

## 4.11 LAND USE AND PLANNING

This section describes the existing land uses on the Project site and in its vicinity, and evaluates the compatibility of the proposed Project with surrounding land uses and relevant policy and planning documents. The consistency analysis presented in this section was prepared in compliance with *California Environmental Quality Act Guidelines* (State CEQA Guidelines) Section 15125(d). Information presented in this section is based on information provided in the City of Lake Forest (City) General Plan (last amended in 2016), the City's General Plan Land Use Map (2016), the City's Zoning Code (2019), the City's Zoning Map (2019), the Orange County (County) Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) (1996), and the Nakase Project Fiscal Impact Analysis (Stanley R. Hoffman Associates, May 2018), which is included in Appendix N of this EIR. In addition, pursuant to State CEQA Guidelines Section 15125(d), this Environmental Impact Report (EIR) evaluates the proposed Project's consistency with other applicable planning documents as they relate to specific topical sections within Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

### 4.11.1 Scoping Process

The Initial Study/Notice of Preparation found that the proposed Project would not disrupt/realign the existing roadway network or affect/disrupt residential neighborhoods in the Project site vicinity; therefore, it was determined that implementation of the proposed Project would not physically divide an established community. This topic will not be discussed further in this section.

The City of Lake Forest (City) received 28 comment letters during the public review period of the Initial Study/Notice of Preparation (IS/NOP). For copies of the IS/NOP comment letters, refer to Appendix A of this EIR. Five comment letters included comments related to Land Use/Planning.

The letter from the Southern California Association of Governments (SCAG) (August 15, 2018) expressed concern with the proposed Project's consistency with the 2016 Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS). SCAG also suggested including a side-by-side comparison table for consistency analysis in the EIR and recommended the use of the Final Program EIR for 2016 RTP/SCS for guidance and potential project-level mitigation measures.

The letter from Sima Soltani (July 24, 2018) expressed favor for new housing on the Project site. The letter from Loretta Herrin (July 25, 2018) suggested evaluating the development of a cemetery for veterans or an aquatic center on the Project site. The letter from Bob Stuart (July 25, 2018) expressed opposition to a zoning change for the nursery. The letter from Charles Larson (August 4, 2018) expressed favor for agricultural zoning on the Project site.

### 4.11.2 Existing Environmental Setting

The Project site is located in the north-central portion of the City of Lake Forest, which is in the south-central portion of the County. The current Nakase Brothers Wholesale Nursery is located at 20621 Lake Forest Drive. As illustrated in Figure 3.1, Regional Project Location, the Project site is bounded by Rancho Parkway to the northeast, Bake Parkway to the northwest, Serrano Creek to the southeast, and light industrial uses to the southwest. The Project site is rectangular in shape and

consists of a single parcel (Assessor's Parcel Number [APN] 612-221-01) totaling approximately 122 acres (ac).

As shown in Figure 3.3, Existing Land Uses, the Project site is developed with a wholesale plant nursery. Figure 3.3 also shows that the Project site is surrounded by a variety of residential, business park, regional park/open space, commercial, and light industrial land uses. Specifically, land uses surrounding the Project site include a commercial center with a Home Depot, 24 Hour Fitness, FedEx, Auto Repair Shop, Shell Gas Station, and various restaurants immediately northeast of the site. Business parks with several office buildings and surface parking lots are immediately southwest of the Project site. Business parks and a hotel are located to the northwest of the Project site beyond Bake Parkway and to the southeast of the Project site on the opposite side of Serrano Creek. Although not immediately adjacent to the Project site, single-family and multifamily residential uses exist to the northwest, northeast, and south of the Project site.

### 4.11.3 Regulatory Setting

#### 4.11.3.1 Federal Regulations

There are no federal regulations applicable to land use and planning.

#### 4.11.3.2 State Regulations

**California State Planning and Zoning Law.** This law, which is codified in California Government Code sections 65000-66037, delegates most of the State's local land use and development decisions to cities and counties. The California Government Code establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific plans, subdivisions, and zoning. California Government Code Section 65302 requires that all California cities and counties include the following seven elements in their general plan:

- Land Use
- Circulation
- Housing
- Conservation
- Open Space
- Noise
- Safety

Cities and counties in the San Joaquin Air Pollution Control District must also address air quality in their general plans. Cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality.<sup>1</sup>

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<sup>1</sup> Senate Bill 1000 (SB 1000), adopted in 2016 requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local government already has EJ goals, policies, and objectives, must happen "upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018."

**Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375).** This statute requires California’s regional planning agencies to include a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy in their Regional Transportation Plans (RTP). Senate Bill 375 (SB 375) was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing and environmental planning. Under the law, California’s regional planning agencies are required to include a Sustainable Communities Strategy (SCS) in their Regional Transportation Plans (RTP). The SCS provides a plan for meeting the regional emissions reduction targets established by the California Air Resources Board (ARB). If the emissions reduction targets cannot be met through the SCS, an Alternative Planning Strategy (APS) may be developed that shows how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures of policies. SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives.

The requirements of SB 375 are reflected in the 2016 RTP/SCS adopted by the Southern California Association of Governments (SCAG), which serves as the regional planning agency in the six-county metropolitan region composed of Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties. The 2016–2040 RTP/SCS is discussed in further detail below.

#### 4.11.3.3 Regional Regulations

The Project site is covered by several planning documents and programs that have varying degrees of regulation over use of the Project site. The following paragraphs explain regional regulations, plans, and policies applicable to the Project site that are analyzed in this EIR section.

**Southern California Association of Governments (SCAG).** As discussed above, regional planning in Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties is conducted by SCAG. SCAG is also the federally designated Metropolitan Planning Organization (MPO) for these six counties. As the designated MPO, SCAG is mandated by the federal government to research and prepare plans for transportation, a growth forecast, hazardous waste, and air quality. The growth forecast serves as the foundation of these plans. Of the various plans adopted by SCAG, the Regional Comprehensive Plan and the 2016–2040 RTP/SCS are relevant to the Project.

**Regional Comprehensive Plan and Guide.** In 2008, SCAG adopted the Regional Comprehensive Plan (RCP) for the purpose of providing a comprehensive strategic plan for defining and solving housing, traffic, water, air quality, and other regional challenges. The 2008 RCP has two primary objectives in implementing this strategic plan: (1) integrating transportation, land use, and air quality planning approaches, and (2) outlining key roles for public and private sector stakeholders to implement reasonable policies regarding transportation, land use, and air quality approaches. While the 2008 RCP outlines several policies to inform local decision-makers within the SCAG region with respect to policy and planning decisions, these policies are considered recommendations and are not mandated by law.

With respect to land use policy, the 2008 RCP includes a Land Use and Housing chapter that aims to link land use and transportation planning decisions to the projected population and economic growth in the SCAG region. Specifically, the Land Use and Housing chapter of the 2008

RCP promotes sustainable planning for land use and housing in the SCAG region by maximizing the efficiency of the existing circulation network, providing a greater variety in housing types, promoting a diverse and growing economy, and protecting the existing natural environment. The 2008 RCP identifies 2% Strategy Areas as part of the Sustainability Planning Grant (formerly known as Compass Blueprint growth vision); however, these areas have since been updated and replaced by the High-Quality Transit Areas (HQTAs) identified in the 2016–2040 RTP/SCS.

**Regional Transportation Plan/Sustainable Communities Strategy.** On April 7, 2016, SCAG adopted the 2016–2040 RTP/SCS. The 2016–2040 RTP/SCS is a long-range planning document that provides a common foundation for regional and local planning, policymaking, and infrastructure goals in the SCAG region. The overall vision for the 2016–2040 RTP/SCS is to allow for compact communities that are connected by numerous public transit options, are more walkable, and are safe for bicyclists. By promoting more compact communities and improving the regional transit system, SCAG’s 2016–2040 RTP/SCS aims to reduce vehicular miles traveled and associated air quality and greenhouse gas emissions, promote active lifestyles, and fuel economic growth.

The 2016–2040 RTP/SCS establishes a number of initiatives aimed at improving the regional transit system and reducing automobile reliance in the SCAG planning area. Examples of these initiatives include promoting alternative modes of transportation and active transportation (e.g., bicycling and focusing new growth near transit and HQTAs and Livable Corridors). HQTAs are defined as walkable transit villages or corridors within 0.5 mile of a well-serviced transit stop or transit corridor with a 15-minute or less service frequency during peak commuting hours. Livable corridors are defined as arterials characterized by a mix of higher-density residential uses, employment centers, active transportation, and alternative transportation modes. In addition, the 2016–2040 RTP/SCS aims to provide sustainable transportation options or residents of the region through the creation of Neighborhood Mobility Areas (NMAs). NMAs promote active transportation and encourage biking, walking, skateboarding, neighborhood electric vehicles, and senior mobility devices in place of automobile use. Overall, the 2016–2040 RTP/SCS aims to focus new growth around transit.

The following goals in the 2016–2040 RTP/SCS are applicable to the proposed Project:<sup>1</sup>

**Goal 1:** Align the plan investments and policies with improving regional economic development and competitiveness.

**Goal 2:** Maximize mobility and accessibility for all people and goods in the region.

**Goal 3:** Ensure travel safety and reliability for all people and goods in the region.

**Goal 4:** Preserve and ensure a sustainable regional transportation system.

**Goal 5:** Maximize the productivity of our transportation system.

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<sup>1</sup> Goal 9 of the 2016–2040 RTP/SCS relates to planning/policy actions to be taken by regional and local agencies; therefore, it does not apply to the Project.

**Goal 6:** Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).

**Goal 7:** Actively encourage and create incentives for energy efficiency, where possible.

**Goal 8:** Encourage land use and growth patterns that facilitate transit and active transportation.

**Orange County Natural Community Conservation Plan and Habitat Conservation Plan.** The City of Lake Forest, including the Project site, is located within the Central and Coastal Subregion of the Orange County NCCP/HCP. The Central and Coastal Subregion encompasses approximately 208,000 ac of developed, agricultural, and undeveloped natural lands. The majority of land within this subregion has already been developed with urban land uses. Habitats of concern subject to potential development pressure include, but are not limited to, coastal sage scrub and other sage, chaparral, woodland and forest, riparian, wetlands, and native annual grasses. As part of the NCCP/HCP, projects that would impact sensitive habitat areas, as designated by the NCCP/HCP, are required to pay NCCP/HCP in lieu fees to mitigate impacts to sensitive biological resources.

The Project site is located within the jurisdiction of the Central and Coastal Orange County NCCP/HCP. Specifically, the Project site is located within an area identified as “developed” and is located well outside the habitat reserve.

#### 4.11.3.4 Local Regulations

The City has preeminent decision-making authority regarding allowable land uses on the Project site. The City’s General Plan and Zoning Code both apply to the Project site.

**City of Lake Forest General Plan.** The City of Lake Forest General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan consists of a Land Use Map and the following six elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element
- Recreation and Resources Element (satisfies the State’s Conservation and Open Space Element requirements)
- Safety and Noise Element (satisfies the State’s Safety and Noise Element requirements)
- Public Facilities/Growth Management Element (optional element not required by State law)

At the heart of the General Plan is the Land Use Element (2010). This element presents the City’s goals and policies directing the long-term growth, development, and revitalization of the City. The

Land Use Element serves as a guide to the allocation of land use in the City and has major impacts on key issues and subject areas examined in the other elements of the General Plan. The Land Use Map, which illustrates land uses within the City, is a primary feature of the Land Use Element. Land use designations indicate the type and nature of development that is allowed in a given location.

As shown on Figure 3.5, General Plan Land Use and Business Development Overlay, the Project site is designated for Business Park uses on the City's General Plan Land Use Map. The Business Park designation is intended to provide a mix of uses as allowed under the Commercial, Professional Office, and Light Industrial designations. The Business Park designation does not provide for agricultural uses. Thus, the existing land use is inconsistent with the current Business Park designation of the Project site. As stated in the City's General Plan Land Use Element, the maximum intensity of development allowed within the Business Park designation is a Floor Area Ratio (FAR)<sup>1</sup> of 1.0:1.

The Project site is also within the Business Development Overlay (BDO) established by the City. The BDO designation applies to most areas designated for Commercial, Professional Office, Business Park, and Light Industrial land uses, and is intended to provide a balance of land uses that contribute to the future financial success of the City. Proposed land use designation changes within the BDO may not result in a loss of future net revenue for the City.<sup>2</sup>

The following policies included in the City's General Plan are relevant to the proposed Project:

- **Circulation Element**

- **Policy 4.1:** Promote the provision of non-vehicular circulation within Lake Forest.
- **Policy 4.3:** Improve pedestrian access from neighborhoods to commercial areas.
- **Policy 5.1:** Require sufficient off street parking for all land uses and maximize the use of parking facilities in Lake Forest.

- **Housing Element**

- **Policy 1.1:** Ensure the provision of a variety of housing opportunities (ownership and rental) in Lake Forest including low-density single-family homes, moderate-density townhomes, higher-density apartments and condominiums, mixed-use development, second dwelling units, and mobile homes to fulfill regional housing needs.
- **Policy 1.3:** Ensure that the design of new residential development is compatible with that of existing residences.
- **Policy 1.4:** Encourage the development of residential units that are designed and marketed to meet the needs of extremely low income households and special groups, such as the elderly, persons with disabilities (including developmental disabilities), and those in need of temporary shelter.

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<sup>1</sup> Floor area ratio is the ratio of a building's total (gross) floor area to the size of the piece of land on which it is built.

<sup>2</sup> City of Lake Forest General Plan. Land Use Element. June 1994 (revised September 2016).

- **Policy 1.5:** Encourage the development of new housing units in close proximity to public transportation and community services, including mixed use development in the Baker Ranch and Portola Hills Planned Communities.
- **Policy 1.8:** Encourage residential developments to incorporate a minimum of 15% affordable units, including units affordable to extremely low income households.
- **Policy 4.4:** Encourage the provision of designs which support aging in place (such as universal design) in new development.
- **Land Use Element**
  - **Policy 2.1:** Enhance the physical attributes of Lake Forest to create an identifiable and distinct community within Orange County.
  - **Policy 2.2:** Promote high quality in the design of all public and private development projects.
  - **Policy 3.1:** Ensure that new development fits within the existing setting and is compatible with the physical characteristics of available land, surrounding land uses, and public infrastructure availability.
  - **Policy 3.3:** Ensure that the affected public agencies can provide necessary facilities and services to support the impact and intensity of development in Lake Forest and in areas adjacent to the City.
  - **Policy 3.4:** Blend residential and nonresidential development with landscaping and architectural design techniques to achieve visual compatibility.
  - **Policy 4.1:** Ensure that all development proposals within the planned community areas conform to applicable development plans and agreements.
  - **Policy 5.7:** Preserve the fiscal well-being of the community by ensuring that land use designation changes for land within the Business Development Overlay will not result in a loss of future net revenue for the City.
- **Public Facilities/Growth Management Element**
  - **Policy 8.1:** Utilize information on the jobs/housing balance in the City and region as a factor in land use decision-making.
- **Recreation and Resources Element**
  - **Policy 1.2:** Maximize the utilization of existing parks, recreational facilities, and open space within Lake Forest.
  - **Policy 1.6:** Promote the future development of community centers as focal points for local activities.
  - **Policy 1.7:** Develop a network of multipurpose trails to provide convenient, safe access to recreational, residential, and commercial areas.

- **Policy 2.1:** Conserve and protect important natural plant and animal communities, such as areas supporting rare and endangered species, riparian areas, wildlife movement corridors, wetlands, and significant tree stands through appropriate site planning and grading techniques, re-vegetation and soil management practices, and other resource management techniques.
- **Policy 2.3:** Encourage the expansion of reclaimed water production and use.
- **Policy 2.4:** Conserve and protect important topographical features, watershed areas, and soils through appropriate site planning and grading techniques, re-vegetation and soil management practices, and other resource management techniques.
- **Policy 4.1:** Protect areas of important historic, archaeological, and paleontologic resources.
- **Policy 5.1:** Solicit citizen participation during the early stages of major public or private development projects and regulatory programs.
- **Policy 7.1:** Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.
- **Policy 7.5:** Implement land use policy aimed at achieving a greater balance between jobs and housing in Lake Forest.
- **Policy 7.6:** Integrate air quality planning with land use and transportation planning.
- **Policy 7.7:** Promote energy conservation and recycling by the public and private sector in Lake Forest.
- **Safety and Noise Element**
  - **Policy 1.1:** Reduce the risk of impacts from geologic and seismic hazards.
  - **Policy 1.2:** Protect the community from flooding hazards.
  - **Policy 2.4:** Reduce the risk to the community from fire.
  - **Policy 5.1:** Utilize noise/land use compatibility standards as a guide for future planning and development decisions.
  - **Policy 5.2:** Provide noise control measures, such as berms, walls, and sound attenuating construction in areas of new construction or rehabilitation.
  - **Policy 6.1:** Reduce noise impacts to sensitive land uses from transportation noise sources.

**City of Lake Forest Municipal Code.** Zoning is the division of a city into districts and the application of land use and development regulations specific to each district. The City of Lake Forest Zoning Code, Title 9 of the Municipal Code, includes development standards applicable to the Project site. It establishes zone-specific height limits, setback requirements, parking ratios, and other development standards, and specifies permitted and prohibited uses.

It is the intent of the City that the General Plan Land Use Element and the Zoning Code be consistent in order to ensure that long-term goals and objectives are implemented through land use

regulations and other tools. The Zoning Code is a primary tool for implementing the City's General Plan. As shown in Figure 3.6, Zoning Map, the Project site's zoning classification is General Agriculture (A1). The A1 district allows for agriculture, outdoor recreational uses, and other low-intensity uses requiring open space. According to Section 9.72.010 of the City's Zoning Code, the A1 district may be used as an interim zone in those areas which the General Plan may designate for more intensive urban uses in the future. This is the case with the Project site, which is currently designated for Business Park uses.

Approval of the proposed Project would include a Zone Change (ZC 05-17-5034) to Planned Community. Approval of the Planned Community Program outlined in the Area Plan would be required as part of the Zone Change. Should the City Council approve the proposed Project, the Area Plan would replace and supersede the Zoning requirements that apply to the Project site with those contained in the Area Plan. It should be noted that the Area Plan would not replace every provision of the City's Zoning Code. Some of the development standards established in the Zoning Code, including the off-street parking requirements, would still apply to the proposed Project. If the Area Plan is silent regarding a particular item addressed in the City's Zoning Code, the Zoning Code would continue to apply.

#### 4.11.4 Methodology

The impact analysis presented in this Land Use and Planning section evaluates potential physical impacts of the proposed Project on land use compatibility and considers whether the proposed Project would result in potential inconsistencies with relevant plans or policies contained in applicable planning documents adopted by the City and other agencies. Neither CEQA nor the *State CEQA Guidelines* set forth standards for determining whether or not a project is consistent with an applicable plan; rather, the final determination that a project is consistent or inconsistent with an applicable plan is made by the Lead Agency when it acts on the project. The analysis in this Draft EIR discusses the findings of policy review and is meant to provide a guide for decision-makers during policy interpretation.

A project's inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact (per *State CEQA Guidelines* Section 15382). This EIR section determines whether or not the proposed Project would conflict with any adopted land use policies or programs and whether mitigation is feasible. Under this approach, a policy or program conflict is not in and of itself considered a significant environmental impact. An inconsistency between the proposed Project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact. In some cases, an inconsistency may be evidence that an underlying physical impact is significant and adverse.

#### 4.11.5 Thresholds of Significance

The proposed Project may be deemed to have a significant impact with respect to land use and planning if it would:

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- Threshold 4.11.1: Physically divide an established community**
- Threshold 4.11.2: 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**
- Threshold 4.11.3: 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**
- Threshold 4.11.4: 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**
- Threshold 4.11.5: 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**

The Initial Study, included as Appendix A, substantiates that there would be no impacts associated with Threshold 4.11.1. This threshold will not be addressed in the following analysis.

#### **4.11.6 Project Impacts**

**Threshold 4.11.2: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**AND**

**Threshold 4.11.4: Would the Project 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.*** The main documents regulating land use for the Project site and the immediate vicinity are the City's General Plan and its Zoning Code. The proposed Project's relationship to these planning documents is described below. In light of SCAG's request to evaluate the Project's consistency with the 2016–2040 RTP/SCS, the proposed Project's relationship to that document is also provided below.

**SCAG Regional Comprehensive Plan.** The 2008 Regional Comprehensive Plan (RCP) addresses regional goals related to growth and infrastructure in the Southern California region. The RCP also addresses issues such as housing, traffic, air quality, and water resources as a guide for local agencies to use in preparing plans that deal with regional issues. The RCP outlines a vision of how the Southern California region can balance growth with conservation in order to achieve a higher quality of life. In order to achieve this balance, the RCP establishes the following land use

goals: (1) focus growth in existing centers and along major transportation corridors, (2) encourage mixed-use development, (3) provide new housing opportunities, (4) encourage development near existing and planned transportation stations to reduce traffic congestion and associated air pollutants, (5) preserve existing single-family neighborhoods, and (6) protect open space and environmentally sensitive habitat areas from development. RCP Goal 2 does not apply to the proposed Project.

The Project site is located immediately south of Bake Parkway, which is a Primary Roadway consisting of four lanes. The proposed Project would replace a wholesale plant nursery with a mix of land uses, including a residential neighborhood, an elementary school site, and neighborhood parks. Although the Project would not include new commercial or industrial development, it would be located on a site that is surrounded by existing commercial and industrial uses. Uses proposed as part of the Project would be easily accessed from Bake and Rancho Parkways and other major transportation corridors near the site (e.g., SR-241). In addition, the proposed Project would be located immediately adjacent to Class II bike lanes and bus stops on Bake Parkway and 3.5 mi northeast of the Irvine Transportation Center, a multimodal transit station that includes a Metrolink/Amtrak train station and serves as hub for express, local and rail-feeder bus services operated by OCTA. Residents may utilize alternative transportation to commute to jobs in surrounding business parks or the nearby Irvine Spectrum employment center. Therefore, the Project would be consistent with RCP Goal 1 to focus growth along major transportation corridors and Goal 4 to encourage new development near existing transportation stations.

The proposed Project would provide up to 776 new housing units on the Project site. Therefore, the Project would be consistent with RCP Goal 3 to provide new housing opportunities.

Development of the proposed Project would be consistent with existing single-family neighborhoods in the vicinity of the Project site. As such, the proposed Project would not interfere or conflict with the existing land use patterns and visual character of established residential neighborhoods near the site. Therefore, the Project would be consistent with RCP Goal 5 of preserving existing single-family neighborhoods.

The proposed Project would include a 10.4 ac open space and habitat restoration area on the Project site adjacent to Serrano Creek. The open space and habitat restoration area would be placed into a conservation easement or similar legal protection that would protect the lands in perpetuity. Therefore, the Project would be consistent with RCP Goal 6 of protecting open space and environmentally sensitive habitat areas from development.

For the reasons stated above, the proposed Project would be consistent with applicable goals and policies in SCAG's 2008 RCP.

**SCAG Regional Transportation Plan/Sustainable Community Strategies.** Table 4.11.A provides a consistency analysis of the goals from the 2016–2040 RTP/SCS that are relevant to the proposed Project. In order to eliminate repetitive policies and focus on key issues, goals that are not relevant to the proposed Project are not included in Table 4.11.A. As stated in Table 4.11.A, the proposed Project would be consistent with applicable goals in the 2016–2040 RTP/SCS, and no mitigation is required.

**City of Lake Forest General Plan.** As noted above, the proposed Project includes a General Plan Amendment request to modify the land use designation of the Project site from Business Park to Low-Medium and Medium Density Residential, High Density Residential, Public Facility, Community Park/Open Space, and Regional Park/Open Space. The Business Development Overlay applies to areas designated for Commercial, Professional Office, Business Park, and Light Industrial land uses. The General Plan Amendment would remove the Business Development Overlay from the Project site. Therefore, upon its approval by the City Council, the proposed Project would be consistent with the land use designations contained in the City’s General Plan.

Table 4.11.B provides a consistency analysis of the policies from the City’s General Plan that are relevant to the proposed Project. In order to eliminate repetitive policies and focus on key issues, policies that are not relevant to the proposed Project are not included in Table 4.11.B. As stated in Table 4.11.B, the proposed Project would be consistent with most of the applicable General Plan policies, with the exception of General Plan Recreation and Resources Element Policy 7.5 and General Plan Housing Element Policy 4.4. By adding 776 new housing units to the Project site, the proposed Project would lower the City’s jobs-to-household ratio, resulting in a greater imbalance between jobs and housing in the City (Recreation and Resources Element Policy 7.5). In addition, the proposed Project does not contain any specific design elements that would support aging-in-place (General Plan Housing Element Policy 4.4). Despite these inconsistencies, the Project would generally be consistent with the goals and policies contained in the City’s General Plan. As discussed elsewhere in this EIR, the change in planned land uses on the Project site and the resulting change in the City’s jobs-housing balance alone would not result in any significant and unavoidable impacts. Similarly, although universal design is encouraged in new development, it is not required under the General Plan. Thus, inconsistency with General Plan Housing Element Policy 4.4 would not result in any significant and unavoidable impacts. Therefore, the proposed Project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations, and no mitigation is required.

**City of Lake Forest Municipal Code.** As described above, the proposed Project includes a Zone Change to Planned Community and the Area Plan would include a Planned Community Program applicable to the Project site. Should the City Council approve the proposed Project, the Area Plan would replace and supersede the Zoning requirements that apply to the Project site with those contained in the Area Plan. Some provisions of the City’s Zoning Code would remain in effect. Therefore, upon its approval by the City Council, the proposed Project would be consistent with the City’s Municipal Code and Zoning. Therefore, the proposed Project would result in less than significant impacts related to potential conflicts with applicable land use plans, policies, and regulations, and no mitigation is required.

**Table 4.11.A: Regional Transportation Plan/Sustainable Communities Strategy  
Policy Consistency Analysis**

Goals	Consistency Analysis
<p><b>RTP/SCS Goal 1:</b> Align the plan investments and policies with improving regional economic development and competitiveness.</p>	<p><b>Consistent.</b> Development of the currently underutilized Project site would provide additional housing opportunities in a region that is currently experiencing a severe housing shortage. The Project would change the General Plan Land Use designation on the Project site from Business Park to allow residential uses and an elementary school site, which would likely decrease the potential number of jobs in the City of Lake Forest. However, the development of up to 776 new housing units in an area of Lake Forest that is surrounded by business parks would improve the region’s economic competitiveness by ensuring that area workers would have access to new housing in close proximity to their jobs. Therefore, the proposed Project would be consistent with Goal 1 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 2:</b> Maximize mobility and accessibility for all people and goods in the region.</p>	<p><b>Consistent.</b> The proposed Project would result in the conversion of a wholesale plant nursery to a residential community and an elementary school site. The Project site is located directly adjacent to Bake Parkway, which is a Primary Roadway that runs in a general north-south direction through the Cities of Irvine and Lake Forest. The Project site would also be located approximately 0.5 mi south of the SR-241/Alton Parkway interchange. Access to SR-241 from the Project site is also available via Rancho Parkway and Lake Forest Drive (to and from the northwest) and Portola Parkway South interchanges. The SR-241/Lake Forest Drive interchange is located approximately 0.2 mi northeast of the Project site and the SR-241/Portola Parkway South interchange is approximately 0.5 mi east of the Project site.</p> <p>The Project would provide off-street bicycle and pedestrian paths along the on-site collector streets, the perimeter of the Central Park, and a connection to the Serrano Creek Trail from the southeastern Project site boundary. The Project bikeways would connect with existing Class II bikeways (on-street bicycle lanes), which are located on both sides of Bake Parkway, Rancho Parkway South and Rancho Parkway.</p> <p>The Project would provide access to the site from Bake and Rancho Parkways, which would serve to connect the site with the local and regional transportation systems. As such, development of the proposed Project would maximize mobility and accessibility to the site, which is currently only accessible via a single driveway off Lake Forest Drive. In addition, the Project would provide connections to the existing regional bikeway and trail network, which would enhance nonmotorized mobility and accessibility in the region. Therefore, the proposed Project would be consistent with Goal 2 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 3:</b> Ensure travel safety and reliability for all people and goods in the region.</p>	<p><b>Consistent.</b> All proposed pedestrian, bike, roadway, and trail improvements included as part of the proposed Project would comply with City and OCFA standards to ensure their safety and reliability. Therefore, the proposed Project would be consistent with Goal 3 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 4:</b> Preserve and ensure a sustainable regional transportation system.</p>	<p><b>Consistent.</b> As described above in the analysis for Goal 2, the Project would provide a robust on-site circulation system that would accommodate pedestrians and cyclists. The Project would also provide connections to the existing regional bikeway and trail network, thereby encouraging the use of active transportation modes. Therefore, the proposed Project would be consistent with Goal 4 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 5:</b> Maximize the productivity of our transportation system.</p>	<p><b>Consistent.</b> The Project would provide access to the site from Bake and Rancho Parkways, which would serve to connect the site with the local and regional transportation systems. Signalized intersections at these access points will include road-embedded sensors and will be well-timed for maximum efficiency. As such, development of the proposed Project would maximize the productivity of the existing roadway network in the vicinity of the site. In addition, the Project would provide connections to the existing regional bikeway and trail network, which would encourage greater use of the region’s existing sidewalks, bikeways, and multi-purpose trails. Therefore, the proposed Project would be consistent with Goal 5 in the 2016–2040 RTP/SCS.</p>

**Table 4.11.A: Regional Transportation Plan/Sustainable Communities Strategy  
Policy Consistency Analysis**

Goals	Consistency Analysis
<p><b>RTP/SCS Goal 6:</b> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p><b>Consistent.</b> As described above in the analysis for Goal 2, the Project would provide a robust on-site circulation system that would accommodate pedestrians and cyclists. The Project would also provide connections to the existing regional bikeway and trail network, thereby encouraging the use of active transportation modes.</p> <p>As described in Section 4.3, Air Quality, of this EIR, construction and operation of the proposed Project would result in less than significant air quality impacts with the implementation of Regulatory Compliance Measures. Because the Project would encourage active transportation and not degrade air quality, the proposed Project would be consistent with Goal 6 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 7:</b> Actively encourage and create incentives for energy efficiency, where possible.</p>	<p><b>Consistent.</b> The proposed Project would provide energy efficiency through compliance with the California Green Building Standards Code (CALGreen). Sustainability features proposed as part of the Project include, but are not limited to: the installation of a 240-volt circuit in each home to facilitate electric vehicle (EV) charging; the installation of light-emitting diode (LED) technology within homes; and the installation of EV charging stations at Central Park. As such, the proposed Project would be consistent with Goal 7 in the 2016–2040 RTP/SCS.</p>
<p><b>RTP/SCS Goal 8:</b> Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>Consistent.</b> As described above in the analysis for Goal 2, the Project would provide a robust on-site circulation system that would accommodate pedestrians and cyclists. The Project would also provide connections to the existing regional bikeway and trail network, thereby encouraging the use of active transportation modes.</p> <p>The Project site is currently served by OCTA Route 206, which provides bus service along Bake Parkway and a portion of Dimension Drive. OCTA Route 177, which provides bus service along Lake Forest Drive, is also located near the Project site. Both bus routes would provide opportunities for Project residents to use transit service.</p> <p>The Project would facilitate transit use and active transportation by providing new housing on the Project site, which is already connected to Class II bikeways and served by existing transit service on Bake Parkway. New residents would be able to cycle or take transit to work in the Irvine Spectrum, a major regional employment center that is approximately 4 mi southwest of the Project. Therefore, the proposed Project would be consistent with Goal 8 in the 2016–2040 RTP/SCS.</p>

Source: Southern California Association of Governments. 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy.  
 City = City of Lake Forest  
 EIR = Environmental Impact Report  
 mi = miles  
 OCFA = Orange County Fire Authority  
 OCTA = Orange County Transportation Authority  
 RTP/SCS = Regional Transportation Plan/Sustainable Community Strategies  
 SR-241 = State Route 241

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
<b>Circulation Element</b>	
<p><b>Policy 4.1:</b> Promote the provision of non-vehicular circulation within Lake Forest.</p>	<p><b>Consistent.</b> The proposed Project would provide off-street bicycle and pedestrian paths along the on-site collector streets, the perimeter of the Central Park, and a connection to the Serrano Creek Trail from the southeastern Project site boundary. The Project bikeways would connect with existing Class II bikeways (on-street bicycle lanes), which are located on both sides of Bake Parkway, Rancho Parkway South and Rancho Parkway. By providing connections to the existing regional bikeway and trail network as well as the existing sidewalks on Bake and Rancho Parkways adjacent to the Project site, the Project would promote the provision of non-vehicular circulation within Lake Forest. Therefore, the proposed Project would be consistent with General Plan Circulation Element Policy 4.1.</p>
<p><b>Policy 4.3:</b> Improve pedestrian access from neighborhoods to commercial areas.</p>	<p><b>Consistent.</b> As described above in the analysis for Circulation Element Policy 4.1, the Project would provide a robust on-site pedestrian circulation system that would connect with existing sidewalks along Bake and Rancho Parkways adjacent to the Project site. These connections would facilitate pedestrian movement between the Project’s neighborhoods and nearby commercial centers on Bake and Rancho Parkways. Therefore, the proposed Project would be consistent with General Plan Circulation Element Policy 4.3.</p>
<p><b>Policy 5.1:</b> Require sufficient off street parking for all land uses and maximize the use of parking facilities in Lake Forest.</p>	<p><b>Consistent.</b> The proposed Project’s residential uses would be required to provide off-street parking in compliance with Chapter 9.168, Off-Street Parking, of the City’s Municipal Code. On-street parking will be provided to serve the Neighborhood Parks and Central Park. Therefore, the proposed Project would provide sufficient off-street parking for the Project’s land uses would be considered consistent with General Plan Circulation Element Policy 5.1.</p>
<b>Housing Element</b>	
<p><b>Policy 1.1:</b> Ensure the provision of a variety of housing opportunities (ownership and rental) in Lake Forest including low-density single-family homes, moderate-density townhomes, higher-density apartments and condominiums, mixed-use development, second dwelling units, and mobile homes to fulfill regional housing needs.</p>	<p><b>Consistent.</b> The proposed Project includes the development of five residential neighborhoods consisting of 675 single-family residential for-sale units and one senior affordable housing neighborhood. Four of the residential neighborhoods would be developed at a low-medium density (7-15 du/ac); one would be developed at a medium density (15-25 du/ac), and the senior residential neighborhood would be developed at a high density (25-43 du/ac). The proposed Project would provide conventional single-family detached homes, single-family detached four-pack cluster homes, single-family attached homes, and senior affordable apartment homes. By providing several different housing product types, the proposed Project would diversify housing opportunities available in the City. Therefore, the proposed Project would provide housing opportunities to fulfill regional housing needs and is considered consistent with the General Plan Housing Element Policy 1.1.</p>
<p><b>Policy 1.3:</b> Ensure that the design of new residential development is compatible with that of existing residences.</p>	<p><b>Consistent.</b> Although not immediately adjacent to the Project site, single-family and multifamily residential uses exist to the northwest, northeast, and south of the Project site within several residential planned communities. These planned communities include the Foothill Ranch Planned Community to the north, the Portola Hills Planned Community to the northeast, the Baker Ranch Planned Community to the west, and the Rancho de Los Alisos Planned Community to the southeast.</p> <p>The proposed Project would be designed following the California Contemporary aesthetic, which includes Coastal Contemporary, California Modern, Modern Hacienda, and Spanish architectural styles that would blend with existing residential development in the Project vicinity. In addition, the residential densities of the proposed Project would generally be similar to those of the surrounding residential communities. Therefore, the proposed Project would be designed to be compatible with existing residences and is considered consistent with the General Plan Housing Element Policy 1.3.</p>

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
<p><b>Policy 1.4:</b> Encourage the development of residential units that are designed and marketed to meet the needs of extremely low income households and special groups, such as the elderly, persons with disabilities (including developmental disabilities), and those in need of temporary shelter.</p>	<p><b>Consistent.</b> As described above in the analysis for Housing Element Policy 1.1, the proposed Project would provide up to 101 rental housing units, which would be made affordable to senior citizens. Therefore, the proposed Project would be consistent with General Plan Housing Element Policy 1.4.</p>
<p><b>Policy 1.5:</b> Encourage the development of new housing units in close proximity to public transportation and community services, including mixed-use development in the Baker Ranch and Portola Hills Planned Communities.</p>	<p><b>Consistent.</b> The Project site is located adjacent to OCTA Route 206, which provides bus service along Bake Parkway and a portion of Dimension Drive. OCTA Route 177, which provides bus service along Lake Forest Drive, is also located near the Project site (the nearest bus stops are located at the intersection of Lake Forest Drive/Rancho Parkway). Both bus routes would provide opportunities for Project residents to use transit service. The Project would provide park space and an elementary school site. Emergency services and other community services are located within a 2 mi radius of the Project site. Therefore, the proposed Project would develop new housing in close proximity to public transportation and community services and is considered consistent with General Plan Housing Element Policy 1.5.</p>
<p><b>Policy 1.8:</b> Encourage residential developments to incorporate a minimum of 15% affordable units, including units affordable to extremely low income households.</p>	<p><b>Consistent.</b> The City implements this policy by requiring the preparation of an Affordable Housing Implementation Plan (AHIP). The AHIP, which is included in the Development Agreement between the Applicant and the City, must demonstrate how the project complies with the City's Affordable Housing Point System by meeting certain affordable housing production requirements. The Affordable Housing Point System awards "points" for each affordable unit provided on-site. Additional points are awarded if the units are made available as rental units for very low- or low-income households (points are weighted toward production of very-low income units). Two bedroom and second units receive additional points. The City requires that the Project provide a number of affordable units that is greater than 8.5 percent of the total number of market-rate units for which the Project is entitled. Based on the total number of market rate housing units proposed for the Project site (675), the Applicant will be required to achieve 101 points (an amount equal to 15 percent of the total number of market-rate units approved as part of the Project) under the City's Affordable Housing Point System. The AHIP included in the Development Agreement shows that the proposed Project would meet the City's affordable housing production requirements by achieving the minimum number of points required under the Affordable Housing Point System. Therefore, the proposed Project would be consistent with General Plan Housing Element Policy 1.8.</p>
<p><b>Policy 4.4:</b> Encourage the provision of designs which support aging in place (such as universal design) in new development.</p>	<p><b>Inconsistent.</b> The Project's single-family residential units do not contain any specific design elements that would support aging in place. Therefore, the proposed Project would be inconsistent with General Plan Housing Element Policy 4.4.</p>
<b>Land Use Element</b>	
<p><b>Policy 2.1:</b> Enhance the physical attributes of Lake Forest to create an identifiable and distinct community within Orange County.</p>	<p><b>Consistent.</b> As described in Section 4.1, Aesthetics, the proposed Project would contribute to the creation of an identifiable and distinct community within Lake Forest. The proposed Project includes over 24 ac of public parks, public and private recreational facilities, sport fields, trails, open space, and habitat restoration area. Specifically, improvements along the southeastern portion of the Project site are anticipated to enhance existing physical attributes of Lake Forest due to proximity to the Serrano Creek Trail. The proposed Project's Central Park would provide a memorable entry to the community and provide space for public events like Farmer's Markets, art fairs, and other community activities. Further, implementation of architectural and landscape design guidelines included in the Area Plan would serve to provide increased visual cohesion between the Project site and surrounding area and</p>

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
	create neighborhoods that possess a unique sense of place and individuality. Therefore, the proposed Project would be consistent with General Plan Land Use Element Policy 2.1.
<b>Policy 2.2:</b> Promote high quality in the design of all public and private development projects.	<b>Consistent.</b> The Area Plan included as part of the proposed Project provides detailed architectural and landscape design guidelines that will provide design direction and standards for future development and landscaping on the Project site. As discussed above, the proposed Project would be designed following the California Contemporary aesthetic, which includes Coastal Contemporary, California Modern, Modern Hacienda, and Spanish architectural styles that would blend with existing residential development in the Project vicinity. The purpose of the design guidelines and development standards is to ensure that all design and development on the Project site is of high quality and maintains the Project’s overall vision. Therefore, the proposed Project represents high-quality design and would be consistent with General Plan Land Use Element Policy 2.2.
<b>Policy 3.1:</b> Ensure that new development fits within the existing setting and is compatible with the physical characteristics of available land, surrounding land uses, and public infrastructure availability.	<b>Consistent.</b> As demonstrated in Section 4.11, Land Use and Planning; Section 4.3, Air Quality; Section 4.12, Noise; and Section 4.16, Transportation, the Project is designed to be compatible with surrounding land uses. The Project would make use of existing infrastructure to minimize the need for additional public investment. Therefore, the proposed Project would be consistent with General Plan Land Use Element Policy 3.1.
<b>Policy 3.3:</b> Ensure that the affected public agencies can provide necessary facilities and services to support the impact and intensity of development in Lake Forest and in areas adjacent to the City.	<b>Consistent.</b> As discussed further in Section 4.14, Public Services, and Section 4.18, Utilities and Service Systems, the affected public agencies were contacted during preparation of this EIR to determine potential Project-related impacts to affected public agencies. As described in Sections 4.14 and 4.18, the Project’s impacts to utilities and other public services would be less than significant. Therefore, the proposed Project would be consistent with General Plan Land Use Element Policy 3.3.
<b>Policy 3.4:</b> Blend residential and nonresidential development with landscaping and architectural design techniques to achieve visual compatibility.	<b>Consistent.</b> Figure 3.8 depicts the Conceptual Landscape Plan for the proposed Project. As discussed above, the proposed Project would be designed following the California Contemporary aesthetic, which includes Coastal Contemporary, California Modern, Modern Hacienda, and Spanish architectural styles that would blend with existing residential development in the Project vicinity. The proposed Project would incorporate landscaping to achieve visual compatibility with surrounding land uses as well as to provide privacy for residents. Therefore, the proposed Project would use landscaping and architectural design to blend residential and non-residential development and is considered consistent with General Plan Land Use Element Policy 3.4.
<b>Policy 4.1:</b> Ensure that all development proposals within the planned community areas conform to applicable development plans and agreements.	<b>Consistent.</b> Should the Project be approved, the Area Plan would establish a new planned community area on the Project site. Any future development on the Project site would be required to conform with the development standards and design guidelines set forth in the Area Plan. The proposed Project also includes a Development Agreement intended to ensure that the proposed Project would not negatively affect the fiscal stability of the City. Therefore, the proposed Project would be consistent with General Plan Land Use Element Policy 4.1.
<b>Policy 5.7:</b> Preserve the fiscal well-being of the community by ensuring that land use designation changes for land within the Business Development Overlay will not result in a loss of future net revenue for the City.	<b>Consistent.</b> The City’s General Plan designates the Project site as Business Park and Business Development Overlay (BDO). To implement the Area Plan, the Project would require approval of a General Plan Amendment to change the Project site’s General Plan land use designation to Low-Medium Density Residential and Medium Density Residential (Neighborhoods One through Five, including the neighborhood parks), High Density Residential (Senior Affordable Housing), Public Facility (school site), Community Park/Open Space and Regional Park/Open Space (habitat restoration area). Neighborhood park uses would be included in each of the proposed Project’s five residential neighborhoods. A Fiscal Impact Analysis (FIA) (Appendix N) prepared by the Applicant, compares the estimated net revenue to the City resulting from

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
	implementation of the proposed Project with the estimated new revenue resulting from a hypothetical development scenario based upon the current Business Park General Plan designation. According to the FIA, the proposed Project would generate an estimated \$99,826 more in annual revenue to the City. Therefore, the proposed Project would be consistent with General Plan Land Use Element Policy 5.7.
<b>Public Facilities/Growth Management Element</b>	
<b>Policy 8.1:</b> Utilize information on the jobs/housing balance in the City and region as a factor in land use decision-making.	<b>Consistent.</b> According to the Existing Conditions Report prepared for the City’s General Plan Update, the City of Lake Forest has a jobs-to-household ratio of 1.40, which is slightly lower than that of Orange County overall (1.55). This means that slightly more of the City’s employed residents commute to jobs out of the City than come in from elsewhere. The proposed Project’s addition of 776 new housing units on the Project site would slightly lower the City’s jobs-to-household ratio from 1.40 to 1.36. This information will be provided to City decision makers prior to considering approval of the proposed Project. Therefore, the proposed Project would be consistent with General Plan Public Facilities/Growth Management Element Policy 8.1.
<b>Recreation and Resources Element</b>	
<b>Policy 1.2:</b> Maximize the utilization of existing parks, recreational facilities, and open space within Lake Forest.	<b>Consistent.</b> The proposed Project would provide a multi-purpose trail connection to the Serrano Creek Trail from the southeastern Project site boundary. By providing a connection to the existing regional trail network, the Project would encourage additional use of existing parks and recreational facilities located along the Serrano Creek Trail within Lake Forest, including Nature Park and the Whiting Ranch Open Space Preserve. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 1.2.
<b>Policy 1.6:</b> Promote the future development of community centers as focal points for local activities.	<b>Consistent.</b> The proposed Project’s Central Park would provide a memorable entry to the community and provide space for public events like Farmer’s Markets, art fairs, and other community activities. In addition, a private community clubhouse and recreational facility, including pools, cabanas, multipurpose rooms, barbecues, and entertainment areas, would be provided within the Central Park for use by residents only. The community clubhouse and recreational facility would serve as a gathering place for the Project’s residents. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 1.6.
<b>Policy 1.7:</b> Develop a network of multipurpose trails to provide convenient, safe access to recreational, residential, and commercial areas.	<b>Consistent.</b> The proposed Project would provide off-street bicycle and pedestrian paths along the on-site collector streets, the perimeter of the Central Park, and a connection to the Serrano Creek Trail from the southeastern Project site boundary. The Project bikeways would connect with existing Class II bikeways (on-street bicycle lanes), which are located on both sides of Bake Parkway, Rancho Parkway South and Rancho Parkway. By providing connections to the existing regional bikeway and trail network as well as the existing sidewalks on Bake and Rancho Parkways adjacent to the Project site, the Project would provide convenient, safe access to recreational, residential, and commercial areas. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 1.7.
<b>Policy 2.1:</b> Conserve and protect important natural plant and animal communities, such as areas supporting rare and endangered species, riparian areas, wildlife movement corridors, wetlands, and significant tree stands through appropriate site planning and grading techniques, re-vegetation and soil management practices, and other resource management techniques.	<b>Consistent.</b> As discussed in greater detail in Section 3.0, Project Description, the proposed Project would provide an open space and habitat restoration area along Serrano Creek in the southern portion of the Project site. The Project site does not otherwise contain any important natural plant and animal communities. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 2.1.

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
<b>Policy 2.3:</b> Encourage the expansion of reclaimed water production and use.	<b>Consistent.</b> The proposed Project would install 8-inch reclaimed water lines in each of the Project’s collector streets. These water lines would provide reclaimed water for landscaping for the Project’s various uses. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 2.3.
<b>Policy 2.4:</b> Conserve and protect important topographical features, watershed areas, and soils through appropriate site planning and grading techniques, re-vegetation and soil management practices, and other resource management techniques.	<b>Consistent.</b> As discussed in greater detail in Section 3.0, Project Description, the proposed Project would provide an open space and habitat restoration area along Serrano Creek in the southern portion of the Project site. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 2.4.
<b>Policy 4.1:</b> Protect areas of important historic, archaeological, and paleontologic resources.	<b>Consistent.</b> Section 4.5, Cultural Resources, analyzes the potential for the proposed Project to result in potential impacts to archaeological or historic resources. As discussed in that section, the proposed Project would result in no impacts related to adverse changes in the significance of a historical resource because there are no previously recorded cultural resources in the proposed Project site, and the existing structure on the Project site is not a historical resource. Section 4.5 also states that the proposed Project would result in less than significant impacts related to archaeological resources with the implementation of mitigation.  Section 4.7, Geology and Soils, evaluates whether the proposed Project would result in potential impacts to paleontological resources. As discussed in that section, the proposed Project would result in less than significant impacts related to the destruction of paleontological resources with the implementation of mitigation.  Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 4.1.
<b>Policy 5.1:</b> Solicit citizen participation during the early stages of major public or private development projects and regulatory programs.	<b>Consistent.</b> The City has encouraged public participation in the environmental review process for the proposed Project. In July 2018, the City circulated the NOP for the proposed Project and held a scoping meeting at Lake Forest City Hall on July 25, 2018. On August 15, 2019, the Community Services Commission reviewed conceptual park designs and made recommendation to the Planning Commission and City Council. The City will continue to solicit input from stakeholders throughout the Project’s environment review. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 5.1.
<b>Policy 7.1:</b> Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.	<b>Consistent.</b> As described in Section 4.3, Air Quality, the proposed Project would not conflict with the AQMP or result in any significant impacts related to implementation of the AQMP. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 7.1.
<b>Policy 7.5:</b> Implement land use policy aimed at achieving a greater balance between jobs and housing in Lake Forest.	<b>Inconsistent.</b> As described above in the analysis for Public Facilities/Growth Management Element Policy 8.1, the proposed Project’s addition of 776 new housing units on the Project site would lower the City’s jobs-to-household ratio from 1.40 to 1.36, resulting in a slightly greater imbalance between jobs and housing in the City. Therefore, the proposed Project would be inconsistent with General Plan Recreation and Resources Element Policy 7.5.
<b>Policy 7.6:</b> Integrate air quality planning with land use and transportation planning.	<b>Consistent.</b> As described above in the analysis for Recreation and Resources Element Policy 7.1, the proposed Project would not conflict with the AQMP or result in any significant impacts related to implementation of the AQMP. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 7.6.

**Table 4.11.B: General Plan Policy Consistency Analysis**

Policies	Consistency Analysis
<b>Policy 7.7:</b> Promote energy conservation and recycling by the public and private sector in Lake Forest.	<b>Consistent.</b> As described in Section 3.0, Project Description, the proposed Project would be consistent with California’s Title 24 energy efficiency code and would incorporate sustainability features intended to result in energy conservation. For example, the proposed Project would reduce operational emissions associated with energy consumption by installing Energy Star appliances, tankless water heater systems, and utilizing high-efficiency heating, ventilation, and air-conditioning (HVAC) systems. Therefore, the proposed Project would be consistent with General Plan Recreation and Resources Element Policy 7.7.
<b>Safety and Noise Element</b>	
<b>Policy 1.1:</b> Reduce the risk of impacts from geologic and seismic hazards.	<b>Consistent.</b> As discussed in Section 4.7, Geology and Soils, the Project would result in less than significant impacts related to geologic and seismic hazards with the implementation of mitigation. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 1.1.
<b>Policy 1.2:</b> Protect the community from flooding hazards.	<b>Consistent.</b> As discussed in Section 4.10, Hydrology and Water Quality, the Project would result in less than significant impacts related to causing a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding during construction or operation. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 1.2.
<b>Policy 2.4:</b> Reduce the risk to the community from fire.	<b>Consistent.</b> As described further in Section 4.19, Wildfire, the Project site is not located in a VHFHSZ, as designated by the California Department of Forestry and Fire Protection (CAL FIRE). However, the open space approximately 0.2 mi northeast of the Project site on the other side of SR-241 is considered a VHFHSZ. As such, the proposed Project would include a conceptual fuel modification plan to employ three fuel modification zones. The three proposed zones would provide an integral level of protection for structures from wildfires by slowing the speed and reducing the intensity of the fire. A conceptual Fire Master Plan and a conceptual Fire Protection Plan with Ember Mitigation has also been approved for the proposed Project. The Fire Master Plan and Fire Protection Plan address specific fire prevention and access elements required by the Lake Forest Municipal Code and the California Building Code. As discussed in Section 4.19, Wildfire, the Project would result in less than significant impacts related to wildfire. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 2.4.
<b>Policy 5.1:</b> Utilize noise/land use compatibility standards as a guide for future planning and development decisions.	<b>Consistent.</b> Section 4.12, Noise, of this EIR evaluates whether the proposed Project would result in any violations of the City’s noise standards. As discussed in that section, the Project would result in less than significant off-site construction, traffic, and operational noise and vibration impacts. This information will be provided to City decision makers prior to considering approval of the proposed Project. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 5.1.
<b>Policy 5.2:</b> Provide noise control measures, such as berms, walls, and sound attenuating construction in areas of new construction or rehabilitation.	<b>Consistent.</b> As described further in Section 3.0, Project Description, the proposed Project would construct 8-foot high noise barriers along Bake Parkway on the northwestern perimeter of the senior affordable housing and Neighborhood 1 to reduce noise for residential uses. 8-foot high noise barriers would also be constructed along Rancho Parkway on the northeastern perimeter of Neighborhood 3 for noise attenuation. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 5.2.
<b>Policy 6.1:</b> Reduce noise impacts to sensitive land uses from transportation noise sources.	<b>Consistent.</b> As discussed in Section 4.12, Noise, the proposed Project would result in less than significant traffic noise impacts. Therefore, the proposed Project would be consistent with General Plan Safety and Noise Element Policy 6.1.

Source: City of Lake Forest General Plan, as amended.

ac = acres

AQMP = Air Quality Management Plan

du/ac = dwelling units per acre

EIR = Environmental Impact Report

mi = miles

NOP = Notice of Preparation

OCTA = Orange County Transportation Authority

VHFHSZ = very high fire hazard severity zone

**Threshold 4.11.3: Would the Project 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.** As identified elsewhere in this EIR, development of the proposed Project would not result in significant noise, aesthetic, or other unavoidable impacts that could adversely affect adjacent uses. The existing on-site nursery use would cease prior to construction or operation; therefore, no potential conflicts with any existing on-site land uses would occur.

As discussed in Section 4.12, Noise, of this EIR, the Project would result in less than significant off-site construction, traffic, and operational noise and vibration impacts on surrounding land uses.

According to Section 4.3, Air Quality, the Project would result in less than significant air quality impacts because it would not expose nearby sensitive receptors to substantial pollutant concentrations during construction or operation (Threshold 4.3.3). In addition, the Project's construction and operational emissions would not exceed the significance thresholds established by the SCAQMD for any of the criteria pollutants (Threshold 4.3.2). The Initial Study, included as Appendix A, substantiates that impacts associated with Threshold 4.3.4 (odors and other emissions) would be less than significant because odors during construction would be temporary and the uses associated with the operation of the proposed Project would not generate objectionable odors.

Section 4.1, Aesthetics, concludes that the proposed Project would result in less than significant impacts related to aesthetics. The proposed Project would serve to provide increased visual cohesion between the Project site and the surrounding area. The landscape and architectural design guidelines set forth in the Area Plan would ensure that the Project's development would be visually compatible with surrounding land uses (Threshold 4.1.3). Finally, the proposed Project is not anticipated to result in excessive lighting or generate glare that would adversely affect surrounding land uses (Threshold 4.1.4). Therefore, the proposed Project would result in a less than significant impact related to potential conflicts with adjacent land uses, and no mitigation is required.

**Threshold 4.11.5: Would the Project 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.** The City is a participant in the Orange County Central and Coastal NCCP/HCP. According to the *Biological Technical Report for the Nakase Property Project* (Glenn Lukos Associates, Inc., March 2019; Appendix D), the Project site is located within the Orange County Central and Coastal NCCP/HCP planning area but outside the boundaries of the NCCP/HCP Reserve System. The Reserve System boundary is located approximately 3,960 ft (0.75 mi) northeast of the proposed Project site. The Project site is in an area identified in the NCCP/HCP as urbanized and is located in an area designated for development. As described in the response to Threshold 4.4.6 in Section 4.4, Biological Resources, in this Draft EIR, development of the proposed Project would not result in the removal of any sensitive habitat species identified in the Orange County Central and Coastal NCCP/HCP. The proposed Project would not conflict with the Orange County

Central and Coastal NCCP/HCP. Therefore, the proposed Project would result in a less than significant impact related to conflict with the Orange County Central and Coastal NCCP/HCP, and no mitigation is required.

#### 4.11.7 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use and planning. The cumulative impact area for land use for the proposed Project is the City of Lake Forest. Several development projects are approved and/or pending within the City. Table 4.A (refer to Chapter 4.0) lists adopted and planned projects within the City, and Figure 4.0.1, Related Project Locations, maps the locations of these projects. Each of these projects, as well as all proposed development in the City, would be subject to its own General Plan consistency analysis and would be reviewed for consistency with adopted land use plans and policies.

The City of Lake Forest is an urbanized area with a wide variety of established land uses. The land around the Project site has been developed with a variety of residential, business park, regional park/open space, commercial, and light industrial land uses. As previously stated, the Project site is designated for Business Park uses on the City's General Plan Land Use Map. However, the proposed Project would amend the General Plan to modify the land use designation of the Project site from Business Park to Low-Medium and Medium and High Density Residential, Public Facility, Community Park/Open Space, and Regional Park/Open Space to accommodate the proposed uses allowed under the Area Plan. The proposed Project also includes a Zone Change to Planned Community and the adoption of the Area Plan, which includes a Planned Community Program applicable to the Project site. Should the City Council approve the proposed Project, the proposed Project would be consistent with the City's General Plan and Zoning Code and cumulative land use impacts would be considered less than significant.

The proposed Project would include land uses that would be compatible with the surrounding neighborhoods and commercial areas and would replace the existing on-site nursery use. Therefore, the proposed Project would not contribute to a pattern of development that adversely impacts adjacent land uses or conflicts with existing on site or surrounding land uses.

There are no incompatibilities between the proposed Project and planned future projects in the City, which primarily include residential developments. As discussed previously, the proposed Project would not divide an established community; conflict with the SCAG 2016-2040 RTP/SCS or the City-adopted plans, policies, or zoning; or conflict with any NCCP/HCPs. All identified City-related projects would be reviewed for consistency with adopted land use plans and policies by the City. For this reason, the related projects are anticipated to be consistent with applicable General Plan and zoning requirements, or would be subject to allowable exceptions; further, they would be subject to CEQA, mitigation requirements, and design review. Therefore, the proposed Project would not contribute to a significant cumulative land use compatibility impact in the study area, and no mitigation is required.

#### **4.11.8 Level of Significance Prior to Mitigation**

The proposed Project would result in less than significant impacts related to land use and planning.

#### **4.11.9 Regulatory Compliance Measures and Mitigation Measures**

##### **4.11.9.1 Regulatory Compliance Measures**

There are no regulatory compliance measures applicable to land use.

##### **4.11.9.2 Mitigation Measures**

The proposed Project would not result in potentially significant impacts related to land use and planning, so no mitigation is required.

#### **4.11.10 Level of Significance after Mitigation**

No mitigation is required. The proposed Project would not result in potentially significant impacts related to land use and planning.

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