2 would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.

In summary, Alternative 2 would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk and less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks. Alternative 2 would result in similar wildfire impacts compared to the proposed Project because both alternatives include development of the Project site from a nursery to an urban use.

5.4.2.3 Project Objectives

Alternative 2 would develop the Project site with a mix of residential and commercial/industrial uses consistent with the proposed Urban Industrial/Residential land use designation in the General Plan update. Alternative 2 would include fewer housing units but also additional acres of commercial/industrial uses compared to the proposed Project. Alternative 2 would be potentially consistent with all of the Project objectives, which include:

- Provide a comprehensive plan for development of the Nakase Property, which implements the goals and policies of the Lake Forest General Plan.
- Provide a site design that is sensitive to the existing natural features, including Serrano Creek.
- Reduce vehicular traffic and peak-hour trips through thoughtful site planning that emphasizes connectivity, access, and mobility.

- Provide a balanced mix of single-family and attached senior affordable homes, open space, and active public and private uses.
- Accommodate public uses by incorporating a new elementary school site conveniently located within easy walking distance for Project site residents.
- Provide an exceptional trail system and on-site parks that enhance the quality of life of the larger community.
- Provide for logical, attractive, and safe pedestrian and bicycle connections within the community.
- Create high-quality residential homes and distinct, identifiable neighborhoods with a range of specifically targeted single-family product types.

5.4.3 Alternative 3: No School Alternative

5.4.3.1 Description

Alternative 3 would be similar to the proposed Project, but without a school and with a community garden. Alternative 3 would include development of up to 675 single-family residential units, 101 senior affordable rental units, a 3.5 ac community garden, and 21.41 ac of parks, open space, and habitat restoration area. Alternative 3 would not include the school that is included in the proposed Project. Instead, Planning Area 2 would be expanded to encompass the school site and would include residential uses as well as a 3.5 ac community garden. Table 5.B summarizes the uses assumed on the Project site for Alternative 3.

Table 5.B: Land Use Statistics for Alternative 3 (No School)

Land Use	Planning Area	Maximum DU/ac	Acreage	Maximum # of Units ¹
Residential	1	14.2	12.8	182
	2	21.6	13.6	294
	3	11.4	12.3	141
	4	10.4	13	135
	5	13.2	7.3	96
School	Elementary School Site	N/A	0	N/A
Affordable Housing	Senior Affordable Housing	38.9 (high density)	2.6	101
Parks and Open Space	Community Garden/Farm (Planning Area 2)	N/A	3.5	N/A
	Central Park/Private Recreation Center	N/A	4.8	N/A
	Neighborhood Mini-Parks	N/A	2.62	N/A
	Neighborhood Park	N/A	3.59	N/A
	Open Space & Habitat & Restoration Area	N/A	10.4	N/A
Utilitarian	Street Medians & Parkways	N/A	12.5	N/A
	Roads	N/A	22.8	N/A

Note: Grey highlighted rows show how Alternative 3 differs from the proposed Project.

¹ Although the total number of residential units in Planning Areas 1-5 exceed 675 based on allowable density, the total development would be capped at 675 residential units and 101 senior affordable housing units.

DU/ac = dwelling units per acre

N/A = not applicable

5.4.3.2 Environmental Analysis

Aesthetics. The Project site is located in a fully developed area (with the exception of the Project site) in the northern portion of Lake Forest. Although the proposed Project would obstruct some views of the Santa Ana Mountains and some views from the Serrano Creek Trail, most views would be preserved; therefore, the proposed Project would result in less than significant impacts related to scenic vistas. The proposed Project would not impact a State Scenic Highway because none are located in the vicinity of the Project site. The visual character and quality of the Project site and the surrounding area would be preserved and enhanced through the application of the architectural and landscape design guidelines outlined in the Area Plan. Therefore, the proposed Project would not substantially degrade the visual character of the Project site nor conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant. The Project site is currently developed with few structures, and the majority of the Project site is not illuminated at night. The proposed Project would add lighting to the Project site that could result in impacts related to light and glare. However, the Project includes mitigation measures that require preparation of a comprehensive lighting plan and a photometric survey to demonstrate that no spill lighting or glare would occur in sensitive areas. With implementation of mitigation, impacts related to light and glare would be less than significant.

Since Alternative 3 would result in a similarly scaled project overall, the overall visual changes to the site would be similar to those associated with the proposed Project. Therefore, the impacts of Alternative 3 to scenic vistas, degradation of the visual character of the Project site, and conflict with applicable zoning and other regulations governing scenic quality would be less than significant and similar to the proposed Project. Alternative 3 would not impact a State Scenic Highway because there are none in the vicinity of the Project site.

Alternative 3 would require nighttime lighting similar to that of the proposed Project. Because Alternative 3 would introduce nighttime lighting to a Project site that is not currently illuminated at night on the majority of the site, the alternative would result in potentially significant impacts related to new sources of nighttime light. The mitigation measures would be the same as the proposed Project, would require preparation of a comprehensive lighting plan and photometric survey, and would reduce potential impacts related to lighting and glare to less than significant.

In summary, Alternative 3 would result in a potentially significant impact related to nighttime lighting that would be reduced to less than significant with mitigation. No impact to State Scenic Highways would occur. Other potential impacts related to aesthetics would be less than significant. Alternative 3 would result in a similar project overall and therefore would result in aesthetic impacts similar to that of the proposed Project.

Agricultural Resources. According to the DOC, 119.2 ac of the approximately 122 ac Project site is designated as Unique Farmland. The Project site is currently being used as a retail nursery with all products grown and/or sold in pots. The proposed Project would permanently convert 119.2 ac of Unique Farmland to a non-agricultural use, which would result in a significant and unavoidable impact. The Project site has an agricultural district zoning designation; however, the Project Applicant/Developer is seeking a zoning classification amendment and once the zone change is approved, the future use of the Project site would be consistent with the City's zoning designation

and impacts pertaining to conflicts with existing agricultural zoning would be less than significant. The Project site is not currently under a Williamson Act contract; therefore, the proposed Project would not conflict with an existing Williamson Act contract. The proposed Project would not involve other changes in the existing environment that, due to the location or nature, could result in the conversion of Unique Farmland to a non-agricultural use. Mitigation measures were considered for the proposed Project in order to reduce the significant impact of converting Unique Farmland on the Project site to non-agricultural uses; however, none of the mitigation measures were feasible in large part due to a lack of Important Farmland within the City or County that could be used to offset the agricultural land conversion impact from the proposed Project.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses as well as a 3.5 ac community garden. Alternative 3 would change the use on the Project site and would convert 117.2 ac of Unique Farmland to a non-agricultural use while retaining 3.5 ac for gardening. Impacts pertaining to conflict with existing agricultural zoning associated with Alternative 3 would be less than significant. Alternative 3 would not conflict with an existing Williamson Act contract and would not involve other changes in the existing environment that, due to the location or nature, could result in conversion of Unique Farmland to a non-agricultural use. Alternative 3 would convert 2 fewer acres of Unique Farmland than the proposed Project. In addition, Alternative 3 would retain the agricultural character on a portion of the Project site in recognition that the Project site has been in agricultural production since 1938 and is a large percentage of the City's remaining agricultural land. However, the reduction in agricultural conversion amounts to approximately 2 percent of the Unique Farmland converted by the proposed Project. This reduction is not sufficient to reduce the significant and unavoidable impacts associated with the conversion of agricultural land to a non-agricultural use to less than significant.¹ There are no feasible mitigation measures to address the conversion of 117.2 ac of Unique Farmland to a non-agricultural use and thereby reduce the significant impacts to agricultural resources. Therefore, the agricultural impacts of Alternative 3 would be comparable to the agricultural impacts of the proposed Project.

Air Quality. Air quality emissions associated with construction and operation of the proposed Project would not exceed SCAQMD significance thresholds. Therefore, impacts of the proposed Project related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable NAAQS or CAAQS would be less than significant. The proposed Project is consistent with the SCAQMD Final 2016 AQMP because: (1) the construction and operation emissions of the proposed Project would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although the proposed Project would not be consistent with the land use designations of the Project site, the proposed Project is expected to generate a net decrease in emissions as compared to the currently adopted land use designation. Therefore, impacts related to a conflict or obstruction of implementation of the applicable air quality plan would be less than significant.

¹ The California Department of Conservation has indicated that the Project site would lose its Important Farmland designation if the remaining agricultural use is less than 10 ac (e-mail communication with Troy Dick, Research Analyst II, California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, July 19, 2019).

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. A similar grading footprint but less construction would be required for Alternative 3 compared to the proposed Project; therefore, construction emissions would be less than the proposed Project and less than significant. Alternative 3 would generate 1,890 fewer vehicle trips daily than the proposed Project because there would be no trips associated with a school. Therefore, emissions generated during operation of Alternative 3 would be less than the proposed Project and would not exceed the SCAQMD thresholds. As such, Alternative 3 would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment. Alternative 3 would be consistent with the SCAQMD Final 2016 AQMP because: (1) the construction and operation emissions would be less than the proposed Project and would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although Alternative 3 would not be consistent with the land use designations of the Project site, the alternative would be expected to generate a net decrease in emissions as compared to the currently adopted land use designation. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant. For these reasons, Alternative 3 air quality impacts would be less than significant and less than that of the proposed Project.

Biological Resources. No special-status plants are present on the Project site; therefore, the proposed Project would not impact special-status plant species. The proposed Project would remove 119.77 ac (115.26 ac permanently, 4.51 ac temporarily) of low-quality potential foraging habitat for two special-status bats: the western red bat and the western mastiff bat. The proposed Project would impact a small patch (0.28 ac) of Maritime Succulent Scrub/Southern Cactus Scrub (Coastal Sage Scrub) that is highly disturbed in nature and would not require mitigation because of its small size and degraded nature. While burrowing owls were not detected on the Project site during focused surveys, the proposed Project includes mitigation to ensure the species has not moved onto the site between the dates the survey was performed and construction commences through a pre-construction survey prior to ground disturbance, per CDFW survey guidelines. Bats have the potential to roost and possibly breed in Serrano Creek; therefore, mitigation would be implemented to reduce indirect impacts to bats during construction. Bat roosting/nursery exit counts and acoustic surveys would be conducted prior to the start of any construction activities, and a Bat Management Plan would be prepared, if required, based on the results of the survey. Project construction has the potential to introduce and spread nonnative species; therefore, mitigation would be implemented to ensure that the proposed landscaping would not include invasive exotic plants. Additionally, indirect impacts to Serrano Creek would be reduced through mitigation measures that require installation of construction fencing and implementation of BMPs. Additionally, an HMP would be prepared and the Open Space & Habitat & Restoration Area would be placed in a permanent conservation easement to avoid impacts to sensitive riparian habitat associated with Serrano Creek. The proposed Project would impact the on-site drainage that transverses the Project site and contains potential CDFW, ACOE, and RWQCB jurisdiction. Mitigation measures for jurisdictional waters includes coordination with ACOE, CDFW, and RWQCB regarding potential jurisdictional areas and the associated permitting processes and enhancement, re-establishment, or establishment of jurisdictional areas on off-site conserved lands. Finally, compliance with the MBTA and California Fish and Game Code Section 3503 would reduce construction impacts to nesting birds, including Cooper's hawk and red-tailed hawk in Serrano

Creek. In summary, compliance with the mitigation summarized above and existing regulatory requirements, such as the MBTA, would reduce potentially significant impacts to biological resources to less than significant.

Alternative 3 would include the same amount of residential development on the Project site as the proposed Project, but would not include a school. Alternative 3 would also include a 3.5 ac community garden. Because Alternative 3 would involve development on the same Project site and would include an Open Space & Habitat & Restoration Area along Serrano Creek, Alternative 3 impacts would be essentially the same as that of the proposed Project. Because the potential biological impacts of Alternative 3 would be comparable to those associated with the proposed Project, the same mitigation measures would be required. After implementation of mitigation, impacts to biological resources would be less than significant and comparable to that of the proposed Project.

Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. The proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Due to the number of cultural resources recorded within 0.5 mi of the Project site and the location of the proposed Project site in the archaeologically sensitive Aliso Creek and Foothill areas (as identified in the City's General Plan), there is potential that ground-disturbing construction activities would impact archaeological resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 3 would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Because the Project site is in an area of archaeological sensitivity, there is potential that ground-disturbing construction activities associated with the residential development and community garden would impact archaeological resources. Alternative 3 would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to cultural resources to a less than significant level.

In summary, Alternative 3 would result in no impacts to historical resources and less than significant impacts with mitigation incorporated for archaeological resources and human remains. Alternative 3 would result in comparable cultural resources impacts compared to the proposed Project because both alternatives include ground disturbance on the Project site.

Energy. Construction of the proposed Project would require energy for activities such as the manufacture and transportation of building materials, demolition and grading activities, and building construction. Total diesel fuel consumption would be 118,339 gal from construction truck trips. Total gasoline consumption would be 1,084,438 gal from construction worker vehicle trips. During operation, electricity demand would be 6,140,783 kWh per year and natural gas demand would be 116,020.6 therms per year, compared to the existing nursery use. The proposed Project would be constructed to CALGreen standards and appliances would be energy efficient, which would help to reduce energy and natural gas consumption. The proposed Project is estimated to generate approximately 5,948,016 VMT for the elementary school, 1,086,584 VMT for the retirement community, and 19,064,105 VMT for the single-family residential uses annually, which would result in an annual fuel consumption of 54,189 gal of gasoline and 758 gal of diesel. Although Project construction and operation would require using energy, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. A similar grading footprint but less construction would be required for Alternative 3 compared to the proposed Project; therefore, energy use during construction would be less than the proposed Project. Alternative 3 would include the same amount of residential development on the Project site as the proposed Project but would not include a school. Buildings would be required to be constructed to CALGreen standards to reduce energy use. Because Alternative 3 includes less development than the proposed Project, consumption of natural gas and electricity during operation would be less. Alternative 3 would generate 5,948,016 fewer VMT, which would consume less fuel compared to the proposed Project, because there would be no school to generate these trips. Therefore, energy use during operation would be less than the proposed Project. Although construction and operation would require use of energy, operational energy demand would be less than the proposed Project during both construction and operation. Alternative 3 would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts related to energy use would be less than significant.

Geology and Soils. The proposed Project would not result in any impacts related to subsidence. Potential impacts related to expansive soils would be less than significant, and no mitigation is required. Impacts related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), and corrosive soils are considered potentially significant, and mitigation is required. The mitigation measures require compliance with the recommendations in the *Final Geotechnical Evaluation* and compliance with the CBC. With implementation of mitigation, the proposed buildings would be designed and constructed to current safety standards, and all potentially significant impacts related to soils and geology would be less than significant. The proposed Project would increase erosion and loss of topsoil during construction; however, Erosion Control and Sediment Control BMPs would be implemented during construction in compliance with the requirements of the Construction General Permit to ensure impacts related to erosion would be less than significant. The Project site is in an area previously determined as sensitive for paleontological resources; therefore, it is possible that ground-

disturbing construction activities could impact significant previously undiscovered paleontological resources. A PRIMP would be prepared and implemented to reduce potentially significant impacts to paleontological resources to less than significant.

Although Alternative 3 is reduced in size compared to the proposed Project because the school would not be constructed, the required grading and construction activities would result in the same or similar impacts related to geology and soils as the proposed Project. While some construction specifications would be different for this alternative compared to the proposed Project, the overall risks related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), corrosive soils, and paleontological resources would be comparable. Therefore, it is anticipated that Alternative 3 impacts related to geology and soils would be similar to that of the proposed Project, and the same mitigation measures would be required.

In summary, Alternative 3 would result in potentially significant impacts related to geology and soils. These impacts would be less than significant with implementation of mitigation measures. Alternative 3 would result in impacts related to geology and soils that would be comparable to those of the proposed Project.

Greenhouse Gas Emissions. The proposed Project would result in 4.91 MT CO₂e/SP/yr in 2025 and 4.42 MT CO₂e/SP/yr in 2030 of GHG emissions. The total GHG emissions of the proposed Project would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030; therefore, the proposed Project would result in a potentially significant impact related to GHG emissions generation. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. More than 73 percent of all mobile-source emissions in 2025 and 66 percent of all mobile-source emissions in 2030 (by weight) would be generated by the proposed Project's mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features included as part of the proposed Project. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the proposed Project's mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to the generation of GHG emissions would remain significant and unavoidable.

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. The *Greenhouse Gas Analysis* (Urban Crossroads 2019b) included GHG modeling for residential sources and for "other" sources (which consist primarily of school emissions). The GHG modeling results for just the proposed residential uses are shown in Tables 5.C and 5.D, which represent the GHG emissions for Alternative 3. As shown in Tables 5.C and 5.D, the total GHG emissions of Alternative 3 would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030, respectively; therefore, Alternative 3 would result in a potentially significant impact related to the generation of GHG emissions. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. A majority of the GHG emissions would be generated by the mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source

**Table 5.C: 2025 Greenhouse Gas Emissions for Alternative 3
(No School)**

Emissions Source		Emissions (MT/yr)			
		CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years		372.21	0.04	0.00	373.19
Area	Residential	199.42	0.02	3.42E ⁻⁰³	200.84
Energy	Residential	1,712.09	0.09	0.03	1,722.16
Mobile	Residential	6,906.23	0.27	0.00	6,912.99
Waste	Residential	170.14	10.06	0.00	421.52
Water Usage	Residential	170.81	1.33	0.03	213.96
Total CO₂e (All Sources)		9,844.66			
<i>Existing Emissions</i>		<i>-599.10</i>			
Net CO₂e (Project Minus Existing)		9,245.56			
Project Service Population		2,289			
Total CO₂e/Service Population		4.04			
2025 GHG Service Population Threshold		3.84			
Threshold Exceeded?		YES			

Source: *Greenhouse Gas Analysis* (Urban Crossroads 2019b).

Note: Service Population = 776 residential units times 2.95 persons per household = 2,289

CH₄ = methane

GHG = greenhouse gas

CO₂ = carbon dioxide

MT/yr = metric tons per year

CO₂e = carbon dioxide equivalent

N₂O = nitrous oxide

**Table 5.D: 2030 Greenhouse Gas Emissions for Alternative 3
(No School)**

Emissions Source		Emissions (MT/yr)			
		CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years		372.21	0.04	0.00	373.19
Area	Residential	199.42	0.02	3.42E ⁻⁰³	200.84
Energy	Residential	1,549.03	0.09	0.03	1,559.10
Mobile	Residential	6,161.18	0.23	0.00	6,167.00
Waste	Residential	170.14	10.06	0.00	421.52
Water Usage	Residential	147.85	1.33	0.03	191.00
Total CO₂e (All Sources)		8,912.65			
<i>Existing Emissions</i>		<i>-599.10</i>			
Net CO₂e (Project Minus Existing)		8,313.55			
Project Service Population		2,289			
Total CO₂e/Service Population		3.63			
2030 GHG Service Population Threshold		2.88			
Threshold Exceeded?		YES			

Source: *Greenhouse Gas Analysis* (Urban Crossroads 2019b).

Note: Service Population = 776 residential units times 2.95 persons per household = 2,289

CH₄ = methane

GHG = greenhouse gas

CO₂ = carbon dioxide

MT/yr = metric tons per year

CO₂e = carbon dioxide equivalent

N₂O = nitrous oxide

emissions beyond the regulatory requirements and project design features that would be included in Alternative 3. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the Alternative 3 mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to the generation of GHG emissions would remain significant and unavoidable but would be less than that of the proposed Project.

Hazards and Hazardous Materials. The proposed Project may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve the transport, use, and disposal of small quantities of hazardous materials or wastes associated with the routine maintenance of residential and school facilities. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities.

The proposed Project would include a school. In order to gain approval for development of a school at the Project site that would receive State funding, previous Phase I and II ESAs prepared for the Project would need to be submitted to the DTSC for review. The DTSC would determine whether or not additional sampling and analysis, preparation of a PEA, site remediation, and public review of reports are required in order to obtain a finding of "No Further Action". Coordination with DTSC is included as mitigation to reduce impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school. With implementation of the mitigation discussed above, impacts related to hazardous waste would be less than significant.

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. Because Alternative 3 would not include a school, no impact related to hazardous emissions or hazardous materials within 0.25 mi of a school would occur. Alternative 3 would involve demolition of the existing structure, grading, and construction of new buildings, which would result in impacts related to hazardous waste and materials similar to that of the proposed Project. Alternative 3 may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented similar to the proposed Project that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with the routine maintenance of the residents and school. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. In

summary, with implementation a Demolition Plan, impacts related to hazardous waste would be less than significant and comparable to that of the proposed Project.

Hydrology and Water Quality. The proposed Project would develop the Project site with a new use and would increase impervious surface area on the Project site, which would increase stormwater runoff and change the pollutants of concern in stormwater runoff. The proposed Project would implement a comprehensive WQMP and BMPs to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. In addition, the proposed Project includes drainage infrastructure and BMPs to minimize development impacts to the site hydrology in compliance with hydromodification requirements. Hydrology and water quality impacts of the proposed Project would be less than significant upon compliance with existing plans, programs, and policies in place to ensure compliance with NPDES regulations.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses. Alternative 3 would change the use on the Project site, increase impervious surface area, increase stormwater runoff, and change the pollutants of concern in stormwater runoff. Alternative 3 would be required to implement BMPs and drainage infrastructure to reduce pollutants of concern on the Project site and reduce stormwater runoff in compliance with NPDES and hydromodification requirements.

With compliance with adopted regulations, Alternative 3 would result in less than significant impacts related to hydrology and water quality. The hydrology and water quality impacts of Alternative 3 would be comparable to the hydrology and water quality impacts of the proposed Project with implementation of BMPs and drainage infrastructure in compliance with adopted regulations.

Land Use and Planning. The proposed Project would be consistent with the SCAG 2008 RCP and RTP/SCS by siting residential uses near commercial/industrial uses and major transportation corridors and transit stops, providing new housing, and providing an open space and habitat restoration area. The proposed Project would require a General Plan Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Neighborhood Parks, and Open Space and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, the proposed Project would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. The proposed Project would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant, and no mitigation is required.

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. Alternative 3 would be consistent with the SCAG 2008 RCP and RTP/SCS by siting commercial uses near residential development, providing new housing opportunities that focus on growth near major transportation corridors and transit stops, and providing an open space and habitat restoration area. Alternative 3 would require a General Plan

Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Neighborhood Parks, and Open Space and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, Alternative 3 would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. Alternative 3 would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant and comparable to those of the proposed Project.

Noise. Construction noise levels would range from 53.3 to 65.2 dBA L_{eq} at the sensitive receiver locations. Construction vibration velocity levels are expected to range from 0.002 to 0.008 in/sec PPV. During operation, off-site traffic-associated trips generated from the proposed Project would increase noise levels by 0.1 to 0.72 dBA CNEL on the study area roadway segments. Operational noise generated from the on-site uses would range from 17.9 to 32.5 dBA L_{50} at the sensitive off-site receiver locations. The construction noise, construction vibration, off-site traffic, and on-site operational noise levels would not exceed City noise level standards or Caltrans construction vibration standards, and impacts would be less than significant. Operation would not generate excessive ground-borne vibration or ground-borne noise, and impacts would be less than significant. Adjacent traffic noise from nearby roadways and freeways would not exceed the City's exterior noise standards at the proposed outdoor uses on the Project site with the planned 6 ft high noise barriers, and impacts would be less than significant. Additionally, interior noise levels within the proposed residences and school, which would be constructed to meet ventilation standards and include dual-paned glass, are not anticipated to exceed the City's interior noise standards. However, a *Final Noise Study* would be required to verify the design and building performance, which is included as mitigation to ensure interior noise levels are reduced to less than significant.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses, but would not include the school that is proposed as part of the proposed Project. Alternative 3 would generate similar noise levels during the construction period, but the duration of noise exposure would be less because the construction period would be slightly reduced. Alternative 3 would generate reduced operational noise compared to the proposed Project because the number of vehicular trips generated would be fewer. It is not anticipated that any heavy landscaping or farming equipment would be used in the community garden; therefore, this use would not generate excessive noise. Similar to the proposed Project, a *Final Noise Study* would be required to demonstrate that the interior noise levels within the proposed buildings would be less than the City's interior noise.

In summary, Alternative 3 would result in less than significant impacts at off-site sensitive receivers. On-site noise levels would be less than significant after mitigation (preparation of *Final Noise Study*). Alternative 3 would generate similar construction noise but for a shorter duration and would generate less operational noise than the proposed Project.

Population and Housing. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units, which would serve approximately

2,274 residents. Because the Project site is designed as Business Park and BDO, residential uses were not envisioned on the Project site, and the population increase from the proposed Project would not have been accounted for in the City's projected population growth. While the proposed Project would result in population growth, the growth attributable to the proposed Project would not be substantial in relation to existing or projected conditions in Lake Forest. The addition of new affordable housing units also supports the affordable housing goals of the City. Although the proposed Project would provide short-term construction jobs and the proposed school would employ 60 workers, up to 249 nursery employees would be displaced. However, given the availability of jobs in the region, it is anticipated that workers would find employment elsewhere. Although the Project may contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities, the overall increase in housing compared to employment is not of sufficient magnitude to negatively affect the forecasted jobs-housing ratio. The proposed Project would result in less than significant impacts related to population, housing, and employment growth.

Alternative 3 includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units, which would serve approximately 2,274 residents. The increased population from Alternative 3 would be the same as the proposed Project, which would not have been accounted for in the City's projected population. While Alternative 3 would result in population growth, the growth attributable to Alternative 3 would not be substantial in relation to the existing or projected conditions in Lake Forest. Additionally, Alternative 3 would support the affordable housing goals of the City by providing senior affordable housing. Alternative 3 would displace 249 nursery employees. Although Alternative 3 would provide short-term construction jobs, this alternative would not provide long-term job opportunities. Alternative 3 would contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities. Additionally, because Alternative 3 includes the same residential units and fewer job opportunities than the proposed Project, the decline in the jobs-housing ratio would be greater than that of the proposed Project.

In summary, Alternative 3 would result in less than significant impacts related to population, housing, and employment growth. However, because Alternative 3 would include the same amount of housing and fewer job opportunities than the proposed Project, it would result in a greater decline in the balance between jobs and housing.

Public Services. Public service impacts related to fire and police protection services would be potentially significant; however, implementation of a CTMP would reduce construction impacts to less than significant, and a secured fire protection agreement and establishment of a Neighborhood Watch Program would reduce operational impacts to less than significant. The proposed Project includes the construction of a public elementary school on the Project site, and the Project Applicant/Developer would include an elementary school to reduce impacts on school services from the additional students generated by the proposed Project. Therefore, potential impacts related to the provision of school services for construction of the proposed Project would be less than significant. With the provision of on-site private parks and amenities, the proposed Project would not require the construction of new or expansion of existing construction, or expansion of existing recreational facilities or parks to maintain acceptable service ratios or performance objectives.

Based on the City's library demand ratio, the population growth that would result from the proposed Project would not require the expansion of existing library facilities in Lake Forest in order to maintain acceptable service ratios. Finally, OCTA would be able to provide adequate transit services to the proposed Project. Therefore, with implementation of the mitigation described above for fire and police service impacts, impacts to public services would be less than significant.

Alternative 3 would develop the Project site with single-family residential units and senior affordable rental units similar to the proposed Project, but would not include the school. Because Alternative 3 would include the same housing as the proposed Project, the increase in population and the resulting demand for public services would be comparable. The increased population from Alternative 3 would result in the same increase in demand for fire and emergency medical services, police protection, library, park, and transit services as the proposed Project. However, because Alternative 3 would not include a school, the increase in demand for schools from the additional students on the Project site would be greater than that of the proposed Project. Alternative 3 would include similar mitigation as the proposed Project, including implementation of a CTMP, establishment of a Neighborhood Watch Program, and payment of development fees. Additionally, Alternative 3 would include parks and open space to reduce demand for parks. Therefore, with implementation of mitigation, impacts to public services would be less than significant.

In summary, with implementation of the mitigation, Alternative 3 impacts to public services would be less than significant. Alternative 3 would result in the same increase in population; therefore, impacts related to increased demand for fire and emergency medical services, police protection, library, park, and transit services would be the same as the proposed Project. However, because Alternative 3 does not include a school, the increase in demand for schools services would be greater than the proposed Project.

Recreation. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable housing, which would increase the population in Lake Forest by approximately 2,274 persons. The increase in population would result in potentially significant impacts to existing neighborhood and regional parks and other recreational facilities. The proposed Project includes both private and public recreational uses on site. The City Municipal Code requires dedication of land equivalent to 5 ac per 1,000 residents or payment of in-lieu fees to reduce impacts to parklands. The proposed Project would meet the City's public park requirement of 11.37 ac by including approximately 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public parks. Additionally, the proposed Project includes mitigation that requires on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation.

Alternative 3 would include the development of up to 675 single-family residential units and up to 101 senior affordable housing, which would increase the population in Lake Forest by approximately 2,274 persons. Alternative 3 would be required to meet the City's public park requirement of 11.37 ac through dedication of land or payment of in-lieu fees. Alternative 3 would include 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public

parks.¹ The remaining 0.05 ac would be offset through payment of in-lieu fees. Alternative 3 would also include mitigation similar to the proposed Project that would require the on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation. Alternative 3 would result in comparable impacts to parks and recreational facilities as the proposed Project because both alternatives would offset impacts through construction of on-site parks and dedication of land or payment of in-lieu fees.

Transportation/Traffic. The proposed Project would increase VMT to 26,098,705 from the 2,698,384 VMT generated by the existing nursery. The proposed Project would not be inconsistent with *State CEQA Guidelines* Section 15064.3(b) because the City has not established thresholds for assessing VMT impacts; therefore, traffic impacts were assessed based on LOS. The proposed Project is anticipated to generate a total of approximately 8,789 trip-ends per day that would contribute to an impact at the Bake Parkway/Jeronimo Road intersection, which is currently operating at an unacceptable LOS. The proposed Project would mitigate the impact at this location to acceptable levels through a combination of fee payments to the City pursuant to a Fair Share Agreement or construction of the specific improvements. All construction equipment would be staged on-site, and mitigation would be implemented to require that large construction equipment be delivered during off-peak times to reduce travel during peak travel periods so that construction would not result in incompatible uses that increase on-road hazards. Mitigation measures also require a distance analysis to be prepared for all Project intersections to determine limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), if necessary, and any turning restrictions (e.g., right-in/right-out). With implementation of mitigation, project construction and operation would not result in incompatible uses that increase on-road hazards, and impacts would be reduced to less than significant. Preparation of a CTMP is required as mitigation to ensure that emergency vehicles would be able to navigate to the Project site through adjacent streets that may experience congestion due to construction activities. Impacts related to emergency access during construction would be reduced to less than significant with implementation of mitigation. The Area Plan meets or exceeds the OCFA requirements to not hinder fire and emergency access; therefore, operational impacts related to emergency access would be considered less than significant.

Alternative 3 would include the same amount of residential development as the proposed Project but would not include a school. A smaller grading footprint and less construction would be required for Alternative 3 compared to the proposed Project; therefore, Alternative 3 would require fewer construction trips than the proposed Project. A CTMP would be required for Alternative 3 to reduce impacts to emergency access during construction. Alternative 3 would generate 5,948,016 fewer VMT than the proposed Project because there would be no vehicle trips associated with the school. Therefore, traffic impacts would be less than the proposed Project. Alternative 3 would be required to mitigate any traffic impacts through a Fair Share Agreement or construction of the specific improvements, similar to the mitigation included for the proposed Project. Alternative 3 would be required to meet or exceed the OCFA requirements to not hinder fire and emergency access.

¹ Only 0.8 ac of trail within the open space and habitat and restoration area trail is classified as a public park.

In summary, Alternative 3 would result in less than significant impacts related to traffic after implementation of mitigation measures similar to those of the proposed Project. Alternative 3 would result in less traffic impacts during construction and operation compared to the proposed Project.

Tribal Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. No previously recorded cultural resources were identified in the Project site, and no specific information regarding tribal cultural resources was received during the Native American consultation. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register. Based on the results of Native American consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to previously undiscovered significant tribal cultural resources through Native American monitoring and evaluation of archaeological resources by the Native American monitor, and reduce potentially significant impacts to Native American buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts from the proposed Project to a less than significant level.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses and a community garden, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 3 would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the Project site during the records search or during the Native American consultation. Based on the results of Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. Alternative 3 would be required to incorporate the same mitigation measures as the proposed Project that require Native American monitoring and evaluation of archaeological resources by the Native American monitor, and compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, Alternative 3 would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. Alternative 3 would result in comparable tribal cultural resources impacts compared to the proposed Project because both alternatives include ground-disturbance on the Project site.

Utilities and Service Systems. Utilities and service systems include water, wastewater, electricity, natural gas, telecommunication, solid waste, and storm drain facilities. The proposed Project would increase demand for these services; however, there are sufficient supplies and capacity available to

service the increased demand. Impacts related to utilities and service systems would be less than significant.

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses but would not include a school. Alternative 3 would increase demand for utilities and service systems services; however, the increase in demand would be somewhat less than the proposed Project because there would be no demand associated with operation of the school. Therefore, there would be sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant and somewhat less than the proposed Project.

Wildfire. The Project site is designated as a non-VHFHSZ and is not located in or near an SRA. However, the Project site is in the vicinity of a VHFHSZ. The proposed Project would result in no impact related to installation of maintenance of infrastructure that may exacerbate fire risk. The proposed Project would result in less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks.

Alternative 3 would require temporary lane closures on nearby local roadways during construction, similar to the proposed Project; however, these closures would be anticipated to be implemented consistent with the *California Temporary Traffic Control Handbook* (California Inter-Utility Coordinating Committee 2018). Because Alternative 3 would generate less traffic than the proposed Project, study area intersections would be expected to operate at acceptable LOS. Therefore, the construction and operation of Alternative 3 would not substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site is not located in a VHFHSZ. Despite the VHFHSZ to the northeast of the Project site, the uncontrolled spread of a wildfire in the vicinity of the Project site is unlikely due to the density of existing non-combustible development and roadways, specifically SR-241 and Rancho Parkway. Due to the lack of steep slopes, prevailing winds, location, and other factors, Alternative 3 would not exacerbate wildfire risks or expose people or structures to post-fire risks.

Alternative 3 would include installation of utilities and an on-site roadway network. The installation of Project-related utilities and an on-site roadway network would not exacerbate fire risk due to the Project site's location in an urban and built-out area outside of a designated fire hazard zone. Therefore, Alternative 3 would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.

In summary, Alternative 3 would result in no impacts related to the installation or maintenance of infrastructure that may exacerbate fire risk, and less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks. Alternative 3 would result in similar wildfire impacts compared to the proposed Project because both alternatives include development of the Project site from a nursery to a residential use.

5.4.3.3 Project Objectives

Alternative 3 would develop the Project site with single-family residential and senior affordable rental uses but would not include a school. Alternative 3 would be potentially consistent with the following seven project objectives:

- Provide a comprehensive plan for development of the Nakase Property that implements the goals and policies of the Lake Forest General Plan.
- Provide a site design that is sensitive to the existing natural features, including Serrano Creek.
- Reduce vehicular traffic and peak-hour trips through thoughtful site planning that emphasizes connectivity, access, and mobility.
- Provide a balanced mix of single-family and attached senior affordable homes, open space, and active public and private uses.
- Provide an exceptional trail system and on-site parks that enhance the quality of life of the larger community.
- Provide for logical, attractive, and safe pedestrian and bicycle connections within the community.
- Create high-quality residential homes and distinct, identifiable neighborhoods with a range of specifically targeted single-family product types.

Because Alternative 3 would not include a school, it would not be consistent with the following project objective:

- Accommodate public uses by incorporating a new elementary school site conveniently located within easy walking distance for Project site residents.

5.4.4 Alternative 4: Reduced Project

5.4.4.1 Description

Alternative 4 assumes the Project site would be developed with single-family residential, senior affordable rental units, an elementary school, and parks, open space, and habitat restoration area similar to the proposed Project but at a reduced intensity. Alternative 4 includes development of 600 single-family residential units, 90 senior affordable rental units, an 11.5 ac elementary school, 19.41 ac of parks, open space, and habitat restoration area, and a 2 ac community garden. Alternative 4 would include 75 fewer single-family residential units, 11 fewer senior affordable units, and 2.3 fewer acres of parks, open space, and habitat restoration area than the proposed Project, and would include the addition of a 2 ac community garden. Table 5.E summarizes the uses assumed on the Project site for Alternative 4.

Table 5.E: Land Use Statistics for Alternative 4 (Reduced Project)

Land Use	Planning Area	Maximum DU/ac	Acreage	Maximum # of Units
Residential	1	12.5	12.8	160
	2	17.9	5.6	100
	3	10.2	12.3	125
	4	9.6	13	125
	5	12.3	7.3	90
School	Elementary School Site	N/A	11.5	N/A
Affordable Housing	Senior Affordable Housing	34.6 (high density)	2.6	90
Parks and Open Space	Community Garden/Farm	N/A	2	N/A
	Central Park/Private Recreation Center	N/A	2.8	N/A
	Neighborhood Mini-Parks	NA	2.62	N/A
	Neighborhood Park	N/A	3.59	N/A
	Open Space & Habitat & Restoration Area	N/A	10.4	N/A
Utilitarian	Street Medians & Parkways	N/A	12.5	N/A
	Roads	N/A	22.8	N/A

Note: Grey highlighted rows show how Alternative 4 differs from the proposed Project.
DU/ac = dwelling units per acre
N/A = not applicable

5.4.4.2 Environmental Analysis.

Aesthetics. The Project site is located in a fully developed area (with the exception of the Project site) in the northern portion of Lake Forest. Although the proposed Project would obstruct some views of the Santa Ana Mountains and some views from the Serrano Creek Trail, most views would be preserved; therefore, the proposed Project would result in less than significant impacts related to scenic vistas. The proposed Project would not impact a State Scenic Highway because there are none in the vicinity of the Project site. The visual character and quality of the Project site and surrounding area would be preserved and enhanced through the application of the architectural and landscape design guidelines outlined in the Area Plan. Therefore, the proposed Project would not substantially degrade the visual character of the Project site, would not conflict with applicable zoning and other regulations governing scenic quality, and its impacts would be less than significant. The Project site is currently developed with few structures, and the majority of the Project site is not illuminated at night. The proposed Project would add lighting to the Project site that could result in impacts related to light and glare. However, the Project includes mitigation measures that require preparation of a comprehensive lighting plan and a photometric survey to demonstrate that no spill lighting or glare would occur in sensitive areas. With implementation of mitigation, impacts related to light and glare would be less than significant.

Since Alternative 4 results in a smaller project overall, the overall visual changes to the site would be less than those associated with the proposed Project. Therefore, the impacts of Alternative 4 to scenic vistas, degradation of the visual character of the Project site, and conflict with applicable zoning and other regulations governing scenic quality would be less than significant and less than the proposed Project. Alternative 4 would not impact a state scenic highway because none are located in the vicinity of the Project site.

Alternative 4 would require less nighttime lighting than the proposed Project. However, because Alternative 4 would introduce nighttime lighting to a Project site that is not currently illuminated at night on the majority of the site, Alternative 4 would result in potentially significant impacts related to new sources of nighttime light. The mitigation measures would be the same as the proposed Project and would require preparation of a comprehensive lighting plan and photometric survey and would reduce potential impacts related to lighting and glare to less than significant.

In summary, Alternative 4 would result in a potentially significant impact related to nighttime lighting which would be reduced to less than significant with mitigation. No impact to state scenic highways would occur. Other potential impacts related to aesthetics would be less than significant. Alternative 4 would result in a smaller project overall compared to the proposed Project and would therefore result in aesthetic impacts that are less than the proposed Project.

Agricultural Resources. According to the DOC, 119.2 ac of the approximately 122 ac Project site is designated as Unique Farmland. The Project site is currently being used as a retail nursery with all products grown and/or sold in pots. The proposed Project would permanently convert 119.2 ac of Unique Farmland to a non-agricultural use, which would result in a significant and unavoidable impact. The Project site has an agricultural district zoning designation. However, the Project Applicant/Developer is seeking a zoning classification amendment. Once the zone change is approved, the future use of the Project site would be consistent with the City's zoning designation, and impacts pertaining to conflicts with existing agricultural zoning would be less than significant. The Project site is not currently under a Williamson Act contract; therefore, the proposed Project would not conflict with an existing Williamson Act contract. The proposed Project would not involve other changes in the existing environment that, due to the location or nature, could result in conversion of Unique Farmland to a non-agricultural use. Mitigation measures were considered for the proposed Project in order to reduce the significant impact of converting Unique Farmland on the Project site to non-agricultural uses; however, none of the mitigation measures were feasible in large part because a lack of land designated as Important Farmland within the City or Orange County that could be used to offset the agricultural land conversion impact from the proposed Project.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would also include a 2 ac community garden. Alternative 4 would change the use on the Project site and would convert 117.2 ac of Unique Farmland to a non-agricultural use, while retaining 2 ac for gardening. Impacts pertaining to conflict with existing agricultural zoning associated with Alternative 4 would be less than significant. Alternative 4 would not conflict with an existing Williamson Act contract and would not involve other changes in the existing environment that, due to the location or nature, could result in conversion of Unique Farmland to a non-agricultural use. In addition, Alternative 3 would retain the agricultural character on a portion of the Project site in recognition that the Project site has been in agricultural production since 1938 and is a large percentage of the City's remaining agricultural land. Alternative 4 would convert 2 fewer acres of Unique Farmland than the proposed Project. However, the reduction in agricultural conversion amounts to approximately 2 percent of the Unique Farmland converted by the proposed Project. This reduction is not sufficient to reduce the significant and unavoidable impacts associated

with the conversion of agricultural land to a non-agricultural use to a less than significant impact.¹ There are no feasible mitigation measures to address the conversion of 117.2 ac of Unique Farmland to a non-agricultural use and thereby reduce the significant impacts to agricultural resources. Therefore, the agricultural impacts of Alternative 4 would be comparable to that of the proposed Project.

Air Quality. Air quality emissions associated with construction and operation of the proposed Project would not exceed SCAQMD significance thresholds. Therefore, impacts of the proposed Project related to the cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable NAAQS or CAAQS would be less than significant. The proposed Project is consistent with the SCAQMD Final 2016 AQMP because (1) the construction and operational emissions of the proposed Project would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although the proposed Project would not be consistent with the land use designations of the Project site, the proposed Project is expected to generate a net decrease in emissions as compared to the currently adopted land use designation. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. A similar grading footprint but less construction would be required for Alternative 4 compared to the proposed Project; therefore, construction emissions would be less than the proposed Project and less than significant. Alternative 4 would generate fewer vehicle trips as the proposed Project because there would be fewer residential uses and therefore fewer residents. Therefore, emissions generated during operation of Alternative 4 would be less than the proposed Project and would not exceed the SCAQMD thresholds. As such, Alternative 4 would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment. Alternative 4 would be consistent with the SCAQMD Final 2016 AQMP because (1) the construction and operational emissions would be less than the proposed Project and would not exceed the regional significance thresholds or cause or contribute to NAAQS or CAAQS violations; and (2) although Alternative 4 would not be consistent with the land use designations of the Project site, Alternative 4 would be expected to generate a net decrease in emissions as compared to the currently adopted land use designation. Therefore, impacts related to conflict or obstruction of implementation of the applicable air quality plan would be less than significant. For these reasons, Alternative 4 air quality impacts would be less than significant and less than the proposed Project.

Biological Resources. No special-status plants are present on the Project site; therefore, the proposed Project would not impact special-status plant species. The proposed Project would remove 119.77 ac (115.26 ac permanently, 4.51 ac temporarily) of low-quality potential foraging habitat for two special-status bats: the western red bat and the western mastiff bat. The proposed Project

¹ The California Department of Conservation has indicated that the Project site would lose its Important Farmland designation if the remaining agricultural use is less than 10 ac (e-mail communication with Troy Dick, Research Analyst II, California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, July 19, 2019).

would impact a small patch (0.28 ac) of Maritime Succulent Scrub/Southern Cactus Scrub (Coastal Sage Scrub) that is highly disturbed in nature and would not require mitigation because of its small size and degraded nature. While burrowing owls were not detected on the Project site during focused surveys, the proposed Project includes mitigation to ensure the species has not moved onto the site between the dates the survey was performed and construction commences through a pre-construction survey prior to ground disturbance, per CDFW survey guidelines. Bats have the potential to roost and possibly breed in Serrano Creek; therefore, mitigation would be implemented to reduce indirect impacts to bats during construction. Bat roosting/nursery exit counts and acoustic surveys would be conducted prior to the start of any construction activities, and a Bat Management Plan would be prepared, if required, based on the results of the survey. Project construction has the potential to introduce and spread nonnative species; therefore, mitigation would be implemented to ensure the proposed landscaping would not include invasive exotic plants. Additionally, indirect impacts to Serrano Creek would be reduced through mitigation measures that require installation of construction fencing and implementation of BMPs. Additionally, an HMP would be prepared, and the Open Space & Habitat & Restoration Area placed in a permanent conservation easement to avoid impacts to sensitive riparian habitat associated with Serrano Creek. The proposed Project would impact the on-site drainage that transverses the Project site and contains potential CDFW, ACOE, and RWQCB jurisdiction. Mitigation measures for jurisdictional waters includes coordination with ACOE, CDFW, and RWQCB regarding potential jurisdictional areas and the associated permitting processes and enhancement, re-establishment, or establishment of jurisdictional areas on off-site conserved lands. Finally, compliance with the MBTA and California Fish and Game Code Section 3503 would reduce construction impacts to nesting birds, including Cooper's hawk and red-tailed hawk, in Serrano Creek. In summary, compliance with the mitigation summarized above and existing regulatory requirements, such as the MBTA, would reduce potentially significant impacts to biological resources to less than significant.

Alternative 4 would develop the Project site with business park uses consistent with the existing Business Park and BDO land use designation. Because Alternative 4 would involve development on the same Project site and would include an Open Space & Habitat & Restoration Area along Serrano Creek, Alternative 4 impacts would be essentially the same as the proposed Project. Because the potential biological impacts of Alternative 4 would be comparable to those associated with the proposed Project, the same mitigation measures would be required. After implementation of mitigation, impacts to biological resources would be less than significant and comparable to the proposed Project.

Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. The proposed Project would not cause a substantial adverse change in the significance of a historical resources as defined by CEQA because no previously recorded historical resources were identified in the Project site. Due to the number of cultural resources recorded within 0.5 mi of the Project site and the location of the proposed Project site in the archaeologically sensitive Aliso Creek and Foothill areas (as identified in the City's General Plan), there is potential that ground-disturbing construction activities would impact archaeological resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through

compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density than the proposed Project, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 4 would not cause a substantial adverse change in the significance of a historical resource as defined by CEQA because no previously recorded historical resources were identified in the Project site. Because the Project site is in an area of archaeological sensitivity, there is potential that ground-disturbing construction activities would impact archaeological resources. Alternative 4 would be required to incorporate mitigation measures to reduce potentially significant impacts to archaeological resources through archaeological monitoring and reduce potentially significant impacts to previously undiscovered buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to cultural resources to a less than significant level.

In summary, Alternative 4 would result in no impacts to historical resources and less than significant impacts with mitigation incorporated for archaeological resources and human remains. Alternative 4 would result in comparable cultural resources impacts compared to the proposed Project because both alternatives include ground disturbance on the Project site.

Energy. Construction of the proposed Project would require energy for activities such as the manufacture and transportation of building materials, demolition and grading activities, and building construction. Total diesel fuel consumption would be 118,339 gal from construction truck trips. Total gasoline consumption would be 1,084,438 gal from construction worker vehicle trips. During operation, electricity demand would be 6,140,783 kWh per year and natural gas demand would be 116,020.6 therms per year, compared to the existing nursery use. The proposed Project would be constructed to CALGreen standards and appliances would be energy efficient, which would help to reduce energy and natural gas consumption. The proposed Project is estimated to generate approximately 5,948,016 VMT for the elementary school, 1,086,584 VMT for the retirement community, and 19,064,105 VMT for the single-family residential uses annually, which would result in an annual fuel consumption of 54,189 gal of gasoline and 758 gal of diesel. Although Project construction and operation would require using energy, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. A similar grading footprint but less construction would be required for Alternative 4 compared to the proposed Project; therefore, energy use during construction would be less than the proposed Project. Alternative 4 would include less residential development than the proposed Project and the building would be required to be constructed to CALGreen standards to reduce energy use. Because Alternative 4 includes less development than the proposed Project, the consumption of natural gas and electricity during operation would be less. Alternative 4 would generate fewer vehicle trips,

which would reduce fuel consumption compared to the proposed Project because there would be fewer residential uses and therefore fewer residents. Therefore, energy use during operation would be less than the proposed Project. Although construction and operation would require using energy, construction and operational energy demand would be less than the proposed Project during both construction and operation, and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, Alternative 4 impacts related to energy use would be less than significant.

Geology and Soils. The proposed Project would not result in any impacts related to subsidence. Potential impacts related to expansive soils would be less than significant, and no mitigation is required. Impacts related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), and corrosive soils are considered potentially significant, and mitigation is required. The mitigation measures require compliance with the recommendations in the *Final Geotechnical Evaluation* and compliance with the CBC. With implementation of mitigation, the proposed buildings would be designed and constructed to current safety standards, and all potentially significant impacts related to soils and geology would be less than significant. The proposed Project would increase erosion and loss of topsoil during construction; however, Erosion Control and Sediment Control BMPs would be implemented during construction in compliance with the requirements of the Construction General Permit to ensure that impacts related to erosion would be less than significant. The Project site is in an area previously determined as sensitive for paleontological resources; therefore, it is possible that ground-disturbing construction activities could impact significant previously undiscovered paleontological resources. A PRIMP would be prepared and implemented to reduce potentially significant impacts to paleontological resources to less than significant.

Although Alternative 4 is reduced in overall development intensity compared to the proposed Project, the required grading and construction activities would result in the same or similar impacts related to geology, soils, and paleontological resources as the proposed Project. While some construction specifications would be different for Alternative 4 compared to the proposed Project, the overall risks related to strong seismic ground shaking, liquefaction, slope stability, lateral spreading, unsuitable soils (from settlement), corrosive soils, and paleontological resources would be comparable. Therefore, it is anticipated that Alternative 4 would result in similar impacts related to geology, soils, and paleontological resources as the proposed Project, and the same mitigation measures would be required.

In summary, Alternative 4 would result in potentially significant impacts related to geology, soils, and paleontological resources. These impacts would be less than significant with implementation of mitigation measures. Alternative 4 would result in impacts related to geology, soils, and paleontological resources that would be comparable to those of the proposed Project.

Greenhouse Gas Emissions. The proposed Project would result in 4.91 MT CO₂e/SP/yr in 2025 and 4.42 MT CO₂e/SP/yr in 2030 of GHG emissions. The total GHG emissions of the proposed Project would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030; therefore, the proposed Projects would result in a potential significant impact related to generation

of GHG emissions. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. More than 73 percent of all mobile-source emissions in 2025 and 66 percent of all mobile-source emissions in 2030 (by weight) would be generated by the proposed Project's mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features included as part of the proposed Project. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the proposed Projects mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to generation of GHG emissions would remain significant and unavoidable.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would include approximately 10 percent less housing and residents compared to the proposed Project. Alternative 4 would also include a school. The *Greenhouse Gas Analysis* (Urban Crossroads 2019b) included GHG modeling for residential sources and for "other" sources (which consist primarily of school emissions). The GHG emissions were calculated assuming residential emissions would be reduced by 10 percent compared to the proposed Project (see Tables 5.F and 5.G). As shown in Tables 5.F and 5.G, the total GHG emissions of Alternative 4 would exceed the thresholds of 3.84 MT CO₂e/SP/yr for 2025 and 2.88 MT CO₂e/SP/yr for 2030, respectively; therefore Alternative 4 would result in a potential significant impact related to generation of GHG emissions. Although construction emissions would be reduced because less construction would be required compared to the proposed Project, no reduction would be large enough to reduce the impact to less than significant. No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. A majority of the GHG emissions would be generated by the mobile sources (traffic). Neither the Project Applicant/Developer nor the City can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features that would be included in Alternative 4. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, Alternative 4's mobile-source emissions alone would still exceed the threshold of significance. Therefore, impacts related to the generation of GHG emissions would remain significant and unavoidable, but would be less than that of the proposed Project.

Hazards and Hazardous Materials. The proposed Project may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment.

**Table 5.F: 2025 Greenhouse Gas Emissions for Alternative 4
(Reduced Project)**

Emissions Source	Emissions (MT/yr)
	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	373.19
Residential (90% less than proposed Project emissions of 9,471.47)	8,524.33
School	2,297.67
Total CO₂e (All Sources)	11,195.18
<i>Existing Emissions</i>	<i>-599.10</i>
Net CO₂e (Project Minus Existing)	10,596.08
Project Service Population	2,096
Total CO₂e/Service Population	5.06
2025 GHG Service Population Threshold	3.84
Threshold Exceeded?	YES

Source: *Greenhouse Gas Analysis* (Urban Crossroads 2019b).

Note: Service Population = 690 residential units times 2.95 persons per household plus 60 employees = 2,096

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT/yr = metric tons per year

N₂O = nitrous oxide

**Table 5.G: 2030 Greenhouse Gas Emissions for Alternative 4
(Reduced Project)**

Emissions Source	Emissions (MT/yr)
	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	373.19
Residential (90% less than proposed Project emissions of 8,539.46)	7,685.51
School	2,059.92
Total CO₂e (All Sources)	10,118.62
<i>Existing Emissions</i>	<i>-599.10</i>
Net CO₂e (Project Minus Existing)	9,519.52
Project Service Population	2,096
Total CO₂e/Service Population	4.54
2030 GHG Service Population Threshold	2.88
Threshold Exceeded?	YES

Source: *Greenhouse Gas Analysis* (Urban Crossroads 2019b).

Note: Service Population = 690 residential units times 2.95 persons per household plus 60 employees = 2,096

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT/yr = metric tons per year

N₂O = nitrous oxide

Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with routine maintenance of residential and school facilities. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. The proposed Project would include a school. In order to gain approval for development of a school at the Project site that would receive State funding, previous Phase I and II ESAs prepared for the Project would need to be submitted to the DTSC for review. The DTSC would determine whether or not additional sampling and analysis, preparation of a PEA, site remediation, and public review of reports are required in order to obtain a finding of “No Further Action”. Coordination with the DTSC is included as mitigation to reduce impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school. With implementation of the mitigation discussed above, impacts related to hazardous waste would be less than significant.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would involve demolition of the existing structure, grading, and construction of new buildings that would result in similar impacts related to hazardous waste and materials compared to the proposed Project. Alternative 4 may result in a significant impact related to the possible discovery of unknown waste or suspect materials, or upset or accident of hazardous materials on the Project site during demolition, grading, or construction activities. In addition, the presence of ACMs, lead-based paint, mercury, and PCBs cannot be ruled out in the existing structure that would be demolished. Mitigation would be implemented similar to the proposed Project that includes preparation of a Demolition Plan to specify how to appropriately contain, remove, and dispose of hazardous building materials or unknown hazardous materials to protect human health and the environment. Operation and maintenance of the Project site would involve transport, use, and disposal of small quantities of hazardous materials or wastes associated with routine maintenance of the residents and school. Adopted regulations and procedures are in place to minimize impacts related to use and disposal of household hazardous waste associated with the proposed facilities. Alternative 4 would include a school, and impacts related to hazardous emissions or hazardous materials within 0.25 mi of a school could occur; therefore, a finding of “No Further Action” would be required to be obtained from the DTSC. With implementation a Demolition Plan and a finding of “No Further Action”, impacts related to hazardous waste would be less than significant and comparable to that of the proposed Project.

Hydrology and Water Quality. The proposed Project would develop the Project site with a new use and would increase impervious surface area on the Project site, which would increase stormwater runoff and change the pollutants of concern in stormwater runoff. The proposed Project would implement a comprehensive WQMP and BMPs to address pollutants of concern and to ensure protection of beneficial uses of receiving waters. In addition, the proposed Project includes drainage infrastructure and BMPs to minimize development impacts to the site hydrology in compliance with hydromodification requirements. Hydrology and water quality impacts of the proposed Project would be less than significant upon compliance with existing plans, programs, and policies in place to ensure compliance with NPDES regulations.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would change the use on the Project site, increase impervious surface area, increase stormwater runoff, and change the pollutants of concern in stormwater runoff. Alternative 4 is anticipated to include less impervious surface area than the proposed Project; therefore, the increased runoff and pollutant loading would be less than the proposed Project. Similar to the proposed Project, Alternative 4 would be required to implement BMPs and drainage infrastructure to reduce pollutants of concern on the Project site and reduce stormwater runoff in compliance with NPDES and hydromodification requirements.

With compliance with adopted regulations, Alternative 4 would result in less than significant impacts related to hydrology and water quality. The hydrology and water quality impacts of Alternative 4 would result in less hydrology and water quality impacts compared to the proposed Project. However, Alternative 4 would also be required to implement BMPs and drainage infrastructure in compliance with adopted regulations similar to the proposed Project.

Land Use and Planning. The proposed Project would be consistent with the SCAG 2008 RCP and RTP/SCS by siting residential uses near commercial/industrial uses and major transportation corridors and transit stops, providing new housing, and providing an open space and habitat restoration area. The proposed Project would require a General Plan Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Neighborhood Parks, and Open Space and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, the proposed Project would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. The proposed Project would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Impacts related to land use and planning would be less than significant, and no mitigation is required.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would be consistent with the SCAG 2008 RCP and RTP/SCS by siting commercial uses near residential development, providing new housing opportunities that focus on growth near major transportation corridors and transit stops, and providing an open space and habitat restoration area. Alternative 4 would require a General Plan Amendment to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Neighborhood Parks, and Open Space and a Zone Change from General Agriculture (A-1) to Planned Community. Upon the approval of the General Plan Amendment and Zone Change request by the City Council, Alternative 4 would be consistent with the land use designations contained in the City's General Plan and the City's Municipal Code and zoning. Alternative 4 would not result in noise, air quality, or aesthetic impacts that would conflict with adjacent land uses and would not conflict with the Orange County NCCP/HCP. Alternative 4 impacts related to land use and planning would be less than significant and comparable to those of the proposed Project.

Noise. Construction noise levels would range from 53.3 to 65.2 dBA L_{eq} at the sensitive receiver locations. Construction vibration velocity levels are expected to range from 0.002 to 0.008 in/sec PPV. During operation, off-site traffic-associated trips generated from the proposed Project would increase noise levels by 0.1 to 0.72 dBA CNEL on the study area roadway segments. Operational noise generated from the on-site uses would range from 17.9 to 32.5 dBA L_{50} at the sensitive off-site receiver locations. The construction noise, construction vibration, off-site traffic, and on-site operational noise levels would not exceed City noise level standards or Caltrans construction vibration standards, and impacts would be less than significant. Operation would not generate excessive ground-borne vibration or ground-borne noise, and impacts would be less than significant. Adjacent traffic noise from nearby roadways and freeways would not exceed the City's exterior noise standards at the proposed outdoor uses on the Project site with the planned 6 ft high noise barriers, and impacts would be less than significant. Additionally, interior noise levels within the proposed residences and school, which would be constructed to meet ventilation standards and include dual-paned glass, are not anticipated to exceed the City's interior noise standards. However, a *Final Noise Study* would be required to verify design and building performance, which are included as mitigation to ensure interior noise levels are reduced to less than significant.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density of single-family residential uses than the proposed Project. Alternative 4 would generate similar noise levels during the construction period, but the duration of the noise exposure would be less because the construction period would be reduced. Alternative 4 would generate less operational noise impacts than the proposed Project because the number of vehicular trips generated would be somewhat fewer. It is not anticipated that any heavy landscaping or farming equipment would be used in the community garden; therefore, this use would not generate excessive noise. Similar to the proposed Project, a *Final Noise Study* would be required to demonstrate that the interior noise levels within the proposed buildings would be less than the City's interior noise.

In summary, Alternative 4 would result in less than significant impacts at off-site sensitive receivers. On-site noise levels would be less than significant after mitigation (preparation of *Final Noise Study*). Alternative 4 would generate similar construction noise, but for a shorter duration, and would generate less operational noise than the proposed Project.

Population and Housing. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units, which would serve approximately 2,274 residents. Because the Project site is designed as Business Park and BDO, residential uses were not envisioned on the Project site, and the population increase from the proposed Project would not have been accounted for in the City's projected population growth. While the proposed Project would result in population growth, the growth attributable to the proposed Project would not be substantial in relation to the current or projected conditions in Lake Forest. The addition of new affordable housing units also supports the affordable housing goals of the City. Although the proposed Project would provide short-term construction jobs and the proposed school would employ 60 workers, up to 249 nursery employees would be displaced. However, given the availability of jobs in the region, it is anticipated that workers would find employment elsewhere. Although the Project may contribute to a decline in the jobs-housing ratio by adding a greater

number of residential units to the City than job opportunities, the overall increase in housing compared to employment is not of a sufficient magnitude to negatively affect the forecasted jobs-housing ratio. The proposed Project would result in less than significant impacts related to population, housing, and employment growth.

Alternative 4 would develop the Project site with up to 600 single-family residential units and up to 90 senior affordable rental units, which would serve approximately 2,022 residents. Although Alternative 4 would include fewer housing units and serve fewer residents than the proposed Project, the increased population from Alternative 4 would not have been accounted for in the City's projected population. While Alternative 4 would result in population growth, the growth attributable to Alternative 4 would not be substantial in relation to the existing or projected conditions in Lake Forest. Additionally, Alternative 4 would support the affordable housing goals of the City by providing senior affordable housing. Alternative 4 would displace 249 nursery employees; however, Alternative 4 would also provide short-term construction jobs and the proposed school would employ 60 workers. Alternative 4 would contribute to a decline in the jobs-housing ratio by adding a greater number of residential units to the City than job opportunities. However, because Alternative 4 includes fewer residential units and the same job opportunities than the proposed Project, the decline in the jobs-housing ratio would be less than that of the proposed Project.

In summary, Alternative 4 would result in less than significant impacts related to population, housing, and employment growth. However, because Alternative 4 would include less housing and the same job opportunities than the proposed Project, it would result in less of a decline in the balance between jobs and housing. Therefore, Alternative 4 would have less impact related to population and housing than the proposed Project.

Public Services. Public service impacts related to fire and police protection services would be potentially significant; however, implementation of a CTMP would reduce construction impacts to less than significant, and a secured fire protection agreement and establishment of a Neighborhood Watch Program would reduce operational impacts to less than significant. The proposed Project includes the construction of a public elementary school on the Project site, and the Project Applicant/Developer would include an elementary school to reduce impacts on school services from the additional students generated by the proposed Project. Therefore, potential impacts related to the provision of school services for construction of the proposed Project would be less than significant. With the provision of on-site private parks and amenities, the proposed Project would not require the construction of new or expansion of existing construction, or expansion of existing recreational facilities or parks to maintain acceptable service ratios or performance objectives. Based on the City's library demand ratio, the population growth that would result from the proposed Project would not require the expansion of existing library facilities in Lake Forest in order to maintain acceptable service ratios. Finally, OCTA would be able to provide adequate transit services to the proposed Project. Therefore, with implementation of the mitigation described above for fire and police service impacts, impacts to public services would be less than significant.

Alternative 4 would develop the Project site with up to 600 single-family residential units and up to 90 senior affordable rental units, which would serve approximately 2,022 residents. Alternative 4

would include less housing and would result in less population growth than the proposed Project. The increased population from Alternative 4 would increase demand for fire and emergency medical services, police protection, library, park, school, and transit services, although the increased demand would be less than the proposed Project. Alternative 4 would include similar mitigation as the proposed Project, including implementation of a CTMP, establishment of a Neighborhood Watch Program, and payment of development fees. Additionally, Alternative 4 would include a school, and parks and open space to reduce demand for schools and parks. Therefore, with implementation of mitigation, impacts to public services would be less than significant.

In summary, with implementation of mitigation, Alternative 4 impacts to public services would be less than significant. Alternative 4 would result in less of an increase in population; therefore, impacts to public services would be less than the proposed Project.

Recreation. The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units, which would increase the population in the City by approximately 2,274 persons. The increase in population would result in potentially significant impacts to existing neighborhood and regional parks, and other recreational facilities. The proposed Project includes both private and public recreational uses on site. The City's Municipal Code requires dedication of land equivalent to 5 ac per 1,000 residents or payment of in-lieu fees to reduce impacts to parklands. The proposed Project would meet the City's public park requirement of 11.37 ac by including approximately 21.41 ac of parks, open space, and habitat restoration area, of which 11.32 ac would be classified as public parks. Additionally, the proposed Project includes mitigation that requires on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation.

Alternative 4 would develop the Project site with up to 600 single-family residential units and up to 90 senior affordable rental units. Alternative 4 would increase the population within Lake Forest by 2,022 persons, which is a public park requirement of 10.11 ac using the City's standard of 5 ac of recreational space per 1,000 residents. Alternative 4 would include 19.41 ac of parks, open space, and habitat restoration area, of which 9.02 ac would be classified as public parks. The remaining 2.35 ac would be offset through payment of in-lieu fees. Alternative 4 would also include mitigation similar to the proposed Project that would require on-site parks to be maintained in perpetuity. Therefore, impacts related to the use of existing neighborhood and regional parks and recreational facilities would be less than significant with implementation of mitigation. Alternative 4 would result in comparable impacts to parks and recreational facilities as the proposed Project because both alternatives would offset impacts by dedicating parkland through construction of on-site parks or payment of in-lieu fees.

Transportation/Traffic. The proposed Project would increase VMT to 26,098,705 from the 2,698,384 VMT generated by the existing nursery. The proposed Project would not be inconsistent with *State CEQA Guidelines* Section 15064.3(b) because the City has not established thresholds for assessing VMT impacts; therefore, traffic impacts were assessed based on LOS. The proposed Project is anticipated to generate a total of approximately 8,789 trip-ends per day that would contribute to an impact at the Bake Parkway/Jeronimo Road intersection, which is currently

operating at an unacceptable LOS. The proposed Project would mitigate the impact at this location to acceptable levels through a combination of fee payments to the City pursuant to a Fair Share Agreement or construction of the specific improvements. All construction equipment would be staged on site, and mitigation would be implemented to require that large construction equipment be delivered during off-peak times to reduce travel during peak travel periods so that construction would not result in incompatible uses that increase on-road hazards. Mitigation measures also require a distance analysis to be prepared for all Project intersections to determine limited use areas (e.g., low-height landscaping), and on-street parking restrictions (e.g., red curb), if necessary, and any turning restrictions (e.g., right-in/right-out). With implementation of mitigation, project construction and operation would not result in incompatible uses that increase on-road hazards, and impacts would be reduced to less than significant. Preparation of a CTMP is required as mitigation to ensure that emergency vehicles would be able to navigate to the Project site through adjacent streets that may experience congestion due to construction activities. Impacts related to emergency access during construction would be reduced to less than significant with implementation of mitigation. The Area Plan meets or exceeds the OCFA requirements to not hinder fire and emergency access; therefore, operational impacts related to emergency access would be considered less than significant.

Alternative 4 would include fewer residential units than the proposed Project. A similar grading footprint but less construction would be required for Alternative 4 compared to the proposed Project; therefore, construction trips would be less than the proposed Project. A CTMP would be required for Alternative 4 to reduce impacts to emergency access during construction. Alternative 4 would generate fewer vehicle trips compared to the proposed Project because there would be fewer residential uses and therefore fewer residents. Therefore, traffic impacts would be less than the proposed Project. Alternative 4 would be required to mitigate any traffic impacts through a Fair Share Agreement or construction of specific improvements, similar to the mitigation included for the proposed Project. Alternative 4 would be required to meet or exceed the OCFA requirements to not hinder fire and emergency access.

In summary, Alternative 4 would result in less than significant impacts related to traffic after implementation of mitigation measures similar to those of the proposed Project. Alternative 4 would result in less traffic impacts during construction and operation compared to the proposed Project.

Tribal Cultural Resources. The proposed Project would develop the Project site, which would require ground-disturbing construction activities. No previously recorded cultural resources were identified in the Project site, and no specific information regarding tribal cultural resources was received during the Native American consultation. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register. Based on the results of Native American consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. The proposed Project would incorporate mitigation measures to reduce potentially significant impacts to previously undiscovered significant tribal cultural resources through Native American monitoring and evaluation of archaeological resources by the Native

American monitor, and reduce potentially significant impacts to Native American buried human remains through compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts to a less than significant level.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density than the proposed Project, and would require ground-disturbing construction activities for the development. Similar to the proposed Project, Alternative 4 would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA that is listed or eligible for listing in the California Register or a local register because no previously recorded cultural resources were identified in the Project site during the records search or during the Native American consultation. Based on the results of Native American consultation, there is potential that ground-disturbing construction activities would impact previously undiscovered significant tribal cultural resources. Alternative 4 would be required to incorporate the same mitigation measures as the proposed Project that require Native American monitoring and evaluation of archaeological resources by the Native American monitor, and compliance with Health and Safety Code Section 7050.5. The mitigation measures would reduce potential impacts related to tribal cultural resources to a less than significant level.

In summary, Alternative 4 would result in no impacts to tribal cultural resources that are listed or eligible for listing in the California Register or a local register, and less than significant impacts with mitigation incorporated for previously undiscovered significant tribal cultural resources and Native American human remains. Alternative 4 would result in comparable tribal cultural resources impacts compared to the proposed Project because both alternatives include ground disturbance on the Project site.

Utilities and Service Systems. Utilities and service systems include water, wastewater, electricity, natural gas, telecommunication, solid waste, and storm drain facilities. The proposed Project would increase demand for these services; however, there is sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant.

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density than the proposed Project. Alternative 4 would increase demand for these services; however, the increase in demand would be less than the proposed Project. Therefore, there would be sufficient supplies and capacity available to service the increased demand. Impacts related to utilities and service systems would be less than significant and also less than the proposed Project.

Wildfire. The Project site is designated as a non-VHFHSZ and is not located in or near an SRA. However, the Project site is in the vicinity of a VHFHSZ. The proposed Project would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk. The proposed Project would result in less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks.

Alternative 4 would require temporary lane closures on nearby local roadways during construction, similar to the proposed Project; however, these closures would be anticipated to be implemented consistent with the *California Temporary Traffic Control Handbook* (California Inter-Utility Coordinating Committee 2018). Because Alternative 4 would generate less traffic than the proposed Project, study area intersections would be expected to operate at acceptable LOS. Therefore, construction and operation of Alternative 4 would not substantially impair an adopted emergency response plan or emergency evacuation plan.

The Project site is not located in a VHFHSZ. Despite the VHFHSZ to the northeast of the Project site, the uncontrolled spread of wildfire in the vicinity of the Project site is unlikely due to the density of existing non-combustible development and roadways, specifically SR-241 and Rancho Parkway. Due to the lack of steep slopes, prevailing winds, location, and other factors, Alternative 4 would not exacerbate wildfire risks or expose people or structures to post-fire risks.

Alternative 4 would include installation of utilities and an on-site roadway network. The installation of Project-related utilities and an on-site roadway network would not exacerbate fire risk due to the Project site's location in an urban and built-out area outside of a designated fire hazard zone. Therefore, Alternative 4 would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment.

In summary, Alternative 4 would result in no impact related to installation or maintenance of infrastructure that may exacerbate fire risk and less than significant impacts related to impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risk, and exposure of people or structures to post-wildfire risks. Alternative 4 would result in similar wildfire impacts compared to the proposed Project because both alternatives include development of the Project site from a nursery to a residential use.

5.4.4.3 Project Objectives

Alternative 4 would develop the Project site with single-family residential and senior affordable rental uses but at a lower density than the proposed Project. Alternative 4 would be potentially consistent with all of the project objectives, which include:

- Provide a comprehensive plan for development of the Nakase Property that implements the goals and policies of the Lake Forest General Plan.
- Provide a site design that is sensitive to the existing natural features, including Serrano Creek.
- Reduce vehicular traffic and peak-hour trips through thoughtful site planning that emphasizes connectivity, access, and mobility.
- Provide a balanced mix of single-family and attached senior affordable homes, open space, and active public and private uses.
- Accommodate public uses by incorporating a new elementary school site conveniently located within easy walking distance for Project site residents.

- Provide an exceptional trail system and on-site parks that enhance the quality of life of the larger community.
- Provide for logical, attractive, and safe pedestrian and bicycle connections within the community.
- Create high-quality residential homes and distinct, identifiable neighborhoods with a range of specifically targeted single-family product types.

5.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative among the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Table 5.H provides, in summary format, a comparison of the level of impacts of each alternative to the proposed Project.

Alternative 4 has the least impact on the environment because the Project site would be developed at a reduced density, thereby reducing the most of the proposed Project's environmental impacts compared to the other alternatives. However, Alternative 4 would not reduce the significant impacts related to agricultural resources and GHG emissions to a less than significant level. These impacts would remain significant and unavoidable. Additionally, Alternative 4 would potentially meet all of the project alternatives. Accordingly, it is determined that Alternative 4 is the Environmentally Superior Alternative because it would meet all of the project' objectives and result in reduced environmental impacts as compared to the proposed Project.

Table 5.H: Comparison of the Environmental Impacts of the Proposed Project and Project Alternatives

Impact Area	Proposed Project Impact with Mitigation (if any)	Alternative 1: No Project (Business Park)	Alternative 2: Urban Industrial/Residential	Alternative 3: No School	Alternative 4: Reduced Project
Aesthetics	Less than Significant ¹	Similar	Similar	Similar	Less
Agricultural Resources	Significant and Unavoidable	Similar	Similar	Similar	Similar
Air Quality	Less than Significant	Greater and Significant	Similar	Less	Less
Biological Resources	Less than Significant ¹	Similar	Similar	Similar	Similar
Cultural Resources	Less than Significant ¹	Similar	Similar	Similar	Similar
Energy	Less than Significant	Similar (construction) Greater (operation)	Similar	Less	Less
Geology and Soils	Less than Significant ¹	Similar	Similar	Similar	Similar
Greenhouse Gas Emissions	Significant and Unavoidable	Greater	Similar	Less (remains Significant)	Less (remains Significant)
Hazards and Hazardous Materials	Less than Significant ¹	Similar	Similar	Similar	Similar
Hydrology and Water Quality	Less than Significant	Similar	Similar	Similar	Similar
Land Use and Planning	Less than Significant	Similar	Similar	Similar	Similar
Noise	Less than Significant ¹	Similar (construction) Less (on-site operation) Greater (off-site traffic)	Similar	Similar (construction) Less (operational)	Similar (construction) Less (operational)
Population and Housing	Less than Significant	Less	Less	Greater	Less
Public Services	Less than Significant ¹	Less	Less	Greater (schools) Similar (all other public services)	Less
Recreation	Less than Significant ¹	Less	Similar	Similar	Similar
Transportation/Traffic	Less than Significant ¹	Similar (construction) Greater (operation)	Similar	Less	Less
Tribal Cultural Resources	Less than Significant ¹	Similar	Similar	Similar	Similar
Utilities and Service Systems	Less than Significant	Similar	Similar	Less	Less
Wildfire	Less than Significant	Similar	Similar	Similar	Similar

¹ Mitigation identified.