

# **CITY OF LAGUNA WOODS**

## **2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE**

*Final Initial Study/Negative Declaration*



**City of Laguna Woods**

***January 2022***

*Prepared by:*

# **LSA**



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**FINAL**

**INITIAL STUDY/  
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE  
CITY OF LAGUNA WOODS**



January 2022

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**FINAL**

**INITIAL STUDY/  
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE  
CITY OF LAGUNA WOODS**

Submitted to:

City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, California 92637

Prepared by:

LSA  
20 Executive Park, Suite 200  
Irvine, California 92614  
(949) 553-0666  
Project No. LWD2101



January 2022

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## APPENDIX

A: DRAFT INITIAL STUDY/NEGATIVE DECLARATION

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## LIST OF ACRONYMS AND ABBREVIATIONS

Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of Laguna Woods
HCD	California Department of Housing and Community Development
IS/ND	Initial Study/Negative Declaration
NOI	Notice of Intent
project	City of Laguna Woods 2021–2029 General Plan Housing Element Update
RHNA	Regional Housing Needs Assessment
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
VMT	vehicle miles traveled

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## 1.0 INTRODUCTION

This section comprises the Comments and Responses of the Final Initial Study/Negative Declaration (IS/ND) for the proposed City of Laguna Woods 2021–2029 General Plan Housing Element Update (project) in Laguna Woods, Orange County, California. The purpose of this document is to respond to all comments received by the City of Laguna Woods (City) regarding the environmental information and analyses contained in the Draft IS/ND (the Draft IS/ND is provided as Appendix A).

Consistent with *State CEQA Guidelines* Section 15073 and in accordance with the City’s Local CEQA Procedures, a Notice of Intent (NOI) to adopt a Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the project. In addition, the NOI was filed with the Orange County Clerk-Recorder’s Department and the State Clearinghouse on August 17, 2021.

The Draft IS/ND circulated for public review for a period of 31 days, from August 17, 2021, to September 16, 2021. Copies of the Draft IS/ND were made available for public review at the City Clerk’s Office at Laguna Woods City Hall and on the City’s website.

Comments were accepted for a period of 31 days to ensure adequate time for residents and agencies to comment on the Draft IS/ND. Six comment letters were received during the public review period. Comments were received from one State agency, the California Department of Transportation (Caltrans); four local agencies, the Saddleback Valley Unified School District, the Orange County Fire Authority, the City of Irvine, and the Southern California Association of Governments;; and one interested party: the Gabrieleno Band of Mission Indians Kizh Nation.

The City is the Lead Agency under the California Environmental Quality Act (CEQA) and is required to consider agency and public comments on the IS/ND. Although preparation of responses to comments on an IS/ND is not required, responses have been prepared.

Information provided in this Response to Comments document clarifies, amplifies, or makes minor modifications to the IS/ND. No significant changes have been made to the information contained in the IS/ND as a result of the responses to comments, no significant new information has been added that would require recirculation of the document, and the CEQA findings have remained unchanged.

### 1.1 INDEX OF COMMENTS RECEIVED

The following is an index list of the agencies and interested parties that commented on the IS/ND prior to the close of the public comment period. The comments received have been organized in a manner that facilitates a particular comment or set of comments. Each comment letter received is indexed with an alphanumeric code below.

### Comment Letter Index

Comment Code	Signatory	Date
<b>State Agencies</b>		
S-1	California Department of Transportation (Caltrans)	September 16, 2021
<b>Local Agencies</b>		
L-1	Saddleback Valley Unified School District	September 1, 2021
L-2	Orange County Fire Authority	August 26, 2021
L-3	City of Irvine	September 16, 2021
L-4	Southern California Association of Governments	September 16, 2021
<b>Interested Parties</b>		
I-1	Gabrielino Band of Mission Indians Kizh Nation	August 24, 2021
I-2	Gabrielino Tongva Tribe	September 12, 2021
I-3	Juaneño Band of Mission Indians, Acjachemen Nation	September 16, 2021

## 1.2 FORMAT OF RESPONSE TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment index numbers are provided in the upper right-hand corner of each comment letter, and individual points within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow the letter and are referenced by index numbers in the margins.

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## 2.0 RESPONSE TO COMMENTS

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## 2.1 STATE AGENCIES

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**DEPARTMENT OF TRANSPORTATION**

DISTRICT 12

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6000

FAX (657) 328-6522

TTY 711

[www.dot.ca.gov/caltrans-near-me/district12](http://www.dot.ca.gov/caltrans-near-me/district12)**Comment Letter S-1***Making Conservation  
a California Way of Life.*

September 16, 2021

Mr. Christopher Macon  
City Manager  
City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, CA 92637

File: IGR/CEQA  
SCH#: 2021080313  
12-ORA-2021-01759  
SR 133, PM R4.534-R6.548  
I-5, PM 17.821-19.386  
SR 73, PM 14.819-16.282

Dear Mr. Macon,

Thank you for including the California Department of Transportation (Caltrans) in the review of the 2021-2029 General Plan Housing Element Update for the City of Laguna Woods. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment.

The project proposes an update to the Housing Element in the City's General Plan. Regional access to the project area is provided by State Route 133 (SR 133), Interstate 5 (I-5), and State Route 73 (SR 73). Caltrans is a responsible agency for this project and upon review, we have the following comments:

**S-1-1****Transportation Planning**

1. Caltrans recognizes our responsibility to assist communities of color and under-served communities by removing barriers to provide a more equitable transportation system for all.

The Department firmly embraces racial equity, inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system.

Please consider including a discussion on equity in General Plan Element updates.

**S-1-2**

2. Caltrans supports the city's evaluation of 17 potential opportunity sites for housing in areas that are already designated for residential, commercial, or community facilities development.

The state mandates that cities must plan for housing needs of future residents of all incomes. This analysis would assist in accommodating the Regional Housing Needs Assessment (RHNA) allocation per the California Department of Housing & Community Development (HCD).

**S-1-3**

3. Caltrans supports projects which provide a diversity of housing choices and destinations accessible by Active Transportation (i.e. bicycle and pedestrian) and transit users. Please consider improving multimodal connections to housing which will encourage future residents, visitors, and workers in the city to utilize all modes of transportation.

S-1-4

4. Any pedestrian facility enhancements from future housing development projects that are within Caltrans' Right of Way will need to comply with Caltrans Design Information Bulletin (DIB) 82-06. The aforementioned DIB can be found here: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib82-06-ally.pdf>

S-1-5

5. According to Government Code 65302, "upon the next revision of the Housing Element on or after January 1, 2020, the Safety Element shall be reviewed and updated as necessary to identify residential developments in any hazard areas identified in the Safety Element that do not have at least two emergency evacuation routes."

Safety elements are also now required to include more information about wildfire risks in the community and how to improve wildfire safety. As well as identifying new information related to flood hazards and climate adaptation and resiliency strategies applicable to the city.

S-1-6

For further information regarding required background information and policy program guidance for Safety Element updates, please see <https://leginfo.legislature.ca.gov>.

6. Safety is one of Caltrans' strategic goals. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners.

We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

S-1-7

### **Traffic Impact Study**

7. New developments resulting from the City's Housing Element update should provide a Vehicle Miles Traveled (VMT) based Traffic Impact Study (TIS). Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts
8. The TIS may also need to identify the future project's near-term and long-term safety or operational issues, on or adjacent to any existing or proposed State facilities.

S-1-8

### **Encroachment Permit**

9. Any project work proposed in the vicinity of the State Right-of-Way (ROW) would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at:

<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

S-1-9

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Joseph Jamoralin at (657) 328-6276 or [Joseph.Jamoralin@dot.ca.gov](mailto:Joseph.Jamoralin@dot.ca.gov)

S-1-10

Sincerely,



SCOTT SHELLEY  
Branch Chief, Regional-IGR-Transit Planning  
Caltrans, District 12

## CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

**Letter Code:** S-1  
**Commenter:** California Department of Transportation  
**Date:** September 16, 2021

### Response to Comment S-1-1

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses its understanding of the intentions and terms of the Housing Element Update.

This comment is introductory and does not contain any substantive comments or questions; therefore, no response is required.

### Response to Comment S-1-2

This comment recommends that the City to include a discussion on equity in General Plan Element Updates.

The City acknowledges this comment; however, as it pertains to the Housing Element Update, it may be noted that Laguna Woods does not contain any disadvantaged communities. This comment has been noted. No changes to the Draft IS/ND have been made in response to this comment.

### Response to Comment S-1-3

This comment indicates support for the City's evaluation of 17 potential opportunity sites for housing in areas that are already designated for residential, commercial, or community facilities development.

The City has noted this comment, and because it does not contain any substantive questions about the environmental analysis or conclusions contained in the Draft IS/ND, no further response is required.

### Response to Comment S-1-4

This comment states the commenter's support for projects that promote diversity of housing choices and destinations accessible by active transportation and transit users. The commenter asks that the City consider improving multimodal connections to housing, which would encourage future residents, visitors, and workers in Laguna Woods to use all modes of transportation.

The 2021–2029 General Plan Housing Element contains information and data, including an assessment of actual and potential constraints to the provision and maintenance of affordable housing, that would likely address the concerns relating to housing choices in this comment. As for the comments related to improving multimodal transportation connections to housing, new development would be subject to policies described in the Circulation Element of the General Plan, as well as other policies that promote reduction of vehicle miles traveled (VMT). The proposed

project would not, in and of itself, result in transportation impacts, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. This comment has been noted. No changes to the Draft IS/ND have been made in response to this comment.

#### **Response to Comment S-1-5**

This comment relates to compliance with Caltrans Design Information Bulletin 82-06 for pedestrian facility enhancements from future housing development projects.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

#### **Response to Comment S-1-6**

This comment relates to compliance with Government Code Section 65302, which requires that local jurisdictions review and update their safety elements to address wildfire and flood hazards and incorporate applicable climate adaptation and resiliency strategies.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

#### **Response to Comment S-1-7**

This comment expresses encouragement for the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

#### **Response to Comment S-1-8**

This comment states that new developments that result from the Housing Element Update should provide a VMT-based Traffic Impact Study, explains what types of content should be included in the study, and suggests resources that may be used as guidance for developing that study.

The City acknowledges and notes this comment. Future discretionary projects will be reviewed for compliance with CEQA and will address VMT thresholds.

#### **Response to Comment S-1-9**

This comment states that any projects that are proposed in the vicinity of the State right-of-way would need an encroachment permit and that all environmental concerns must be adequately

addressed. The commenter then calls for coordination with Caltrans to meet requirements for any work within or near State right-of-way.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

**Response to Comment S-1-10**

The commenter requests that the City keep it informed of the project and any future developments that could potentially impact State transportation facilities.

The City acknowledges all comments provided by Caltrans and looks forward to working collaboratively on any future projects.



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## 2.2 LOCAL AGENCIES

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25631 Peter A. Hartman Way, Mission Viejo, California 92691  
(949) 586-1234  
www.svUSD.org

**Board of Education**

Suzie R. Swartz, President · Amanda Morrell, Vice President ·  
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Member

Crystal Turner, Ed.D.  
**Superintendent**

September 1, 2021

Rebecca M. Pennington, Development Programs Analyst  
City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, California 92637

Via Email: [cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org)

Subject: Housing Element Update (Negative Declaration/Initial Study)

Thank you for the opportunity to review and comment on the Negative Declaration for the City of Laguna Woods Housing Element Update (Housing Element Update or proposed project). Laguna Woods is within the Saddleback Valley Unified School District (Saddleback Valley USD) boundaries. A portion of the city also lies within the Laguna Beach Unified School District.

The City plans to adopt the 2021-2029 General Plan Housing Element, and we understand that the proposed Housing Element Update would not result in an actual housing development involving ground disturbance that could result in environmental impacts. The Housing Element Update identifies several potential housing sites that are candidates for future housing development. However, because the proposed project does not include the necessary amendments to the City's Zoning Ordinance and other General Plan elements that allow for future housing development, no actual development on these potential sites could occur and result in environmental impacts. We understand that after the State certifies the Housing Element Update, a separate environmental study will be prepared.

The Saddleback Valley USD requests that this subsequent environmental study include an analysis of the proposed project's impacts on Saddleback Valley USD's school facilities. Please continue to notify us of all actions on the Housing Element Update and other resulting development projects and give us an opportunity to review future environmental documents. We look forward to working cooperatively with the City to create the best environment for our students and staff. Please contact me if you have any questions.

Sincerely,

Stella Escario-Doiron  
Chief of Facilities, Maintenance, Operations, Construction and Transportation

C: Crystal Turner, Ed.D., Superintendent  
Robert Craven, Assistant Superintendent, Facilities, Operations and Technology  
Mark Perez, Director, Communications & Administrative Services

**Saddleback Valley Unified School District****Letter Code:** L-1**Commenter:** Stella Escario-Doiron – Chief of Facilities, Maintenance, Operations, Construction, and Transportation**Date:** September 1, 2021**Response to Comment L-1-1**

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses understanding of the intentions and terms of the Housing Element Update. The commenter also requests that it remain notified and be given an opportunity to comment on all future updates to the Housing Element and looks forward to working cooperatively with the City.

The City acknowledges the Saddleback Valley Unified School District's comments and looks forward to working collaboratively on any future projects.

**Chris Macon**

---

**From:** Rivers, Tamy <TamyRivers@ocfa.org>  
**Sent:** Thursday, August 26, 2021 4:31 PM  
**To:** City Hall -- City of Laguna Woods  
**Subject:** 2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE

Thank you for the opportunity to review the subject document. OCFA has no comments

L-2-1



**Tamera Rivers**

Management Analyst  
Orange County Fire Authority  
Office: 714-573-6199  
tamyrivers@ocfa.org

*In service of others!*

### Orange County Fire Authority

**Letter Code:** L-2

**Commenter:** Tamera Rivers – Management Analyst

**Date:** August 26, 2021

#### Response to Comment L-2-1

The commenter thanks the City of Laguna Woods (City) for an opportunity to comment on the new Housing Element and expresses that it has no comments to convey.

The City acknowledges Orange County Fire Authority's review of the IS/ND and looks forward to working collaboratively on any future projects.





September 16, 2021

Ms. Rebecca M. Pennington  
Development Program Analyst  
City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, CA 92637  
Email: [cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org)

**Subject: Initial Study/Negative Declaration (IS/ND) for the 2021-2029 General Plan Housing Element Update City of Laguna Woods**

Dear Ms. Pennington:

The City is in receipt of an IS/ND for the 2021-2029 General Plan Housing Element Update for the City of Laguna Woods. The draft 2021-2029 General Plan Housing Element incorporates current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments in March 2021 for the 6<sup>th</sup> Cycle Planning Period.

The draft ND examines the potential impacts generated by the proposed project in relation to the Environmental Analysis Checklist categories identified in the City of Laguna Woods' environmental document.

Staff has reviewed the project and has no comments. If you have any questions, please contact Senior Planner Justin Equina at [jequina@cityofirvine.org](mailto:jequina@cityofirvine.org) or at 949-724-6364.

Thank you for the opportunity to review the project.

Sincerely,

A handwritten signature in black ink, appearing to be 'Justin Equina'.

Justin Equina  
Senior Planner

cc: Marika Poynter, Principal Planner

**City of Irvine****Letter Code:** L-3**Commenter:** Justin Equina – Senior Planner**Date:** September 16, 2021**Response to Comment L-3-1**

The commenter thanks the City of Laguna Woods (City) for the opportunity to review the project, and acknowledges that it received and reviewed the IS/ND for the Housing Element Update and currently has no comments.

The City acknowledges the comment provided by the City of Irvine and looks forward to working collaboratively on any future projects.



September 16, 2021

Ms. Rebecca M. Pennington, Development Programs Analyst  
City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, California 92637  
Phone: (949) 639-0561  
E-mail: [cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org)

**RE: SCAG Comments on the Initial Study/Negative Declaration for the Laguna Woods 2021-2029 General Plan Housing Element Update [SCAG NO. IGR10460]**

SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
T: (213) 236-1800  
[www.scag.ca.gov](http://www.scag.ca.gov)

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Energy & Environment  
**David Pollock, Moorpark**  
  
Transportation  
**Sean Ashton, Downey**

Dear Ms. Pennington,

Thank you for submitting the Notice of Intent to Adopt a Negative Declaration for the Laguna Woods 2021-2029 General Plan Housing Element Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. The proposed project is a Housing Element Update to reflect the Regional Housing Needs Assessment for the 6th Cycle Planning Period.

L-4-1

Based on SCAG staff's review, the Initial Study/Negative Declaration (IS/ND) does not reference the most recently adopted 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). SCAG staff comments are detailed in the attachment to this letter.

L-4-2

When available, please send project related documents and notices to [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

L-4-3

Sincerely,

Frank Wen, Ph.D.  
Manager, Planning Strategy Department

**COMMENTS ON THE NOTICE OF INTENT TO ADOPT A  
NEGATIVE DECLARATION FOR THE  
LAGUNA WOODS 2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE [SCAG NO. IGR10460]**

**SUMMARY**

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies.

L-4-4

Based on SCAG staff review, the IS/ND does not reference the most recently adopted 2020 Connect SoCal. SCAG staff recommends including references to Connect SoCal as described in the following sections.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

L-4-5

### Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

L-4-6

### SCAG Staff Comments

*SCAG staff recommends that you review 2020 Connect SoCal and consider its adopted goals and policies when finalizing the proposed project.*

L-4-7

### DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

L-4-8

	Adopted SCAG Region Wide Forecasts				Adopted City of Laguna Woods Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	16,303	16,668	16,669	16,532
Households	6,333,458	6,902,821	7,170,110	7,633,451	11,415	11,439	11,418	11,513
Employment	8,695,427	9,303,627	9,566,384	10,048,822	5,762	6,415	6,642	6,809

L-4-8

#### SCAG Staff Comments

The IS/ND does not refer to Regional Growth Forecasts. SCAG staff recommends that you review the population, housing, and employment trends and forecasts based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts to recognize the city's planned growth.

L-4-9

#### REGIONAL HOUSING NEEDS ALLOCATION

On March 4, 2021 SCAG's Regional Council adopted the [6<sup>th</sup> cycle Final Regional Housing Needs Assessment \(RHNA\) Allocation Plan](#) which covers the planning period October 2021 through October 2029. The 6<sup>th</sup> cycle Final RHNA allocation for the applicable jurisdiction is below.

SCAG 6 <sup>th</sup> Cycle Final RHNA Allocation for City of Laguna Woods	
Income Category	RHNA Allocation (Units)
Very low income	127
Low income	136
Moderate income	192
Above moderate income	542
Total RHNA Allocation	997

Sixth cycle housing elements are due to the California Department of Housing and Community Development (HCD) by October 15, 2021. SCAG encourages jurisdictions to prepare the draft housing element in advance of the due date to ensure adequate time to address HCD comments and adopt a final housing element. Jurisdictions that do not have a compliant housing element may be ineligible for certain State funding and grant opportunities and may be at risk for legal action from stakeholders or HCD.

L-4-10

SCAG staff would like to call your attention to SCAG's [HELPR 2.0](#), a web-mapping tool developed by SCAG to help local jurisdictions and stakeholders understand local land use, site opportunities, and environmental sensitivities for aligning housing planning with the state Department of Housing and Community Development's (HCD) [6<sup>th</sup> cycle housing element requirements](#).

#### SCAG Staff Comments

Table 4.14.A: City of Laguna Woods Housing Needs Allocation (2021-2029) on page 4-38 of the IS/ND, and all references to RHNA allocation units in the Draft Housing Element that SCAG staff reviewed, refers to the correct Final RHNA Allocation numbers.

L-4-11

**ENVIRONMENTAL JUSTICE**

***SCAG Staff Comments***

*Per [Senate Bill 1000](#) (SB 1000), local jurisdictions in California with disadvantaged communities are required to develop an Environmental Justice (EJ) Element or consider EJ goals, policies, and objectives in their General Plans when updating two or more General Plan Elements. The City of Laguna Woods does not have any disadvantaged communities but if the City would like to consider environmental justice in its General Plan Update, SCAG staff recommends that you review the [Environmental Justice Technical Report](#) and the updated [Environmental Justice Toolbox](#), which is a resource document to assist local jurisdictions in developing EJ-related goals and policies regarding solutions for EJ-related community issues.*

L-4-12

## Southern California Association of Governments

**Letter Code:** L-4

**Commenter:** Southern California Association of Governments (SCAG)

**Date:** September 16, 2021

### Response to Comment L-4-1

The commenter thanks the City of Laguna Woods (City) for the opportunity to review and comment on the new Housing Element Update.

This comment is introductory and no further response is required.

### Response to Comment L-4-2

The commenter states that the IS/ND does not reference the most recently adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the 2020 Connect SoCal RTP/SCS.

Please refer to Responses to Comments L-4-5, L-4-6, and L-4-7 for responses regarding the incorporation of the SCAG RTP/SCS.

### Response to Comment L-4-3

The commenter requests that all project-related documents be sent to them electronically, and provides the reviewer's contact information.

The City acknowledges SCAG's participation in providing feedback and contact information and looks forward to continued cooperation with them in the future.

### Response to Comment L-4-4

This commenter states that their feedback is intended to assist with implementing projects that have the potential to contribute to RTP/SCS goals and align with RTP/SCS policies. This comment also states that, based on their staff's review, the IS/ND does not reference the most recently adopted 2020 Connect SoCal Plan.

As Chapter 2 of the IS/ND articulates, the draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information, with revisions incorporating current population and housing projections based on the Regional Housing Needs Assessment (RHNA) SCAG adopted in March 2021 for the 6th Cycle Planning Period. The draft Housing Element contains information and data including, but not limited to, an assessment of housing needs in Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.



Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City’s Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to take place on all of the sites. The Housing Element contains a rezoning program to accommodate Laguna Woods’ unmet housing needs; however, it does not specifically amend the City’s Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. If project-specific environmental evaluation is required, any potentially significant impacts identified with the proposed development project would be addressed through mitigation measures imposed as part of the environmental review process. Therefore, the proposed project would have no impacts related to conflicts with land use plans, policies, or regulations.

As described above, the 2021–2029 Housing Element was prepared to meet the City’s established RHNA target; however, it should be noted that the final RHNA targets for the 6th Housing Element Cycle (from 2021–2029) were not incorporated into the Connect SoCal Plan. In addition, as described above, the City has included a rezoning program in its 2021–2029 Housing Element, the implementation of which would require the amendment of the City’s Zoning Ordinance and other elements in its General Plan to allow for housing development on some of the opportunity sites. Due to these circumstances, a separate environmental study will be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Therefore, an evaluation of the proposed 2021–2029 Housing Element’s consistency with applicable goals and policies included in the Connect SoCal Plan is neither warranted nor appropriate. No changes to the Draft IS/ND have been made in response to this comment.

#### **Response to Comment L-4-5**

This comment provides additional background information regarding the recent adoption of Connect SoCal and states that goals included in Connect SoCal may be pertinent to the proposed 2021–2029 Housing Element and are meant to provide guidance for its consideration. The comment letter then provides 10 goals from the Connect SoCal Plan that the commenter notes may be relevant to the 2021–2029 Housing Element.

This comment has been noted. As stated in Response to Comment L-1-4, the inclusion of Connect SoCal Plan’s goals is neither warranted nor appropriate. Therefore, no changes to the Draft IS/ND have been made in response to this comment.

#### **Response to Comment L-4-6**

The comment states that a wide range of land use and transportation strategies are included in Chapter 3 of Connect SoCal to support the implementation of the regional SCS. These strategies are

provided as guidance for lead agencies, including local jurisdictions, when a project is under consideration.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

#### **Response to Comment L-4-7**

This comment recommends that the City review the Connect SoCal plan and consider its adopted goals and policies as part of the proposed project.

The goals and policies included in Connect SoCal have been reviewed and considered, as suggested. However, as described above in the Response to Comment L-1-5, no changes have been made to the Draft IS/ND.

#### **Response to Comment L-4-8**

The commenter describes the methodology used in the formation and development of growth forecasts in the Connect SoCal plan and includes a table with population, household, and employment growth forecasts for the SCAG region and for Laguna Woods.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

#### **Response to Comment L-4-9**

This comment expresses concern that the IS/ND does not refer to Regional Growth Forecasts and recommends that the City reviews the population, housing, and employment trends and forecasts based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts to recognize the City's planned growth.

As described in Section 4.14, Population and Housing, of the IS/ND, the proposed project would not, in and of itself, result in impacts related to population and housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program would accommodate planned regional housing growth included in the SCAG RHNA and may require subsequent project-specific environmental evaluation to determine whether it could result in potentially significant impacts. In the case where an additional environmental evaluation is required, any potentially significant impacts identified with the proposed development project would be addressed through compliance with applicable adopted development guidelines/standards and mitigation measures specific to any potentially significant impacts, imposed as part of the environmental review process. Therefore, the proposed project would not induce substantial unplanned population growth. The inclusion of the population, housing, and employment trends and forecasts included in the recently adopted Connect SoCal Regional Growth Forecasts would not affect the analysis or conclusions of

the Draft IS/ND. Therefore, these growth forecasts were not included. No changes to the Draft IS/ND have been made in response to this comment.

**Response to Comment L-4-10**

The commenter cites the 6th Cycle RHNA Allocation Plan for the City of Laguna Woods and calls the City's attention to HELPR 2.0, a tool intended to help jurisdictions and stakeholder understand local land use, site opportunities, and environmental sensitivities for aligning housing with the California Department of Housing and Community Development's (HCD) 6th Cycle housing element requirements.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. The City acknowledges this new tool and appreciates SCAG's efforts to provide assistance and support to local jurisdictions within its region to meet HCD housing element requirements.

**Response to Comment L-4-11**

This comment states that Table 4.14.A on page 4-38 of the IS/ND references the correct Final RHNA Allocation numbers.

This comment has been noted. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/ND. No further response is required.

**Response to Comment L-4-12**

The commenter recommends that the City review the Environmental Justice Technical Report and the updated Environmental Justice Toolbox, which are resources to assist local jurisdictions in developing environmental justice-related goals and policies regarding solutions for environmental justice-related community issues.

As the commenter notes, Laguna Woods does not have any disadvantaged communities; however, the City appreciates the references to the various tools that can be used to develop environmental justice-related goals and policies.

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## 2.3 INTERESTED PARTIES

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**GABRIELENO BAND OF MISSION INDIANS - KIZH NATION**  
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

August 24, 2021

**Project Name: City of Laguna woods 2021-2029 General Plan Housing  
Element Update**

Dear Rebecca M. Pennington,

Thank you for your letter dated August 17, 2021 regarding the project above. This is to concur that we are in agreement with the General Plan Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects within this location.

I-1-1

Sincerely,

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation  
1(844)390-0787

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians.org](http://www.gabrielenoindians.org)

admin@gabrielenoindians.org

**Gabrieleno Band of Mission Indians – Kizh Nation****Letter Code:** I-1**Commenter:** Gabrieleno Band of Mission Indians – Kizh Nation**Date:** August 24, 2021**Response to Comment I-3-1**

The commenter thanks the City of Laguna Woods (City) for sending it the IS/ND regarding the Housing Element Update, and expresses that it agrees with the plan. The commenter also requests that it remain notified and given an opportunity to comment on all future projects within Laguna Woods.

The City acknowledges the comment provided by the Gabrieleno Band of Mission Indians – Kizh Nation and looks forward to working collaboratively on any future projects.



**Chris Macon**

---

**From:** Sam Dunlap <tongvatcr@gmail.com>  
**Sent:** Sunday, September 12, 2021 4:48 PM  
**To:** Chris Macon  
**Subject:** AB52 Consultation - General Plan Housing Element Update

Dear Mr. Macon

Thank you for the letter regarding the General Plan Housing Element Update. The Gabrielino Tongva Tribe would like to engage in an AB52 Consultation for the proposed project. Feel free to contact me at your earliest convenience for a meeting and time.

Sincerely,  
 Sam Dunlap  
 Cultural Resource Director  
 Gabrielleno Tongva Tribe  
 (909)262-9351

I-2-1

**Gabrielino Tongva Tribe****Letter Code:** I-2**Commenter:** Gabrielino Tongva Tribe**Date:** September 12, 2021**Response to Comment I-2-1**

The commenter thanks the City of Laguna Woods (City) for sending them information regarding the Housing Element Update. The commenter also states that they would like to engage in Assembly Bill 52 consultation for the project.

The City acknowledges the comment provided by the Gabrielino Tongva Tribe and looks forward to working collaboratively on any future projects.

## Chris Macon

**From:** Joyce Perry <kaamalam@gmail.com>  
**Sent:** Thursday, September 16, 2021 2:27 PM  
**To:** Chris Macon  
**Cc:** Rebecca Pennington  
**Subject:** Re: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California

Thank you for your response,

At this time we have no concerns.

Húu'uni 'óomaqati yáamaqati.  
 Teach peace  
 Joyce Stanfield Perry  
 Payomkawichum Kaamalam - President  
 Juaneño Band of Mission Indians, Acjachemen Nation  
 Tribal Manager, Cultural Resource Director

I-3-1

On Thu, Sep 16, 2021 at 2:19 PM Chris Macon <[CMacon@cityoflagunawoods.org](mailto:CMacon@cityoflagunawoods.org)> wrote:

Ms. Perry,

Thank you for your interest in the Laguna Woods General Plan Housing Element Update project. As stated in the Initial Study/Negative Declaration (IS/ND), the proposed project is a planning action and would not, in and of itself, result in impacts to tribal cultural resources, as it does not directly result in any physical disturbance to lands within the City. The proposed project includes the adoption of the 2021–2029 General Plan Housing Element, which is intended to address a number of housing-related issues and to ensure sufficient land capacity to meet the Regional Housing Needs Assessment (RHNA) objectives. After the State certifies the Housing Element, a separate environmental study would be required to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known.

If you would like to discuss the project further, we are happy to meet with you. Rebecca Pennington, our Development Programs Analyst, is copied to this email and is available to help schedule a meeting. Please feel free to reach out to her with possible dates and times.

Thank you again for your interest.

Best regards,

**Christopher Macon**

City Manager

City of Laguna Woods

(949) 639-0525

---

**From:** Joyce Perry <[kaamalam@gmail.com](mailto:kaamalam@gmail.com)>

**Sent:** Thursday, September 16, 2021 1:06 PM

**To:** Chris Macon <[CMacon@cityoflagunawoods.org](mailto:CMacon@cityoflagunawoods.org)>

**Subject:** Re: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California

Good Afternoon,

I am writing on behalf of the Juaneno Band of Mission Indians, Achjachemen Nation- Belardes in response to your letter pursuant to AB52 regarding the City of Laguna Woods 2021-2029 General Plan Housing Element Update. I apologize for the delay in response. We wish to consult on this matter. Can you please tell me whether the General Plan Housing element will address turbal cultural resources or mitigation measures for future ground disturbance? Thank you.

Húu'uni 'óomaqati yáamaqati.

Teach peace

Joyce Stanfield Perry

Payomkawichum Kaamalam - President

Juaneño Band of Mission Indians, Acjachemen Nation

Tribal Manager, Cultural Resource Director

On Wed, Aug 11, 2021 at 3:55 PM Chris Macon <[CMacon@cityoflagunawoods.org](mailto:CMacon@cityoflagunawoods.org)> wrote:

*(This letter is also being mailed to the address listed below.)*

August 11, 2021

Juaneno Band of Mission Indians Acjachemen Nation - Belardes

Matias Belardes, Chairperson

32161 Avenida Los Amigos

San Juan Capistrano, CA 92675

ALSO VIA EMAIL [kaamalam@gmail.com](mailto:kaamalam@gmail.com)

**Subject: Project Notification and Invitation to Consult under Assembly Bill 52 for the City of Laguna Woods 2021-2029 General Plan Housing Element Update in Laguna Woods, Orange County, California**

Dear Chairperson Belardes:

Please consider this letter as formal notification of a proposed project as required under the California Environmental Quality Act, specifically Public Resources Code (PRC) Section 21080.3.1 and Chapter 532 Statutes of 2014 (i.e., Assembly Bill [AB] 52). Pursuant to PRC Section 21080.3.1(d), you normally have 30 days from receipt of this letter to respond in writing if you would like to consult on this project. However, per AB 1561, you have an additional 30 days to request consultation under AB 52 for the proposed project. As such, please respond in writing within 60 days of receipt of this letter if you would like to consult on the project. If you do not wish to consult for the proposed project, a written response indicating your declination to consult would be appreciated. Please provide a designated lead contact person if you have not provided that information to us already.

The proposed project (City of Laguna Woods [City] 2021-2029 General Plan Housing Element Update) includes the adoption of the 2021-2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021-2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021-2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and, the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives. The proposed project does not involve ground disturbance.

A search of the Sacred Lands Files conducted by the Native American Heritage Commission (NAHC) was positive for the presence of tribal cultural resources within the project site (City limits).

If you have any questions or concerns about the project, or if you would like to consult on the project, please contact me via email at [cmacon@cityoflagunawoods.org](mailto:cmacon@cityoflagunawoods.org) or by telephone at (949) 639-0525. You may also mail correspondence to City of Laguna Woods, Attn: Christopher Macon, 24264 El Toro Road, Laguna Woods, CA 92637.

Attachment: Figure 1 – Project Location

Sincerely,



**Christopher Macon**

City Manager

City of Laguna Woods

24264 El Toro Road, Laguna Woods, CA 92637

(949) 639-0525 | [cmacon@cityoflagunawoods.org](mailto:cmacon@cityoflagunawoods.org)

[www.cityoflagunawoods.org](http://www.cityoflagunawoods.org)

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### Juaneño Band of Mission Indians – Acjachemen Nation

**Letter Code:** I-3

**Commenter:** Juaneño Band of Mission Indians – Acjachemen Nation

**Date:** September 16, 2021

#### Response to Comment I-3-1

The commenter thanks the City of Laguna Woods (City) for sending them information regarding the Housing Element Update and whether it will address tribal cultural resources or mitigation measures for future ground disturbance. The commenter also states that they currently have no concerns.

The City acknowledges the comment provided by the Juaneño Band of Mission Indians – Acjachemen Nation and looks forward to working collaboratively on any future projects.

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## **APPENDIX A**

### **DRAFT INITIAL STUDY/NEGATIVE DECLARATION**

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# **CITY OF LAGUNA WOODS** **2021-2029 GENERAL PLAN** **HOUSING ELEMENT UPDATE** *Draft Initial Study/Negative Declaration*



**City of Laguna Woods**

***August 2021***

*Prepared by:*

**LSA**

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**DRAFT**

**INITIAL STUDY/  
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE  
CITY OF LAGUNA WOODS**



August 2021

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**DRAFT**

**INITIAL STUDY/  
NEGATIVE DECLARATION**

**2021–2029 GENERAL PLAN HOUSING ELEMENT UPDATE  
CITY OF LAGUNA WOODS**

Submitted to:

City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, California 92637

Prepared by:

LSA  
20 Executive Park, Suite 200  
Irvine, California 92614  
(949) 553-0666  
Project No. LWD2101



August 2021

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## LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADU	accessory dwelling unit
APN(s)	Assessor's Parcel Number(s)
BMPs	Best Management Practices
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen Code	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board's
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
City	City of Laguna Woods
DOC	California Department of Conservation
ETWD	El Toro Water District
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FIRM	Flood Insurance Rate Map
FRAP	Fire and Resources Assessment Program
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
I-5	Interstate 5
IS/ND	Initial Study/Negative Declaration
Leisure World	(now known as) Laguna Woods Village
LRA	Local Responsibility Area
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
NCCP/HCP	Natural Community Conservation Plan/Habitat Conservation Plan

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NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NPDES	National Pollutant Discharge Elimination System
OCFA	Orange County Fire Authority
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
PRC	Public Resources Code
proposed project	City of Laguna Woods 2021–2029 General Plan Housing Element Update
RHNA	Regional Housing Needs Assessment
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SFHA	Special Flood Hazard Area
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SOCWA	South Orange County Wastewater Authority
SR-73	State Route 73
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
USPS	United States Postal Service
VHFHSZ	very high fire hazard severity zones
VMT	vehicle miles traveled

## 1.0 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study/Negative Declaration (IS/ND) has been prepared for the proposed City of Laguna Woods 2021–2029 General Plan Housing Element Update (proposed project) in Laguna Woods, Orange County, California. Consistent with *State CEQA Guidelines* Section 15071 and in accordance with the City of Laguna Woods’ (City) Local CEQA Procedures, this IS/ND includes a description of the proposed project, an evaluation of the potential environmental impacts, and findings from the environmental analysis.

This IS/ND evaluates the potential environmental impacts that may result from implementation of the proposed project. The City is the Lead Agency under CEQA and is responsible for adoption of the IS/ND and approval of the project.

### 1.1 CONTACT PERSON

Any questions or comments regarding the preparation of this IS/ND, its assumptions, or its conclusions should be directed as follows:

**Address Comments to:**

Rebecca M. Pennington, Development Programs Analyst  
City of Laguna Woods  
24264 El Toro Road  
Laguna Woods, CA 92637

OR

[cityhall@cityoflagunawoods.org](mailto:cityhall@cityoflagunawoods.org)  
(reference “Housing Element Update”)

**Questions May be Directed to:**

Rebecca M. Pennington, Development Programs Analyst  
Telephone: (949) 639-0561

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## 2.0 PROJECT DESCRIPTION

This section describes the proposed project that is evaluated in this IS/ND. A description of the proposed project's location, objectives, and required approvals is provided below.

### 2.1 PROJECT OVERVIEW

The proposed project includes the adoption of the 2021–2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments (SCAG) in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021–2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.

### 2.2 PROJECT LOCATION AND EXISTING ENVIRONMENTAL SETTING

#### 2.2.1 Regional Location

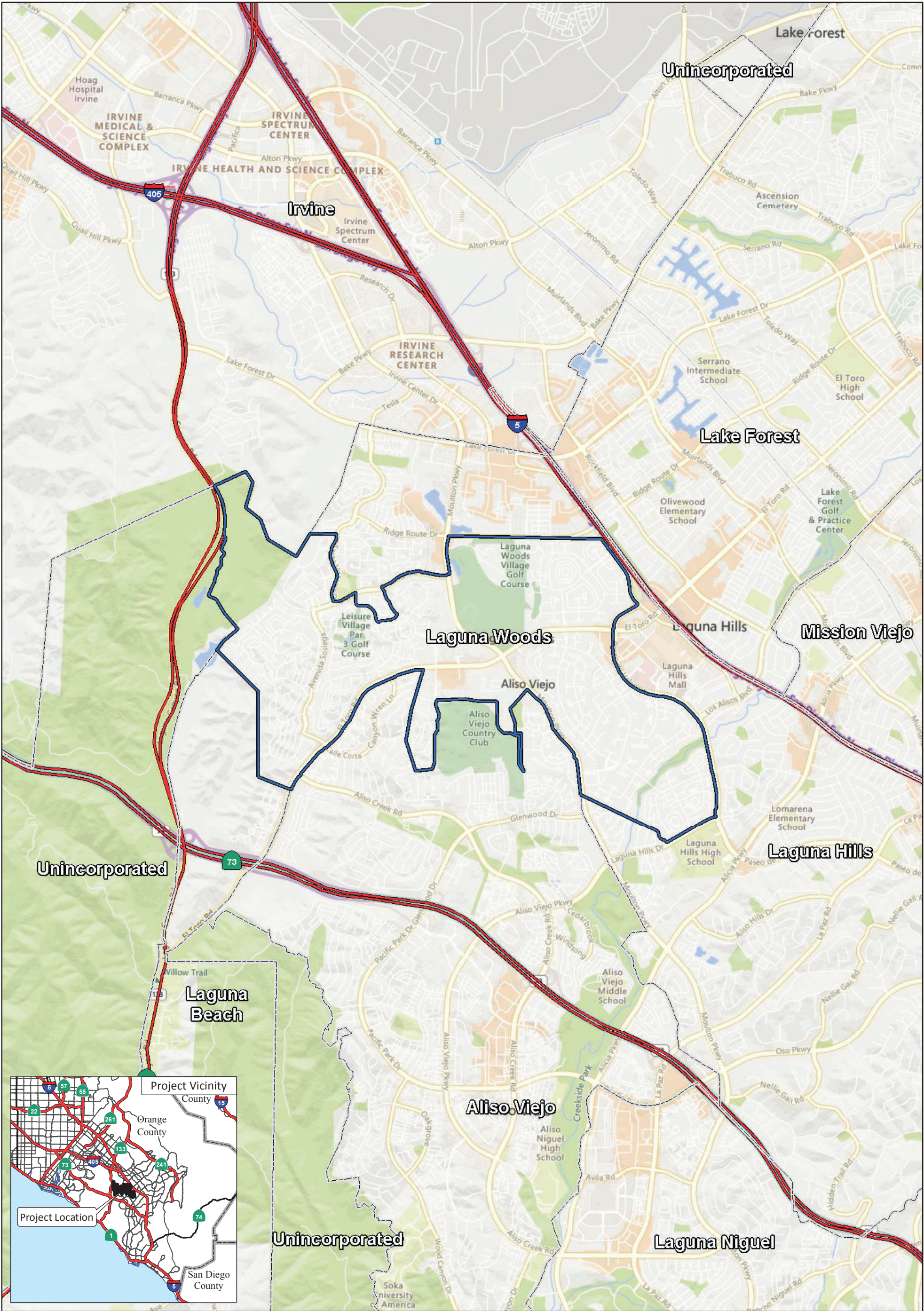
The city of Laguna Woods is located in southern Orange County within Southern California. As shown in Figure 2.1, Regional Location, the city of Laguna Woods is bordered on the north, east, and southeast by the city of Laguna Hills, on the northwest by the city of Irvine, on the west by unincorporated Orange County and the city of Laguna Beach, and on the south by the city of Aliso Viejo. According to the United States Census Bureau, the city of Laguna Woods has a total area of 3.3 square miles. Regional access is provided via Interstate 5 (I-5) and State Route 73 (SR-73).

#### 2.2.2 Existing Project Area Conditions

Laguna Woods began as a retirement community with the development of Leisure World (now known as Laguna Woods Village) in the 1960s. Due to this, Laguna Woods is unique in that nearly all of its existing residential uses are predominantly age-restricted for adults aged 55 years and older. Of the 13,386 dwelling units in Laguna Woods, 12,736 are located in the gated community of Laguna Woods Village, which occupies approximately 80 percent of Laguna Woods' total land area. Four other residential communities (Las Palmas, The Regency, San Sebastian, and Whispering Fountains) provide an additional 650 dwelling units.

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The majority of commercial and institutional uses in Laguna Woods are situated along El Toro Road and Moulton Parkway within four-tenths of a mile of this intersection. Two smaller retail nodes are located at the El Toro Road and Paseo de Valencia intersection and at the Moulton Parkway and Ridge Route Drive intersection. The City is now almost completely built out and contains very limited undeveloped land.

## **2.3 PROJECT DESCRIPTION**

The proposed project evaluated in this IS/ND includes the adoption of the 2021–2029 General Plan Housing Element. The project is described in greater detail below.

### **2.3.1 Project Background**

State law requires a Housing Element as a mandatory component of a jurisdiction's General Plan and requires that the Housing Element be revised every 8 years. Periodic updates of the Housing Element ensure that local policies and programs are responsive to changing conditions and future housing needs. State Housing Element law requires the City to analyze resources available and to quantify projected housing needs by income category. The City must demonstrate that there is available land with the appropriate densities to allow the development of affordable housing to occur, and that it has programs in place or it will develop programs that will modify any regulatory measures serving as a constraint to the development of affordable housing.

### **2.3.2 2021–2029 General Plan Housing Element**

The proposed project includes the adoption of the 2021–2029 General Plan Housing Element. Pursuant to State law, the City has prepared an update to its General Plan Housing Element covering the 6th Cycle Planning Period from October 2021–October 2029. The draft 2021–2029 General Plan Housing Element contains an analysis and update of housing and population data based on current conditions and sources of information. The revisions incorporate current population and housing projections based on the RHNA adopted by SCAG in March 2021 for the 6th Cycle Planning Period. In accordance with State Housing law, the draft 2021–2029 General Plan Housing Element contains information and data including, but not limited to, the following: an assessment of housing needs in the city of Laguna Woods; an assessment of actual and potential constraints to the provision and maintenance of affordable housing; an analysis of the City's accomplishments during the 2014–2021 General Plan Housing Element cycle; an evaluation of potential residential development based on the current General Plan and Zoning Ordinance; and, the formulation of goals, policies, and programs the City will implement to address a number of housing-related issues and to ensure sufficient land capacity to meet the RHNA objectives.

### **2.3.3 Compatibility with Zoning and Plans**

The proposed project does not propose or approve any specific development projects and, as such, does not involve ground disturbance. The proposed project acknowledges and addresses recent State legislation regarding requirements for local density bonus programs, surplus lands, accessory dwelling unit (ADU) streamlining, and removing local barriers to housing. It is not possible to predict which properties in Laguna Woods, if any, may propose and qualify for density bonus programs. The proposed project includes a policy that requires that a rezoning program be undertaken during the

early portion of the 6th Cycle Planning Period to ensure internal consistency between the various elements of the City's General Plan and its Zoning Ordinance.

#### **2.3.4 Potential Housing Sites**

All new development under the proposed project is planned for areas that are already designated for residential, commercial, or community facilities development. This IS/ND analyzes the potential environmental impacts that would be expected to result from the adoption of the proposed project.

The City has identified several sites that are candidates for future housing development. Amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the potential housing sites. Because the City's General Plan is required to be "internally consistent," meaning any and all conflicts between General Plan elements must be acknowledged and resolved, the General Plan Housing Element is required to contain a program to zone and/or rezone sites or amend the General Plan to accommodate this housing need.

Due to the various complexities that are often involved with processing a General Plan amendment and rezoning, State law provides local jurisdictions with a grace period for rezoning/amending their General Plans. Customarily, any rezoning or General Plan amendments required to ensure internal consistency should occur no later than 3 years and 120 days from the beginning of the planning period.

On July 21, 2021, the Laguna Woods City Council authorized the City Manager to submit drafts of the updated General Plan Housing Element and Housing Element Sites Inventory Form to the California Department of Housing and Community Development (HCD) for review, as required by California Government Code Section 65585. The scenario for meeting the City's RHNA housing needs allocation that was included in that submittal is described in detail below.

The environmental analysis in this IS/ND is limited to the proposed General Plan Housing Element Update. After the State certifies the General Plan Housing Element, a separate environmental study will be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including the corresponding changes in land uses and development intensities.

The City has identified 17 potential sites within Laguna Woods that appear to be viable for near-term residential development that would help the City meet its RHNA requirements. Table 2.A provides a brief description of each site and its corresponding Assessor's Parcel Numbers (APNs), along with a description of the existing uses on each site, the parcel size, and the existing zoning and General Plan land use designations on each site. The citywide locations of these 17 sites are provided in Figure 2.2, Housing Sites Key Map.

**Table 2.A: Site Descriptions**

Site	Description/APN	Existing Uses	Parcel Size (acres)	Current General Plan Land Use Designation	Current Zoning
1	Town Centre Vacant Lot (APN 616-012-29)	Undeveloped	1.8	Commercial	Community Commercial
2	Pacific Hills Calvary Chapel Parking Lot (APN 621-131-38)	Surface parking lot for the adjacent Pacific Hills Calvary Chapel in neighboring Aliso Viejo	0.696	Commercial	Professional & Administrative Office
3	Rossmoor Electric (APN 621-131-21)	Commercial use with a small number of office and storage uses	1.232	Commercial	Community Commercial
4	Saddleback Golf Cars (APN 621-131-26)	Commercial use with neighborhood electric vehicle and golf cart sales and repair	1.235	Commercial	Community Commercial
5	Laguna Woods Self Storage (APN 616-012-19)	Commercial use with approximately eight single-story structures used for individual storage	5.249	Commercial	Community Commercial
6	Animal Hospital (APN 616-012-03)	Commercial use with an animal hospital	0.76	Commercial	Community Commercial
7	PS Business Park (excludes Jack in the Box) (APN 616-021-30)	Commercial use with a self-storage facility and small shopping center	2.867	Commercial	Community Commercial
8	Smart Parke (APN 621-211-09)	Commercial use with a pet boarding facility	2.373	Commercial	Community Commercial
9	McCormick & Son Mortuary (APN 621-091-016)	Commercial use with a mortuary facility	1.411	Commercial	Community Commercial
10	Lutheran Church of the Cross (APN 616-041-01)	Church	3.028	Community Facilities	Community Facilities—Private
11	Geneva Presbyterian Church (APNs 616-191-05 & 616-191-06)	Church	3.955	Community Facilities	Community Facilities—Private
12	Saint Nicholas Catholic Church (APN 621-121-11)	Church	4.596	Community Facilities	Community Facilities—Private
13	Temple Judea (APN 621-121-18)	Temple	1.757	Community Facilities	Community Facilities—Private
14	Laguna Country United Methodist Church (APN 621-121-23)	Church	3.899	Community Facilities	Community Facilities—Private
15	Medical Building at Town Centre (APN 616-012-24)	Commercial use with office uses	2.69	Commercial	Professional & Administrative Office
16	Willow Tree Center East (APN 621-121-30)	Commercial use with retail, a restaurant, and an adult day services facility	3.095	Commercial	Community Commercial
17	Helm Medical Center (APN 621-091-15)	Commercial use with office uses	0.65	Commercial	Professional & Administrative Office

APN = Assessor's Parcel Number  
County = County of Orange

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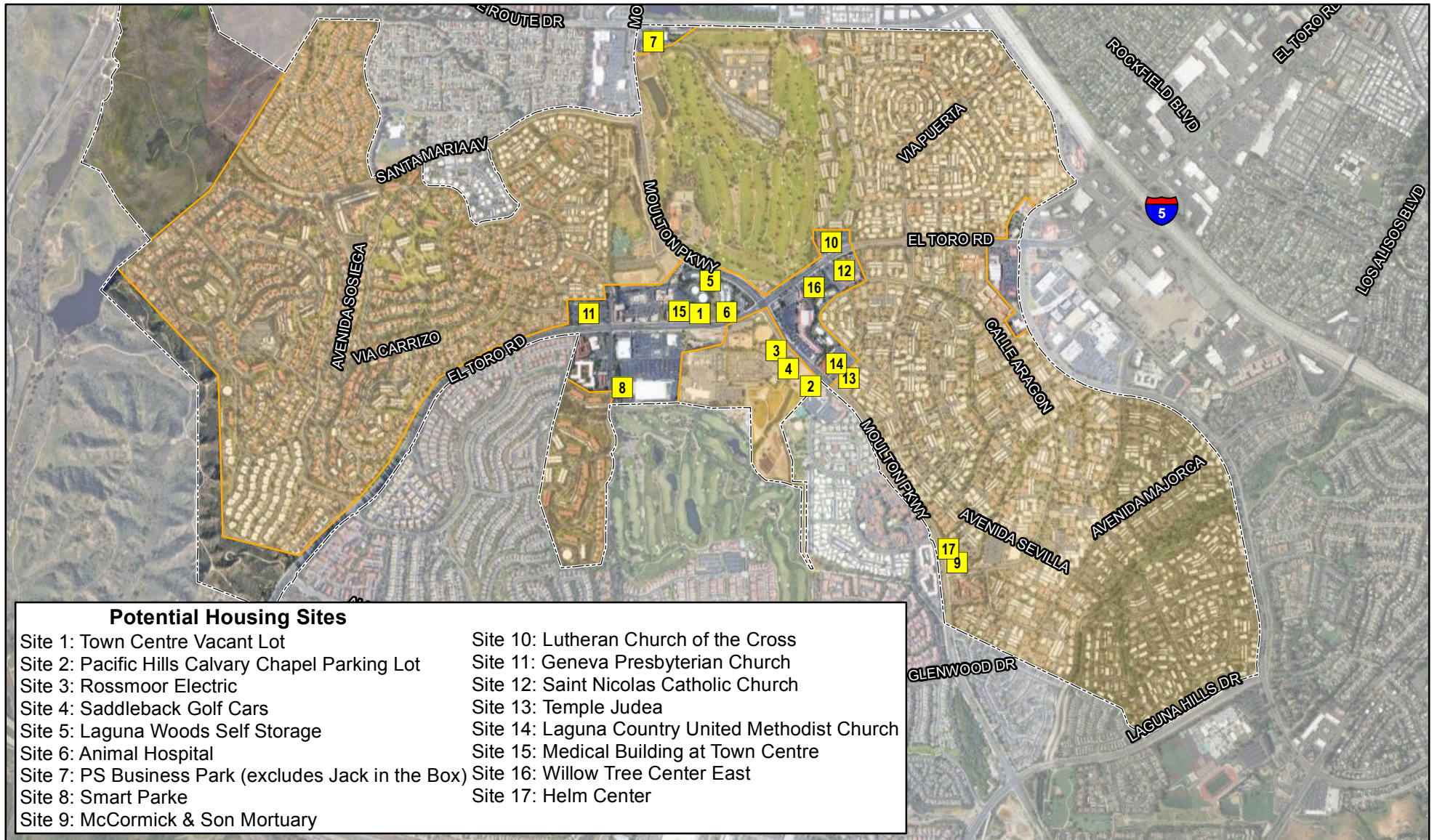


FIGURE 2.2

LSA



0 1000 2000  
FEET

SOURCE: Google Maps (2020)

I:\LWD2101\GIS\MXD\Key\_Map.mxd (8/3/2021)

LEGEND

- Potential Housing Sites (with Site ID#)
- City of Laguna Woods
- Laguna Woods Village

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As described above, the City proposes to include a rezoning program in its General Plan Housing Element to apply an appropriate residential overlay zoning district to each of the 17 potential housing sites. Such overlay zoning districts would allow new housing units to be developed on many of the sites while also allowing the existing uses to continue operating. City staff has identified five potential overlay zones, which are described in further detail in Table 2.B below. Table 2.B also describes the potential overlay zone that has been assigned to each of the 17 potential housing sites under the scenario that was authorized to be submitted to HCD for review on July 21, 2021.

**Table 2.B: Potential Overlay Zones**

Overlay Zone	Density Range	Potential Housing Sites
Residential High Density	30–50 du/ac	1–8
Residential Medium Density	20–30 du/ac	9, 14, 17
Residential Low Density	15–20 du/ac	10–13
Mixed-Use High Density	30–50 du/ac	15
Mixed-Use Low Density	15–20 du/ac	16

du/ac = dwelling unit per acre

## 2.4 DISCRETIONARY ACTIONS

Discretionary approvals required for the proposed project are outlined in Table 2.C, below, and described in the following text.

**Table 2.C: Discretionary Approvals**

Discretionary Action	Agency Responsible
Adoption of the General Plan Housing Element	Laguna Woods City Council
Adoption of this IS/ND	Laguna Woods City Council

IS/ND = Initial Study/Negative Declaration

### 2.4.1 Adoption of the General Plan Housing Element

Adoption of the General Plan Housing Element would be conducted pursuant to the City’s Municipal Code. As part of this review, the City would consider whether the proposed project is in compliance with State law (Section 65580–65589.8 of the California Government Code) requirements.

### 2.4.2 Adoption of the Final Initial Study/Negative Declaration

The Laguna Woods City Council would confirm that the Final IS/ND addresses the potential environmental effects of the proposed project, and adopt the IS/ND to satisfy CEQA requirements.

### 2.4.3 Other Public Agencies Whose Approval is Required

There are no other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement) for the proposed project. HCD reviews and determines whether the proposed General Plan Housing Element complies with State law; however, HCD approval is not required for the City’s adoption of the General Plan Housing Element or adoption of the IS/ND.

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### 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 4.0.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

#### 3.1 DETERMINATION

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Digitally signed by Christopher Macon  
Date: 2021.08.16 10:09:27 -07'00'

Date

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## 4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously

prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significant.



## 4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.1.1 Impact Analysis

#### a. *Would the project have a substantial effect on a scenic vista?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a program to zone and/or rezone sites or amend the General Plan (rezoning program) to accommodate this housing need; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. The goals and policies in the Housing Element Update would not result in any impact to scenic vistas or resources, would not degrade the visual character of Laguna Woods, and would not cause light or glare impacts beyond what has already been contemplated in the General Plan and Zoning Code. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. Future housing projects would continue to be reviewed through the City's entitlement process and in compliance with CEQA to ensure that existing views and aesthetic conditions are preserved, and that the projects are consistent with all General Plan goals, objectives, and policies. Therefore, the proposed project would have no impacts on aesthetic resources, including substantial adverse effects on scenic vistas. No mitigation is required.

*b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**No Impact.** As described above, the proposed project does not propose any direct changes to land uses, nor does it call out or approve any specific development projects. The proposed project would not result in any impact to scenic resources beyond what has already been contemplated in the General Plan and Zoning Code. As described above, the proposed project would not, in and of itself, result in impacts to scenic resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan.

After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not substantially damage scenic resources. No mitigation is required.

*c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

**No Impact.** According to the United States Census Bureau, Laguna Woods is located within the Mission Viejo—Lake Forest—San Clemente, CA Urbanized Area.<sup>1</sup> As described in the *State CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an “urbanized area” is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile.<sup>2</sup> Therefore, Laguna Woods is considered an urbanized area.

As discussed above, the proposed project does not propose any direct changes to land uses, nor does it call out or approve any specific development projects. The proposed project would not, in and of itself, result in impacts to existing visual character or quality of public views as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the

<sup>1</sup> United States Census Bureau. 2010a. Mission Viejo—Lake Forest—San Clemente, CA Urbanized Area No. 57709. Website: [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua57709\\_mission\\_viejo--lake\\_forest--san\\_clemente\\_ca/DC10UA57709\\_001.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua57709_mission_viejo--lake_forest--san_clemente_ca/DC10UA57709_001.pdf) (accessed August 2, 2021).

<sup>2</sup> United States Census Bureau. 2010b. Census Urban Area FAQs. Website: <https://www.census.gov/programs-surveys/geography/about/faq/2010-urban-area-faq.html> (accessed August 2, 2021).

implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards protecting and enhancing the City's visual character and public views. All future projects would be required to conform to all applicable development standards and design guidelines in the City's Municipal Code, General Plan, and any applicable Specific Plans, that regulate scenic quality. Therefore, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. No mitigation is required.

*d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**No Impact.** As described above, the proposed project does not propose any direct changes to land uses nor does it call out or approve any specific development projects. The proposed project would not, in and of itself, create sources of substantial light or glare that adversely affect views as it does not entitle, propose, or otherwise require the construction of new development or the rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential aesthetic-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to all applicable requirements related to light and glare, including applicable regulations of the 2019 State Building Energy Efficiency Standards (Title 24) and all applicable lighting standards in the City's Zoning Ordinance. Therefore, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. No mitigation is required.

## 4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.2.1 Impact Analysis

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to agricultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities.

There is no land within Laguna Woods zoned for agricultural uses or land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared as part of the Farmland Mapping and Monitoring Program by the California Department of Conservation. As of 2018, all land within the City was designated as "Urban and Built Up Land."<sup>1</sup> The proposed project would not convert farmland to a non-agricultural use. Therefore, no impacts to agricultural resources would occur, and no mitigation is required.

<sup>1</sup> California Department of Conservation (DOC). 2018. Orange County Important Farmland 2018 (accessed August 2, 2021).

*b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to agricultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. There is no land within Laguna Woods zoned for agricultural uses. The proposed project would not affect Williamson Act contract lands because there is no land under a Williamson Act Contract within Laguna Woods.<sup>1</sup> The proposed project would not convert farmland to a non-agricultural use. Therefore, no impacts to agricultural use or a Williamson Act contract would occur, and no mitigation is required.

*c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to timber land or forest land, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Additionally, there is no land zoned as forest land or timberland within Laguna Woods, and forest land and timberland do not exist within the City. The proposed project would not convert forest land to non-forest use. Therefore, no impacts to forest land or timberland would occur, and no mitigation is required.

*d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?*

**No Impact.** As stated in the response under Threshold 4.2(c) above, the proposed project would not contribute to environmental changes that could result in conversion of forest land to a non-forest use. Therefore, no impacts to forest land would occur, and no mitigation is required.

*e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

**No Impact.** Laguna Woods does not contain land used for agricultural production and does not contain any forest land. In addition, the City has not designated any land within Laguna Woods for any type of agricultural production. The proposed project would not, in and of itself, result in changes in the existing environment that could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Therefore, no impacts to farmland or forest land would occur, and no mitigation is required.

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<sup>1</sup> California DOC. 2017. Division of Land Resource Protection. State of California Williamson Act Contract Land Website: <https://www.conservation.ca.gov/dlrp/wa> (accessed August 2, 2021).

### 4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 4.3.1 Impact Analysis

##### *a. Would the project conflict with or obstruct implementation of the applicable air quality plan?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. The proposed project would not conflict with or obstruct the implementation of the air quality plans prepared by the South Coast Air Quality Management District (SCAQMD) to attain State and national air quality standards, or violate any air quality standard. Future housing projects would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal air quality standards and consistency with the goals, policies, and standards established within the other elements of the General Plan that are intended to protect air quality. As such, the proposed project would result in no impacts related to a conflict or obstruction of implementation of applicable air quality plans. No mitigation is required.

- b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

**No Impact.** As described above, the proposed project would not, in and of itself, result in impacts to air quality as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential air quality-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would result in no impacts related to a cumulatively considerable net increase of any criteria pollutant. No mitigation is required.

- c. Would the project expose sensitive receptors to substantial pollutant concentrations?*

**No Impact.** The proposed project would not, in and of itself, expose sensitive receptors to substantial pollutant concentrations, as it does not propose any development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential air quality-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers would be subject to localized significance thresholds determined by the SCAQMD for South Orange County. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. No mitigation is required.

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

**No Impact.** As described above, the proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The proposed project would not, in and of itself, produce pollutants or odors as it does not propose any development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any potential impacts would be potentially significant. Potential odor-related impacts are location- and project-specific and often cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards including SCAQMD Rule 402 to prevent occurrences of public nuisances. SCAQMD Rule 402 regarding nuisances states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the

public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” Any impacts identified with future development allowable under the rezoning program would be addressed through compliance with SCAQMD Rule 402. Therefore, the proposed project would not result in other emissions or objectionable odors adversely affecting a substantial number of people. No mitigation is required.



## 4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.4.1 Impact Analysis

*a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

**No Impact.** The City's General Plan Conservation Element addresses the long-range conservation, preservation, and enhancement of Laguna Woods' open space and natural environment. The proposed project would not, in and of itself, result in impacts to biological habitats as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After

the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.

*b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

**No Impact.** As described above, the proposed project would not, in and of itself, result in impacts to riparian habitats or other sensitive natural communities as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No mitigation is required.

*c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

**No Impact.** As described above, the proposed project would not result in any adverse impacts to biological resources. The proposed project would not, in and of itself, result in impacts to State or federally protected wetlands as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts to State or federally protected wetlands would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not have a substantial adverse effect on State or federally protected wetlands. No mitigation is required.

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

**No Impact.** As described above, the proposed project would not result in any adverse impacts to biological resources. The proposed project would not, in and of itself, result in impacts to the movement of any native resident or migratory fish or wildlife species as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any impacts would be potentially significant. Potential biological impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or impede the use of native wildlife nursery sites. No mitigation is required.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**No Impact.** The proposed project has been prepared to be consistent with the City's adopted local policies and ordinances protecting biological resources. Future development projects allowed under the rezoning program would be required to be consistent with local policies and ordinances. The City has Tree Maintenance and Removal Standards per Chapter 4.25 in its Municipal Code. Future development consistent with the Housing Element would be required to comply with the City's tree maintenance and removal standards. Therefore, the proposed project would have no impact related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No mitigation is required.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**No Impact.** The City is not currently participating in a Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan. The Orange County Transportation Authority's (OCTA) 2016 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) includes a Plan Area that covers the entirety of Orange County, including Laguna Woods. The City is not a party to the OCTA NCCP/HCP, and development activity within the City is not subject to the provisions of the OCTA NCCP/HCP. Therefore, the proposed project would have no impact related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No mitigation is required.

## 4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any humans remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.5.1 Impact Analysis

*a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to historical resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential impacts to historical resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the *State CEQA Guidelines*. No mitigation is required.

*b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**No Impact.** As described above, the proposed project would not result in any adverse impacts to cultural resources. The proposed project would not, in and of itself, result in impacts to archaeological resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether those projects would result in any potentially significant impacts. Potential impacts to archaeological resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development

guidelines/standards. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource. No mitigation is required.

*c. Would the project disturb any human remains, including those interred outside of formal cemeteries?*

**No Impact.** The proposed project would not, in and of itself, result in the disturbance of any human remains as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether the implementation of those projects could result in any potentially significant impacts. Potential cultural impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Additionally, all future development would be required to comply with California Health and Safety Code Section 7050.5 in the event human remains are encountered. Therefore, the proposed project would not disturb any human remains, including those interred outside of dedicated cemeteries. No mitigation is required.

## 4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.6.1 Impact Analysis

- a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?; or*

**No Impact.** The proposed project would not, in and of itself, result in impacts to energy resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential energy impacts are project-specific and cannot be assessed in a meaningful way until the specific details of a project are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards, including California Building Code (CBC) requirements. New buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen Code) requirements. Therefore, the proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No mitigation is required.

- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**No Impact.** Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any impacts that could be potentially significant. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Future housing development facilitated by the proposed project would be required to obtain permits and comply with federal, State, and local regulations aimed at reducing energy consumption. Applicable provisions of federal and State energy regulations, such as the California Energy Code Building

Energy Efficiency Standards (California Code of Regulations [CCR] Title 24, Part 6), the CALGreen Code (CCR Title 24, Part 11), and SB 743 transportation-related impact analysis requirements would also be imposed through future development permit review to minimize future energy consumption. Therefore, future development facilitated by the proposed project would be required to be consistent with applicable federal, State, and local laws, policies, and regulations related to renewable energy and energy efficiency. The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No mitigation is required.

## 4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.7.1 Impact Analysis

- a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
  - ii. *Strong seismic ground shaking?*
  - iii. *Seismic-related ground failure, including liquefaction?*
  - iv. *Landslides?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to geology and soils, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental



impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Any future housing development would continue to be required to adhere to the CBC and other standards and regulations for building designs. Impacts resulting from ground shaking, ground failure, landslides, and liquefaction hazards would be required to comply with existing codes and adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. No mitigation is required.

*b. Would the project result in substantial soil erosion or the loss of topsoil?*

**No Impact.** The proposed project would not, in and of itself, result in substantial soil erosion or the loss of topsoil, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Future housing development would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts concerning soil erosion or loss of topsoil. Short-term construction-related erosion would be addressed through compliance with the National Pollution Discharge Elimination System (NPDES) program, which requires implementation of a Storm Water Pollution Prevention Plan (SWPPP) for certain projects and Best Management Practices (BMPs) intended to reduce soil erosion. The proposed project would not result in substantial soil erosion or the loss of topsoil as no development or ground disturbance is proposed. No mitigation is required.

*c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

**No Impact.** Adoption of the proposed project would not have an impact on any soil resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Future housing development would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts caused by unstable geological units or soils and would require adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project. No mitigation is required.

*d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

**No Impact.** Adoption of the proposed project would not have an impact related to expansive soils, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Any future housing development that is facilitated by the proposed project would be subject to permits and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts caused by expansive soils and would require adherence with the recommendations of a project-specific geotechnical report, including engineered site preparation and adequate structural design. Any proposed construction would be required to implement appropriate engineering design in conformance with the recommended geotechnical standards for construction. Therefore, the proposed project would not create direct or indirect substantial risks to life or property as a result of expansive soils. No mitigation is required.

*e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

**No Impact.** Adoption of the proposed project would not have an impact related to the use of septic tanks or alternative wastewater disposal systems, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. As described above, future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. However, any future housing development that is facilitated by the proposed project would be in areas served by a sanitary sewer system and would therefore not use septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur, and no mitigation is required.

*f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

**No Impact.** Adoption of the proposed project would not have an impact on any unique paleontological resources or unique geologic features, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential impacts to paleontological resources are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. Future housing development facilitated by the proposed project would be subject to permits

and required to adhere to all federal, State, and local requirements for avoiding and minimizing impacts to paleontological resources. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. No mitigation is required.

## 4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.8.1 Impact Analysis

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or*

**No Impact.** The proposed project would not, in and of itself, result in the emission of greenhouse gases (GHG) as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not actually amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts. While future projects would emit GHGs, existing regulations and standards that would apply to any future residential development would significantly reduce GHG emissions associated with future projects. Potential GHG-related impacts cannot be assessed in a meaningful way until specific details regarding the type and location of a project are known. At such time that a future housing development proposal is considered, it would be subject to adopted development guidelines/standards. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. No mitigation is required.

- b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

**No Impact.** The proposed project would not, in and of itself, result in the emission of GHGs as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. The City has not adopted a GHG reduction plan. In addition, the City has not completed the GHG inventory, benchmarking, and goal-setting process required to identify a reduction target and to take advantage of the streamlining provisions contained in the *State CEQA Guidelines* amendments adopted for SB 97. Since no other local or regional climate

action plan is in place, future projects may be assessed for their consistency with the California Air Resources Board's (CARB) adopted Scoping Plan.<sup>1</sup> This would be achieved with an assessment of a project's compliance with the elements of the Scoping Plan. In addition, future projects would be required to comply with CCR Title 24 regarding energy conservation and green-building standards. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation is required.

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<sup>1</sup> California Air Resources Board (CARB). 2017. November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. Website: [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf) (accessed August 2, 2021).

## 4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.9.1 Impact Analysis

#### a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**No Impact.** Adoption of the proposed project would not have an impact from the routine transport, use, or disposal of hazardous materials, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program would be required to comply with applicable State and federal regulations for the proper transport, use, storage, and disposal of hazardous materials and hazardous waste and may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of

a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation is required.

*b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

**No Impact.** Adoption of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development allowed under the rezoning program would be required to comply with applicable State and federal regulations for proper handling of hazardous materials and may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation is required.

*c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**No Impact.** As described above, adoption of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Any future housing development allowed under the rezoning program would need to adhere to mandatory requirements and regulations related to the emissions or handling of hazardous materials, substances, or wastes near schools to reduce the potential for impacts to schools. As a result, future housing development facilitated by the proposed project would not conflict with any State or local plan aimed at preventing emissions or handling of hazardous materials near schools. All future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts. Potential hazard-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No mitigation is required.

- d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

**No Impact.** As described above, adoption of the proposed project would not result in impacts related to hazardous materials sites, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development would require site-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts related to hazardous materials sites. At such time that a future development proposal is considered, that development project would be subject to adopted development guidelines/standards. Therefore, the proposed project would result in no impacts related to hazardous materials sites. No mitigation is required.

- e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** Adoption of the proposed project would not result in impacts related to safety hazards in the vicinity of airports, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. There are no public or private airports located within the City's limits. The closest airport to Laguna Woods is the John Wayne Airport, which is located approximately 9.5 miles northwest of the City's boundaries. Therefore, Laguna Woods is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, implementation of the proposed project would not result in a safety hazard for people residing or working in the project area. No mitigation is required.

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**No Impact.** Adoption of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. All future development allowed under the rezoning program may require site-specific environmental evaluation in order to determine whether it would result in any potentially significant impacts related to adopted emergency response plans and emergency evacuation plans. All future housing development would be required to meet the fire department and emergency personnel access requirements and therefore would not interfere with emergency response and evacuation plans. Therefore, implementation of the proposed project would not interfere with an adopted emergency response plan and/or emergency evacuation plan. No impact would occur, and no mitigation is required.

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**No Impact.** Adoption of the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, as it does not



entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future housing development allowed under the rezoning program would be located in an urban area and would not expose people or structures to a substantial risk of wildfires. Therefore, there would be no risk of loss, injury, or death involving wildland fires. No impact would occur, and no mitigation is required.

## 4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.10.1 Impact Analysis

#### a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

**No Impact.** Adoption of the proposed project would not have an impact on hydrology or water resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether any potential impacts are less than significant. Potential water-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. If a project proposes to disturb more than 1 acre of soil, the State requires that a SWPPP, which includes BMPs,

be prepared. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, and gravel bags, etc. Therefore, there would be no impacts. No mitigation is required.

*b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**No Impact.** Adoption of the proposed project would not have an impact on groundwater supplies or groundwater recharge, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. Future housing development facilitated by the proposed project would be required to incorporate features that would reduce impervious area, as feasible, and promote water infiltration. Treatment control and hydromodification management facilities would promote retention and infiltration of stormwater. Redevelopment of already developed sites requires compliance with water quality standards intended to reduce runoff, increase infiltration, and improve water quality. Increased water use would not substantially affect groundwater supplies because the El Toro Water District's (ETWD) water supply portfolio does not include groundwater.<sup>1</sup> Future housing development would be required to adhere to all federal, State, and local requirements for avoiding and minimizing construction and operations impacts to groundwater supplies. Considering these requirements, future housing development facilitated by the proposed project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable management of the local basin. Therefore, there would be no impact, and no mitigation is required.

*c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

*i. Result in substantial erosion or siltation on- or off-site;*

*Or*

*ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

*Or*

*iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

*Or*

*iv. Impede or redirect flood flows?*

<sup>1</sup> El Toro Water District (ETWD). 2021. 2020 Urban Water Management Plan. Website: <http://etwd.com/wp-content/uploads/2021/07/ETWD-2020-UWMP-FINAL-2021.06.22.pdf> (accessed July 26, 2021).

**No Impact.** Adoption of the proposed project would not have an impact on existing drainage patterns of a site or area or create or contribute runoff water, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts. Future development may be subject to site-specific environmental studies as determined by the City and would comply with applicable policies related to hydrology and water quality issues, including the requirements of the Federal Water Pollution Control Act as enforced by the State Water Resources Control Board, which requires compliance with the NPDES permit for construction runoff and long-term urban runoff. Future housing development would be required to adhere to all federal, State, and local requirements for avoiding construction and operations impacts that could substantially alter the existing drainage pattern or alter the course of a stream or river. Considering these requirements, future housing development facilitated by the proposed project would not substantially alter the existing drainage pattern of the site or area. This includes no alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. Therefore, no impacts would occur, and no mitigation is required.

*d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

**No Impact.** Laguna Woods is not located within an inundation zone of a seiche. Laguna Woods is located approximately 5 miles northeast of the Pacific Ocean and is not located within a tsunami inundation zone, according to the Orange County Tsunami Inundation Maps.<sup>1</sup> According to the City's General Plan Safety Element, portions of Laguna Woods are subject to inundation from flooding. The Federal Emergency Management Agency (FEMA) produces Flood Insurance Rate Maps (FIRM) that show the areas in the City that are subject to flooding and the risk associated with flood hazards. FIRMs are used to administer FEMA's National Flood Insurance Program (NFIP). NFIP-designated Special Flood Hazard Areas (SFHAs) comprise approximately 26 acres of the City with an additional 2,115 acres designated as either minimal or moderate risk (Zone X). Adoption of the proposed project would not result in impacts related to inundation due to flood hazard, tsunami, or seiche zones, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential flood-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impact related to the risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. No mitigation is required.

<sup>1</sup> California DOC. 2019. Orange County Tsunami Inundation Maps. Website: [https://www.conservation.ca.gov/cgs/tsunami/maps/orange\\_](https://www.conservation.ca.gov/cgs/tsunami/maps/orange_) (accessed July 26, 2021).

*e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

**No Impact.** Adoption of the proposed project would not have an impact on a water quality control plan or sustainable groundwater management plan, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. Future housing development facilitated by the proposed project would be required to incorporate features that would reduce impervious area, as feasible, and promote water infiltration. Treatment control and hydromodification management facilities would promote retention and infiltration of stormwater. Redevelopment of already developed sites requires compliance with water quality standards intended to reduce runoff, increase infiltration, and improve water quality. Increased water use would not substantially affect groundwater supplies because the ETWD's water supply portfolio does not include groundwater.<sup>1</sup> Future housing development would be required to adhere to all federal, State, and local requirements to avoid the obstruction of implementation of a water quality control plan or sustainable groundwater management plan. Considering these requirements, future housing development facilitated by the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, there would be no impact, and no mitigation is required.

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<sup>1</sup> ETWD. 2021. 2020 Urban Water Management Plan. Website: <http://etwd.com/wp-content/uploads/2021/07/ETWD-2020-UWMP-FINAL-2021.06.22.pdf> (accessed July 26, 2021).

## 4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.11.1 Impact Analysis

#### a. *Would the project physically divide an established community?*

**No Impact.** Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. The proposed project would not, in and of itself, result in the physical division of an established community, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential land use-related impacts are location- and project-specific and cannot be assessed in a meaningful way until specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impact related to the physical division of an established community. No mitigation is required.

#### b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

**No Impact.** Although the City has identified several sites that are candidates for meeting its unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning

program, including any corresponding changes in land uses and development intensities. The location and nature of development would continue to be guided by the City's General Plan and Zoning Ordinance. With implementation of the rezoning program, the proposed project would be consistent with the City's Zoning Ordinance and other elements in its General Plan. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential land use-related impacts are location- and project-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would have no impacts related to conflicts with land use plans, policies, or regulations. No mitigation is required.

## 4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.12.1 Impact Analysis

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

**No Impact.** The Surface Mining and Reclamation Act (SMARA) enacted by the California Legislature in 1975 provides guidelines to assist with classification and designation of mineral lands. These areas were designated under the basis of several geologic factors but not in regard to existing land uses and ownership. These Mineral Resource Zones (MRZs) are divided into the following four categories:

- **MRZ-1:** An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2:** An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- **MRZ-3:** An area containing mineral deposits of which their significance cannot be properly evaluated.
- **MRZ-4:** An area where information is not adequate enough to be able to assign to any other MRZ zone.

From these four categories, areas classified as MRZ-2 are considered to be of the greatest importance. Under an MRZ-2 classification, areas have been found to possess a high likelihood for the presence of a significant amount of mineral deposits. Additionally, MRZ-2 areas are designated by the State of California Mining and Geology Board as being “regionally significant.”

The entirety of Laguna Woods is shown to not contain any MRZ-2 zones or be within proximity to these areas.<sup>1</sup> There are no known mineral resources in Laguna Woods and future extraction of mineral resources is very unlikely due to the urbanized nature of the area. As indicated in the City’s

<sup>1</sup> California DOC. 1981. Division of Mines and Geology. Mineral Land Classification Map. *San Juan Capistrano and Laguna Beach* Quadrangles. Special Report 143.



General Plan Conservation Element, no mineral resources have been identified within Laguna Woods.

The proposed project would not, in and of itself, result in impacts to mineral resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. All future development allowed under the rezoning program may require subsequent project-specific environmental evaluation in order to determine whether it could result in any potentially significant impacts. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, no impacts related to the loss of availability of a known mineral resource would occur, and no mitigation is required.

*b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

**No Impact.** As stated in above, Laguna Woods is clearly shown to not be a part of a mineral resource zone containing any known valuable mineral resources, which would suggest a high unlikelihood of minerals being extracted in Laguna Woods. Additionally, the proposed project would not, in and of itself, result in impacts to mineral resources as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential mineral-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, no impact would occur, and no mitigation is required.

### 4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 4.13.1 Impact Analysis

*a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**No Impact.** Adoption of the proposed project would not result in exposure of persons to noise in excess of established standards, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential noise-related impacts are project- and location-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, there would be no impacts related to the generation of a substantial temporary or permanent increase in ambient noise levels. No mitigation is required.

*b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

**No Impact.** As described above, adoption of the proposed project would not result in the generation of excessive vibration or groundborne noise, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental

evaluation to determine whether it could result in any potentially significant impacts. Potential vibration-related impacts are project- and location-specific and cannot be assessed in a meaningful way until the specific details of a project and its location are known. At such time that a future housing development proposal is considered, it would be subject to adopted development guidelines/standards. Therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. No mitigation is required.

*c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

**No Impact.** The closest airport to Laguna Woods is the John Wayne Airport, which is located approximately 9.5 miles northwest of the City’s boundaries. Laguna Woods is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, aircraft noise would not expose people residing or working on the project site to excessive noise levels due to the proximity of a public airport. Adoption of the proposed project would not result in the exposure of people residing or working in the project area to excessive noise levels, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential noise-related impacts are location-specific and cannot be assessed until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. No mitigation is required.

#### 4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

##### 4.14.1 Impact Analysis

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**No Impact.** The proposed project includes revision of the General Plan Housing Element as required by State law. The City's housing needs allocation for the planning period between October 2021 and October 2029 was established by SCAG at 997 units divided into four income groups as shown in Table 4.14.A, below.

**Table 4.14.A: City of Laguna Woods Housing Needs Allocation (2021–2029)**

Income Level	Number of Units	Percent of Total Housing Needs Allocation
Very Low (<50% of AMI)	127	12.7%
Low (50–80% of AMI)	136	13.6%
Moderate (80–120% of AMI)	192	19.3%
Above Moderate (>120% of AMI)	542	54.4%
<b>Total</b>	<b>997</b>	<b>100%</b>

Source: SCAG. 6th Cycle Final RHNA Allocation Plan (approved by HCD on March 22, 2021).

AMI = Area Median Income

HCD = California Department of Housing and Community Development

RHNA = Regional Housing Needs Assessment

SCAG = Southern California Association of Governments

As part of the proposed project, the City has identified several sites that are candidates for meeting the City's unmet housing needs. Amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation

of the rezoning program, including any corresponding changes in land uses and development intensities.

The proposed project would not, in and of itself, result in impacts related to population and housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Future development allowed under the rezoning program would accommodate planned regional housing growth included in the SCAG RHNA. Therefore, the proposed project would not induce substantial unplanned population growth. No mitigation is required.

*b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** The proposed project would not, in and of itself, result in impacts from the displacement of people or housing, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. Therefore, no impacts related to the displacement of substantial numbers of existing people or housing would occur. No mitigation is required.

## 4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.15.1 Impact Analysis

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- i. *Fire protection?*
- ii. *Police protection?*
- iii. *Schools?*
- iv. *Parks?*
- v. *Other public facilities?*

**No Impact.** Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The proposed project would not, in and of itself, result in environmental impacts associated with the construction of new or additional facilities needed as a result of reduced public service performance objectives as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential recreation-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future housing development proposal is considered, that project would be subject to adopted development guidelines/standards. Section 11.06 of the City's Municipal Code establishes a standard of 2.5 acres of land per 1,000 residents for park and recreational purposes. Therefore, the proposed project would not result in impacts to recreational facilities. No mitigation is required.

## 4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.16.1 Impact Analysis

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

OR

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

**No Impact.** The proposed project would not, in and of itself, result in impacts to parks or recreational facilities as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element Update, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities.

Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it could result in any potentially significant impacts. Potential recreation-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a specific development proposal is considered, that project would be subject to adopted development guidelines/standards. Section 11.06 of the City's Municipal Code establishes a standard of 2.5 acres of land per 1,000 residents for park and recreational purposes. Therefore, the proposed project would not result in impacts to recreational facilities. No mitigation is required.



## 4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.17.1 Impact Analysis

a. *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

OR

b. *Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?*

**No Impact.** The proposed project is consistent with regulations to promote pedestrian and bicycle pathways, transit, and other actions to decrease Vehicle Miles Traveled (VMT) within Laguna Woods. New development would be subject to policies described in the Circulation Element of the General Plan, as well as other policies that promote reduction of VMT. Therefore, the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The proposed project would not, in and of itself, result in transportation impacts, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development.

Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Therefore, the proposed project would have no impacts related to *State CEQA Guidelines* Section 15064.3, subdivision (b). No mitigation is required.

- c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

OR

- d. Would the project result in inadequate emergency access?*

**No Impact.** As described above, the proposed project would not, in and of itself, result in geometric design hazards or inadequate emergency access, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Street designs for future roads would be required to conform to the typical street widths and design elements. The roadway design standards for the City are based on engineering standards and on evolving policies and practices regarding the City's transportation infrastructure. All street improvements within the City would be subject to the approval of the City Engineer; furthermore, these improvements would be subject to the standards of the latest adopted edition of the California Department of Transportation's (Caltrans) *Highway Design Manual*, where applicable. Long-term congestion relief resulting from implementation of the Circulation Element of the General Plan would improve emergency access throughout the City for police, fire, and emergency protection services. Therefore, no dangerous design components or inadequate emergency access would occur. Therefore, the proposed project would not result in impacts related to inadequate emergency access. No mitigation is required.

## 4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.18.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*
  - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

**No Impact.** AB 52 and CEQA Public Resources Code (PRC) Section 21080.3.1, subdivisions (b), (d), require a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The Native American Heritage Commission (NAHC) was contacted on July 15, 2021, to conduct a Sacred Lands File (SLF) search and provide a Native American Contact List for the project site pursuant to AB 52 and CEQA PRC Section 21080.3.1, subdivisions (b), (d). The NAHC responded on August 5, 2021, stating that an SLF search was completed for the project site with positive results. The NAHC

recommended that 23 Native American individuals representing the Diegueño, Gabrielino, Gabrieleno, Juaneño, Luiseño, Cupeño Luiseño, Cahuilla, and Cahuilla Luiseño groups be contacted for information regarding cultural resources that could be affected by the proposed project. These 23 individuals were contacted through letters sent via United States Postal Service (USPS) Certified Mail on August 11, 2021. As of the date of this IS/ND, no Native American tribes have requested consultation; however, the consultation process is considered open and ongoing. Any information received through tribal consultation will inform the assessment as to whether the tribes believe any tribal cultural resources are present within the project area and whether any measures are needed to reduce impacts.

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the NAHC. The NAHC was contacted on July 15, 2021, to conduct an SLF search and provide a Native American Contact List for the project site pursuant to SB 18. The NAHC responded on August 5, 2021, stating that an SLF search was completed for the project site with positive results. The NAHC recommended that 23 Native American individuals representing the Diegueño, Gabrielino, Gabrieleno, Juaneño, Luiseño, Cupeño Luiseño, Cahuilla, and Cahuilla Luiseño groups be contacted for information regarding cultural resources that could be affected by the proposed project. These 23 individuals were contacted through letters sent via USPS Certified Mail on August 11, 2021. As of the date of this IS/ND, no Native American tribes have requested consultation; however, the consultation process is considered open and ongoing. Any information received through tribal consultation will inform the assessment as to whether the tribes believe any tribal cultural resources are present within the project area and whether any measures are needed to reduce impacts.

The proposed project would not, in and of itself, result in impacts to tribal cultural resources, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. Therefore, the proposed project would have no impacts on tribal cultural resources. No mitigation is required.

## 4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.19.1 Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

**No Impact.** The proposed project would not, in and of itself, result in impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Potential utilities and services-related impacts are location-specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the proposed project would have no impact to utilities and service systems. No mitigation is required.

*b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Laguna Woods is served by the ETWD. Like many water districts in south Orange County, the ETWD is nearly 100 percent dependent on imported water to meet the water needs of its customers. The imported supply typically consists of a blend of water from the Colorado River and the Sacramento Bay Delta via the State Water Project.<sup>1</sup> The ETWD Recycling Plant services its wastewater that comes from portions of Laguna Hills, Mission Viejo, Aliso Viejo, Lake Forest, and Laguna Woods. The water is treated through a water recycling plant and is completely separate from the drinking water. The treated water is only used for irrigation purposes. Therefore, adequate water supply is available to accommodate the RHNA during the 2021–2029 Housing Element planning period. The proposed project would result in no impacts related to water supplies. No mitigation is required.

*c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Therefore, the proposed project would not result in impacts related to the provision of wastewater treatment services. No mitigation is required.

*d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed

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<sup>1</sup> ETWD. About Us. Water Recycling Plant. Website: <https://etwd.com/water-recycling-plant/> (accessed August 2, 2021)

under the rezoning program may require subsequent project-specific environmental evaluation. Future housing development allowed under the rezoning program would be required to adhere to all federal, State, and local requirements for solid waste reduction and recycling. Considering these requirements, the proposed project would not result in any impacts related to the generation of solid waste in excess of State or local standards, or in excess of local infrastructure's capacity. Therefore the proposed project would have no impact on planned solid waste capacity, and no mitigation is required.

*e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation. Solid waste disposal practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations ensuring that landfill operations minimize impacts to public health and safety and the environment. The California Integrated Waste Management Act (AB 939) changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting). The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995, 50 percent by 2000, and 75 percent by 2020. The City provides curbside recycling for both residential and commercial uses, as well as curbside residential green waste, which both count toward the City's solid waste diversion rate. CalRecycle tracks and monitors solid waste disposal on a per capita basis. Future projects allowed under the rezoning program would be required to comply with the City's Construction and Demolition Ordinance (City Ordinance No. 12-05). As stipulated by City Ordinance No. 12-05 and the CALGreen Code, the future projects would be required to divert a minimum of 65 percent of construction and demolition debris in order to obtain building permits. Future projects would be required to comply with existing and future statutes and regulations, including waste diversion programs mandated by City, State, and federal law. Therefore, the proposed project would not result in an impact related to federal, State, and local statutes and regulations related to solid wastes, and no mitigation is required.

## 4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.20.1 Impact Analysis

- Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**No Impact.** The proposed project would not, in and of itself, result in impacts related to wildfires, as it does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Although the City has identified several sites that are candidates for meeting the City's unmet housing needs, amendments to the City's Zoning Ordinance and other elements in its General Plan would be required to allow for housing development to occur on all of the sites. The Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in the General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the



implementation of the rezoning program, including any corresponding changes in land uses and development intensities. Future development allowed under the rezoning program may require subsequent project-specific environmental evaluation to determine whether it would result in any potentially significant impacts.

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in the State through its Fire and Resources Assessment Program (FRAP). These maps place areas of California into different fire hazard severity zones (FHSZ), based on a hazard scoring system using subjective criteria for fuels, fire history, terrain influences, housing densities, and occurrence of severe fire weather where urban conflagration could result in catastrophic losses. As part of this mapping system, CAL FIRE is responsible for wildland fire protection for land areas that are generally unincorporated and they are classified as State Responsibility Areas (SRAs). In areas where local fire protection agencies (e.g., Orange County Fire Authority [OCFA]) are responsible for wildfire protection, the lands are classified as Local Responsibility Areas (LRAs). CAL FIRE currently identifies all of Laguna Woods as an LRA.

In addition to establishing local or State responsibility for wildfire protection in a specific area, CAL FIRE designates areas as very high fire hazard severity zones (VHFHSZ) or non-VHFHSZ. According to the CAL FIRE Very High Fire Hazard Severity Zone Maps for the Orange County region, the majority of Laguna Woods is designated as a non-VHFHSZ, while the southwestern corner of the City is designated VHFHSZ.<sup>1</sup> All future development would require project-specific environmental evaluation in order to determine that any potential impacts are less than significant. Potential wildfire-related impacts are locations specific and cannot be assessed in a meaningful way until the location of a project site and scope of development are known. At such time that a future development proposal is considered, that project would be subject to adopted development guidelines/standards. Therefore, the project would result in less than significant impacts related to wildfire. No mitigation is required.

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<sup>1</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in LRA. Website: [https://osfm.fire.ca.gov/media/5887/c30\\_lagunawoods\\_vhfhsz.pdf](https://osfm.fire.ca.gov/media/5887/c30_lagunawoods_vhfhsz.pdf) (accessed July 26, 2021).

## 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 4.21.1 Impact Analysis

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

**No Impact.** As described throughout Section 4.4, Biological Resources, Section 4.5, Cultural Resources, Section 4.7, Geology and Soils, and Section 4.18, Tribal Cultural Resources, the analysis indicates that the proposed project does not have the potential to degrade the quality of the environment, substantially reduce fish or wildlife habitats, impact wildlife populations or ranges, or eliminate historical, archaeological, or paleontological resources. As described throughout the analysis, the Housing Element contains a rezoning program to accommodate the City's unmet housing needs; however, it does not specifically amend the City's Zoning Ordinance or other elements in its General Plan. After the State certifies the General Plan Housing Element, a separate environmental study would be necessary to analyze the environmental impacts associated with the implementation of the rezoning program, including any corresponding changes in land uses and development intensities. The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development. Development projects would continue to be subject to existing requirements for project-level review. For the reasons stated above, the proposed project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or

animal, or eliminate important examples of the major periods of California history or prehistory. No mitigation is required.

*b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

**No Impact.** The proposed project does not entitle, propose, or otherwise require the construction of new development or rehabilitation of existing development that could contribute to short-term or long-term cumulative impacts that have not previously been contemplated by the General Plan and Zoning Code, which would continue to guide the location and nature of future development in Laguna Woods. Therefore, the proposed project would not have cumulatively considerable impacts. No mitigation is required.

*c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

**No Impact.** As indicated throughout the analysis, the proposed project would have no adverse impacts on people or the environment. The proposed project would not create environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. The proposed project would facilitate future development to the City's housing stock providing increased housing development opportunities for all income levels. Therefore, the proposed project would not have environmental effects that would cause substantial adverse effects on human beings. No mitigation is required.

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