

## 1.0 EXECUTIVE SUMMARY

### 1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences of a project to support informed decision-making.

This EIR has been prepared by the City of Lake Forest (City) to evaluate environmental impacts associated with the proposed Nakase Nursery/Toll Brothers Project (Project); to discuss alternatives; and to propose mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts.

This EIR has been prepared pursuant to the requirements of CEQA and the *State CEQA Guidelines*. The City is the Lead Agency, and as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this EIR to reflect its own independent judgment.

Data for this EIR were obtained from on-site field observations; discussion with affected agencies; review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the Project (e.g., air quality, noise, and traffic).

The Executive Summary is intended to highlight the major areas of importance in the environmental analysis for the proposed Project as required by *State CEQA Guidelines* Section 15123. The Executive Summary includes a brief description of the proposed Project, areas of controversy known to the City, including issues raised by agencies and the public, a summary of the significant unavoidable impacts of the proposed Project, and a summary of alternatives evaluated in the EIR. This Executive Summary also provides a table summarizing (1) the potential environmental impacts that would occur as a result of Project implementation and operation; (2) the level of significance prior to implementation of mitigation measures; (3) regulatory compliance measures and mitigation measures that avoid or reduce the significant impacts of the proposed Project, and (4) the level of significance after mitigation measures are implemented.

### 1.2 SUMMARY OF PROJECT DESCRIPTION

The Nakase property (Project site) is located in the north-central portion of Lake Forest in Orange County, California. The Project site is bounded on the northwest by Bake Parkway, on the northeast by Rancho Parkway, on the southeast by the Serrano Creek Trail, and on the southwest by commercial, industrial, and office uses, with Dimension Drive beyond. State Route 241 (SR-241) is approximately 0.07 mile (mi) northeast of the Project site.

The Project proposes the approval of the “Nakase Property Area Plan” (referred to hereafter as the Area Plan and/or the Project) (Woodley Architectural Group 2019), which would facilitate the

development of the 122-acre (ac) Project site as a master planned community. The Area Plan would establish guidelines for the future development of the planned community, which would consist of up to 675 single-family residential units (contained in 5 distinct neighborhoods), 101 affordable housing units for senior citizens with up to 10 of these units available for permanent supportive housing, an elementary school that could accommodate up to 1,000 Kindergarten to Sixth Grade students, parks and open space, and an internal circulation system.

### 1.3 AREAS OF CONTROVERSY

Pursuant to *State CEQA Guidelines* Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. The City held a public scoping meeting at Lake Forest City Hall on Wednesday, July 25, 2018, to present the proposed Project and to solicit input from interested parties regarding environmental issues that should be addressed in this EIR. The material environmental issues and concerns raised in response to the Notice of Preparation (NOP) or at the scoping meeting included:

- **Traffic:** Concerns about additional traffic on Bake Parkway and the appropriate number of traffic lanes on Bake Parkway, evaluation of a traffic signal coordination program along Bake Parkway, concern regarding traffic conditions during peak hours, pedestrian and bike safety, parking issues, traffic-related air and noise pollution, concern with vehicle queuing and parking on nearby roads, concern about school-related traffic impacts, and concern about truck and motorcycle traffic on Bake Parkway.
- **Noise:** Concerns about traffic-related increases in noise pollution, suggestions of noise mitigation, including special pavement, triple-paned windows, or a noise barrier along Bake Parkway, concern with noise level along Bake and Rancho Parkways, concern about existing truck and motorcycle noise along Bake Parkway, concern about lack of enforcement of the City's noise ordinance, and concern about elevated backyard noise levels.
- **Air Quality:** Concern about additional vehicle emissions, concern about worsening air quality in adjacent neighborhoods, concern about particulate matter and carcinogens along Bake Parkway, suggestion to conduct sampling for particulate matter in neighborhoods along Bake Parkway between Trabuco Road and Portola Parkway, suggestion to prepare a health risk assessment for the project, suggestion to implement mitigation measures for the proposed project, and suggestion to adhere to guidelines from the South Coast Air Quality Management District (SCAQMD) and its Air Quality Handbook.
- **Alternatives:** Suggestion to evaluate the development of a park and/or garden on the Nakase site, suggestion to make the site into a community garden or forest, suggestion to more clearly define the Project's scope and evaluate a range of alternatives, and suggestion to pursue alternatives that would substantially lessen the project's air quality impacts.
- **Biological Resources:** Concern about potential impacts to coastal sage scrub and associated species, suggestion to include mitigation measures for potential impacts to riparian corridors and wetlands, suggestion to complete jurisdictional delineation, apply for Lake and Streambed

Alteration Agreement, and to satisfy the California Endangered Species Act Incidental Take Permit requirements, suggestion to avoid impacts where feasible and to mitigate for impacts to rare natural communities and sensitive plants, animals, or habitats, and concern to avoid impacts to nesting or migratory birds.

- **Hazards and Hazardous Materials:** Suggestion to complete a Water Pipeline Risk Assessment and Electromagnetic Field (EMF) study for the proposed school site, suggestion that the significance conclusion related to wildland fire hazards be revised to reflect a Fuel Modification Conceptual Plan and a Fire Protection Plan with an Ember Mitigation have been approved for the project, and suggestion to ensure that floodplains are identified and structures conform to Federal Emergency Management Agency (FEMA) regulations with regard to placement adjacent to flood hazards.
- **Hydrology:** Suggestion to review all local hydrology and hydraulic analyses to confirm the Project is protected from erosion and flooding, concern about increased runoff caused by the project, suggestion to incorporate mitigation measures to reduce impacts to hydrology, erosion, and flooding, and concerns about impacts to water quality and storm water runoff.
- **Land Use/Planning:** Opposition to zoning change for the nursery, concern about the Project's consistency with the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and suggestion to include a direct comparison with the plan, suggestion to incorporate practices and policies that would reduce greenhouse gas (GHG) emissions in accordance with Assembly Bill 32 and Senate Bill 375 into the Area Plan, and suggestion to ensure consistency with applicable general plan and regional plans.
- **Public Services:** Suggestion to implement mitigation measures to public services, including fire services, and concern about potential increase in demand for public services.

Please note that this is not an exhaustive list of areas of controversy, but rather key issues that were raised during the scoping process. This EIR addresses each of these areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially significant impacts. Appendix A to this EIR includes the NOP and copies of written comments received in response to the NOP, comments received via Facebook Live at the Public Scoping Meeting, as well as written comment cards received in response to the public scoping meeting. Appendix A also includes a comment summary.

#### 1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. 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 Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

### 1.4.1 Agricultural Resources

The proposed Project would conflict with the existing A-1 zoning and would convert 119.2 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.

### 1.4.2 Greenhouse Gas Emissions

The proposed Project would be designed in compliance with existing 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 SCAQMD thresholds of 3.84 million tons of carbon dioxide equivalent per Service Population per year (MT CO<sub>2</sub>e/SP/yr) for 2025 and 2.88 MT CO<sub>2</sub>e/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.

## 1.5 ALTERNATIVES

### 1.5.1 Alternatives Evaluated in this EIR

Public Resources Code (PRC) Section 21100 and *State CEQA Guidelines* Section 15126 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. 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 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 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; 101 senior affordable rental units; 4 ac of commercial/industrial uses; a 12.6 ac school; 24.9 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 675 single-family residential units; 101 senior affordable rental units; 18.9 ac of parks, open space, and habitat restoration area; and a 2 ac community garden.
- **Alternative 4 – Reduced Project:** Alternative 4 includes: development of 600 single-family residential units; 101 senior affordable rental units; a 12.6 ac elementary school; a 2 ac community garden; and 18.9 ac of parks, open space, and habitat restoration area.

### 1.5.2 Identification of the 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. Alternative 4 would have 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's objectives and result in reduced environmental impacts as compared to the proposed Project.

## 1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.A identifies the potential Project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the Project. Environmental topics addressed in this EIR include: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils and Paleontological Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise,

Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources, Utilities, and Wildfire.

### **1.6.1 Secondary Effects of Mitigation Measures**

In accordance with *State CEQA Guidelines* Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed Project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on Table 1.A) require the Applicant to provide the City with lighting, grading, excavation or other construction plans, or provide evidence that the Project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoptions or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
<b>4.1: Aesthetics</b>			
Threshold 4.1.1: The proposed Project would not have a substantial adverse effect on a scenic vista.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.1.2: The proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact	No mitigation is required.	No Impact
Threshold 4.1.3: The proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.1.4: The proposed Project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Potentially Significant Impact	<p><b>Mitigation Measure 4.1.1: Comprehensive Lighting Plan.</b> Prior to issuance of the first building permit, the Project Applicant/Developer shall prepare a comprehensive lighting plan for review and approval by the City of Lake Forest (City) Director of Community Development or designee. The lighting plan shall be prepared by a qualified engineer and shall address all aspects of lighting, including, but not limited to, height, type, location, infrastructure, and safety. The lighting plan shall include the following in conjunction with other measures as determined necessary by the illumination engineer:</p> <ul style="list-style-type: none"> <li>a. All Project lighting shall be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties.</li> <li>b. All lights shall be designed and located so that direct light rays are confined to the premises.</li> <li>c. Parking area lighting shall be Illuminating Engineering Society "Full Cut Off" designated or "fully shielded" fixtures so that no light is emitted above the lowest light-emitting part of the fixture.</li> <li>d. Light levels at the property line shall not exceed 0.1 foot-candle (fc) adjacent to the <i>Open Space &amp; Habitat &amp; Restoration Area</i> properties.</li> <li>e. Light standards shall not exceed 20 feet in height.</li> </ul> <p>The Lighting Plan shall also include a photometric survey. The photometric survey shall demonstrate that lighting values do not exceed 0.1 fc adjacent to the Open Space &amp; Habitat &amp; Restoration Area and that no direct rays shine onto public streets or adjacent sites.</p>	Less than Significant Impact
<b>4.2: Agricultural Resources</b>			
Threshold 4.2.1: The proposed Project would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	Potentially Significant Impact	No feasible mitigation measures are available.	Significant and Unavoidable Impact
Threshold 4.2.2: The proposed Project would not conflict with existing zoning or agricultural use, or a Williamson Act contract.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.2.5: The proposed Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	Less Than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Agricultural Resources: Because implementation of the proposed Project would result in the conversion, and elimination, of a significant amount of Unique Farmland remaining in the City, the contribution of the proposed Project to the loss of Important Farmland would be cumulatively considerable. Consequently, the cumulative impact of the proposed Project on Unique Farmland would be significant and unavoidable.	Potentially Significant Impact	No feasible mitigation measures are available.	Significant and Unavoidable Impact
<b>4.3: Air Quality</b>			
Threshold 4.3.1: The proposed Project would not conflict with or obstruct implementation of the applicable air quality plan	Less than Significant Impact	No mitigation is required.	Less than Significant Impact



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Threshold 4.3.2: The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard	Less than Significant Impact	<p><b>RCM AQ-1: South Coast Air Quality Management District (SCAQMD) Rule 403.</b> The Project Applicant shall ensure the Construction Contractor implements fugitive dust control measures in compliance with SCAQMD Rule 403. The Project Applicant shall include the following fugitive dust control measures for SCAQMD Rule 403 compliance in the Project plans and specifications:</p> <ul style="list-style-type: none"> <li>• All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 miles per hour (mph) per SCAQMD guidelines in order to limit fugitive dust emissions.</li> <li>• The Construction Contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered, with complete coverage of disturbed areas, at least three (3) times daily during dry weather and preferably mid-morning, afternoon, and after work is done for the day.</li> <li>• The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 mph or less.</li> </ul> <p><b>RCM AQ-2: SCAQMD Rule 1113.</b> The Project Applicant shall ensure the Construction Contractor implements measures to control volatile organic compound (VOC) emissions from architectural coatings in compliance with SCAQMD Rule 1113. The Project Applicant shall include the following control measures for SCAQMD Rule 1113 compliance in the Project plans and specifications:</p> <ul style="list-style-type: none"> <li>• Only “Low-Volatile Organic Compounds” paints (no more than 50 grams/liter of VOC) shall be used.</li> </ul> <p><b>RCM AQ-3: SCAQMD Rule 445.</b> Prior to the issuance of building permits, the City of Lake Forest Director of Community Development, or designee, shall ensure that the project design does not include wood-burning stoves and fireplaces in new development in compliance with SCAQMD Rule 445.</p> <p><b>RCM AQ-4: Title 24 of the California Code of Regulations (CCR).</b> Prior to issuance of building permits, the City of Lake Forest Director of Community Development, or designee, shall ensure that the project design complies with the 2019 Building Energy Efficiency Standards (CCR Title 24) energy conservation and the California Green Building Standards Code (CALGreen).</p>	Less than Significant Impact
Threshold 4.3.3: The proposed Project would not expose sensitive receptors to substantial pollutant concentrations	Less than Significant Impact	Refer to RCM-AQ-1	Less than Significant Impact
Threshold 4.3.4: The proposed Project would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impact related to Air Quality: The proposed Project’s construction- and operation-related regional daily emissions would be less than the SCAQMD significance thresholds for all criteria pollutants. Therefore, the proposed Project would not have a cumulatively considerable increase in emissions, and the proposed Project’s cumulative air quality impacts would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.4: Biological Resources</b>			
Threshold 4.4.1: The proposed Project would have a substantial adverse effect, either directly or through habitat modification, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services.	Potentially Significant Impact	<p><b>Mitigation Measure 4.4.1: Burrowing Owls.</b> A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls no more than 14 days prior to site disturbance and submit the survey results to the Director of the City of Lake Forest Community Development Department, or designee,. If burrowing owls are not detected, no further action is necessary.</p> <p>If burrowing owls are detected during the pre-construction survey, the owls shall be evicted from the site (when not nesting) under the supervision of a qualified biologist and following accepted California Department of Fish and Wildlife (CDFW) protocols and as approved by the CDFW to avoid direct take of burrowing owl and compensate for the loss of habitat. Compensation for the loss of occupied burrowing owl habitat shall occur at a 1:1 ratio such that the habitat acreage and number of burrows occupied by burrowing owls impacted are replaced. As required by the 2012 CDFW Staff Report on Burrowing Owl Mitigation, if owl are detected on the Project site, a mitigation management plan shall be drafted and submitted to CDFW for approval, and shall ensure lands used to compensate for the loss of habitat and burrows occupied by burrowing owls are conserved and managed in perpetuity.</p> <p><b>Mitigation Measure 4.4.2: Bats.</b> Bat roosting/nursery exit counts and acoustic surveys shall be performed in Serrano Creek by</p>	Less than Significant Impact



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		<p>a qualified bat biologist prior to site disturbance to determine whether Serrano Creek supports a bat nursery and/or roost and by which species. The survey results shall be submitted to the Director of the City of Lake Forest Community Development Department, or designee. This survey work shall occur in late-spring/summer and potentially again in the fall, depending on the results of the summer work. This would be determined by the bat biologist. If the results of the bat work finds 25 or more individuals composed of non-special-status bat species and/or one or more bats with a special-status, a Bat Management Plan shall be developed to ensure bat mortality does not occur during construction. If it is determined that excluding the bats during non-breeding (generally October through March) is necessary, the plan shall provide details (both in text and with graphic images) where exclusion devices shall be placed, the timing for exclusion work, and the timeline and methodology needed to exclude the bats. The plan shall be reviewed and approved by CDFW. Prior to issuance of any construction or grading permits, documentation indicating CDFW approval of the plan shall be provided to the City of Lake Forest Director of Community Development, or designee.</p> <p><b>Mitigation Measure 4.4.3: Invasive Plant Species.</b> Prior to issuance of any building permits, the Project Applicant/Developer shall submit a final landscape plan to the Director of the City of Lake Forest Community Development Department, or designee, demonstrating that the landscaping palette for all common areas within the community does not include invasive exotic plants (i.e., those plant species rates as “high” or “moderate” in the California Invasive Plant Council’s [Cal-IPC] Invasive Plant Inventory). Prior to issuance of certificates of occupancy, the Project Applicant/Developer shall submit a copy of the Homeowner Association’s (HOA) Covenants, Conditions, and Restrictions (CC&amp;Rs) to the Director of the City of Lake Forest Community Development Department, or designee, for verification that the CC&amp;Rs prohibit the use of invasive exotic plants in all on-site parks, open space, and other common areas. Further, the CC&amp;Rs shall note that revisions to the HOA CC&amp;Rs related to the maintenance of parks, open space, and other common areas shall be prohibited except with the review and approval of the Director of the City of Lake Forest Community Development Department, or designee.</p> <p><b>Mitigation Measure 4.4.4: Preservation of Serrano Creek During Project Construction.</b> Prior to the start of grading or construction activities, the Director of the City of Lake Forest Community Development Department, or designee, shall verify that plans require the Project impact footprint, including any construction buffers, be staked and fenced (e.g., with orange snow fencing, silt fencing, or a material that is clearly visible). The Director of the City of Lake Forest Community Development Department, or designee, shall further verify that a qualified, experienced biologist has been retained by the Project Applicant/Developer and that the biologist shall: (1) be present on site during all grading or vegetation removal activities occurring within 100 ft of Serrano Creek to ensure that encroachment into Serrano Creek and/or the southern black willow forest does not occur; and (2) verify the boundary is properly delineated, staked, and fenced prior to the start of any ground disturbance or vegetation clearing. The Construction Site Manager shall ensure that the fencing is maintained for the duration of construction and that any required repairs are completed in a timely manner. Prior to the removal of the fencing at the completion of construction activities, a qualified, experienced biologist shall conduct a final inspection of the area to ensure that encroachment into Serrano Creek and/or the southern black willow forest has not occurred. The biologist shall provide a final report to the City of Lake Forest Director of Community Development, or designee. If encroachment did occur, the biologist shall evaluate the encroachment and provide a report to both the City of Lake Forest Director of Community Development and CDFW. The City and CDFW shall determine if and what additional mitigation would be required.</p> <p><b>Mitigation Measure 4.4.5: Construction Best Management Practices.</b> Prior to the start of grading or construction activities, the Director of the City of Lake Forest Community Development Department, or designee, shall verify that the plans note the following requirements:</p> <ul style="list-style-type: none"> <li>● Any open trenches shall be covered at the end of each workday in a manner to prevent the entrapment of wildlife, or be adequately ramped to provide an animal escape route.</li> <li>● Construction shall occur between 30 minutes before sunrise and 30 minutes after sunset.</li> <li>● No nighttime construction within 200 ft of Serrano Creek shall occur.</li> <li>● No construction lighting shall be placed within 200 ft of Serrano Creek unless a qualified biologist confirms the lighting does not illuminate Serrano Creek.</li> <li>● Active construction areas shall be watered regularly (at least once every 2 hours) to control dust and thus minimize</li> </ul>	

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		<p>impacts on vegetation within Serrano Creek.</p> <ul style="list-style-type: none"> <li>● Equipment operators and construction crews shall be informed of the importance of the construction limits by the biological monitor prior to any ground disturbance.</li> <li>● Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the limits of disturbance and the designated staging areas and routes of travel approved by the biological monitor.</li> <li>● Exotic plant species removed during construction shall be properly handled to prevent sprouting or regrowth. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during the course of construction. The cleaning of equipment shall occur at least 300 ft from jurisdictional aquatic features, including Serrano Creek. If the location is closer, it must be approved by the biological monitor.</li> <li>● Vegetation shall be covered while being transported, and vegetation materials removed from the site shall be disposed of in accordance with applicable laws and regulations.</li> <li>● All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other toxic substances shall occur only in designated areas within the limits of disturbance and at least 200 ft from jurisdictional aquatic features, including Serrano Creek. These designated areas shall be clearly marked and located in such a manner as to contain runoff and shall be approved by the biological monitor.</li> <li>● To avoid attracting predators, the Project site will be kept clear of trash and debris. All food-related trash items will be enclosed in sealed containers and regularly removed from the site.</li> </ul> <p><b>Mitigation Measure 4.4.6: Perimeter Glass Fencing.</b> The Project Applicant/Developer shall submit a Wall and Fencing Plan to the City of Lake Forest Director of Community Development, or designee, for review and approval. The Wall and Fencing Plan shall specify, and include details for, the use of a permanent bird strike avoidance treatment consisting of either window film (CollidEscape Clear or equivalent) or UV (ultraviolet) patterned glass (or equivalent) on all perimeter glass fencing, including but not limited to the fencing around Serrano Creek and the radiant heat wall (refer to Figure 4.19.2: Fire Protection Plan). The Wall and Fence Plan shall include documentation addressing the bird strike avoidance effectiveness of the proposed treatment.</p>	
<p>Threshold 4.4.2: The proposed Project would have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.</p>	<p>Potentially Significant Impact</p>	<p>Refer to Mitigation Measures 4.4.1 (Aesthetics), 4.4.4 and 4.4.5, above.</p> <p><b>Mitigation Measure 4.4.7: Habitat Management Plan.</b> Prior to the start of grading or construction activities, the Director of the City of Lake Forest Community Development Department, or designee, shall verify that the Project Applicant/Developer has developed a Habitat Management Plan (HMP) for the Project site. The HMP shall describe the long-term management and maintenance requirements—including funding mechanisms and monitoring—for the Open Space &amp; Habitat &amp; Restoration Area and the southern black willow forest. In addition, the HMP shall, at a minimum:</p> <ul style="list-style-type: none"> <li>● Require the installation of permanent fencing along the perimeter of the Open Space &amp; Habitat &amp; Restoration Area and interior trails, if applicable. In addition, permanent signs shall be installed along all fencing indicating the purpose and need for the fencing and the restrictions within the Open Space &amp; Habitat &amp; Restoration Area. The maintenance of the fencing and signage shall be the responsibility of the HOA or a long-term land management entity.</li> <li>● Require that all lighting along the perimeter of Serrano Creek, particularly street lamps, be shielded and oriented in a manner that prevents spill light or glare into the Creek. This also includes outdoor lighting for those residences abutting Serrano Creek. It shall be the responsibility of the HOA to ensure lighting is maintained consistent with these criteria.</li> <li>● The Project Applicant/Developer shall place the Open Space &amp; Habitat &amp; Restoration Area into a conservation easement or similar legal protection, along with sufficient funds (as approved by the City of Lake Forest Director of Community Development, or designee) to protect the lands in perpetuity. In addition, lands within the conservation easement shall be managed in perpetuity by a qualified entity designated by the Project Applicant/Developer and approved by the City of Lake Forest Director of Community Development, or designee.</li> </ul>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
<p>Threshold 4.4.3: The proposed Project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.</p>	<p>Potentially Significant Impact</p>	<p><b>Mitigation Measure 4.4.8: Jurisdictional Resources.</b> Prior to the issuance of any grading permits, the Project Applicant/Developer shall coordinate with the United States Army Corps of Engineers (ACOE), Santa Ana Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW) regarding their jurisdiction over the on-site drainages.</p> <p>The Project Applicant/Developer shall be obligated to implement/comply with mitigation measures required by the resource agencies regarding impacts on their respective jurisdictions. The ratios at which ACOE, RWQCB, and CDFW may require permanent impacts to be mitigated vary from 1:1 (no net loss) to as high as 3:1. The jurisdictional areas of the ACOE, RWQCB, and CDFW are not additive areas because the jurisdictional areas on the site may be within the jurisdiction of one or more of these agencies. Therefore, the permits and associated jurisdictional replacement requirements would identify which mitigation areas apply to the corresponding jurisdiction. At a minimum, the following shall be implemented by the Project Applicant/Developer:</p> <ul style="list-style-type: none"> <li>• A detailed Habitat Mitigation Monitoring Plan (HMMP) shall be prepared that describes the location of establishment, restoration, and/or enhancement, which shall include replanting requirements, success criteria, and monitoring following construction. The HMMP shall be incorporated into the regulatory agencies permit, certification, and agreement required for the proposed Project and shall be subject to review and approval by the resource agencies.</li> <li>• To mitigate the loss of ACOE, RWQCB, and CDFW jurisdictional waters, the Project Applicant/Developer shall create a minimum of 4.19 acres (ac) of riparian vegetation on the Project site that shall be contiguous with, and contribute to, the existing riparian canopy associated with Serrano Creek within the conservation lands. If on-site mitigation options are not feasible, the Project Applicant/Developer shall purchase credits from an approved mitigation bank/in-lieu fee program at a minimum of a 1:1 ratio, for a minimum of 1.91 ac of mitigation credits. If on-site mitigation options are not feasible and an approved mitigation bank/in-lieu fee program cannot be identified to mitigate the loss of ACOE, RWQCB, and CDFW jurisdiction, the Project Applicant/Developer shall enhance, re-establish, or establish ACOE, RWQCB, and CDFW jurisdictional areas on off-site conserved lands at a minimum 1:1 ratio, for a minimum of 1.91 ac of enhancement, re-establishment, or establishment.</li> </ul> <p><b>Mitigation Measure 4.4.9: Aquatic Resource Integrity Area.</b> The Project site is located within the boundaries of the San Diego Creek Watershed Special Area Management Plan (SAMP). The proposed Project would result in impacts to 0.95 ac of mapped Aquatic Resource Integrity Area. Mitigation for impacts to greater than 0.1 ac within this mapping unit shall be developed in coordination with the CDFW unless the CDFW determines that the Project site does not contain an Aquatic Resource Integrity Area (i.e., there is a mapping error in the SAMP). Prior to the issuance of any grading permits, the Project Applicant/Developer shall provide documentation to the City of Lake Forest Director of Community Development, or designee, that (1) CDFW has determined that a mapping error exists; OR (2) the Project Applicant/Developer shall implement mitigation as specified by the CDFW.</p>	<p>Less than Significant Impact</p>
<p>Threshold 4.4.4: The proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	<p>Less than Significant Impact</p>	<p><b>RCM BIO-1: Migratory Bird Treaty Act and California Department of Fish and Game Code.</b> In the event that any construction, vegetation clearing, or grading activities (including disking and demolition) should occur between February 1st and September 1st, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to commencement of construction activities to confirm the absence of nesting birds. If active nesting of birds is observed within 500 feet (ft) of the designated construction area during surveys, the biologist shall establish suitable buffers around the active nests (e.g., a minimum of 50 ft for passerines and 250 ft for raptors [including burrowing owls]). The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Prior to commencement of grading activities and issuance of any building permits, the Director of the City of Lake Forest Community Development, or designee, shall verify that all Project grading and construction plans include specific documentation regarding the requirements of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3503, that preconstruction surveys have been completed and the results reviewed by staff, and that the appropriate buffers (if needed) are noted on the plans and established in the field with orange snow fencing.</p>	<p>Less than Significant Impact</p>
<p>Threshold 4.4.5: The proposed Project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p>Potentially Significant Impact</p>	<p><b>RCM BIO-2: Tree Ordinance.</b> In compliance with City of Lake Forest Municipal Code Section 6.20.025, if any eucalyptus trees on the Project site are to be cut or trimmed between April 1st through October 31st, the Project Applicant/Developer shall first obtain a permit from the City of Lake Forest for the transportation of any logs, branches, or trunks to an off-site location for disposal.</p>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		<p><b>Mitigation Measure 4.4.10: Invasive Short Hole Borers (ISHBs).</b> A designated biologist familiar with the signs of ISHBs shall survey trees on the Project site designated for removal or trimming. Surveys shall be conducted no more than 30 days prior to removal or trimming activities. If any tree is determined to be infested/infected by ISHBs, a control plan shall be prepared and submitted to CDFW for review and approval. At a minimum, the control plan shall include methods of control, removal, and appropriate disposal techniques to prevent the spread of ISHBs. The results of the tree survey, and if warranted, a copy of the CDFW-approved control plan shall be submitted to the City of Lake Forest Director of Community Development, or designee, prior to issuance of construction permits.</p>	
<p>Threshold 4.4.6: The proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p>Less than Significant Impact</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>
<p>Cumulative Impacts to Biological Resources: During construction, the proposed Project would contribute to cumulatively considerable declines of native streambed vegetation and bats.</p>	<p>Potentially Significant Impact</p>	<p>Refer to Mitigation Measures 4.4.1, 4.4.2, 4.4.4, and 4.4.5.</p>	<p>Less than Significant Impact</p>
<b>4.5: Cultural Resources</b>			
<p>Threshold 4.5.1: The proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.</p>	<p>No Impact</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Threshold 4.5.2: The proposed Project would potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p>	<p>Potentially Significant Impact</p>	<p><b>Mitigation Measure 4.5.1 Archaeological Resources, Tribal Cultural Resources, and Human Remains.</b> Prior to issuance of a grading permit for any site within the Project Area, a qualified archaeologist shall be retained by the Applicant for that grading permit to provide professional archaeological services. The archaeologist shall be present at the pre-grading conference to establish procedures for archaeological resource surveillance. Those procedures shall include provisions for temporarily halting or redirecting work to permit sampling, identification, and evaluation of resources deemed by the archaeologist to potentially be historical resources or unique archaeological resources under CEQA. The archaeologist also shall conduct on-site archaeological monitoring for the grading operation. Should historical resources or unique archaeological resources be discovered during the grading operation, grading activities shall be modified to allow expeditious and proper analysis and/or salvage of the resources. Disposition of the resources shall be within the discretion of the City of Lake Forest.</p> <p>Prior to Approval of Grading or Improvement plans, the Applicant shall implement a grading monitoring plan to mitigate potential impacts to undiscovered buried archaeological resources on the Portola Center Project to the satisfaction of the City of Lake Forest. This program shall include, but shall not be limited to, the following actions:</p> <ol style="list-style-type: none"> <li>1. Provide evidence to the lead agency that a qualified archaeologist and Native American monitor have been contracted to implement a grading monitoring program to the satisfaction of the City of Lake Forest. A letter from the Project Archaeologist shall be submitted to the City of Lake Forest Director of Development Services. A letter from the Native American Monitor shall also be submitted to the City of Lake Forest Director of Community Development. The letter shall include the following guidelines:                     <ol style="list-style-type: none"> <li>a. The qualified archaeologist/historian and Native American Monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.</li> <li>b. The consulting archaeologist and Native American monitor shall monitor all areas identified for development.</li> <li>c. An adequate number of monitors (archaeological/ historical/Native American) shall be present to ensure that all earth-moving activities are observed and shall be on site during all grading activities.</li> <li>d. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on site full-time. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections shall be determined by the Principal Investigator.</li> <li>e. During the cutting of previously disturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on site as determined by the Principal Investigator of the excavations. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and</li> </ol> </li> </ol>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		<p>location of inspections shall be determined by the Principal Investigator in consultation with the Native American monitor.</p> <p>f. Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.</p> <p>g. In the event that previously unidentified, potentially significant cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow for evaluation. The archaeologist shall contact the City of Lake Forest Director of Development Services at the time of discovery. Disposition of the resources shall be within the discretion of the City of Lake Forest. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist, then carried out using professional archaeological methods.</p> <p>h. If any human bones are discovered, the Principal Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.</p> <p>i. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Principal Investigator shall determine the amount of material to be recovered for an adequate artifact sample for analysis.</p> <p>j. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a facility that meets federal standards per 36 CFR Part 79, and therefore shall be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to the John D. Cooper Archaeological and Paleontological Curation Center, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.</p> <p>k. In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the City of Lake Forest prior to the issuance of any building permits. The report shall include Department of Parks and Recreation Primary and Archaeological Site Forms.</p> <p>l. In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the City of Lake Forest by the consulting archaeologist that the grading monitoring activities have been completed.</p> <p>2. Provide evidence to the Lead Agency that the following notes have been placed on the Grading Plan:</p> <p>a. The qualified archaeologist/historian and Native American monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the monitoring program.</p> <p>b. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on site to perform full-time monitoring as determined by the Principal Investigator of the excavations. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.</p> <p>c. During the cutting of previously disturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on site as determined by the Principal Investigator of the excavations. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections shall be determined by the Principal Investigator in consultation with the Native American monitor.</p> <p>d. In the event that previously unidentified, potentially significant cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow for</p>	



**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		<p>evaluation. The archaeologist shall contact the City of Lake Forest Director of Development Services at the time of discovery. Disposition of the resources shall be within the discretion of the City of Lake Forest. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist, then carried out using professional archaeological methods.</p> <p>e. The consulting archaeologist shall monitor all areas identified for development.</p> <p>f. If any human bones are discovered, the Principal Investigator shall contact the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.</p> <p>g. Prior to rough grading inspection sign-off, provide evidence that the field grading monitoring activities have been completed to the satisfaction of the City of Lake Forest. Evidence shall be in the form of a letter from the Project Archaeologist.</p> <p>h. Prior to final grading release, submit to the satisfaction of the City of Lake Forest, a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program. The report shall also include the following:</p> <ul style="list-style-type: none"> <li>• Department of Parks and Recreation Primary and Archaeological Site Forms.</li> <li>• Evidence that all cultural materials collected during the grading monitoring program has been curated, and therefore shall be professionally curated and made available to other archaeologists/ researchers for further study. The collections and associated records shall be transferred, including title, to the John D. Cooper Archaeological and Paleontological Curation Center, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.</li> </ul> <p>3. In the event that no cultural resources area discovered, a brief letter to that effect shall be sent to the City of Lake Forest by the consulting archaeologist that the grading monitoring activities have been completed.</p> <p>4. The qualified archaeologist retained shall prepare monthly progress reports to be filed with the site developer(s) and the City of Lake Forest.</p> <p>5. Artifacts recovered shall be prepared, identified, and cataloged before donation to the Gabrieleno Band of Mission Indians – Kizh Nation. If the Tribe does not want custody, an accredited repository designated by the City of Lake Forest shall be utilized. Any artifacts determined to be insignificant shall be offered to local schools for use in educational programs.</p> <p>6. The qualified archaeologist retained shall prepare a final report to be filed with the site developer(s) and the City of Lake Forest. The report shall include a list of specimens recovered, documentation of each locality, interpretation of artifacts recovered and shall include all specialists’ reports as appendices.</p>	
<p>Threshold 4.5.3: The proposed Project would potentially disturb human remains, including those interred outside of formal cemeteries.</p>	<p>Potentially Significant Impact</p>	<p>Refer to Mitigation Measure 4.5.1 above.</p>	<p>Less than Significant Impact</p>
<p>Cumulative Impacts to Cultural Resources: Potential impacts of the proposed Project to unknown cultural resources, when combined with the impacts of past, present, and reasonably foreseeable projects in the City of Lake Forest, could contribute to a cumulatively significant impact due to the overall loss of historical and archaeological artifacts unique to the region.</p>	<p>Potentially Significant Impact</p>	<p>Refer to Mitigation Measure 4.5.1 above.</p>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
<b>4.6: Energy</b>			
Threshold 4.6.1: The proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than Significant Impact	<p><b>RCM EN-1: California Code of Regulations, Title 13, General Requirements for In-Use Off-Road Diesel-Fueled Fleets.</b> The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to 5 minutes or less in compliance with California Code of Regulations (CCR) Title 13, Chapter 9, Article 4.8, Section 2449. Prior to issuance of any grading or building permits, the City of Lake Forest Director of Community Development, or designee, shall confirm that plans include notes with this requirement.</p> <p><b>RCM EN-2: California Code of Regulations, Title 13, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.</b> During operation, all school bus drivers shall comply with CCR Title 13, Article 1, Chapter 10, Section 2480 to limit bus idling at schools. School bus shall be turned off upon stopping at the school or within 100 feet of the school. School buses shall not be turned on more than 30 seconds before beginning to depart from the school or from within 100 feet of the school. School bus within 100 feet of the school shall not idle for more than 5 consecutive minutes and shall not idle for more than a cumulative 5 minutes in any 1 hour.</p> <p>In addition, refer to RCM AQ-4 and RCM GHG-1</p>	Less than Significant Impact
Threshold 4.6.2: The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Energy: There are sufficient planned energy supplies to serve the proposed Project and related projects. The proposed Project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.7: Geology and Soils</b>			
Threshold 4.7.1(ii): The proposed Project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	Potentially Significant Impact	<p><b>RCM GEO-1: California Building Code Compliance Seismic Standards.</b> Structures and retaining walls shall be designed in accordance with the seismic parameters presented in the Geotechnical Evaluation (NMG Geotechnical 2017) and applicable sections of Section 1613 of the most current California Building Code (CBC). Prior to issuance of building permits for planned structures, the Project soils engineer and the Director of the City of Lake Forest Community Development Department, or designee, shall review building plans to verify that the structural design conforms to the requirements of the geotechnical study and the City of Lake Forest Municipal Code.</p> <p><b>Mitigation Measure 4.7.1: Incorporation of and compliance with the recommendations in the Project Geotechnical Assessment.</b> All grading operations and construction shall be conducted in conformance with the recommendations included in the geotechnical evaluation on the Project site that has been prepared by NMG Geotechnical, Inc., titled Geotechnical Evaluation of Proposed Residential and School Site Development, Nakase Property, Lake Forest, California (April 19, 2017). Specific recommendations in the geotechnical evaluation address the following and shall be incorporated into the final Project plans and construction-level geotechnical report:</p> <ol style="list-style-type: none"> <li>1. Removal of undocumented fill on the northern half of the Project site during remedial grading.</li> <li>2. Removal of any soft or poor quality fill during remedial grading. If some of this material cannot be removed in order to prevent undermining the existing road, then a structural setback would be required to protect the planned structures from excessive differential settlement induced by the new fill loading.</li> <li>3. Compact fill placement to reduce the potential for surface manifestations of liquefaction during seismic shaking.</li> <li>4. Installation of a seismic shear key to mitigate the potential of lateral slope failure due to the effects of liquefaction potential in the alluvium during a significant seismic shaking event.</li> <li>5. Evaluation of the stability of the slopes. If existing slopes are to essentially remain in place to ensure they have been graded to a standard that resulted in a 1.5 safety factor for gross and surficial stability. If there are any deficiencies with the existing slope, they would have to be regraded to project standards or a structural setback established to protect the planned structures.</li> <li>6. Over-excavation to mitigate differential settlement in the design cut-and-fill transition areas.</li> </ol>	Less than Significant Impact



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		<p>7. Scour protection related to periodic surface flow in Serrano Creek.</p> <p>Additional site testing and final design evaluation shall be conducted by the Project Geotechnical Consultant to refine and enhance these requirements. The Project Applicant/Developer shall require the Project Geotechnical Consultant to assess whether the requirements in that report need to be modified or refined to address any changes in the Project features that occur prior to the start of grading. If the Project Geotechnical Consultant identifies modifications or refinements to the requirements, the Project Applicant/Developer shall require appropriate changes to the final Project design and specifications. Design, grading, and construction shall be performed in accordance with the requirements of the City of Lake Forest (City) Municipal Code (Title 8) and the California Building Code (CBC) applicable at the time of grading, appropriate local grading regulations, and the requirements of the Project Geotechnical Consultant as summarized in a final written report, subject to review by the Director of the City of Lake Forest Community Development Department, or designee, prior to commencement of grading activities.</p> <p>Grading plan review shall also be conducted by the Director of the City of Lake Forest Community Development Department or designee prior to the start of grading to verify that the requirements developed during the geotechnical design evaluation have been appropriately incorporated into the project plans. Design, grading, and construction shall be conducted in accordance with the specifications of the Project Geotechnical Consultant as summarized in a final report based on the CBC applicable at the time of grading and building, and the City's Building Code. On-site inspection during grading shall be conducted by the Project Geotechnical Consultant and the City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with geotechnical specifications as incorporated into project plans. Prior to final of grading permits, the Project geotechnical engineer shall submit a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee.</p>	
Threshold 4.7.1(iii): The proposed Project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	Potentially Significant Impact	Refer to Mitigation Measure 4.7.1 and RCM GEO-1 above.	Less than Significant Impact
Threshold 4.7.2: The proposed Project would not result in substantial soil erosion or the loss of topsoil.	Less than Significant Impact	Refer to Regulatory Compliance Measures RCM WQ-1, RCM WQ-2, and RCM WQ-3 (Hydrology and Water Quality)	Less than Significant Impact
Threshold 4.7.3: The proposed Project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Potentially Significant Impact	<p>Refer to Mitigation Measure 4.7.1, RCM GEO-1 above.</p> <p><b>Mitigation Measure 4.7.2: Corrosive Soils.</b> Prior to issuance of a building permit, the Director of the City of Lake Forest Public Works Department, or designee, shall verify that the Project Applicant/Developer has retained the services of a licensed corrosion engineer to provide detailed corrosion protection measures. Where steel may come in contact with on-site soils, project construction shall include the use of steel that is protected against corrosion. Corrosion protection may include, but is not limited to, sacrificial metal, the use of protective coatings, and/or cathodic protection. Additional site testing and final design evaluation regarding the possible on-site presence of significant volumes of corrosive soils shall be performed by the Project Geotechnical Consultant to refine and enhance these recommendations. On-site inspection during grading shall be conducted by the Project Geotechnical Consultant and City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with geotechnical specifications as incorporated into Project plans.</p>	Less than Significant Impact
Threshold 4.7.4: The proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.7.6: The proposed Project would potentially directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant Impact	<p><b>Mitigation Measure 4.7.3: Paleontological Resources Impact Mitigation Program.</b> Prior to the issuance of the first preliminary or precise grading permit, the Project Applicant/Developer shall provide a letter to the Director of the City of Lake Forest Community Development Department, or designee, retained a qualified paleontologist (defined as a practicing paleontologist that is recognized in the paleontological community and proficient in vertebrate paleontology) who is listed on the County of Orange list of certified paleontologists. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for this Project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the Project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology.</p> <p>Excavation and grading activities in deposits with high paleontological sensitivity shall be monitored by a paleontological</p>	Less than Significant Impact

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		<p>monitor following a PRIMP. No monitoring is required for excavations in deposits with no or low paleontological sensitivity.</p> <p>If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and a paleontologist shall be contacted to assess the find for significance.</p> <p>Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution.</p> <p>Prior to rough grading inspection sign-off, a report of findings shall be prepared to document the results of the monitoring program.</p>	
<p>Cumulative Impacts to Geology and Soils: Potential impacts of the proposed Project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable projects in the City of Lake Forest, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, when resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant.</p>	<p>Potentially Significant Impact</p>	<p>Refer to Mitigation Measure 4.7.3 above.</p>	<p>Less than Significant Impact</p>
<b>4.8: Greenhouse Gas Emissions</b>			
<p>Threshold 4.8.1: The proposed Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p>Potentially Significant Impact</p>	<p>No feasible mitigation measures are available</p> <p><b>RCM GHG-1: Title 20 of the California Code of Regulations (CCR).</b> Appliances installed in a project building will comply with the energy efficiency requirements in CCR Title 20, Appliance Energy Efficiency Standards. All appliances shall be Energy Star appliances.</p> <p>In addition, refer to RCM-AQ-3 and RCM-AQ-4</p>	<p>Significant and Unavoidable Impact</p>
<p>Threshold 4.8.2: The proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p>Potentially Significant Impact</p>	<p>No feasible mitigation measures are available</p>	<p>Significant and Unavoidable Impact</p>
<p>Cumulative Impact related to Greenhouse Gas Emissions: Because the Project's GHG emissions are considered significant and unavoidable, the Project's GHG emissions and contribution to global climate change impacts are considered cumulatively considerable and therefore significant and unavoidable.</p>	<p>Potentially Significant Impact</p>	<p>No feasible mitigation measures are available</p>	<p>Significant and Unavoidable Impact</p>
<b>4.9: Hazards and Hazardous Materials</b>			
<p>Threshold 4.9.1: The proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	<p>Potentially Significant Impact</p>	<p><b>Mitigation Measure 4.9.1: Demolition Plan.</b> Prior to or concurrent with demolition permit applications, the Construction Contractor shall provide a Demolition Plan to the City of Lake Forest Director of Community Development or designee for review and approval. The Demolition Plan shall include the procedures for pre-demolition surveys and testing for hazardous building materials such as asbestos, lead-based paint, mercury, and polychlorinated biphenyls, and removal and disposal of hazardous building materials. All inspections, surveys, and analyses shall be performed by appropriately licensed and qualified individuals in accordance with applicable regulations. All identified hazardous materials shall be removed, handled, and properly disposed of by appropriately licensed contractors according to all applicable regulations during demolition of structures. The Construction Contractor shall provide documentation (e.g., all required waste manifests, sampling, and air monitoring analytical results) to the City of Lake Forest Director of Community Development or designee showing that abatement of hazardous building materials has been completed in full compliance with all applicable regulations. The City of Lake Forest Director of Community Development or designee shall document that the Demolition Plan has been approved prior to issuance of demolition permits and that the requirements of the Demolition Plan have been implemented prior to issuance of grading permits.</p> <p><b>Mitigation Measure 4.9.2: Construction Contingency Plan.</b> Prior to or concurrent with grading permit applications, the Construction Contractor shall provide a Construction Contingency Plan to the City of Lake Forest Director of Development</p>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		Services or designee for review and approval. The Construction Contingency Plan shall include provisions for emergency response in the event that unidentified hazardous materials, petroleum hydrocarbons, or hazardous or solid wastes are discovered during construction activities. The Construction Contingency Plan shall address field screening, contaminant materials testing methods, mitigation and contaminant management requirements, and health and safety requirements for construction workers. The construction contractor shall implement the Construction Contingency Plan during all construction activities. During construction, the construction contractor shall cease work immediately if an unexpected release of hazardous substances is found in reportable quantities. If an unexpected release of hazardous substances is found in reportable quantities, the construction contractor shall notify the National Response Center by calling 1-800-424-8802. The Construction Contractor shall clean up any unexpected releases under appropriate federal, State, and local agency oversight. The City of Lake Forest Director of Community Development or designee shall document that the Construction Contingency Plan has been approved and that the requirements of the Construction Contingency Plan have been implemented prior to issuance of certificate of occupancy.	
Threshold 4.9.2: The proposed Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Potentially Significant Impact	Refer to Mitigation Measures 4.9.1 and 4.9.2 above.	Less than Significant Impact
Threshold 4.9.3: The proposed Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Potentially Significant Impact	Refer to Mitigation Measures 4.9.1 and 4.9.2 above.  <b>Mitigation Measure 4.9.3: DTSC Oversight of School Site.</b> Prior to submittal of grading permits for the elementary school portion of the Project site, the Project Applicant shall provide documentation to the City of Lake Forest Director of Community Development or designee that the Department of Toxic Substances Control (DTSC) has issued a "No Further Action" letter for the school site. The steps that may be required in order to gain a "No Further Action" letter from DTSC could include: DTSC review of all Phase I and Phase II ESAs for the project site; soil and/or groundwater testing, health risk analysis, Preliminary Endangerment Assessment preparation and approval, site remediation/cleanup, and public review of prepared reports.	Less than Significant Impact
Threshold 4.9.4: The proposed Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would create a significant hazard to the public or the environment.	No Impact	No mitigation is required.	No Impact
Threshold 4.9.6: The proposed Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Potentially Significant Impact	Refer to Mitigation Measure 4.16.1 (Transportation and Traffic), below.	Less than Significant Impact
Cumulative Impacts related to Hazards and Hazardous Materials: The proposed Project would not result in a significant contribution to cumulative hazards or hazardous materials impacts.	Potentially Significant Impact	Refer to Mitigation Measures 4.9.1, 4.9.2, and 4.9.3 above.	Less than Significant Impact
<b>4.10: Hydrology and Water Quality</b>			
Threshold 4.10.1: The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	Less than Significant Impact	<b>RCM WQ-1: Construction General Permit.</b> Prior to commencement of construction activities, the Applicant shall obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), NPDES No. CAS000002, Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ, or any other subsequent permit. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the permit, to the State Water Resources Control Board via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the project from the SMARTS and provided to the Director of the City of Lake Forest Public Works Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained. Project construction shall comply with all applicable requirements specified in the Construction General Permit, including but not limited to, preparation of a SWPPP and implementation of construction site Best Management Practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., Sediment Control, Erosion Control, and	Less than Significant Impact

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		<p>Good Housekeeping BMPs) to control the pollutants in stormwater runoff. Construction Site BMPs shall also conform to the requirements specified in the latest edition of the Orange County Stormwater Program Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers to control and minimize the impacts of construction and construction-related activities, materials, and pollutants on the watershed. Upon completion of construction activities and stabilization of the Project site, a Notice of Termination shall be submitted via SMARTS.</p> <p><b>RCM WQ-2: Erosion and Sediment Control Plans.</b> In compliance with the requirements of Title 8 Buildings and Construction, Chapter 8.30, Grading and Excavation, Article XIII, Erosion Control of the City of Lake Forest Municipal Code, the Applicant shall submit a grading plan and erosion control plan to the Director of the City of Lake Forest Public Works Department, or designee, for review and approval prior to issuance of a grading permit. The Applicant shall also submit erosion and sediment control plans annually to the Director of the City of Lake Forest Public Works Department, or designee, for review and approval by September 15th of each year during construction.</p> <p><b>RCM WQ-3: Water Quality Management Plan.</b> Prior to issuance of building permits, the Applicant shall submit a Final Water Quality Management Plan (WQMP) to the Director of the City of Lake Forest Public Works Department, or designee, for review and approval in compliance with the Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (North Orange County MS4 Permit), Order No. R8-2009-0030, NPDES No. CAS618030 (as amended by Order No. R8-2010-0062). The Final WQMP shall be prepared consistent with the requirements of the Model Water Quality Management Plan (WQMP) (County of Orange 2011), Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs) (County of Orange 2013), the City of Lake Forest Local Implementation Plan (LIP) (2010), and Managing Wet Weather with Green Infrastructure Municipal Handbook Green Streets (EPA 2008), or subsequent guidance manuals. The Final WQMP shall specify the BMPs to be incorporated into the project design to target pollutants of concern in runoff from the project site. The Final WQMP shall also incorporate the results of the Final Hydrology Analysis to demonstrate that the detention facilities meet the hydromodification requirements of the North Orange County MS4 Permit. The Director of the City of Lake Forest Public Works Department, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final project design.</p> <p><b>RCM WQ-5: Groundwater Dewatering Permits.</b> If groundwater dewatering is required during excavation activities, the Applicant shall obtain coverage under one of two orders, or any subsequent orders, that apply to groundwater discharges to surface waters within the Newport Bay/San Diego Creek Watershed depending on the nature of the groundwater. The General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimus) Threat to Water Quality (Order No. R8-2009-0003, NPDES No. CAG998001) covers discharges to surface waters that pose an insignificant (de minimus) threat to water quality within. This Order would be applicable to the project if it can be demonstrated that the groundwater being discharged to surface waters does not contain pollutants of concern (selenium and nitrates) in the discharge. However, if groundwater is found to contain petroleum hydrocarbons, solvents, metals and/or salts, the project would be subject to the General Discharge Permit for Discharges to Surface Waters of Groundwater Resulting from Groundwater Dewatering Operations and/or Groundwater Cleanup Activities at Sites Within the San Diego Creek/Newport Bay Watershed Polluted by Petroleum Hydrocarbons, Solvents, Metals and/or Salts (Order No. R8-2007-0041, NPDES No. CAG918002, as amended by R8-2007-0041), which covers general discharge permits for discharges to surface waters of groundwater resulting from groundwater dewatering operations and/or groundwater cleanup activities at sites within the San Diego Creek/Newport Bay Watershed that have been polluted by petroleum hydrocarbons, solvents, metals and/or salts, or nutrients, selenium, and other pollutants of TMDL concern. This shall include submission of a Notice of Intent (NOI) for coverage under the permit to the Santa Ana Regional Water Quality Control Board (RWQCB) at least 45 days prior to the start of dewatering. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.</p>	
<p>Threshold 4.10.2: The proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.</p>	<p>Less than Significant Impact</p>	<p>No mitigation is required.</p>	<p>Less than Significant Impact</p>

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.10.3(i): The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.	Less than Significant Impact	<b>RCM WQ-4: Final Hydrology and Hydraulic Analyses.</b> Prior to issuance of building permits, the Applicant shall submit a Final Hydrology and Hydraulic Analyses to the Director of the City of Lake Forest Public Works Department, or designee, and the Orange County Flood Control District (OCFCD) for review and approval. The Final Hydrology and Hydraulic Analyses shall be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology and Hydraulic Analyses shall confirm that the on-site storm drains, on-site detention basins, and any other drainage structures are appropriately sized to accommodate stormwater runoff from the design storm so that the peak flow of stormwater discharge from the Project site is less than existing conditions. The Final Hydrology and Hydraulic Analyses shall also demonstrate that the detention facilities meet the hydromodification requirements of the Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (North Orange County MS4 Permit), Order R8-2009-0030, NPDES No. CAS618030 (as amended by Order No. R8-2010-0062). In compliance with the hydromodification requirements, the post-project runoff discharge volume for the 2-year storm shall not exceed that of the predevelopment condition by more than 5 percent, and the time of concentration of post-development runoff for the 2-year storm event shall not be greater than 5 percent less than that of the predevelopment condition. The Director of the City of Lake Forest Public Works Department, or designee, shall ensure that the drainage facilities specified in the Final Hydrology and Hydraulic Analyses are incorporated into the final project design.  In addition, refer to RCM WQ-1, RCM WQ-2, and RCM WQ-3	Less than Significant Impact
Threshold 4.10.3(II): The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.3(III): The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.3(iv): The proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.10.4: The proposed Project would not be in a flood hazard, tsunami, or seiche zone with the risk of release of pollutants due to project inundation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.10.5: The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.6: The proposed Project would not deposit sediment and debris materials within existing channels obstructing flows.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.7: The proposed Project would not exceed the capacity of a channel and cause overflow during design storm conditions.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.8: The proposed Project would not adversely change the rate, direction or flow of groundwater.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.10.9: The proposed Project would not cause a significant alteration of receiving water quality during or following construction.	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact



**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.10.10: The proposed Project would not substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving or downstream waters	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Threshold 4.10.11: The proposed Project would not result in an increase in any pollutant for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list	Less than Significant Impact	Refer to RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-5	Less than Significant Impact
Cumulative Impact related to Hydrology and Water Quality: The proposed Project and other related Projects would comply with applicable NPDES and City requirements, therefore, cumulative hydrology and water quality impacts would be less than significant. Therefore, the proposed Project's incremental hydrology and water quality impacts would not be cumulatively considerable.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.11: Land Use &amp; Planning</b>			
Threshold 4.11.2: The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.11.3: The proposed Project would not substantially conflict with existing on-site or adjacent land use due to project-related significant unavoidable indirect effects (i.e. noise, aesthetics, etc.) that preclude use of the land as it was intended by the General Plan.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.11.4: The proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, planned community, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.11.5: The proposed Project would not conflict with the Central and Coastal Natural Communities Conservation Program/Habitat Conservation Plan (NCCP/HCP) of which the City of Lake Forest is a participant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Land Use & Planning: The proposed Project's contribution to cumulative impacts associated with land use and planning would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.12: Noise</b>			
Threshold 4.12.1: The proposed Project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact	<p><b>RCM NOI-1: Ventilation Requirements.</b> Prior to the issuance of building permits, documentation shall be provided to the City of Lake Forest Director of Community Development, or designee, demonstrating that Project buildings meet ventilation standards required by the CBC with the windows closed. It is likely that a form of mechanical ventilation, such as an air-conditioning system, will be required as part of the Project design for all on-site buildings/units.</p> <p><b>Mitigation Measure 4.12.1: Final Acoustical Study.</b> Prior to issuance of any building permits, the Project Applicant/Developer shall submit a final acoustical study, prepared by a qualified acoustical consultant, to the City of Lake Forest. The Director of Community Development of the City of Lake Forest, or designee, shall verify that the final acoustical study demonstrates that all residential units will comply with the City's interior noise standard (45 dBA CNEL). Noise reduction techniques will be incorporated into construction plans in order to reduce interior noise levels. These techniques include, but are not limited to, weather-stripped solid core exterior doors, dual glazed windows with a minimum sound transmission class rating of 27, and/or exterior wall/roof assemblies free of cut-outs or openings.</p>	Less than Significant Impact

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.12.2: The proposed Project would not result in the generation of excessive groundborne vibration or groundborne noise levels.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.12.3: The proposed Project would not be located within the vicinity of a private airstrip, public airport, or an airport land use plan and would not expose people residing or working in the Project area to excessive noise levels.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Noise and Vibration: The proposed Project's contribution to cumulative impacts associated with noise and vibration would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.13: Population and Housing</b>			
Threshold 4.13.1: The proposed Project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Population and Housing: The proposed Project's contribution to cumulative impacts associated with population, housing, and employment growth would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.14: Public Services</b>			
Threshold 4.14.1(i): The proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.	Potentially Significant Impact	Refer to Mitigation Measure 4.16.1 (Transportation and Traffic)  <b>Mitigation Measure 4.14.1 Secured Fire Protection Agreement.</b> The Project Applicant/Developer shall enter into a Secured Fire Protection Agreement with the Orange County Fire Authority (OCFA). The Secured Fire Protection Agreement shall specify the developer's pro-rata fair-share funding of capital improvements necessary to establish adequate fire protection facilities and equipment, and/or personnel. Evidence of an OCFA-approved agreement shall be submitted to City of Lake Forest Director of Community Development, or designee, prior to issuance of any building permits.  <b>RCM PS-1 City of Lake Forest Municipal Code Section 8.24.010 (California Fire Code Adoption) and Section 7.08.145 (Fire Protection).</b> Prior to issuance of grading permits for planned structures, the City of Lake Forest Public Works Director, or designee, shall review the building plans to verify that the design conforms to the requirements of the Fire Code as adopted in the City Municipal Code.	Less than Significant Impact
Threshold 4.14.1(ii): The proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Potentially Significant Impact	Refer to Mitigation Measure 4.16.1 (Transportation and Traffic)	Less than Significant Impact
Threshold 4.14.1(iii): The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	Less than Significant Impact	Refer to RCM PS-1 above.	Less than Significant Impact



**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.14.1(iv): The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.	Less than Significant Impact	Refer to RCM REC-1 (Recreation)	Less than Significant Impact
Threshold 4.14.1(v): The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	Less than Significant Impact	<b>RCM PS-2: Payment of School Facility Fees.</b> Prior to issuance of a building permit, the Project Applicant/Developer shall submit proof of payment of all applicable school facility fees in accordance with Government Code Section 65995 to the Director of the City of Lake Forest Department of Community Development, or designee. This requirement may be satisfied through the dedication of land on the Project site to the Saddleback Valley Unified School District for future construction of a school.	Less than Significant Impact
Cumulative Impacts to Public Services: The proposed Project's potential impacts to fire services, police protection, school services, public libraries, and public transportation are not cumulatively considerable.	Less than Significant Impact	Refer to RCM PS-2 above.	Less than Significant Impact
<b>4.15: Recreation</b>			
Threshold 4.15.1: The Proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Potentially Significant Impact	<p><b>RCM REC-1: Dedication of Parkland.</b> The Project Applicant/Developer shall comply with the applicable provisions of Chapter 7.38, Dedication of Land for Park Facilities and Payment in Lieu Fees, of the City's Municipal code, which requires applicable subdividers to dedicate to the City, an amount of land equivalent to 5 acres per 1,000 estimated population for use as park facilities, or pay in lieu fees instead of or in combination with the dedication of land so long as the fees are equal to the value of parkland, which would otherwise be dedicated.</p> <p><b>Mitigation Measure 4.15.1 Park and Open Space Access and Maintenance.</b> Prior to the issuance of any certificate of occupancy, the Project Applicant/Developer shall submit documentation to the Director of the City of Lake Forest Community Development Department, or designee, demonstrating the following:</p> <ul style="list-style-type: none"> <li>• The HOA shall provide for the ongoing maintenance and care of all on-site park and open space facilities.</li> <li>• With the exception of the on-site private recreation center, all on-site parks shall also be private, but open and accessible to the public. Appropriate signage shall be posted in all on-site parks.</li> <li>• The HOA shall maintain maintenance records for a period not less than 2 years and shall make the records available to the City upon request.</li> <li>• Long-term funding for maintenance and care of on-site recreation, park, and open space facilities shall be funded through fees paid into the HOA. The Project Applicant/Developer, which will set up the HOA, shall oversee that adequate funding for park and open space maintenance is included within the HOA fee structure, including annual maintenance fees and long-term maintenance reserve funds.</li> <li>• Revisions to the HOA's Covenants, Conditions, and Restrictions (CC&amp;Rs) related to park and open space maintenance shall be prohibited except with the review and approval of the Director of the City of Lake Forest Community Development Department, or designee.</li> </ul>	Less than Significant Impact
Threshold 4.14.2: The proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Recreational Resources: The proposed Project, in conjunction with the cumulative projects in the City, has the potential to increase demand on the City's recreational resources. The cumulative Projects would also be subject to Municipal Code requirements for the provision of parkland and/or payment of in-lieu	Potentially Significant Impact	Refer to Mitigation Measure 4.15.1 and RCM REC-1	Less than Significant Impact

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
fees. Therefore, the cumulative impact of the proposed Project and the applicable related projects would be less than significant with respect to recreational facilities.			
<b>4.16: Transportation and Traffic</b>			
Threshold 4.16.1: The proposed Project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Potentially Significant Impact	<p><b>Mitigation Measure 4.16.1 Construction Traffic Management Plan.</b> Prior to the issuance of grading permits, the Project Applicant/Developer shall prepare a Construction Traffic Control Plan for approval by the City of Lake Forest Director of Public Works/City Engineer, or designee, and shall implement the Plan during Project construction with the goal of maintaining acceptable intersection levels of service (LOS) during peak traffic hours. At a minimum, the Construction Traffic Management Plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways and ensure the safe access into and out of the site (e.g., warning signs, lights and devices, and flag person).</li> <li>• The delivery and removal of heavy equipment shall occur outside of the morning and evening peak periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m., Monday through Friday).</li> <li>• Routine street closures shall be planned to occur outside of the morning and evening peak traffic hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m., Monday through Friday).</li> <li>• Soil import and export activity shall not be permitted during the morning and evening peak traffic hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m., Monday through Friday).</li> <li>• Rerouting construction trucks to reduce travel on congested streets.</li> <li>• Prohibiting construction-related vehicles from parking on public streets.</li> <li>• Providing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.</li> <li>• Scheduling construction-related deliveries, other than concrete and earthwork-related deliveries, so as to reduce travel during peak travel periods.</li> <li>• Obtaining the required permits for truck haul routes from the City of Lake Forest and/or Caltrans.</li> <li>• All emergency access to the Project site and adjacent areas shall be kept clear and unobstructed during all phases of demolition and construction.</li> <li>• The Orange County Sheriff’s Department and the Orange County Fire Authority (OCFA) shall be notified a minimum of 1 week (7 days) in advance of any lane closures or roadway work so that emergency vehicles can be rerouted during construction if deemed necessary in the expert opinion of the Orange County Sheriff’s Department and/or OCFA.</li> <li>• The Orange County Transportation Authority (OCTA) shall be notified regarding any affected locations a minimum of 10 working days prior to construction so that transit service can be rerouted if deemed necessary in the expert opinion of the OCTA.</li> <li>• Flag persons shall be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access.</li> </ul> <p><b>Mitigation Measure 4.16.2 Intersection Improvements.</b> Unless physical improvements are already constructed, prior to issuance of the first certificate of occupancy, the Project Applicant/Developer shall construct a second northbound left turn lane at the intersection of Bake Parkway &amp; Jeronimo Road consistent with the design requirements of the City of Lake Forest</p>	Less than Significant Impact
Threshold 4.16.2: The proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b).	No Impact	No mitigation is required.	No Impact

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.16.3: The proposed Project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Potentially Significant Impact	<p><b>Mitigation Measure 4.16.3 Sight Distance Analysis.</b> Prior to issuance of grading permits and building permits, the Project Applicant/Developer shall prepare a detailed sight distance analysis for all Project intersections. The sight distance analysis shall be prepared according to the City of Lake Forest Municipal Code and the Caltrans Highway Design Manual standards and guidelines, and indicate 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). Intersections on Bake Parkway, which has a 50 mph posted speed limit, should be provided with a minimum of 430 feet of stopping sight distance according to the Caltrans Highway Design Manual. Intersections internal to the project site would have a 25 mph speed limit and would require a minimum of 150 feet of stopping sight distance according to the Caltrans Highway Design Manual. The findings of the sight distance analysis shall be included in a report(s) subject to review and approval by the Directors of Planning and Building and Public Works, or designees.</p> <p><b>Mitigation Measure 4.16.4 Rectangular Rapid Flashing Beacons (RRFBs).</b> Prior to issuance of the first certificate of occupancy, Rectangular Rapid Flashing Beacons (RRFBs) are required at the uncontrolled crosswalks at the intersection of "B" Street and "BB" Street and the intersection of "A" Street and "D" Street.</p>	Less than Significant Impact
Threshold 4.16.4: The proposed Project would result in inadequate emergency access.	Potentially Significant Impact	Refer to Mitigation Measure 4.16.1 above.	Less than Significant Impact
Cumulative Impacts to Transportation and Traffic: The proposed Project's contribution to cumulative traffic impacts would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.17: Tribal Cultural Resources</b>			
Threshold 4.16.1: The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	No Impact	No mitigation is required.	No Impact
Threshold 4.16.2: The proposed Project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Potentially Significant Impact	Refer to Mitigation Measure 4.5.1 (Cultural Resources) above.	Less than Significant Impact
Cumulative Impacts to Tribal Cultural Resources: The proposed Project's contribution to cumulative tribal cultural resource impacts would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.18: Utilities and Service Systems</b>			
Threshold 4.18.1: The proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than Significant Impact	Refer to Regulatory Compliance Measures AQ-4 (Air Quality) and GHG-1 (Greenhouse Gas)	Less than Significant Impact
Threshold 4.18.2: The proposed Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.18.3: The proposed Project would result in a determination	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.			
Threshold 4.18.4: The proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.18.5: The proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts to Utilities and Service Systems: The proposed Project's potential impacts to wastewater, portable water, solid waste, electricity, natural gas, and telecommunications services are not cumulatively considerable.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
<b>4.19: Wildfire</b>			
Threshold 4.19.1: The proposed Project would not impair an adopted emergency response plan or emergency evacuation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.2: The proposed Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and therefore would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.3: The proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	No Impact	No mitigation is required.	No Impact
Threshold 4.19.4: The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage changes.	Less than Significant Impact	<p><b>RCM FIRE-1: Fire Protection Plan.</b> The Project shall adhere to Chapter 7A of the CBC and/or Section R337 of the California Residential Code (CRC). All structures in the Nakase community shall adhere to the standards from Chapter 7A of the CBC and/or Section R337 of the CRC pertaining to roofing and venting to help prevent the intrusion of embers into structures. Residences adjoining the Fuel Management Zones shall meet all applicable standards set forth in Section R337 of the CRC because those structures would have direct exposure to the native vegetation beyond the Fuel Management Zones.</p> <p><b>RCM FIRE-2: Fire Master Plan.</b> The Project Applicant/Developer shall develop a Fire Master Plan that identifies the proper installation and maintenance of fire access roadways, the locations of fire hydrants, a sufficient water supply, and emergency access to residences and structures within the Project site as required by the most current California Fire Code and Lake Forest Municipal Code.</p> <p><b>RCM FIRE-3: Fuel Modification Plan.</b> –<i>Technical Design for New Construction Fuel Modification Plans and Maintenance Program</i> A preliminary Fuel Modification Plan shall be submitted to and approved by the Fire Code Official prior to or concurrently with the approval of the tentative map.</p> <ol style="list-style-type: none"> <li>A final Fuel Modification Plan shall be submitted to and approved by the Fire Code Official prior to the issuance of the grading permit.</li> <li>The Fuel Modification Plan shall meet the criteria set forth in the Fuel Modification Section of –<i>Technical Design for New Construction Fuel Modification Plans and Maintenance Program</i>.</li> </ol>	Less than Significant Impact

<sup>1</sup> Hazardous fire areas include all areas identified within California Fire Code Section 4906.2 and other areas as determined by the Fire Code Official as presenting a fire hazard due to the presence of combustible vegetation, or the proximity of the property to an area that contains combustible vegetation.

**Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance after Mitigation**

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		4. The fuel modification plan shall include provisions for the maintenance of the fuel modification in perpetuity. 5. The Fuel Modification Plan may be altered if conditions change. Any alterations to the fuel modification areas shall have prior approval from the Fire Code Official. 6. All elements of the Fuel Modification Plan shall be maintained in accordance with the approval plan and are subject to the enforcement process outlined in the California Fire Code.	
Cumulative Impacts to Wildfire: The proposed Project and all related projects are required to adhere to City, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire. With compliance with these regulations, cumulative impacts related to wildfire would be less than significant.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

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