Appendix A Notice of Preparation and Comment Letters

NOTICE OF PREPARATION

OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Subject: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DEIR). The City of Lake Forest will be the Lead Agency and will prepare a DEIR for the Opportunities Study Project. The NOP for the project is available for review at the following locations: Foothill Ranch Branch Library, 27002 Cabriole, Lake Forest, California 92610 and the El Toro Branch Library 24672 Raymond Way, Lake Forest, California 92630.

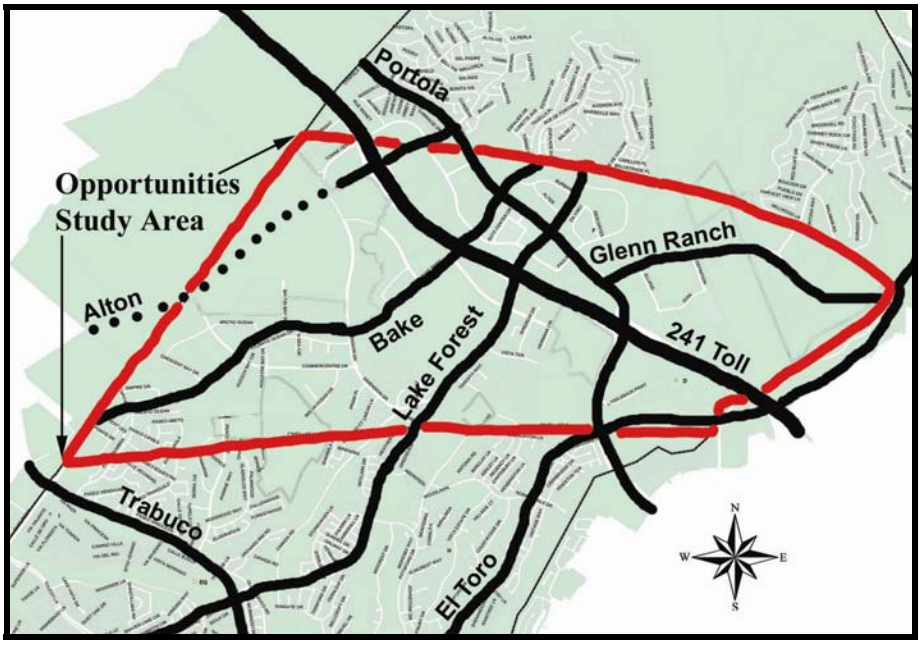
The City requests your comments as to the scope and content of the DEIR. The City has issued the NOP on July 7, 2004 and due to time limits mandated by State Law, your response must be sent at the earliest possible date, but not later than 4:00 p.m. on Monday, August 16, 2004. Please send your comments to:

Jeremy Krout, Associate Planner
City of Lake Forest
25550 Commercentre Drive
Lake Forest, CA 92630

Mr. Krout can also be contacted at (949) 461-3491.

Public Meeting: A public scoping meeting will be held at 4:00 p.m. on Wednesday, August 11, 2004 at the City of Lake Forest City Hall in the Council Chambers, 25550 Commercentre Drive, Lake Forest, California 92630. The purpose of the meeting is to solicit the public's input on the scope and contents of the DEIR. We encourage you to attend the scoping meeting to find out more about the proposed project and give us your comments.

Project Location: The Opportunities Study focuses on approximately 950 acres of vacant land (the "Study Area") located in the City of Lake Forest, Orange County, north and south of the Foothill Transportation Corridor and adjacent to the former Marine Corps Air Station El Toro ("MCAS El Toro"). There are thirteen vacant properties within the Study Area, ranging in size from 380 acres to four acres. Eleven properties are south of the Foothill Transportation Corridor and two are north of the Corridor. Eight properties are involved with the Opportunities Study. The majority of the properties are not contiguous. A further description of the project location can be found in Attachment 1 and Attachment 2.



Project Description: The Opportunities Study includes a General Plan Amendment and Re-Zone of approximately 900 acres of vacant lands in the Study Area. The General Plan Amendment would change the allowed land uses from industrial and commercial land uses to residential and mixed-uses. The vacant lands currently have approximately 7 million square feet of approved industrial and commercial development rights. The number of residences considered in the General Plan Amendment and Re-Zone range between 5,394 and 6,617. Approximately 40 to 70 acres of neighborhood parks, 45 acres of community sports park, community/civic center and 500,000 to 650,000 square feet of commercial development would also be permitted as a result of the project. A detailed project description is contained in Attachment 1.

Description of Anticipated Environmental Effects: The City has determined an EIR is necessary for the proposed project as the proposed project may result in a significant impact to the following environmental issues: Land Use and Planning, Hydrology/Water Quality, Population/Housing; Public Services, Utilities and Service Systems, Aesthetics, Biological Resources, Agricultural Resources, Cultural Resources, Geology and Soils, Recreation, Transportation/Circulation, Air Quality, Noise and Hazards and Hazardous Materials. The City will analyze these environmental issues in the DEIR prepared for the proposed Opportunities Study Project. An Initial Study has not been prepared for the project.

Attachment 1
Project Location and Description

Project Background

Starting in the 1960s, the Orange County Board of Supervisors approved a series of residential communities, industrial areas and commercial developments in what is now the City of Lake Forest. The land use patterns found in much of Lake Forest are similar to those found in many master planned communities approved by the County during this era with the exception of the area straddling the Foothill Transportation Corridor. Due to the aircraft flight patterns from the former MCAS El Toro base and resultant noise from the aircraft, restrictions were placed on a large swath of land ("Study Area") in the heart of present-day Lake Forest. The restrictions limited development to only non-residential land uses. As Lake Forest developed in the southern and northern sections of the city with residential, parks, trails, and other mixed uses, the Study Area was developed with industrial, office, and commercial uses devoid of the open space and trail linkages found in the rest of the city. Consequently, the land use restrictions effectively segregated the two portions of the city.

While much of the Study Area has been developed with industrial and office buildings similar to those found along Bake Parkway, there are currently more than 900 acres of vacant land. The majority of this land is privately owned and has been permitted for development of more than 7 million square feet of industrial and commercial buildings by the County prior to Lake Forest becoming a city. Development pressures in Orange County and the need for additional housing have sparked an interest by landowners to seek changes to the designated land uses to allow residential development.

The City's General Plan Land Use Element, adopted in 1994, includes the following policy statement:

> Should the future use of USMC El Toro reduce or eliminate significant aircraft noise experience by Lake Forest, the future use of land presently impacted by aircraft noise will be reconsidered.

The General Plan was amended in May of 2000, and a Business Development Overlay was established over the Study Area to ensure a balance of land uses required for the continued well-being of the community. A General Plan policy was added that states:

> Preserve the fiscal well-being of the community by ensuring that the land use changes within the Business Development Overlay will not result in a loss of future new revenue for the City.

Recent events, including the passage Measure W, the Navy's formal announcement of its intent to sell the MCAS El Toro base property for non-aviation uses, and annexation of the base property into the City of Irvine for non-aviation uses, led the City of Lake Forest to initiate a series of studies, dubbed the "Opportunities Study". The overall purpose of the Opportunities Study is to examine the impacts and benefits and whether or not changes to the allowed land

uses in the Study Area should occur. At the outset of the Opportunities Study, the City Council developed objectives to establish a clear direction for the Study, as described below.

Utilizing the established objectives as the basis for analysis of the potential land use changes, the City Council approved a phased approach to the Opportunities Study, which would allow the City to proceed in an incremental and cost-effective manner only after assessing the information generated in each phase, and deciding if subsequent phases of work should be undertaken. The following key tasks were approved with the three phases of the Opportunities Study:

Phase 1:
- Define the issues important to the City and its residents.
- Conduct meetings with community members and other stakeholders.
- Identify community-wide benefits desired by the residents of the City and constraints and opportunities to provide such benefits.
- Define a process for Phase 2 of the Opportunities Study, should the City Council desire to move forward after consideration of Phase 1 conclusions.

Phase 2:
- Evaluate proposed land use changes and associated benefits and impacts within the Study Area and city as a whole.
- Prepare a needs assessment for an active sports complex, community center and city hall and identification of potential sites for such facilities.
- Consider the results of the technical studies and determine whether to proceed with Phase 3 of the Opportunities Study.
- Define a planning and entitlement process for land use changes to occur.

Phase 3:
- Prepare a General Plan Amendment and zone change to re-designate land uses within the Study Area.
- Prepare an Environmental Impact Report (EIR) to assess the impacts of re-designating land uses within the Study Area.
- Develop a citywide traffic model and traffic mitigation plan.
- Select a site for an active sports complex, community center and city hall.
- Develop a conceptual plan for the public facilities on the selected site.
- Develop schematic designs for the public facilities on the selected site(s).
- Prepare an affordable housing policy.

During Phase 2 of the Opportunities Study, the City accepted conceptual plans from six landowners in the Study Area, cumulatively called the “Higher Density Plan,” which included residential and mixed uses. The land use changes proposed by the landowners were evaluated from planning, traffic and fiscal perspectives and compared against the industrial and commercial land uses currently allowed under the General Plan. Through this process, a “Lower Density Plan” was developed.

The Higher Density Plan and Lower Density Plan were compared against the industrial and commercial land uses currently allowed under the General Plan and the City Council approved Opportunities Study objectives.

The City Council held a well attended public workshop on January 27, 2004, during which City staff and consultants presented the preliminary findings of the planning, traffic and fiscal analyses conducted for the proposed land use changes in the Study Area. The purpose of the public workshop was to provide information to the City Council and public regarding:

- the landowner proposed plans,
- recommended changes to the plans by the City's consultants,
- comparisons with the currently allowed land uses, and
- present four conceptual designs of the sports park, community center, and city hall.

The City Council developed objectives that have guided the phased Opportunities Study. The intent of the objectives was to establish clear direction for the Study and to ensure thoughtful planning of this potential connection of the two sections of the city. The following project objectives were adopted at the beginning of Phase 2 of the Opportunities Study.

- *Balanced Community*. Future residential and/or commercial development within the Study Area should serve to create a balanced and integrated community by providing linkages between existing segments of the City through master planned trail systems, strategically located public amenities, and carefully planned residential neighborhoods;
- *Fiscal Stability*. Future residential and/or commercial development within the Study Area should ensure a fiscally sound and stable economic base for the community and provide the community with a mechanism to share equitably in the financial benefit derived from such development within the Study Area;
- *Recreational Facilities*. Future residential and/or commercial development within the Study Area should benefit the entire community by providing adequate recreational facilities, including an active sports/park complex;
- *Public Space*. Future residential and/or commercial development within the Study Area should benefit the entire community by providing adequate public open space and other public amenities, including a civic/community center;
- *Natural Resources*. Future residential and/or commercial development within the Study Area should serve to protect natural resources within the Study Area;
- *Diversity of Housing*. Future residential and/or commercial development within the Study Area should provide a diversity of housing types and accessible commercial amenities in order to ensure the establishment of a well balanced community;
- *Circulation System*. Future residential and/or commercial development within the Study Area should facilitate and achieve completion of the City's Circulation System including the extension of Alton Parkway;
- *Level of Service*. Future residential and/or commercial development within the Study Area should not create any greater impacts on the City's infrastructure or fiscal stability than the existing entitlement or uses allowed by the General Plan or adversely impact the City's ability to provide an acceptable level of service to the community; and

- *Development Commitments*. As a precondition to future residential and/or commercial development within the Study Area, each landowner and developer will be required to make binding development commitments determined to be appropriate by the City Council.

The following table summarizes the main characteristics of the land uses encompassed in the three plans.

Table 1
Summaries of the Three Plans

Characteristics	General Plan	Higher Density Plan	Lower Density Plan
Land Uses	• 7 million square feet of industrial and commercial uses • No mixed uses	• Mixed Use Plan • 6,617 residential units • 498,720 square feet of commercial • Some densities incompatible with neighboring uses (Average: 12 units/acre)	• Mixed Use Plan • 5,394 residential units • 650,000 square feet of commercial • Densities that are compatible with surrounding uses (Average: 9 units/acre)
Parks & Public Facilities	18-acre park option – City funds purchase and improvement of the property at a cost to the City of more than $13 million	• 41.4 acres of neighborhood parks (12.3 acre deficiency) • No community park or community/civic center provided	• 70 acres of neighborhood parks • 45-acre sports park, community and civic center
Open space and trails	Class 1 bike path along Borrego Wash	Limited number of trails that are isolated and do not connect to existing trails	Master planned to include more citywide and regional trail connections
Traffic	91,800 ADT	Approximately 26% fewer trips than would occur under the General Plan – 67,624 ADT	Approximately 23% fewer trips than would occur under the General Plan – 70,288
Connection of Alton Parkway	Occurs after development of 1 million square feet of industrial park.	Constructed during initial phases of residential development	Constructed during initial phases of residential development
Fiscal Impact	$330,000 surplus	$280,000 surplus	$630,000 surplus

The Lower Density Plan has some readily identifiable differences from the Higher Density Plan including:

- 1,223 fewer units than the Higher Density Plan
- Incorporation of a 45-acre sports park and Civic Center
- Over 70 acres of neighborhood parks
- More fiscally balanced land use plan as a result of a greater amount mixed-use and commercial square footage
- More trails linkages between the existing and proposed communities
- More than double the quantity of General Fund surplus

The Lower Density Plan also represents a significantly more well thought out plan with the following benefits not enjoyed under the City's existing General Plan:

- Weaves the two halves of the city together while incorporating a balanced mix of residential and mixed uses, open space, parkland and trails linkages
- An approximately 25% reduction in traffic generation
- Accelerated delivery of Alton Parkway
- Additional road improvements to alleviate traffic congestion
- Almost double the quantity of General Fund

A following provides a further description of the Lower Density Plan, Higher Density Plan, and General Plan.

LOWER DENSITY PLAN

The Lower Density Plan involves a General Plan Amendment and Zone Change to re-designate approximately 800 acres of vacant land. Those lands are currently designated exclusively for non-residential land uses with the following general plan designations: Business Park, Commercial, Public Facility, Professional Office, and Open Space. The Lower Density Plan is a mixed use plan which includes 5,394 residential units, approximately 650,000 square feet of commercial uses, a 45-acre sports park, community/civic center complex, and over 50 acres of neighborhood parks.

General Plan Amendment

Table 2 shows proposed general plan land use designations by property. The City desires a diversity of land uses in the Lower Density Plan. Currently Site 1 proposes only residential land uses; however, the property will ultimately include other uses, such as commercial and office. The mixed-use component for this property will be defined during the General Plan Amendment process. Table 2 shows a breakdown by land use designation. Figures 2 and 3 show the Lower Density Plan and General Plan land use maps respectively. Table 4 contains a summary of the Lower Density Plan.

Table 2
Existing and Proposed General Plan Designations
(Lower Density Plan)
all figures rounded to the nearest whole number

Site	Gross Site Area (acres)	Existing General Plan	Existing GP (Acres)	Proposed General Plan	Proposed GP[1] (Acres)
Site 1	387	BP	387	LDR	95
				L-MDR	144
				MDR	148
				SUBTOTAL	**387**
Site 2	243	BP	149	LDR	109
		C	50	L-MDR	18
		OS	44	PF[2]	13
				MU	13
				CP/OS	8
				OS	82
				SUBTOTAL	**243**
Site 3	82	PF	29	PF	33
		LI	53	L-MDR	49
				SUBTOTAL	**82**
Site 4	50	C	50	MU	50
Site 5	13	PO	13	LDR	13
Site 6	19	OS	19	LDR	19
Sports Park	33	LI, BP or C depending on selected site.	45	CP/OS	33
Community/Civic Center	12			PF	12
TOTAL	**793**[3]		**793**[3]		**793**[3]

LDR – Low Density Residential
L-MDR – Low-Medium Density Residential
MDR – Medium Density Residential
BP - Business Park
C - Commercial
PO - Professional Office
PF – Public Facility
LI - Light Industrial
MU – Mixed Use
CP/OS – Community Park/Open Space
OS – Open Space

[1] Major circulation included in all categories
[2] Major circulation included in PF category
[3] Sports Park and Community/Civic Center site(s) has not been selected; therefore, acreage is not included in total land area

Table 3
Proposed General Plan Land Use Categories
(Lower Density Plan)

Land Use Category	Acres
Low Density Residential	236
Low-Medium Density Residential	211
Medium Density Residential	148
Mixed Use	63
Public Facility	46
Open Space	82
Community Park/Open Space	8
Total	**793***

* Sports Park and Community/Civic Center site(s) has not been selected; therefore, the associated acreage is not included in total land area

Table 4
Lower Density Plan Summary

Site	Gross Site Area	Total Net Site Area	Max. # of Units	Total Comm'l SF	Total Industrial SF	Req. Park ac.	Public Facilities	Total Buffer/ Open Space ac.	Density	Students Generated
Site 1	386.8	329.0	2,815	320,000	0	25.9	Sports Park, Community /Civic Center	24.8	7-9	976
Site 2	243.0	163.7	1,132	178,720	0	10.4		82.0	5-7	446
Site 3	82.3	36.3	833	0	0	10.9		1.2	10-23	205
Site 4	49.9	44.8	475	150,000	0	4.2		2.0	10-11	181
Site 5	12.5	11.6	54	0	0	In lieu fees		0.0	6-7	42
Site 6	18.5	17.8	85	0	0	In lieu fees		5.0	5	48
						45-acre Comm Park				
	793.0	**603.2**	**5,394**	**648,720**	**0**	**96.4**		**115**	**8-11**	**1,898**

Zone Change

State law requires that the City's General Plan and Zoning Code be consistent with one another. The proposed Zone Change would apply appropriate zoning designations to implement the proposed GPA. In some cases, the proposed zoning will require additional planning documents, such as a specific plan. The zoning designations proposed are defined in Section 9, Zoning, of the Lake Forest Municipal Code.

As part of the proposed zoning, a unit cap and maximum square footage of commercial development would be assigned to each of the properties. Table 5 shows the proposed zoning, with the cap in parentheses. The residential unit caps are denoted with an "r" and the commercial square footage caps are denoted with a "c". The unit caps were derived from an

analysis of the densities proposed for each of the properties in the context of the densities found in the existing adjacent neighborhoods.

Table 5
Existing and Proposed Zoning (Lower Density Plan)

Site[1]	Existing Zoning	Proposed Zoning
Site 1	Urban Activity-Baker Ranch Planned Community	Specific Plan – SP (r 2,815 units, c 320,000 sf) – *See Table 5 for breakdown by Planning Area*
Site 2	Business Park, Commercial – Portola Hills Planned Community	Specific Plan - SP (r 1, 132 units, c 178,720 sf) See *Table 6 for breakdown by Planning Area*
Site 3	Agriculture (A1)	Multifamily Dwelling District – R2-PD Planned Development (r 833 units) *(Portion of site retained as Public Facility)*
Site 4	Urban Activity (Sand & Gravel Overlay)-Baker Ranch Planned Community	Amend UA district in BRPC to allow residential land uses (r 475 units, c 150,000 sf)
Site 5	Agriculture (A1)	RS-PD, Residential Single-Family Planned Development (r 75 units)
Site 6	Open Space/High Density Residential – Serrano Highlands Planned Community	Amend the Serrano Highlands Planned Community to include 85 additional residential units and zone property High Density Residential II (r 85 units).

1. Refer to map and legal description for location of each site.
r – residential unit cap
c – commercial square footage cap

Development Agreement

Development Agreements would be executed with each of the participating landowners following completion of Phase 3 and adoption of the General Plan Amendment.

Parkland Dedication/Public Facilities

The Lower Density Plan includes a 45 acre sports park and community/civic center complex and over 50 acres of neighborhood parks. The dedication of parkland is a typical requirement of residential development per the City's Subdivision Code prescribed ratio of 5 acres per 1,000 population. Population is assumed based on an average of 2.91 persons per unit as defined in the 2000 census data for the City of Lake Forest. The required provision of 5 acres of parkland per 1,000 population was divided into 2 categories, community and neighborhood parks. The offsite community park requirement of 2 acres per 1,000 population will result in a community sports park of approximately 33 acres. The project sites within the study area will be required to provide neighborhood parks at a rate of 3 acres per 1,000 expected population. Most of the landowners will be required to provide their neighborhood parks onsite. The smaller project sites will be permitted to pay fees in lieu of dedication. The community park requirement will be met by payment of fees for all of the project sites. Table 4 above shows the required neighborhood parkland for the Lower Density Plan.

Approximately twelve additional acres are needed for the community center and city hall. The additional acres and the development of the three facilities would be funded by the participating landowners during project implementation and is considered part of the shared benefit that the City Council included as an objective of the Opportunities Study.

Because a site has not been selected for the public facilities, conceptual designs and an alternative sites analysis were prepared for the 45-acres sports park, community center and city hall as part of a Public Facilities Needs Analysis during Phase 2 of the Opportunities Study. These were used as the basis for a conceptual budget, and will be utilized to select a site for the public facilities during Phase 3 of the Opportunities Study.

The conceptual designs, programming, and site alternatives assume that all three public facility components would be located on the same site. The public facility components are assumed as a 44,000 square foot community center, a 44,000 square foot city hall, and a 33 acre sports park. Four alternative sites were identified from the vacant lands within the Study Area as sites with the ability to host all three components. The four sites are identified as "CP" on Figure 2 (Lower Density Plan) and are either a part or all of Sites 1, 4, 7 and 8. Each of the four sites is approximately 45 acres.

Land Use Overlay Analysis

The individual public facilities may be located on the same or separate sites; therefore, more than one of the sites listed above or other sites may be selected to host the public facilities. A land use overlay analysis will be used to consider impacts related to locating the public facilities on the potential sites. A maximum of four sites within the Study Area in addition to Sites 1, 4, 7 and 8 will be considered potential sites for one or more of the public facilities. A Public Facility/ Community Park land use overlay will be used to assess the potential impacts of one or more of the public facilities on any of the four sites identified above as well as the other sites that are considered appropriate alternative sites. The land use overlay will allow the impacts of the underlying existing and proposed land uses and implementing the Public Facility/Community

Park overlay to be analyzed. The public facilities overlay constitutes 45 acres for the sports park and community/civic center.

An additional overlay will be used for the Site 7 that includes the public facilities as well as 450 single-family detached residential units at a gross density of approximately 6 units per acre. Therefore, the land use overlay would evaluate the Lower Density Plan with an additional 45 acres of Public Facility and Community Park and 75 acres of Low-Medium Residential with a total of 450 residential units.

In total, nine land use overlays will be analyzed in the EIR, including:

- four overlays considering the impacts of locating the sports park, community center and city hall on the same site
- four overlays considering the impacts of locating one or more of the public facilities on one or more sites
- one overlay considering the impacts of locating all of the public facilities on Site 7 as well as an additional 450 residential units with a gross density of six units per acre

The GPA and certification of the EIR is conditioned upon a secured right to purchase the public facilities site(s).

Schools

The Saddleback Valley Unified School District has been working very closely with the City to develop school mitigation alternatives that will accommodate the students that would be generated from new residential development. The District has considered several school mitigation alternatives because the exact level of impacts to existing schools and need for new schools is not known at this time. Additional analysis is necessary during Phase 3 to understand the current and future student enrollment trends. This analysis will lead to the development of a full school mitigation plan.

Product Types

Residential

The Lower Density Plan includes a mix of housing types with half of the total number of units comprised of single family attached and detached for-sale homes and the other half consisting of multifamily rental units. The proposed unit types are shown in Table 5 below. The density of the Lower Density Plan ranges from 4 – 23 dwelling units per acre with an average density of 9.5 dwelling units per acre.

Table 5
Residential Unit Type by Site[1]
(Lower Density Plan)

		Unit Type		
Site	**Total Residential Units**	**For-Sale Attached**	**For-Sale Detached**	**Rental**
Site 1	2,815	1,426	889	500
Site 2	1,132	607	525	0
Site 3	833	0	0	833
Site 4	475	475	0	0
Site 5	75	0	75	0
Site 6	85	0	85	0
Total	**5,394**	**2,508**	**1,574**	**1,333**
Percent of Unit Types	**100%**	**46%**	**29%**	**25%**

Commercial

The Lower Density Plan includes approximately 650,000 square feet of commercial development. Site 1 would include up to 120,000 square feet of commercial development which could consist of neighborhood serving commercial uses such as medium-sized shopping centers with grocery stores and up to 200,000 square feet of business park uses. Site 4 includes up to 150,000 square feet of commercial development which would likely consist of a regional commercial use. Site 2 would include up to 178,720 square feet of commercial development which would include both neighborhood commercial and mixed-use components. The mixed-use component is envisioned to include office or commercial uses at street level with residences above.

[1] Refer to map and legal description for location of each site.

HIGHER DENSITY PLAN

During Phase 2 of the Opportunities Study, the six participating landowners submitted conceptual plans for proposed development on their properties. Those plans comprised a mixed use plan for the Study Area with:

- 6,617 residential units
- 498,720 square feet of commercial uses
- 41.4 acres of neighborhood parks

Table 6 shows the details of the Higher Density Plan as illustrated in Figure 4.

Table 6
Higher Density Plan Summary

Site	Gross Site Area	Total Net Site Area	Max. # of Units	Total Comm'l SF	Total Industrial SF	Park ac. Credit	Public Facilities	Total Buffer/ Open Space ac.	Density	Students Generated
Site 1	386.8	329.0	2,850	320,000	0	19.2	NONE	24.8	7-9	996
Site 2	243.0	163.7	1,132	178,720	0	10.4		82	5-7	446
Site 3	82.3	36.3	1,000	0	0	10.9		1.2	12-28	246
Site 4	49.9	44.8	1,450	0	0	0.9		2.0	29-32	357
Site 5	12.5	11.6	100	0	0	0.0		0.0	8-9	25
Site 6	18.5	17.8	85	0	0	0.0		5.0	5	48
	793.0	**603.2**	**6,617**	**498,720**	**0**	**41.4**	**NONE**	**115**	**11-15**	**2,118**

The following tables provide a breakdown of the Higher Density Plan by general plan land use category and residential unit type. The Higher Density Plan includes the same residential product types as the Lower Density Plan, with 1,202 more units and 150,000 fewer commercial square feet. The residential density of the Higher Density Plan ranges from 4 – 32 dwelling units per acre, with an average density of 13 dwelling units per acre. The Higher Density Plan is similar to the Lower Density Plan, with the following differences:

- Higher Density Plan has higher residential unit counts.
- Higher Density Plan has less commercial square footage.
- Higher Density Plan has less dedicated park acreage and trails connections.
- Higher Density Plan proposes a High Density Residential designation for Site 4 with a total of 1,450 multi-family units, whereas the Lower Density Plan designates the site for Mixed Use.
- Higher Density Plan does not include sports park and community/civic center facilities.

Table 7
Proposed General Plan Land Use Categories
(Higher Density Plan)

Land Use Category	Acres
Low Density Residential	223
Low-Medium Density Residential	224
Medium Density Residential	148
High Density Residential	50
Mixed Use	12
Public Facility	46
Open Space	82
Community Park/Open Space	8
Total	**793**

Table 8
Residential Unit Type by Site[2]
(Higher Density Plan)

		Unit Type		
Site	**Total Residential Units**	**For-Sale Attached**	**For-Sale Detached**	**Rental**
Site 1	2,850	1,461	889	500
Site 2	1,132	607	525	0
Site 3	1,000	0	0	1,000
Site 4	1,450	0	0	1,450
Site 5	100	100	0	0
Site 6	85	0	85	0
Total	**6,617**	**2,168**	**1,499**	**2,950**
Percent of Unit Types	**100%**	**33%**	**23%**	**45%**

[2] Refer to map and legal description for location of each site.

EXISTING GENERAL PLAN

Under the current general plan designations, the Study Area properties could be developed with approximately 7 million square feet of non-residential uses. Table 9 shows the existing entitlements for the project area properties. Most of these entitlements are currently secured with Development Agreements entered into by the landowners and the County of Orange prior to the City's incorporation. Under the existing general plan designations, no residential uses would occur within the Study Area, and dedicated open space would be limited to an 18-acre park option and a Class 1 bike path along the Borrego Wash.

Table 9
Existing General Plan Entitlements

Site	Gross Site Area (acres)	Existing General Plan	Non-Residential Entitlement (Square Feet)
Site 1	386.8	Business Park	4,315,000
Site 2	243	Business Park	2,271,654
		Commercial	544,500
Site 3	82.3	Public Facility Light Industrial	0[1]
Site 4	49.9	Commercial	300,000
Site 5	12.5	Professional Office	283,140
Site 6	18.5	Open Space	0
TOTAL	**793**		**7,714,294**

1. Site currently contains IRWD storage and maintenance facilities.
Source: Adopted OCP 2002, Future Development Assumptions

PLAN COMPARISON

The following tables compare the Lower Density Plan, Higher Density Plan and Existing General Plan. Table 10 compares general categories of land uses by plan. In general, the Lower Density Plan and Higher Density Plan are mixed use plans with a large residential component. The existing General Plan would allow only non-residential land uses within the Study Area. Table 16 compares acreage by general plan land use designations.

Table 10
Alternatives Comparison

	Lower Density Plan	Higher Density Plan	Adopted General Plan
Residential Units	5,394	6,617	0
Average Density	8 – 11 units/acre	11 – 15 units/acre	0
Park Acres	96.4	41.4	0 dedicated (18 acre option)
Public Facilities	Sports Park, Community/ Civic Center	None	None

	Lower Density Plan	Higher Density Plan	Adopted General Plan
Commercial Square Feet	648,720	498,720	0
Industrial Square Feet	0	0	7,000,000
Students Generated	1,898	2,118	0

Table 11
General Plan Designation Comparisons

	Lower Density Plan	Higher Density Plan	Adopted General Plan
LDR	236	223	0
L-MDR	211	224	0
MDR	148	148	0
HDR	0	50	0
C	0	0	100
PO	0	0	12
MU	63	12	0
BP	0	0	536
LI	0	0	0
PF	58	46	82
CP/OS	41	8	0
OS	82	82	63
Totals	***793****	***793***	***793***

LDR – Low Density Residential
L-MDR – Low-Medium Density Residential
MDR – Medium Density Residential
HDR – High Density Residential
C - Commercial
PO – Professional Office
MU – Mixed Use
BP – Business Park
LI – Light Industrial
PF – Public Facility
CP/OS – Community Park/Open Space
OS – Open Space

***** Sports Park and Community/Civic Center site(s) has not been selected; therefore, the associated acreage is not included in total land area

Figures

Figure 1 - Study Area and Opportunities Study Properties
Figure 2 - Lower Density Plan Land Use Map
Figure 3 - General Plan
Figure 4 - Higher Density Plan Land Use Map

Attachment 2
Site Information

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

July 16, 2004

Mr. Jeremy Krout, Associate Planner
City of Lake Forest
25550 Commercentre Drive
Lake Forest, CA 92630

Dear Mr. Krout:

Notice of Preparation of a Draft Environmental Impact Report for Opportunities Study Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the CARB Website at: www.arb.ca.gov.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis. An analysis of all toxic air contaminant impacts due to the

decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Steve Smith

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

SS:CB:li

ORC040714-02LI
Control Number

STATE OF CALIFORNIA — Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax

August 6, 2004

Jeremy Krout
City of Lake Forest
25550 Commercecenter Drive
Lake Forest, CA 92630

RE: SCH# 2004071039 - Opportunities Study, Lake Forest, Orange County

Dear Mr. Krout:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search to determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **Check completed with negative results.**
  - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Rob Wood
Environmental Specialist III
(916) 653-4040

CC: State Clearinghouse

NATIVE AMERICAN CONTACTS
Orange County
August 6, 2004

Coastal Gabrieleno Diegueno
Jim Velasques
5776 42nd Street Gabrielino
Riverside , CA 92509 Kumeyaay
(909) 784-6660

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Tribal Chair/Cultural Resources
5450 Slauson, Ave, Suite 151 PMB Gabrielino Tongva
Culver City , CA 90230-6
gtongva@earthlink.net
562-761-6417 - voice
562-920-9449 - fax

Gabrielino/Tongva Council / Gabrielino Tongva Nation
501 Santa Monica Blvd., Suite 500 Gabrielino Tongva
Santa Monica 90401-2415
, CA
(310) 587-2203
(310) 587-2281 Fax

Gabrielino Tongva Indians of California Tribal Council
Mercedes Dorame, Tribal Administrator
20990 Las Flores Mesa Drive Gabrielino Tongva
Malibu , CA 90202
Pluto05@hotmail.com

Juaneno Band of Mission Indians Acjachemen Nation
Damien Shilo, Chairman
31411-A La Matanza Street Juaneno
San Juan Capistrano , CA 92675-2674
dshilo@juaneno.com
(949) 254-5421
(949) 488-3484
(949) 488-3294 Fax

Juaneno Band of Mission Indians Acjachemen Nation
Joyce Perry , Tribal Manager & Cultural Resources
31742 Via Belardes Juaneno
San Juan Capistrano , CA 92675
(949) 493-0959
(949) 493-1601 Fax

Gabrielino Band of Mission Indians of CA
Ms. Susan Frank
PO Box 3021 Gabrielino
Beaumont , CA 92223
(702) 647-0094: Phone/FAX

Juaneno Band of Mission Indians Acjachemen Nation
Jean Frietze, Tribal Administrator
31411-A La Matanza Street Juaneno
San Juan Capistrano , CA 92675-2674
jfrietze@juaneno.com
(714) 376-8097
(949) 488-3484 Office
(949) 488-3294 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed SCH# 2004071039 - Opportunities Study, Lake Forest, Orange County.

NATIVE AMERICAN CONTACTS
Orange County
August 6, 2004

Juaneno Band of Mission Indians
Kristen Rivers, Tribal Administrator
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
kristen_rivers@msn.com
(909-319-1451

Juaneno Band of Mission Indians
Alfred Cruz, Culural Resources Coordinator
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
714-998-0721

Juaneno Band of Mission Indians
Mike Aguiar, Environmental Coordinator
P.O. Box 25628 Juaneno
Santa Ana , CA 92799
mikeaguilar8@sbcglobal.net
818-347-1732

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed SCH# 2004071039 - Opportunities Study, Lake Forest, Orange County.

NATIVE AMERICAN CONTACTS
Orange County
August 6, 2004

Samuel H. Dunlap
P.O. Box 1391
Temecula , CA 92593
(909) 262-9351 (Cell)
(909) 693-9196 FAX

Gabrielino
Cahuilla
Luiseno

Gabrielino Tongva Indians of California Tribal Council
John Tomy Rosas, Vice Chair/Environmental
4712 Admiralty Way, Suite 172
Marina Del Rey , CA 90202
hhcc@mcn.org
310-570-0440

Gabrielino Tongva

Ti'At Society
Cindi Alvitre
6602 Zelzah Avenue
Reseda , CA 91335
(714) 504-2468 Cell

Gabrielino

Gabrieleno/Tongva Tribal Council
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
(626) 286-1632
(626) 286-1262 Fax
(626) 286-1758 (Home)

Gabrielino Tongva

Juaneno Band of Mission Indians Acjachemen Nation
David Belardes, Chairperson
31742 Via Belardes
San Juan Capistrano , CA 92675
(949) 493-0959
(949) 493-1601 Fax

Juaneno

Craig Torres
713 E. Bishop
Santa Ana , CA 92701
(714) 542-6678

Gabrielino Tongva

Juaneno Band of Mission Indians
Sonia Johnston, Chairperson
P.O. Box 25628
Santa Ana , CA 92799
ajuaneno@gte.net
(714) 323-8312
(714) 848-2951 Fax

Juaneno

Juaneno Band of Mission Indians
Anita Espinoza
1740 Concerto Drive
Anaheim , CA 92807
(714) 779-8832

Juaneno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed SCH# 2004071039 - Opportunities Study, Lake Forest, Orange County.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, Gover

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3337 Michelson Drive Suite 380
Irvine, CA. 92612-8894

August 9, 2004

Mr. Jeremy Krout
City of Lake Forest
Associate Planner
25550 Commercentre Drive
Lake Forestl, CA 92630

File: IGR/CEQA
SCH#: 2004071039
Log #: 1433
SR: SR-241, I-5

Subject: Opportunities Study

Dear Mr. Krout,

Thank you for the opportunity to review and comment on the **Notice of Preparation** dated 07/09/04, for the **Opportunities Study** project. The project site is located north and south of the Foothill Transportation Corridor and adjacent to the former El Toro Marine base in the City of Lake Forest. The project consists of General Plan Amendment and Rezone of approximately 900 acres from all industrial/commercial to the addition of residential and mixed uses as well. **The nearest State Route is SR-241.**

Caltrans District 12 status is a responsible agency on this project and has the following comments:

1. The Department is committed to improving mobility in the region through regionally significant roadways that support our economic, environmental and community needs. In order to achieve this the City should consider the existing and proposed street grid during this study as well as connectivity to other modes of transportation in addition to walking/biking trails. Considerations should include evaluation of a Park and Ride/Transit center near either freeway and/or transit-oriented development with retail options.

2. Due to the traffic impacts of a development of this size on the surrounding streets and freeway system, please provide a comprehensive traffic study which would include (but not be limited to) evaluation of Interstate 5, SR-241, SR-133 and Major Arterials and their I-5 and SR-241 Interchanges (if applicable): Bake Parkway, El Toro Boulevard, Lake Forest Boulevard, Trabuco Road, Alton Parkway, Sand Canyon Road and Portola Parkway.

3. In addition to freeway mainlines affected by the study area, intersections and roads directly adjacent to freeways/ramps should be analyzed using the Highway Capacity Manual method. Please see the attached Traffic Impact Study Guidelines (attached).

4. If any project work (e.g. storage of materials, street widening, emergency access improvements, sewer connections, sound walls, storm drain construction, street connections, etc.) occurs in the vicinity of Caltrans Right of Way (ROW) an encroachment permit would be required and environmental concerns must be adequately addressed. For

more information about encroachment permits please see the Caltrans Encroachment Permit Manual, 7th Edition on our website at: http://www.dot.ca.gov/hq/traffops/developserv/permits.

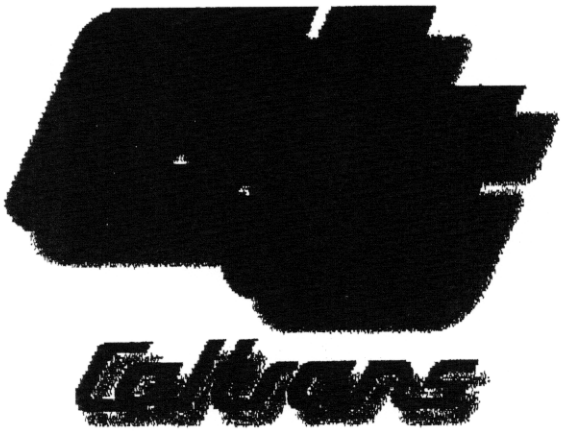
5. All work within the State ROW must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. No additional runoff draining into Caltrans ROW from construction operations or the resulting project will be allowed. Measures must be incorporated to contain all vehicle loads to avoid tracking of materials which may fall or blow onto Caltrans roadways or facilities.

Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2086.

Sincerely,

Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Terry Roberts, OPR
Terry Pencovic, HQ IGR/Community Planning
Raouf Moussa, Traffic Operations South
Charlie Larwood, Transportation Planning A



GUIDE FOR THE PREPARATION

OF

TRAFFIC IMPACT STUDIES

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

December 2002

GRAY DAVIS
Governor

MARIA CONTRERAS-SWEET
Secretary
Business, Transportation and Housing Agency

JEFF MORALES
Director
California Department of Transportation

RANDELL H. IWASAKI
Deputy Director
Maintenance and Operations

BRIAN J. SMITH
Deputy Director
Planning and Modal Programs

JOHN A. (Jack) BODA
Chief
Division of Traffic Operations

JOAN SOLLENBERGER
Chief
Division of Transportation Planning

Additional copies of these guidelines can be copied from the internet at,
http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/

PREFACE

The California Department of Transportation (Caltrans) has developed this "Guide for the Preparation of Traffic Impact Studies" in response to a survey of cities and counties in California. The purpose of that survey was to improve the Caltrans local development review process (also known as the Intergovernmental Review/California Environmental Quality Act or IGR/CEQA process). The survey indicated that approximately 30 percent of the respondents were not aware of what Caltrans required in a traffic impact study (TIS).

In the early 1990s, the Caltrans District 6 office located in Fresno identified a need to provide better quality and consistency in the analysis of traffic impacts generated by local development and land use change proposals that effect State highway facilities. At that time, District 6 brought together both public and private sector expertise to develop a traffic impact study guide. The District 6 guide has proven to be successful at promoting consistency and uniformity in the identification and analysis of traffic impacts generated by local development and land use changes.

The guide developed in Fresno was adapted for statewide use by a team of Headquarters and district staff. The guide will provide consistent guidance for Caltrans staff who review local development and land use change proposals as well as inform local agencies of the information needed for Caltrans to analyze the traffic impacts to State highway facilities. The guide will also benefit local agencies and the development community by providing more expeditious review of local development proposals.

Even though sound planning and engineering practices were used to adapt the Fresno TIS guide, it is anticipated that changes will occur over time as new technologies and more efficient practices become available. To facilitate these changes, Caltrans encourages all those who use this guide to contact their nearest district office (i.e., IGR/CEQA Coordinator) to coordinate any changes with the development team.

ACKNOWLEDGEMENTS

The District 6 traffic impact study guide provided the impetus and a starting point for developing the statewide guide. Special thanks is given to Marc Birnbaum for recognizing the need for a TIS guide and for his valued experience and vast knowledge of land use planning to significantly enhance the effort to adapt the District 6 guide for statewide use. Randy Treece from District 6 provided many hours of coordination, research and development of the original guide and should be commended for his diligent efforts. Sharri Bender Ehlert of District 6 provided much of the technical expertise in the adaptation of the District 6 guide and her efforts are greatly appreciated.

A special thanks is also given to all those Cities, Counties, Regional Agencies, Congestion Management Agencies, Consultants, and Caltrans Employees who reviewed the guide and provided input during the development of this Guide for the Preparation of Traffic Impact Studies.

TABLE OF CONTENTS

I. INTRODUCTION

Caltrans desires to provide a safe and efficient State transportation system for the citizens of California pursuant to various Sections of the California Streets and Highway Code. This is done in partnership with local and regional agencies through procedures established by the California Environmental Quality Act (CEQA) and other land use planning processes. The intent of this guide is to provide a starting point and a consistent basis in which Caltrans evaluates traffic impacts to State highway facilities. The applicability of this guide for local streets and roads (non-State highways) is at the discretion of the effected jurisdiction.

Caltrans reviews federal, State, and local agency development projects[1], and land use change proposals for their potential impact to State highway facilities. The primary objectives of this guide is to provide:

- guidance in determining if and when a traffic impact study (TIS) is needed,
- consistency and uniformity in the identification of traffic impacts generated by local land use proposals,
- consistency and equity in the identification of measures to mitigate the traffic impacts generated by land use proposals,
- lead agency[2] officials with the information necessary to make informed decisions regarding the existing and proposed transportation infrastructure (see Appendix A, Minimum Contents of a TIS)
- TIS requirements early in the planning phase of a project (i.e., initial study, notice of preparation, or earlier) to eliminate potential delays later,
- a quality TIS by agreeing to the assumptions, data requirements, study scenarios, and analysis methodologies prior to beginning the TIS, and
- early coordination during the planning phases of a project to reduce the time and cost of preparing a TIS.

II. WHEN A TRAFFIC IMPACT STUDY IS NEEDED

The level of service[3] (LOS) for operating State highway facilities is based upon measures of effectiveness (MOEs). These MOEs (see Appendix "C-2") describe the measures best suited for analyzing State highway facilities (i.e., freeway segments, signalized intersections, on- or off-ramps, etc.). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" (see Appendix "C-3") on State highway facilities, however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained.

---

[1] "Project" refers to activities directly undertaken by government, financed by government, or requiring a permit or other approval from government as defined in Section 21065 of the Public Resources Code and Section 15378 of the California Code of Regulations.

[2] "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Defined in Section 21165 of the Public Resources Code, the "California Environmental Quality Act, and Section 15367 of the California Code of Regulations.

[3] "Level of service" as defined in the latest edition of the Highway Capacity Manual, Transportation Research Board, National Research Council.

A. Trip Generation Thresholds

The following criterion is a starting point in determining when a TIS is needed. When a project:

1. Generates over 100 peak hour trips assigned to a State highway facility
2. Generates 50 to 100 peak hour trips assigned to a State highway facility – and, affected State highway facilities are experiencing noticeable delay; approaching unstable traffic flow conditions (LOS "C" or "D").
3. Generates 1 to 49 peak hour trips assigned to a State highway facility – the following are examples that may require a full TIS or some lesser analysis[4]:
   a. Affected State highway facilities experiencing significant delay; unstable or forced traffic flow conditions (LOS "E" or "F").
   b. The potential risk for a traffic incident is significantly increased (i.e., congestion related collisions, non-standard sight distance considerations, increase in traffic conflict points, etc.).
   c. Change in local circulation networks that impact a State highway facility (i.e., direct access to State highway facility, a non-standard highway geometric design, etc.).

Note: A traffic study may be as simple as providing a traffic count to as complex as a microscopic simulation. The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic.

B. Exceptions

Exceptions require consultation between the lead agency, Caltrans, and those preparing the TIS. When a project's traffic impact to a State highway facility can clearly be anticipated without a study and all the parties involved (lead agency, developer, and the Caltrans district office) are able to negotiate appropriate mitigation, a TIS may not be necessary.

C. Updating An Existing Traffic Impact Study

A TIS requires updating when the amount or character of traffic is significantly different from an earlier study. Generally a TIS requires updating every two years. A TIS may require updating sooner in rapidly developing areas and not as often in slower developing areas. In these cases, consultation with Caltrans is strongly recommended.

III. SCOPE OF TRAFFIC IMPACT STUDY

Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended before commencing work on the study to establish the appropriate scope. At a minimum, the TIS should include the following:

A. Boundaries of the Traffic Impact Study

All State highway facilities impacted in accordance with the criteria in Section II should be studied. Traffic impacts to local streets and roads can impact intersections with State highway facilities. In these cases, the TIS should include an analysis of adjacent local facilities, upstream and downstream, of the intersection (i.e., driveways, intersections, and interchanges) with the State highway.

[4] A "lesser analysis" may include obtaining traffic counts, preparing signal warrants, or a focused TIS, etc.

B. Traffic Analysis Scenarios

Caltrans is interested in the effects of general plan updates and amendments as well as the effects of specific project entitlements (i.e., site plans, conditional use permits, sub-divisions, rezoning, etc.) that have the potential to impact a State highway facility. The complexity or magnitude of the impacts of a project will normally dictate the scenarios necessary to analyze the project. Consultation between the lead agency, Caltrans, and those preparing the TIS is recommended to determine the appropriate scenarios for the analysis. The following scenarios should be addressed in the TIS when appropriate:

1. When only a general plan amendment or update is being sought, the following scenarios are required:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only with Select Zone[5] Analysis - Trip generation and assignment for build-out of general plan.
   c) General Plan Build-out Only - Trip assignment and peak hour LOS analysis. Include current land uses and other pending general plan amendments.
   d) General Plan Build-out Plus Proposed Project - Trip assignment and peak hour LOS analysis. Include proposed project and other pending general plan amendments.

2. When a general plan amendment is not proposed and a proposed project is seeking specific entitlements (i.e., site plans, conditional use permits, sub-division, rezoning, etc.), the following scenarios must be analyzed in the TIS:
   a) Existing Conditions - Current year traffic volumes and peak hour LOS analysis of effected State highway facilities.
   b) Proposed Project Only - Trip generation, distribution, and assignment in the year the project is anticipated to complete construction.
   c) Cumulative Conditions (Existing Conditions Plus Other Approved and Pending Projects Without Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   d) Cumulative Conditions Plus Proposed Project (Existing Conditions Plus Other Approved and Pending Projects Plus Proposed Project) - Trip assignment and peak hour LOS analysis in the year the project is anticipated to complete construction.
   e) Cumulative Conditions Plus Proposed Phases (Interim Years) - Trip assignment and peak hour LOS analysis in the years the project phases are anticipated to complete construction.

3. In cases where the circulation element of the general plan is not consistent with the land use element or the general plan is outdated and not representative of current or future forecasted conditions, all scenarios from Sections III. B. 1. and 2. should be utilized with the exception of duplicating of item 2.a.

[5] "Select zone" analysis represents a project only traffic model run, where the project's trips are distributed and assigned along a loaded highway network. This procedure isolates the specific impact on the State highway network.

IV. TRAFFIC DATA

Prior to any fieldwork, consultation between the lead agency, Caltrans, and those preparing the TIS is recommended to reach consensus on the data and assumptions necessary for the study. The following elements are a starting point in that consideration.

A. Trip Generation

The latest edition of the Institute of Transportation Engineers' (ITE) TRIP GENERATION report should be used for trip generation forecasts. Local trip generation rates are also acceptable if appropriate validation is provided to support them.

1. Trip Generation Rates – When the land use has a limited number of studies to support the trip generation rates or when the Coefficient of Determination (R^2) is below 0.75, consultation between the lead agency, Caltrans and those preparing the TIS is recommended.
2. Pass-by Trips[6] – Pass-by trips are only considered for retail oriented development. Reductions greater than 15% requires consultation and acceptance by Caltrans. The justification for exceeding a 15% reduction should be discussed in the TIS.
3. Captured Trips[7] – Captured trip reductions greater than 5% requires consultation and acceptance by Caltrans. The justification for exceeding a 5% reduction should be discussed in the TIS.
4. Transportation Demand Management (TDM) – Consultation between the lead agency and Caltrans is essential before applying trip reduction for TDM strategies.

NOTE: Reasonable reductions to trip generation rates are considered when adjacent State highway volumes are sufficient (at least 5000 ADT) to support reductions for the land use.

B. Traffic Counts

Prior to field traffic counts, consultation between the lead agency, Caltrans and those preparing the TIS is recommended to determine the level of detail (e.g., location, signal timing, travel speeds, turning movements, etc.) required at each traffic count site. All State highway facilities within the boundaries of the TIS should be considered. Common rules for counting vehicular traffic include but are not limited to:

1. Vehicle counts should be conducted on Tuesdays, Wednesdays, or Thursdays during weeks not containing a holiday and conducted in favorable weather conditions.
2. Vehicle counts should be conducted during the appropriate peak hours (see peak hour discussion below).
3. Seasonal and weekend variations in traffic should also be considered where appropriate (i.e., recreational routes, tourist attractions, harvest season, etc.).

C. Peak Hours

To eliminate unnecessary analysis, consultation between the lead agency, Caltrans and those preparing the TIS is recommended during the early planning stages of a project. In general, the TIS should include a morning (a.m.) and an evening (p.m.) peak hour analyses. Other peak hours (e.g., 11:30 a.m. to 1:30 p.m., weekend, holidays, etc.) may also be required to determine the significance of the traffic impacts generated by a project.

---

[6] "Pass-by" trips are made as intermediate stops between an origin and a primary trip destination (i.e., home to work, home to shopping, etc.).

[7] "Captured Trips" are trips that do not enter or leave the driveways of a project's boundary within a mixed-use development.

D. Travel Forecasting (Transportation Modeling)

The local or regional traffic model should reflect the most current land use and planned improvements (i.e., where programming or funding is secured). When a general plan build-out model is not available, the closest forecast model year to build-out should be used. If a traffic model is not available, historical growth rates and current trends can be used to project future traffic volumes. The TIS should clearly describe any changes made in the model to accommodate the analysis of a proposed project.

V. TRAFFIC IMPACT ANALYSIS METHODOLOGIES

Typically, the traffic analysis methodologies for the facility types indicated below are used by Caltrans and will be accepted without prior consultation. When a State highway has saturated flows, the use of a micro-simulation model is encouraged for the analysis (please note however, the micro-simulation model must be calibrated and validated for reliable results). Other analysis methods may be accepted, however, consultation between the lead agency, Caltrans and those preparing the TIS is recommended to agree on the data necessary for the analysis.

A. Freeway Segments – Highway Capacity Manual (HCM)*, operational analysis
B. Weaving Areas – Caltrans Highway Design Manual (HDM)
C. Ramps and Ramp Junctions – HCM*, operational analysis or Caltrans HDM, Caltrans Ramp Metering Guidelines (most recent edition)
D. Multi-Lane Highways – HCM*, operational analysis
E. Two-lane Highways – HCM*, operational analysis
F. Signalized Intersections[8] – HCM*, Highway Capacity Software**, operational analysis, TRAFFIX™**, Synchro**, see footnote 8
G. Unsignalized Intersections – HCM*, operational analysis, Caltrans Traffic Manual for signal warrants if a signal is being considered
H. Transit – HCM*, operational analysis
I. Pedestrians – HCM*
J. Bicycles – HCM*
K. Caltrans Criteria/Warrants – Caltrans Traffic Manual (stop signs, traffic signals, freeway lighting, conventional highway lighting, school crossings)
L. Channelization – Caltrans guidelines for Reconstruction of Intersections, August 1985, Ichiro Fukutome

*The most current edition of the Highway Capacity Manual, Transportation Research Board, National Research Council, should be used.

****NOTE**: Caltrans does not officially advocate the use of any special software. However, consistency with the HCM is advocated in most but not all cases. The Caltrans local development review units utilize the software mentioned above. If different software or analytical techniques are used for the TIS then consultation between the lead agency, Caltrans and those preparing the TIS is recommended. Results that are significantly different than those produced with the analytical techniques above should be challenged.

[8] The procedures in the Highway Capacity Manual "do not explicitly address operations of closely spaced signalized intersections. Under such conditions, several unique characteristics must be considered, including spill-back potential from the downstream intersection to the upstream intersection, effects of downstream queues on upstream saturation flow rate, and unusual platoon dispersion or compression between intersections. An example of such closely spaced operations is signalized ramp terminals at urban interchanges. Queue interactions between closely spaced intersections may seriously distort the procedures in" the HCM.

VI. MITIGATION MEASURES

The TIS should provide the nexus [Nollan v. California Coastal Commission, 1987, 483 U.S. 825 (108 S.Ct. 314)] between a project and the traffic impacts to State highway facilities. The TIS should also establish the rough proportionality [Dolan v. City of Tigard, 1994, 512 U.S. 374 (114 S. Ct. 2309)] between the mitigation measures and the traffic impacts. One method for establishing the rough proportionality or a project proponent's equitable responsibility for a project's impacts is provided in Appendix "B." Consultation between the lead agency, Caltrans and those preparing the TIS is recommended to reach consensus on the mitigation measures and who will be responsible.

Mitigation measures must be included in the traffic impact analysis. This determines if a project's impacts can be eliminated or reduced to a level of insignificance. Eliminating or reducing impacts to a level of insignificance is the standard pursuant to CEQA and the National Environmental Policy Act (NEPA). The lead agency is responsible for administering the CEQA review process and has the principal authority for approving a local development proposal or land use change. Caltrans, as a responsible agency, is responsible for reviewing the TIS for errors and omissions that pertain to State highway facilities. However, the authority vested in the lead agency under CEQA does not take precedence over other authorities in law.

If the mitigation measures require work in the State highway right-of-way an encroachment permit from Caltrans will be required. This work will also be subject to Caltrans standards and specifications. Consultation between the lead agency, Caltrans and those preparing the TIS early in the planning process is strongly recommended to expedite the review of local development proposals and to reduce conflicts and misunderstandings in both the local agency CEQA review process as well as the Caltrans encroachment permit process.

APPENDIX "A"

MINIMUM CONTENTS

OF A

TRAFFIC IMPACT STUDY

MINIMUM CONTENTS OF TRAFFIC IMPACT STUDY REPORT

I. EXECUTIVE SUMMARY

II. TABLE OF CONTENTS

A. List of Figures (Maps)
B. List of Tables

III. INTRODUCTION

A. Description of the proposed project
B. Location of project
C. Site plan including all access to State highways (site plan, map)
D. Circulation network including all access to State highways (vicinity map)
E. Land use and zoning
F. Phasing plan including proposed dates of project (phase) completion
G. Project sponsor and contact person(s)
H. References to other traffic impact studies

IV. TRAFFIC ANALYSIS

A. Clearly stated assumptions
B. Existing and projected traffic volumes (including turning movements), facility geometry (including storage lengths), and traffic controls (including signal phasing and multi-signal progression where appropriate) (figure)
C. Project trip generation including references (table)
D. Project generated trip distribution and assignment (figure)
E. LOS and warrant analyses - existing conditions, cumulative conditions, and full build of general plan conditions with and without project

V. CONCLUSIONS AND RECOMMENDATIONS

A. LOS and appropriate MOE quantities of impacted facilities with and without mitigation measures
B. Mitigation phasing plan including dates of proposed mitigation measures
C. Define responsibilities for implementing mitigation measures
D. Cost estimates for mitigation measures and financing plan

VI. APPENDICES

A. Description of traffic data and how data was collected
B. Description of methodologies and assumptions used in analyses
C. Worksheets used in analyses (i.e., signal warrant, LOS, traffic count information, etc.)

METHOD FOR CALCULATING EQUITABLE MITIGATION MEASURES

The methodology below is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of a project's traffic impact, the intent is to provide:

1. A starting point for early discussions to address traffic mitigation equitably.
2. A means for calculating the equitable share for mitigating traffic impacts.
3. A means for establishing rough proportionality [Dolan v. City of Tigard, 1994, 512 U.S. 374 (114 S. Ct. 2309)].

The formulas should be used when:

- A project has impacts that do not immediately warrant mitigation, but their cumulative effects are significant and will require mitigating in the future.
- A project has an immediate impact and the lead agency has assumed responsibility for addressing operational improvements

NOTE: This formula is not intended for circumstances where a project proponent will be receiving a substantial benefit from the identified mitigation measures. In these cases, (e.g., mid-block access and signalization to a shopping center) the project should take full responsibility to toward providing the necessary infrastructure.

EQUITABLE SHARE RESPONSIBILITY: **Equation C-1**

NOTE: $T_E < T_B$, see explanation for T_B below.

$$P = \frac{T}{T_B - T_E}$$

Where:

P = The equitable share for the proposed project's traffic impact.

T = The vehicle trips generated by the project during the peak hour of adjacent State highway facility in vehicles per hour, vph.

T_B = The forecasted traffic volume on an impacted State highway facility at the time of general plan build-out (e.g., 20 year model or the furthest future model date feasible), vph.

T_E = The traffic volume existing on the impacted State highway facility plus other approved projects that will generate traffic that has yet to be constructed/opened, vph.

EQUITABLE COST: **Equation C-2**

$$C = P\ (C_T)$$

Where:

C = The equitable cost of traffic mitigation for the proposed project, ($). (Rounded to nearest one thousand dollars)

P = The equitable share for the project being considered.

C_T = The total cost estimate for improvements necessary to mitigate the forecasted traffic demand on the impacted State highway facility in question at general plan build-out, ($).

NOTES

1. Once the equitable share responsibility and equitable cost has been established on a per trip basis, these values can be utilized for all projects on that State highway facility until the forecasted general plan build-out model is revised.
2. Truck traffic should be converted to passenger car equivalents before utilizing these equations (see the Highway Capacity Manual for converting to passenger car equivalents).

3. If the per trip cost is not used for all subsequent projects, then the equation below will be necessary to determine the costs for individual project impact and will require some additional accounting.

Equation C-2.A

$$C = P\,(C_T - C_C)$$

Where:

C = Same as equation C-2.

P = Same as equation C-2.

C_T = Same as equation C-2.

C_C = The combined dollar contributions paid and committed prior to current project's contribution. This is necessary to provide the appropriate cost proportionality. Example: For the first project to impact the State highway facility in question since the total cost (C_T) estimate for improvements necessary to mitigate the forecasted traffic demand, C_C would be equal to zero. For the second project however, C would equal $P_2(C_T - C_1)$ and for the third project to come along C would equal $P_3[C_T - (C_1 + C_2)]$ and so on until build-out or the general plan build-out was recalculated.

APPENDIX "B"

METHODOLOGY FOR

CALCULATING EQUITABLE

MITIGATION MEASURES

Transition between LOS "C" and LOS "D" Criteria

(Reference Highway Capacity Manual)

BASIC FREEWAY SEGMENTS @ 65 mi/hr

LOS	Maximum Density (pc/mi/ln)	Minimum Speed (mph)	Maximum v/c	Maximum Service Flow Rate (pc/hr/ln)
A	11	65.0	0.30	710
B	18	65.0	0.50	1170
C	26	64.6	0.71	1680
D	35	59.7	0.89	2090
E	45	52.2	1.00	2350

SIGNALIZED INTERSECTIONS and RAMP TERMINALS

LOS	Control Delay per Vehicle (sec/veh)
A	≤ 10
B	> 10 - 20
C	> 20 - 35
D	> 35 - 55
E	> 55 - 80
F	> 80

MULTI-LANE HIGHWAYS @ 55 mi/hr

LOS	Maximum Density (pc/mi/ln)	Minimum Speed (mph)	Maximum v/c	Maximum Service Flow Rate (pc/hr/ln)
A	11	55.0	0.29	600
B	18	55.0	0.47	990
C	26	54.9	0.68	1430
D	35	52.9	0.88	1850
E	41	51.2	1.00	2100

----- Dotted line represents the transition between LOS "C" and LOS "D"

TWO-LANE HIGHWAYS

LOS	Percent Time-Spent-Following	Average Travel Speed (mi/hr)
A	≤ 35	> 55
B	> 35 - 50	> 50 - 55
C	> 50 - 65	> 45 - 50
D	> 65 - 80	> 40 - 45
E	> 80	≤ 40

URBAN STREETS

Urban Street Class	I	II	III	IV
Range of FFS	55 to 45 mi/hr	45 to 35 mi/hr	35 to 30 mi/hr	35 to 25 mi/hr
Typical FFS	50 mi/hr	40 mi/hr	35 mi/hr	30 mi/hr
LOS	Average Travel Speed (mi/hr)			
A	> 42	> 35	> 30	> 25
B	> 34 - 42	> 28 - 35	> 24 - 30	> 19 - 25
C	> 27 - 34	> 22 - 28	> 18 - 24	> 13 - 19
D	> 21 - 27	> 17 - 22	> 14 - 18	> 9 - 13
E	> 16 - 21	> 13 - 17	> 10 - 14	> 7 - 9
F	≤ 16	≤ 13	≤ 10	≤ 7

***** Dotted line represents the transition between LOS "C" and LOS "D"

APPENDIX "C"

MEASURES OF EFFECTIVENESS

BY

FACILITY TYPE

MEASURES OF EFFECTIVENESS BY FACILITY TYPE

TYPE OF FACILITY	MEASURE OF EFFECTIVENESS (MOE)
Basic Freeway Segments	Density (pc/mi/ln)
Ramps	Density (pc/mi/ln)
Ramp Terminals	Delay (sec/veh)
Multi-Lane Highways	Density (pc/mi/ln)
Two-Lane Highways	Percent-Time-Following Average Travel Speed (mi/hr)
Signalized Intersections	Control Delay per Vehicle (sec/veh)
Unsignalized Intersections	Average Control Delay per Vehicle (sec/veh)
Urban Streets	Average Travel Speed (mi/hr)

Measures of effectiveness for level of service definitions located in the most recent version of the Highway Capacity Manual, Transportation Research Board, National Research Council.

IRVINE RANCH WATER DISTRICT 15600 Sand Canyon Ave., P.O. Box 57000, Irvine, CA 92619-7000 (949) 453-5300

August 11, 2004

Jeremy Krout
Associate Planner
City of Lake Forest
25550 Commercecentre Dr.
Lake Forest, CA 92630

Subject: Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DEIR) for the Opportunities Study Area

Dear Mr. Krout:

Irvine Ranch Water District (IRWD) has received and reviewed the Notice of Preparation (NOP) for the subject project. IRWD will be the domestic water, recycled water, and wastewater service provider for the study area. The proposed changes in land use may necessitate the preparation of a sub area master plan (SAMP) to thoroughly analyze the specific demands of the developments under consideration. Please contact Mr. Malcolm Cortez at 949) 453-5551 to discuss processing a SAMP through IRWD.

The proposed project thresholds appear to meet the criteria set forth in Water Code Section 10912 requiring a water supply assessment (WSA) as a part of the environmental impact report. If this is the case, the City would need to formally request the preparation of a WSA by IRWD, which starts a 90-day period during which IRWD analyzes projected demands and determines water availability under the terms of the statute. If you have additional questions regarding the WSA, please contact Ms. Kellie Welch at (949) 453-5604.

In addition, the project proponent will be responsible for the "fair share costs" associated with any improvements to existing facilities for the purpose of adequately serving the project. Plans for the proposed project, or in this case, individual developments, will need to be reviewed by IRWD sections. For Development Services, contact Mr. Al Dyson at (949) 453-5595 to discuss submittals. For Water Resources (On-Site Recycled Water Systems), contact Mr. Alex Harris at (949) 453-5576 to discuss plan check procedures.

IRWD appreciates the opportunity to review and comment on the NOP. Should you have any questions or require additional information, please call Gregory Herr, Planning and Resources Specialist, at (949) 453-5577.

Yours truly,

Norris Brandt
Water Quality Manager

NB/GKH

cc: Al Dyson
Alex Harris

Department of Toxic Substances Control

Terry Tamminen
Agency Secretary
Cal/EPA

5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

August 13, 2004

RECEIVED
AUG 18 2004
CITY OF LAKE FOREST
DEVELOPMENT SERVICES DEPT.

Mr. Jeremy Krout
Associate Planner
City of Lake Forest
25550 Commercentre Drive
Lake Forest, California 92630

NOTICE OR PREPARATION (NOP) FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE OPPORTUNITIES STUDY, LAKE FOREST PROJECT

Dear Mr. Krout:

The Department of Toxic Substances Control (DTSC) has received your NOP. Based on the review of the currently submitted document, DTSC has comments as follows:

1. A copy of the NOP and other California Environmental Quality Act (CEQA) related documents should be filed with the State Clearinghouse, 1400 Tenth Street, P.O. Box 3044, Sacramento, California 95812-3044, Telephone Number: (916) 445-0613.

2. The draft EIR must identify all current and historic uses of the site that has resulted in a release of hazardous wastes/substances. The EIR should summarize in a table any contamination to the soil and groundwater.

3. The EIR must specifically identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate and identify which conditions at the site pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. Following are the databases of some of the regulatory agencies:

    - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

    - CalSites: A Database primarily used by the California Department of Toxic Substances Control.

    - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.

- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.

- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.

- Local County and City maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017; (213) 452-3908; maintains a list of Formerly Used Defense Sites (FUDS).

4. The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials/wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies.

5. All environmental investigation and/or remediation should be conducted under a Workplan which is approved by the regulatory agencies that has jurisdiction to oversee hazardous waste cleanup and regulate the proposed project. Previously submitted assessment reports, sampling results of related and site related documents should be summarized in the EIR.

6. If the subject property is used for vegetation and heavy agriculture, onsite soils could contain pesticide residue. The site may have contributed to soil and groundwater contamination. Proper investigation and remedial actions should be

conducted at the site prior to any construction or replacement of the project.

7. If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property."

8. If any building structures, asphalt or concrete-paved surface areas or transportation structures are planned to be demolished, an investigation should be conducted for the presence of lead-based paints and asbestos containing materials (ACMs). If lead-based paints or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

9. The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.

10. Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site should be conducted to provide basic information for determining if there are, have been, or will be, any threatening releases of hazardous materials that may pose a risk to human health or the environment.

11. If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

12. If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility.

13. If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

14. Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

15. If the project plans include discharging waste water to storm drain, you may be required to obtain a waste water discharge permit from the overseeing Regional Water Quality Control Board.

16. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the government agency to provide appropriate regulatory oversight.

17. If possible the addresses, locations, cross streets and/or street boundaries should be clearly stated and easily identified. Most projects are identified in our agency's database by street address and number, city, and zip code, when possible.

DTSC provides guidance for cleanup oversight, through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at (714) 484-5477 and email at thom@dtsc.ca.gov.

Sincerely,

for

Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch
Cypress Office

cc: See next page

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Community Development Department www.ci.irvine.ca.us

City of Irvine, One Civic Center Plaza, P.O. Box 19575, Irvine, California 92623-9575 (949) 724-6000

August 11, 2004

Mr. Jeremy Krout, Associate Planner
City of Lake Forest
25550 Commercentre Drive
Lake Forest, CA 92630

Subject: **City Of Lake Forest Notice of Preparation of A Draft Program EIR for the Opportunities Study Project**

Dear Mr. Krout:

The City of Irvine has received and reviewed the information on the above referenced project. The Community Development Department has consulted with the Public Works Department for possible comments on transportation issues. Based on their review, Transportation Services staff has the following comments:

COMMENT 1

In May 2003, the Irvine City Council approved the North Irvine Transportation Mitigation (NITM) Program that identified projects and programs necessary to mitigate traffic impacts resulting from the development of Planning Area 40, the Northern Sphere Area, the Great Park and existing General Plan development intensity assigned to Planning Areas 1 and 2 (please see attached map). Please incorporate the approved NITM land uses and phased circulation improvements in the traffic analysis for the proposed project. The City will provide a copy of the NITM land uses and phased circulation improvements, if requested by the City of Lake Forest or their consultants.

COMMENT 2

The proposed project Study Area should be extended to Sand Canyon Avenue (West) to analyze the daily and peak hour traffic impacts of the lower and higher density plans. In addition, the traffic study should include the AM and PM peak hour intersection analysis for the following locations:

- Jeffrey Road and Portola Parkway
- Jeffrey Road and Irvine Boulevard

COMMENT 3

The link [Volume over Capacity (V/C) for Peak hours and ADT] and intersection [Intersection Capacity Utilization (ICU) for AM and PM peak hours] traffic analysis should be provided for the following scenarios:

- Existing Year
- Interim Year (with and without the project)
- 2025 Year (with and without the project)
- Post 2025 Year (with and without the project)

COMMENT 4

The traffic study should include an analysis of the Portola Parkway Connection and provide recommendations for the construction of the missing segment.

COMMENT 5

The traffic study should include a section analyzing the existing and proposed truck routes in the area in conjunction with the proposed project.

COMMENT 6

Please provide a discussion of the impact of the proposed General Plan Amendment and Re-Zone on the current Foothill Circulation Phasing Plan (FCPP) Fee Program consisting of construction, purchase, modification, expansion, improvement and rehabilitation of the approved transportation facilities.

Thank you for the opportunity to review the project. We would appreciate information on any change in the project description as the planning process proceeds. If you have any questions, please contact me at (949) 724-6546.

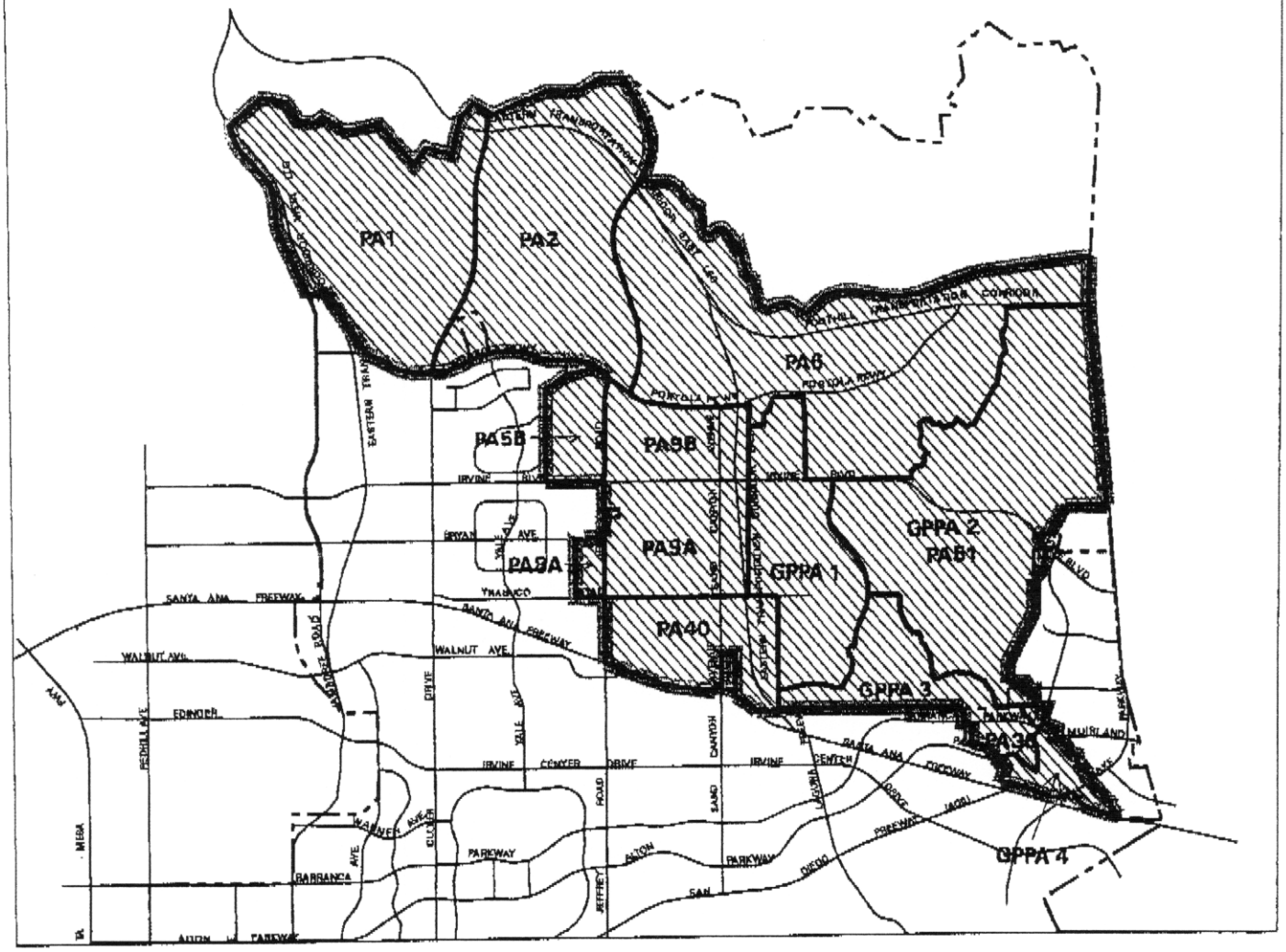
Sincerely,

AMY URCIS
Associate Planner

cc: Barry Curtis, Principal Planner
Farideh E. Lyons, Senior Transportation Analyst

DATE: May 06, 2003

NORTH IRVINE TRANSPORTATION MITIGATION PROGRAM



North Irvine Transportation Mitigation Program Area (NITM)

NITM Program Area Boundary

Planning Area Boundary

City Sphere of Influence Boundary

PA Planning Area

GPPA Great Park Planning Area

May 06, 2003

/raid/database.dir/cd.dir/planning.dir/greatpark.dir/north/irvine3bw.aml

EXHIBIT A