

October 2023 | Initial Study / Mitigated Negative Declaration

# OXFORD PREPARATORY ACADEMY EXPANSION PROJECT

Saddleback Valley Unified School District

*Prepared for:*

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## Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
AQMD	Air Quality Management District
AQMP	air quality management plan
CALGreen	California Green Building Standards Code
CBC	California Building Code
CDE	California Department of Education
CH <sub>4</sub>	methane
CNEL	community noise equivalent level
CO	carbon monoxide
CO <sub>2e</sub>	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DSA	Division of the State Architect
EPA	United States Environmental Protection Agency
FHSZ	fire hazard severity zone
FTA	Federal Transit Administration
GHG	greenhouse gases
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
MRZ	Mineral Resources Zones
MWDOC	Municipal Water District of Orange County
NO <sub>x</sub>	nitrogen oxides
O <sub>3</sub>	ozone
OPA	Oxford Preparatory Academy–Saddleback Valley
PM	particulate matter
ppm	parts per million
PPV	peak particle velocity
RCNM	Roadway Construction Noise Model
RPS	renewable portfolio standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy

## Abbreviations and Acronyms

SB	Senate Bill
SCAG	Southern California Association of Governments
SoCAB	South Coast Air Basin
SO <sub>x</sub>	sulfur oxides
SRA	source receptor area (air quality)
SRA	state responsibility area (wildfire)
USFWS	United States Fish and Wildlife Service
UWMP	urban water management plan
VdB	velocity decibels (vibration)
VMT	vehicle miles traveled
VOC	volatile organic compound



# 1. Introduction

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## 1.1 PROJECT OVERVIEW

The Saddleback Valley Unified School District (District) plans to add 16 relocatable classrooms and a restroom building at the Oxford Preparatory Academy–Saddleback Valley (OPA) site, to support 7th and 8th graders at the school. The school currently serves grades TK-6 with an overall capacity of 336 students. With the addition of the new grades 7 and 8 classrooms, the school would have an overall capacity of 700 students. The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed project.

## 1.2 PURPOSE OF CEQA AND THE INITIAL STUDY

CEQA (California Environmental Quality Act; Public Resources Code Section 21000 et seq.) requires that before a lead agency<sup>1</sup> makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about and consider the project's potential environmental impacts, inform members of the public about the project's potential environmental impacts and provide them an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

Saddleback Valley Unified School District—in its capacity as lead agency pursuant to CEQA Guidelines Section 15050—is responsible for preparing environmental documentation in accordance with CEQA to determine if approval of the discretionary actions and subsequent development associated with the proposed project would have a significant impact on the environment. As part of the project's environmental review, the District authorized preparation of this Initial Study in accordance with the provisions of CEQA Guidelines Section 15063. Pursuant to Section 15063, purposes of an Initial Study are to:

- Provide the lead agency information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or negative declaration.
- Enable an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration.
- Assist in the preparation of an EIR if one is required.
- Facilitate environmental assessment early in the design of a project.

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<sup>1</sup> Pursuant to Public Resources Code Section 21067, lead agency refers to the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.

## 1. Introduction

- Provide documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine whether a previously-prepared EIR could be used with the project.

As further defined by Section 15063, an Initial Study is prepared to provide the District with information to use as the basis for determining whether an environmental impact report (EIR), Negative Declaration, or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the proposed project.

In its preparation of this Initial Study, the District determined that the Initial Study supports the adoption of an MND. An MND is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and therefore does not require preparation of an EIR (CEQA Guidelines Section 15371). The CEQA Guidelines require preparation of an MND if the Initial Study prepared for a project identifies potentially significant effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the Lead Agency, that the project may have a significant effect on the environment (CEQA Guidelines Section 15070[b]).

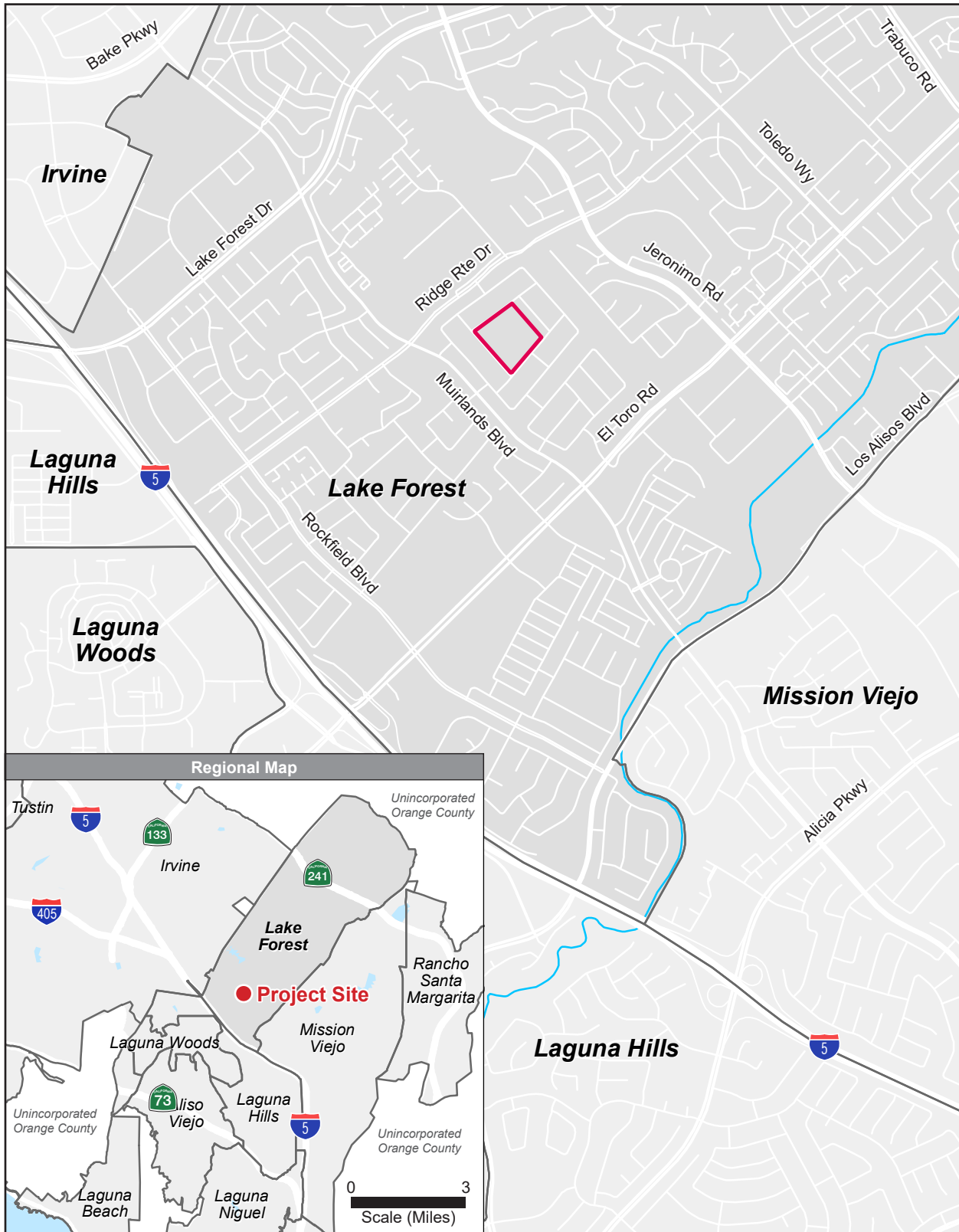
The District has considered the information in this Initial Study in its decision-making processes. Although the Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the District.

## 1.3 ENVIRONMENTAL SETTING

### 1.3.1 Project Location

The approximately 9.7-acre project site encompasses the OPA property at 22882 Loumont Dr., Lake Forest, CA, 92630. The project site consists of Assessor's Parcel Number (APN) 617-151-09. The City of Lake Forest is an incorporated city in southern Orange County and is surrounded by Mission Viejo on the east, Irvine on the west, and Laguna Woods and Laguna Hills on the south. The Cleveland National Forest in unincorporated Orange County lies immediately north of Lake Forest. Figure 1, *Regional and Local Vicinity Map*, shows the project site in its regional and local contexts. Access to the project site is from Loumont Drive to the north and Blackfoot Drive to the west, both of which can be reached by Interstate 5, approximately 1.5 miles west of the project site.

Figure 1 - Regional and Vicinity Map



- Project Boundary
- City Boundary

0 2,000  
Scale (Feet)



Source: Generated using ArcMap 2023.

## 1. Introduction

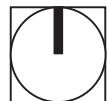
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Figure 2 - Project Site



— Project Boundary

0 230  
Scale (Feet)



Source: Nearmap 2023.

## 1. Introduction

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## 1. Introduction

### **Circulation**

The parking lot and student drop off area can be entered from Blackfoot Drive and exit onto Loumont Drive. The parking lot has a capacity of 40 parked vehicles.

#### **1.3.1.2 PROGRAMS**

OPA is one of three schools in the Oxford Preparatory Academy system. They are charter schools in the Saddleback Valley Unified School District. The district has 35 other schools. OPA offers grades TK-6, currently with 336 students. The school serves students from Orange County, with priority given to those residing in the District.

### **1.3.2 Surrounding Land Use**

The project is surrounded by residential uses, with single-family residential directly east and across the streets, Dune Mear Road to the south, and Coleford Street to the east. Lake Forest Planned Community with multifamily homes is north across Loumont Drive and west across Blackfoot Drive (see Figure 2, *Project Site*). Further from the project site, the area is primarily residential uses with some commercial uses along Muirlands Boulevard. El Toro High School is approximately 1.3 miles away from the project site.

### **1.3.3 Existing Zoning and General Plan Land Use Designations**

The City of Lake Forest General Plan designation for the project site is Public Facility (Lake Forest 2020). The project site is zoned as a Single-Family Residential Zone (R1) (Lake Forest 2023b). The surrounding areas are designated Low-Density Residential and zoned R1 and Medium Density Residential (MDR). The MDR zones to the north and west of the project are in the Lake Forest Planned Community.

## **1.4 PROJECT DESCRIPTION**

### **1.4.1 Proposed Project**

The District plans to add 16 new relocatable classrooms at the OPA site—eight classrooms for 7th-grade students and eight for 8th-grade students. A restroom will be added adjacent to the 7th-grade classrooms to serve the 16 new classrooms. Two paved courtyards will be between each building section—the east courtyard used as the 7th-grade court and the west courtyard used as the 8th grade court. The 16 new relocatable classrooms will be added to the southern part of the project site and south of the current buildings on a 0.60-acre disturbed area (see Figure 3, *Site Plan*).

#### **1.4.1.1 ACCESS AND CIRCULATION**

The project would not affect the parking lot or existing student drop-off area. The existing student drop-off will remain in the northeast section of the project adjacent to Blackfoot Drive and Loumont Drive.

## 1. Introduction

### 1.4.1.2 STUDENT ENROLLMENT

The current student enrollment in TK-6 is 363. The proposed project would increase overall capacity of the school to 700 students and would include grades TK-8.

### 1.4.1.3 PROJECT PHASING

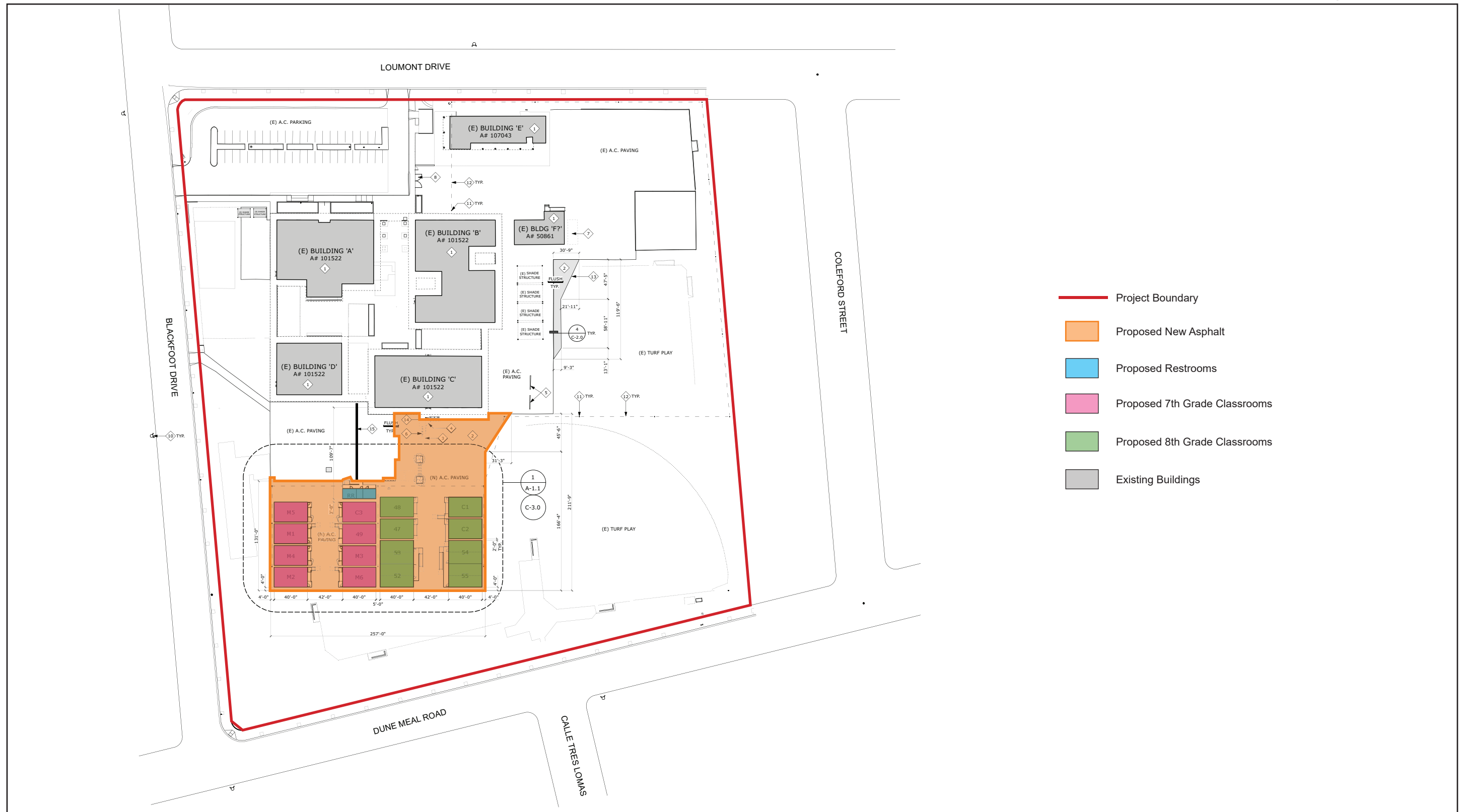
The project would occur in one phase. The project is preliminarily scheduled to begin in June 2023 upon necessary approvals and to be completed by August 2023.

## 1.5 DISCRETIONARY ACTION REQUESTED

It is anticipated that approval required for the proposed project would include, but may not be limited to:

- **City of Lake Forest Department of Transportation.** Approval of construction-related haul route.
- **California Department of General Services, Division of State Architect.** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division (CDE).** If the District is requesting matching funds from the State Allocation Board, CDE must review and approve the plans (Education Code Section 17070.50) prior to submission of a funding request.

Figure 3 - Site Plan



- Project Boundary
- Proposed New Asphalt
- Proposed Restrooms
- Proposed 7th Grade Classrooms
- Proposed 8th Grade Classrooms
- Existing Buildings

Source: PJHM Architects 2023.



## 1. Introduction

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## 2. Environmental Checklist

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### 2.1 PROJECT INFORMATION

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1. **Project Title:** Oxford Preparatory Academy Expansion Project

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2. **Lead Agency:**  
Saddleback Valley Unified School District  
25631 Peter A. Hartman Way  
Mission Viejo, CA 92691

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3. **Contact Person and Phone Number:**  
Doug Monfils  
(949) 580-3250

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4. **Project Location:**  
Oxford Preparatory Academy  
22882 Loumont Dr.  
Lake Forest, CA 92630

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5. **Project Sponsor's Name and Address:**  
Saddleback Valley Unified School District  
25631 Peter A. Hartman Way  
Mission Viejo, CA 92691

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6. **General Plan Designation:** Public Facility

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7. **Zoning:** Single Family Residential

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8. **Description of Project:**  
The District plans to add 16 new relocatable classrooms at the Oxford Preparatory Academy site.

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9. **Surrounding Land Uses and Setting:**  
The project is in a residential community designated Low Density Residential and zoned for Single-Family Residential to the east and south and Medium Density Residential to the north and west.

## 2. Environmental Checklist

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**10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):**

- City of Lake Forest
- California Department of Education, School Facilities Planning Division
- California Department of General Services, Division of State Architect

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**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Saddleback Unified School District invited 25 California Native American tribes that are traditionally and culturally affiliated with the project area to consult on the proposed project via email and certified mail, consistent with Assembly Bill 52. The letters were sent to on July 14, 2023. The District received one response from the Gabrieleno Band of Mission Indians – Kizh Nation requesting consultation. The District conducted consultation with the tribe. The District received no requests to consult from any of the other tribes contacted.

## 2. Environmental Checklist

### 2.2 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 on the following pages.

- |                                                      |                                                           |                                                                        |
|------------------------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                  | <input type="checkbox"/> Agriculture / Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input type="checkbox"/> Biological Resources        | <input checked="" type="checkbox"/> Cultural Resources    | <input type="checkbox"/> Energy                                        |
| <input checked="" type="checkbox"/> Geology/Soils    | <input type="checkbox"/> Greenhouse Gas Emissions         | <input type="checkbox"/> Hazards and 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 checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire                         | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### 2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

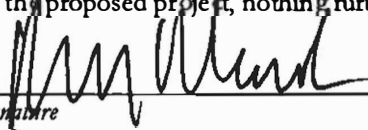
I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

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 EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

10/4/2023  
\_\_\_\_\_  
Date

## 2. Environmental Checklist

### 2.4 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 would 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.
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 Analyses 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.

## 2. Environmental Checklist

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 significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?			<b>X</b>	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				<b>X</b>
c) In nonurbanized 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 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?			<b>X</b>	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			<b>X</b>	
<b>II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</b>				
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?				<b>X</b>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				<b>X</b>
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))?				<b>X</b>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<b>X</b>

## 2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				<b>X</b>
<b>III. 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. Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?			<b>X</b>	
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?			<b>X</b>	
c) Expose sensitive receptors to substantial pollutant concentrations?			<b>X</b>	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			<b>X</b>	
<b>IV. BIOLOGICAL RESOURCES. Would the project:</b>				
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?				<b>X</b>
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?				<b>X</b>
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?				<b>X</b>
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?			<b>X</b>	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			<b>X</b>	
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?				<b>X</b>
<b>V. CULTURAL RESOURCES. Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				<b>X</b>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		<b>X</b>		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			<b>X</b>	

## 2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. ENERGY. Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			<b>X</b>	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			<b>X</b>	
<b>VII. GEOLOGY AND SOILS. Would the project:</b>				
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.			<b>X</b>	
ii) Strong seismic ground shaking?			<b>X</b>	
iii) Seismic-related ground failure, including liquefaction?				<b>X</b>
iv) Landslides?			<b>X</b>	
b) Result in substantial soil erosion or the loss of topsoil?			<b>X</b>	
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?			<b>X</b>	
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?			<b>X</b>	
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?				<b>X</b>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		<b>X</b>		
<b>VIII. GREENHOUSE GAS EMISSIONS. Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			<b>X</b>	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				<b>X</b>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			<b>X</b>	
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?			<b>X</b>	

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Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			<b>X</b>	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				<b>X</b>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?				<b>X</b>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			<b>X</b>	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				<b>X</b>
<b>X. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			<b>X</b>	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			<b>X</b>	
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:				
i) result in a substantial erosion or siltation on- or off-site;			<b>X</b>	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			<b>X</b>	
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			<b>X</b>	
iv) impede or redirect flood flows?				<b>X</b>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				<b>X</b>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				<b>X</b>
<b>XI. LAND USE AND PLANNING. Would the project:</b>				
a) Physically divide an established community?				<b>X</b>
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?				<b>X</b>

## 2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES. Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				<b>X</b>
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?				<b>X</b>
<b>XIII. NOISE. Would the project result in:</b>				
a) 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?			<b>X</b>	
b) Generation of excessive groundborne vibration or groundborne noise levels?			<b>X</b>	
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 two 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?				<b>X</b>
<b>XIV. POPULATION AND HOUSING. Would the project:</b>				
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)?				<b>X</b>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>
<b>XV. PUBLIC SERVICES. Would the project:</b>				
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:				
Fire protection?			<b>X</b>	
Police protection?			<b>X</b>	
Schools?				<b>X</b>
Parks?			<b>X</b>	
Other public facilities?				<b>X</b>
<b>XVI. RECREATION.</b>				
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?			<b>X</b>	

## 2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				<b>X</b>
<b>XVII. TRANSPORTATION. Would the project:</b>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			<b>X</b>	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			<b>X</b>	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			<b>X</b>	
d) Result in inadequate emergency access?			<b>X</b>	
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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		<b>X</b>		
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		<b>X</b>		
<b>XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			<b>X</b>	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			<b>X</b>	
c) Result in a determination by the waste water 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?			<b>X</b>	

## 2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			<b>X</b>	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			<b>X</b>	
<b>XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				<b>X</b>
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?				<b>X</b>
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?				<b>X</b>
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?				<b>X</b>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
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?		<b>X</b>		
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.)			<b>X</b>	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			<b>X</b>	

## 2. Environmental Checklist

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## 3. Environmental Analysis

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Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions in the checklist and identifies mitigation measures, if applicable.

### 3.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

**a) Have a substantial adverse effect on a scenic vista?**

**Less Than Significant Impact.** Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Lake Forest General Plan does not specify any scenic vistas in the city. Lake Forest is in an urban landscape of primarily residential and commercial buildings. The existing project site is a built-out school campus. The proposed project would include 16 classrooms on the southern portion of the site. The proposed project would be a single-story development, similar to the existing structures on the project site. This project would not create any new obstructions to the current views of the Santa Ana Mountains and foothills east of the project site or Pacific Ocean west of the project site. Therefore, impacts would be less than significant.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** The closest designated state scenic highway is a portion of State Route 91 (SR-91) approximately 20 miles north of the project site (Caltrans 2023). The closest eligible state scenic highway is SR-1 10 miles west of the project site and SR-74 12 miles south of the project site. Due to the distance and intervening structures, the proposed project would not result in impacts to scenic resources within a designated state scenic highway. No impacts would occur.

**c) In nonurbanized 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 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?**

**Less Than Significant Impact.** The project site is in an urbanized area on the existing OPA campus. Residential uses surround the project site. The proposed project would include the addition of portable classroom buildings (See Figure 3). The proposed project would be consistent with the existing zoning and General Plan land use designations on-site, and compatible with the surrounding residential character. The

### 3. Environmental Analysis

project would add buildings to the site on what is currently grass, but the locations and style of the buildings would result in a similar scenic quality to the existing school and would not significantly change the aesthetic of the site. Therefore, although project implementation would alter the visual appearance of the site, the completed project would not substantially alter the visual character and quality of the project site and surrounding area. Therefore, the impacts would be less than significant.

**d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?**

**Less Than Significant Impact.** The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the intended area to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. Existing sources of light on the project site include parking lot lights, vehicle headlights, internal and exterior building lights, and security lights.

The proposed project would add portable classroom buildings, and the lighting generated from the proposed project would be like the existing conditions. The proposed project would not substantially increase development intensity or change uses to create a significant increase in light and glare impacts. Additionally, the proposed project does not include significant nighttime lighting. The proposed project would provide lighting sources similar to the existing uses and would not adversely affect day or nighttime views in the area. Impacts would be less than significant.

### 3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?**

**No Impact.** The proposed project would add classrooms on the existing campus. The project site and surrounding area are designated Urban and Built-Up Land (DOC 2023). There are no agricultural uses on the project site, and the proposed project would not convert any specially designated farmland identified on the state's Farmland Mapping and Monitoring Program to a nonagricultural use. No impact would occur.

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**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The proposed project would add classrooms on the existing OPA campus. The proposed project would continue to serve the existing use as a school and public facility. The project site is zoned as a Single-Family Residential Zone (R1) and designated a Public Facility in the General Plan. There are no agricultural uses on-site or in the vicinity of the project site (Lake Forest 2020, 2023b). Implementation of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

**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))?**

**No Impact.** The proposed project would occur within the boundaries of the existing OPA campus. The campus is zoned Single Family Residential (R1) and does not contain any forest land or timberland zoning designation on-site or in the vicinity (Lake Forest 2023b). Implementation of the proposed project would not conflict with existing zoning for forest land or timberland. No impact would occur.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** The proposed project would occur within the boundaries of the existing OPA campus. The campus is zoned Single Family Residential (R1) and does not contain any forest land on-site or in the vicinity. Construction of the proposed project would not result in the loss or conversion of forest land. The project would remain within the boundaries of the campus. No vegetation on-site is cultivated for forest resources. No forest land would be affected by the project. No impact would occur.

**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?**

**No Impact.** Since this project is on the existing OPA campus and there is no existing farmland or forestland within the project site, no farmland or forest land would be converted to nonagricultural use or nonforest use as a result of the proposed project. There is no farmland in the vicinity that would be affected. No impact would occur.

### 3.3 AIR QUALITY

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O<sub>3</sub>), carbon monoxide (CO), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead (Pb). Areas are classified under the federal

### 3. Environmental Analysis

and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (AQMD), is designated nonattainment for O<sub>3</sub>, and PM<sub>2.5</sub> under the California and National AAQS, nonattainment for PM<sub>10</sub> under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2023).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, nitrous oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations. Would the project:

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Less Than Significant Impact.** The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of general plans, specific plans, and significant projects. Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. These demographic trends are incorporated into SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy to determine priority transportation projects and vehicle miles traveled in the SCAG region.

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and the assumptions in South Coast AQMD's AQMP. The proposed project would add 16 new relocatable classrooms at the OPA site, which would increase student capacity from 363 to 700 students. However, based on its scope and nature, buildout of the proposed project would not substantially affect housing, employment, or population projections in the region. Additionally, as demonstrated in Section 3.3(b), the regional emissions that would be generated by the operational phase of the proposed project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be less than significant.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact.** The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the proposed project.

### 3. Environmental Analysis

#### Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of VOCs from paints and asphalt.

Construction activities associated with the 16 new relocatable classrooms would disturb 0.60-acre on the project site. The project would involve site preparation, rough and fine grading, utilities trenching, building construction, and paving. Construction is anticipated to start and finish in summer 2023. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) (ver. 2022.1.1.14) and are based on the preliminary construction duration and equipment mix provided by the District.

Construction emissions modeling is shown in Table 1 and shows that maximum daily emissions for VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Therefore, air quality impacts from project-related construction activities would be less than significant.

**Table 1 Maximum Daily Regional Construction Emissions**

Construction Phase	Pollutants (lb/day) <sup>1,2</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 2023</b>						
Site Preparation and Utility Trenching	1	6	7	<1	1	<1
Site Preparation, Utility Trenching, and Rough Grading	2	19	19	<1	4	2
Rough Grading	1	13	12	<1	3	2
Fine Grading and Paving	2	18	18	<1	4	2
Building Construction	1	8	9	<1	1	<1
<b>Maximum Daily Construction Emissions</b>						
Maximum Daily Emissions	<b>2</b>	<b>19</b>	<b>19</b>	<b>&lt;1</b>	<b>4</b>	<b>2</b>
<b>South Coast AQMD Regional Construction Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.1.14

<sup>1</sup> Based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

<sup>2</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

#### Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). Implementation of the proposed project would result in 16 new relocatable classrooms at the OPA

### 3. Environmental Analysis

school campus. As described in Section 1.3.5.2, *Student Enrollment*, the proposed project would increase overall student capacity from 363 students to 700 students. Because student capacity would increase after full buildout, the proposed project would result in an increase in the long-term air pollutant emissions, and the primary source would be mobile emissions from project-generated vehicle trips.

**Table 2 Maximum Daily Regional Operational Phase Emissions**

Source	Maximum Daily Emissions (lbs/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile <sup>1</sup>	2	1	19	<1	4	1
Area	<1	<1	1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
<b>Total Emissions</b>	<b>3</b>	<b>1</b>	<b>19</b>	<b>&lt;1</b>	<b>4</b>	<b>1</b>
<b>South Coast AQMD Regional Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Regional Threshold?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.1.14. Highest winter or summer emissions are reported.

Notes: Totals may not add up to 100 percent due to rounding. lbs = pounds

<sup>1</sup> Based on trip generation data provided by Garland and Associates (see Appendix C).

As shown in Table 2, air pollutant emissions generated from operation-related activities would be less than their respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. In addition, emissions from the proposed building energy use would be minimized due to compliance with current California Building and Energy Efficiency Standards. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

#### c) Expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** The proposed project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

#### Construction LSTs

Localized significance thresholds (LST) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and source receptor area (SRA). The nearest off-site sensitive receptors are the single-family

### 3. Environmental Analysis

residences along Blackfoot Drive approximately 130 feet to the west and OPA school buildings approximately 90 feet to the north of the construction area within the project site.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD’s screening-level LSTs for sensitive receptors within 90 feet (27 meters) for NO<sub>x</sub> and CO, and within 130 feet (40 meters) for PM<sub>10</sub> and PM<sub>2.5</sub>. As shown in Table 3, construction of the proposed project would not generate construction-related on-site emissions that would exceed the screening-level LSTs. Thus, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations. Localized air quality impacts from construction activities would be less than significant.

**Table 3 Localized Construction Emissions**

Construction Activity	Pollutants(lbs/day) <sup>1</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>2</sup>	PM <sub>2.5</sub> <sup>2</sup>
<b>South Coast AQMD ≤1.00 Acre LST</b>	<b>92</b>	<b>656</b>	<b>9.26</b>	<b>4.17</b>
Site Preparation and Utility Trenching	6	7	0.81	0.33
Site Preparation, Utility Trenching, and Rough Grading	19	18	3.84	1.92
Rough Grading	13	11	3.03	1.59
Fine Grading and Paving	17	17	3.25	1.79
Building Construction	6	7	0.28	0.26
<b>Exceeds LST?</b>	No	No	No	No

Source: CalEEMod Version 2022.1.1.14. South Coast AQMD 2008 and 2023.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on 90 feet (27 meters) for NO<sub>x</sub> and Co and within 130 feet (40 meters) for PM<sub>10</sub> and PM<sub>2.5</sub> in SRA 19.

<sup>1</sup> Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

<sup>2</sup> Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

#### Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and noncancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The proposed project is anticipated to be completed in approximately one month, which would limit the exposure to on-site and off-site receptors. Furthermore, construction activities would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs. Thus, construction emissions would not pose a health risk to on-site and off-site receptors, and project-related construction health impacts would be less than significant.

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#### Operation LSTs

Operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from South Coast AQMD. The proposed project does not fall within these categories of uses. While operation of the new relocatable classroom buildings would use standard on-site mechanical equipment such as heating, ventilation, and air conditioning, air pollutant emissions would be nominal. Localized air quality impacts related to operation-related emissions would be less than significant.

#### Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2023). Based on the traffic study, the proposed project would generate an additional 249 AM and 121 PM peak-hour vehicle trips (Appendix C). Therefore, implementation of the proposed project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the proposed site. Operational impacts would be less than significant.

#### **d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less Than Significant Impact.** The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which 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. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

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The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project involves 16 new relocatable classrooms at the OPA school campus and would not fall within the objectionable odors land uses or generate odors different than what is already generated on-site. Emissions from construction equipment, such as diesel exhaust, and VOCs from paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

#### 3.4 BIOLOGICAL RESOURCES

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?**

**No Impact.** The project site is developed and includes school classrooms and buildings and paved surfaces (parking lots and playgrounds). Vegetation at the project site consists of ornamental trees and plants and grass fields. The disturbance area is currently a grass field. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site due to the frequent disturbances on-site. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the campus is very low. No impact would occur.

- 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?**

**No Impact.** The project site is developed and includes school classrooms and buildings and paved surfaces (parking lots and playgrounds). The U.S. Fish and Wildlife Service (USFWS) manages the National Wetlands Inventory, a digital wetlands mapper with current information on wetlands and riparian. A freshwater pond 0.3 mile north of the project site is the closest wetland area (USFWS 2023a). The National Wetlands Inventory indicates no riparian habitats exist on or in the vicinity of the project site (USFWS 2023a). Additionally, neither the project site nor the city of Lake Forest is within a critical habitat area (USFWS 2023b). Thus, the proposed project would not affect any riparian habitats or other sensitive natural communities. No impact would occur.

- 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?**

**No Impact.** Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. According to the USFWS's National Wetlands Inventory, there are no federally protected wetlands, including but not limited to marsh, vernal pool, and coastal

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areas, within the OPA campus or in the vicinity of Lake Forest (USFWS 2023a). The project site is developed, and there are no waterways or underdeveloped land capable of supporting federally protected wetlands. Implementation of the proposed project would not have a substantial adverse effect on any protected wetlands. No impact would occur.

**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?**

**Less Than Significant Impact.** The project site is already developed and operating as a school and is surrounded by residential uses. The ornamental vegetation on-site or nearby could be used for nesting by birds protected under the Migratory Bird Treaty Act (MBTA) (US Code Title 16, Sections 703-712), and California Fish and Game Code Sections 3503 et seq. Compliance with the MBTA requires:

- Avoid grading activities during the nesting season, February 15 to August 15.
- Or, if grading activities are to be undertaken during the nesting season, a site survey for nesting birds by a qualified biologist is required before commencement of grading activities. If nesting birds are found, the applicant would consult with the USFWS regarding means to avoid or minimize impacts to nesting birds.

Impacts would be less than significant with compliance with the MBTA. Additionally, the project site does not contain any surface water and therefore is not suitable for the movement or migration of fish. No impact would occur to native residents or migratory fish.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact.** The City of Lake Forest Tree Preservation and Landscaping Ordinance states that the removal of trees may be subject to permit conditions should the Directors of Public Works and Community Development “deem it necessary or appropriate to minimize damage to other tree or vegetation on a site”. Though no trees are proposed to be removed, should a tree need to be removed during construction, the appropriate consultations and permits would be followed, and the impacts would be less than significant.

**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?**

**No Impact.** The project site is currently a developed school campus in an urban residential area. The project site is not in a natural community conservation plan or habitat conservation plan area. The project site does not contain any sensitive biological resources. The proposed project would not affect a habitat conservation plan; natural community conservation plan; or other approved local, regional, or state conservation plans. No impact would occur.

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### 3.5 CULTURAL RESOURCES

Would the project:

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

**No Impact.** Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The proposed project would add classrooms to the existing OPA site. This campus was completed and first opened on September 6, 2016 (CDE 2023a). The campus is not listed as a historical resource in the National Register of Historic Places (NPS 2023). Additionally, OPA is not listed in the California Historical Landmarks and Points of Historical Interest, or State Historic Structures, and the proposed project would not demolish any structures that can potentially meet any of the criteria listed above (California State Parks 2023). Therefore, there are no resources on the campuses that would be considered historically significant pursuant to Section 15064.5. No impact would occur.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

**Less Than Significant Impact with Mitigation Incorporated.** Implementation of the proposed project would result in limited ground disturbance to develop the classrooms and other buildings. Earthwork associated with the proposed project would include grading, drilling holes for installation, and utility trenching. The proposed project would not disturb subterranean levels of soil and would not require extensive excavation. The proposed project would occur within the boundaries of an existing campus that has already been developed with associated structures and facilities such as classroom buildings, administration buildings, and paved courtyards; therefore, the potential for discovery of archaeological resources would be minimal. However, ground-disturbing activities from the proposed project still has potential to uncover unknown archaeological resources and could result in a potentially significant impact. Implementation of Mitigation Measure CUL-1 would ensure, in the event archaeological resources are discovered during ground-disturbing activities, that they would be recovered in accordance with state and federal requirements. If archaeological resources are discovered, all ground-disturbing activities shall halt and a qualified archeologist shall be retained to assess such

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findings. Implementation of Mitigation Measure CUL-1 would reduce impacts to archaeological resources to less than significant.

#### Mitigation Measures

CUL-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources. Archaeological resources recovered shall be offered to a repository with a retrievable collection system and an educational and research interest in the materials, or a responsible public or private institution with a suitable repository willing to and capable of accepting and housing the resource.

#### c) Disturb any human remains, including those interred outside of dedicated cemeteries?

**Less Than Significant Impact.** There are no cemeteries or known human remains at the campus, which was previously disturbed during construction of the existing school; however, limited ground-disturbing activities (i.e., grading, utility trenching, and drill holes) would have the potential to result in discovery of human remains. In the unlikely event that human remains are discovered, the District would be responsible for compliance with Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5. California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to the origin. Further, pursuant to California Public Resources Code section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to their treatment and disposition has been made. If the Orange County coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within 24 hours. Subsequently, the NAHC shall identify the most likely descendant. The most likely descendant shall then make recommendations and engage in consultations concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98. Adherence to these existing legal requirements would reduce impacts associated with the disturbance of human remains. Impacts would be less than significant.

### 3.6 ENERGY

Would the project:

#### a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

**Less Than Significant Impact.** The following discusses the potential energy demands from construction activities associated with the construction and operation of the 16 new relocatable classrooms at the OPA school campus.

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### Short-Term Construction Impacts

#### *Electrical Energy*

The majority of construction equipment would be gas or diesel powered, and electricity would not be used to power most of the construction equipment. Electricity use during construction would vary during different phases of construction. Later construction phases could result in the use of electric-powered equipment for interior construction and architectural coatings (if applicable). It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

#### *Natural Gas Energy*

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

#### *Transportation Energy*

Transportation energy use during construction of the proposed project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with the California Code of Regulations, Title 13, Article 4.8, Chapter 9, Section 2449.

Construction trips would also not result in unnecessary use of energy because the project site is centrally located and is served by numerous regional freeway systems (e.g., I-5 and I-405) that provide the most direct routes from various areas of the region. Electrical energy would be available for use during construction from existing connections, precluding the use of less-efficient generators. Thus, energy use during construction of the project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

### Long-Term Impacts During Operation

Operation of the proposed project would generate new demand for electricity, natural gas, and transportation energy on the project site. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, and perimeter lighting.

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#### *Electrical Energy*

The proposed increase in electricity consumption from the proposed project is shown in Table 4.

**Table 4 Operation-Related Electricity Consumption**

Land Use <sup>1</sup>	Electricity (kWh/year) <sup>1</sup>
Proposed Elementary School	96,067

Source: Appendix A.

Note: kWh=kilowatt-hour

<sup>1</sup> The annual electricity demand is based on the square footage of the proposed classroom buildings.

While the proposed project would generate additional energy demand at the site, it would be required to comply with the applicable Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) requirements. In addition to the proposed building energy efficiency, Southern California Edison is required to comply with the state’s renewable portfolios standard (RPS), which mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent by 2045. The RPS requirements would support use of electricity by the proposed project that is generated from renewable or carbon-free sources. Overall, the proposed project would generally be consistent with the goals outlined in Appendix F of the CEQA Guidelines regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources. Because the proposed project would comply with these regulations, it would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the proposed project would result in a less than significant impact related to electricity.

#### *Natural Gas Energy*

The net new natural gas consumption associated with the proposed project is shown in Table 5. As seen in the table, the new natural gas demand by the new relocatable classroom buildings would total 322,251 kilo-British thermal units per year following buildout of the proposed project.

While the proposed project would result in a higher natural gas demand, the new classroom buildings would be consistent with the requirements of the Building Energy Efficiency Standards and would generally result in a decrease in per capita natural gas consumption. Compliance with the Building Energy Efficiency Standards would include installation of a high efficiency heating, ventilation, and air conditioning system and thermal envelope (e.g, insulation materials), which would contribute to reducing natural gas demands and decreasing overall reliance on fossil fuels. Therefore, operation of the proposed project would result in less than significant impacts with respect to natural gas usage.

**Table 5 Operation-Related Natural Gas Consumption**

Land Use	Natural Gas (kBTU/year) <sup>1</sup>
Proposed Elementary School	322,251

Source: Appendix A.

Note: kBTU=kilo-British thermal units.

<sup>1</sup> The annual natural gas demand is based on the square footage of the proposed classroom buildings.

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#### *Transportation Energy*

The proposed project would result in the consumption of transportation energy during operation from the use of motor vehicles associated with students, staff, and visitors to the OPA school campus. The efficiency of the motor vehicles in use (average miles per gallon) is unknown and highly variable. Thus, estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and related transportation energy use. The project-related VMT would primarily come from students and staff. Since student capacity would increase after installation of the new classroom buildings, implementation of the proposed project would result in an additional 708 daily vehicle trips (Appendix C). However, since the proposed project would fall into the category of a local-serving public facility, the proposed project would be screened from requiring a detailed VMT analysis. Based on the traffic study, the student-related trips would not result in an incremental increase in VMT because these trips would occur regardless of the proposed project. Also, providing a closer option for students would avoid the need to travel farther distances to other schools. Therefore, the proposed project would not result in an increase in VMT after buildout.

Moreover, fuel efficiency of vehicles after buildout would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, resulting in a lower per capita fuel consumption assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the school employees do not have direct control in determining the fuel efficiency of vehicles that are manufactured and available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the project site's region more fuel-efficient vehicle options.

As electricity consumed in California is required to meet the increasing renewable energy mix requirements under the State's RPS, accelerated by SB 100, greater and greater proportions of electricity consumed for transportation energy demand envisioned under the proposed project would continue to be sourced from renewable energy sources rather than fossil fuels. Since vehicle fuel efficiencies would improve year over year through the buildout and result in a decrease in overall per capita transportation energy consumption, impacts would be less than significant with respect to operation-related fuel usage.

#### **b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact.** The state's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's RPS to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

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On September 10, 2018, Governor Brown signed SB 100, which supersedes the SB 350 requirements. Under SB 100, the RPS for public-owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 50 percent by 2026, 52 percent by 2027, and 60 percent by 2030. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Additionally, SB 1020 adds interim targets to SB 100 framework to require renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent of all retail electricity sales by 2040. Under SB 100 and SB 1020, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as Southern California Edison, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. In addition, the proposed project would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS Program, and impacts would be less than significant.

#### 3.7 GEOLOGY AND SOILS

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.**

**Less Than Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally 50 feet). An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years (DOC 2023b).

Lake Forest is surrounded by earthquake faults; the Newport-Inglewood Fault and the Glen Ivy North Fault are two major fault lines in the region (DOC 2023c). The nearest fault is the Pelican Hill Fault, approximately 10 miles west of the project site. However, the project site is not in an earthquake fault zone, and the immediate surrounding area is not in an Alquist-Priolo Earthquake special study zone (DOC 2023c). Provided the classroom buildings are constructed in accordance with the applicable California

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Building Code (CBC) and Division of the State Architect (DSA) criteria for seismic safety, less than significant impacts from these major faults are anticipated.

#### ii) Strong seismic ground shaking?

**Less Than Significant Impact.** Southern California is a generally seismically active region. Ground shaking from earthquakes along active faults, many miles away, could cause injury to people and damage to property at the project site. The closest significant regional active faults that could produce earthquakes felt at the project site include the Pelican Hill Fault approximately 10 miles west, the Newport-Inglewood-Rose Canyon fault zone approximately 12 miles west, and the Glen Ivy North Fault approximately 15 miles northeast of the project site. As stated in 3.7(a)(i), above, the project site is not within an earthquake fault zone nor is the immediate surrounding area in an Alquist-Priolo Earthquake special study zone (DOC 2023c).

Development of the proposed project would be required to comply with the CBC) including seismic design parameters. In addition, since the proposed project is a school site, California Geological Survey and DSA would ensure that the buildings are sufficiently designed to withstand ground shaking. Impacts would be less than significant.

#### iii) Seismic-related ground failure, including liquefaction?

**No Impact.** Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking.

According to the California Geological Survey, some of the city is in a liquefaction zone but the project site is not (CGS 2023). The nearest liquefaction zone is one mile north of the project site. Therefore, there is no potential for liquefaction at the project site. Additionally, the proposed project would be designed in compliance with the CBC and the DSA criteria for seismic safety, including from liquefaction impacts. Compliance with established standards would reduce the risk of liquefaction hazards, and no impacts are anticipated.

#### iv) Landslides?

**Less Than Significant Impact.** Landslides are a type of erosion in which masses of earth and rock move downslope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depends on several factors that are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. The OPA campus and adjacent properties are flat and exhibit no unusual geographic features or slopes. Additionally, the California Department of Conservation does not map the campus within a landslide zone nor show any landslide activity in the vicinity of Lake Forest. The proposed project would be designed in compliance with the CBC and the DSA criteria for

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seismic safety, and the proposed project would not result in significant safety impacts due to landslides. Impacts would be less than significant.

#### **b) Result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved and removed from one place and transported to another. The project site is an existing school site with paved and impervious surfaces (parking lot, buildings, pavement) as well as pervious surfaces (landscaping). The project site is flat, and the proposed project does not contain subterranean levels. Therefore, the proposed project would not require extensive excavation, so soils would not be exposed to substantial erosion impacts.

The construction contractor would be required to take all measures deemed necessary during grading to provide erosion control devices to protect exposed soil and adjacent properties from storm damage and flood hazard originating on the proposed project. During operation, all project surfaces would be covered in vegetation, building surfaces, walkways, parking lots, and driveways, and there would be no soils susceptible to soil erosion or the loss of topsoil. Impacts would be less than significant.

#### **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?**

**Less Than Significant Impact.** As discussed in Sections 3.7.a.iii and 3.7.a.iv, impacts from liquefaction and landslides would be less than significant since the proposed project would comply with applicable seismic requirements of the CBC and DSA.

Lateral spreading is a phenomenon where large blocks of intact, nonliquefied soil move downslope on a large, liquefied substratum. The mass moves toward an unconfined area, such as a descending slope or stream-cut bluff and has been known to move on slope gradients as little as one degree. The topography of the project site is flat, and therefore impacts from lateral spreading would be less than significant. Subsidence and collapse are generally due to substantial overdraft of groundwater or underground petroleum reserves. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Seismically induced settlement consists of dynamic settlement of unsaturated soil (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily in low-density sandy soil due to the reduction in volume during and shortly after an earthquake. The City of Lake Forest and the OPA campus are not in areas of recorded subsidence due to groundwater pumping (USGS 2023). Additionally, compliance with applicable CBC and DSA requirements would ensure adequate design and construction of building foundations. Impacts would be less than significant.

#### **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?**

**Less Than Significant Impact.** Highly expansive soils swell when they absorb water and shrink as they dry and can cause structural damage to building foundations. Therefore, they are less suitable for development than

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nonexpansive soils. The soils on campus consist of Myford sandy loam. These are drained sandy soils with low to very low runoff class rates and low shrink-swell or expansion characteristics (USDA 2023). Additionally, the proposed project would be consistent with CBC and DSA requirements, thus reducing any potential impacts due to expansive and collapsible soils. Impacts would be less than significant.

**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?**

**No Impact.** The proposed project is in an urbanized area. No septic tanks or alternative wastewater disposal system is proposed. The proposed project would connect to existing sewer lines in the vicinity of the project site. No impacts would occur.

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

**Less Than Significant Impact With Mitigation Incorporated.** The proposed project is in the urbanized and built-out city of Lake Forest. The project site is already on a developed campus, which had previous earthwork on-site. The project site is underlain by very old alluvial fan deposits (Qvof) from middle to early Pleistocene (DOC 2023d). These old alluvial deposits have high paleontological sensitivity. The proposed project would require light ground-disturbing activities, which are unlikely to unearth paleontological resources. Though discovery of fossils is not expected during project construction, it is possible that paleontological resources could be discovered during ground-disturbing activities.

Implementation of Mitigation Measure GEO-1 would ensure that if paleontological resources are discovered during ground-disturbing activities, they would be recovered in accordance with State and federal requirements. Implementation of Mitigation Measure GEO-1 would reduce impacts to paleontological resources to a less than significant level.

#### **Mitigation Measures**

GEO-1 Prior to construction, a field survey for paleontological resources shall be conducted by a qualified paleontologist. If unique paleontologist resources are not discovered during the field survey, then excavation and/or construction activities can commence. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important, and any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution.

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#### 3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change has identified four major GHGs—water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and ozone (O<sub>3</sub>)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. The Intergovernmental Panel on Climate Change identified other GHG that contribute to global warming to a lesser extent, including nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.<sup>2</sup>

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.<sup>3</sup> Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this short-lived climate pollutant in the state’s Senate Bill 32 (SB 32) and Assembly Bill 1279 (AB 1279) inventory but treats it separately.<sup>4</sup> A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less Than Significant Impact.** Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 6. Implementation of the proposed project would result in 16 new relocatable classroom buildings on the OPA school campus.

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<sup>2</sup> Water vapor (H<sub>2</sub>O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

<sup>3</sup> Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

<sup>4</sup> Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

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Construction of the proposed project would also generate GHG one-time emissions. The annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. In addition, because student capacity would increase after buildout of the proposed project, operation of the proposed project would result in an increase in trips, water demand, wastewater generation, and solid waste generation.

As shown in Table 6, construction and operation of the proposed project would not generate annual emissions that exceed the South Coast AQMD Working Group bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year (South Coast AQMD 2010). Additionally, GHG emissions from building energy use would be minimized because the new classroom building would be required to comply with the current California Building and Energy Efficiency Standards and CALGreen. Therefore, the proposed project’s cumulative contribution to GHG emissions would be less than significant.

**Table 6 Project-Related GHG Emissions**

Source	GHG (MTCO <sub>2e</sub> /Year)
Mobile	417
Area	<1
Energy	32
Water	1
Solid Waste	6
Refrigerants	<1
Amortized Construction Emissions <sup>1</sup>	2
<b>Total GHG Emissions</b>	<b>459</b>
South Coast AQMD Bright-Line Threshold	3,000 MTCO <sub>2e</sub> /Yr
<b>Exceeds Bright-Line Threshold?</b>	<b>No</b>

Source: CalEEMod, Version 2022.1.1.14

Notes: MTons = metric tons; MTCO<sub>2e</sub> = metric ton of carbon dioxide equivalent

<sup>1</sup> Total construction emission are amortized over 30 years per South Coast AQMD Working Group methodology (South Coast AQMD 2008).

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**No Impact.** Applicable plans adopted for the purpose of reducing GHG emissions include CARB’s Scoping Plan and SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

**CARB 2022 Scoping Plan**

CARB’s latest Climate Change Scoping Plan (2022) outlines the State’s strategies to reduce GHG emissions in accordance with the targets established under SB 32 and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan

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has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of SB 32 and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. Overall, the proposed project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be less than significant.

#### **SCAG's Regional Transportation Plan / Sustainable Communities Strategy**

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020 (SCAG 2020). Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed project would expand classroom facilities to include grades TK-8 for the existing and future students of OPA school within an existing operational school campus. The proposed project would continue to serve the local student population in the surrounding communities. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal, and impacts would be less than significant.

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#### 3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?**

**Less Than Significant Impact.** Construction of the proposed project would require small amounts of hazardous materials associated with construction equipment which include vehicle fuels, lubricants, grease and transmission fluids; as well as paints and coatings. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies—the Environmental Protection Agency (EPA), California Division of Occupational Safety and Health, US Occupational Safety and Health Administration, and US Department of Transportation.

The operation of the proposed project would transport, use, store and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). These materials would be used in relatively small quantities, clearly labeled, and stored in compliance with State and federal requirements. The project site is already developed and operating as a school campus, and the proposed project would not change the existing use of the site as a school campus. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur within the campus. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Therefore, the proposed project would not create substantial hazards to the public or the environment. Impacts would be less than significant.

- 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?**

**Less Than Significant Impact.** Five environmental lists were searched for hazardous materials site on the project site and surrounding 1,500 feet:

- GeoTracker: State Water Resources Control Board (SWRCB 2023)
- EnviroStor: Department of Toxic Substances Control (DTSC 2023)
- EJScreen: US Environmental Protection Agency (EPA 2012a)
- EnviroMapper: US Environmental Protection Agency (EPA 2023b)
- Solid Waste Information System (SWIS): California Department of Resources, Recycling and Recovery (CalRecycle 2021)

The only evidence that a hazardous materials release or threatened release have occurred on the project site or within a 1,500- foot radius was on GeoTracker. Three leaking underground storage tank sites were identified—one on Muirlands Boulevard and two on Ridge Route. All three are completed gasoline cleanup sites, and cases

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are closed. The project site is surrounded by residential uses. No significant hazards from hazardous materials are expected at the project site. As discussed in 3.9(a), construction activities would require small amounts of hazardous materials; which include vehicle fuels, lubricants, grease, transmission fluids, paints, and coatings. The use, transportation, and disposal of hazardous materials would be in accordance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small quantities and properly stored so they do not pose significant safety hazards. The operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). The operation of the proposed project would use cleaners and other chemicals—not typically considered hazardous materials that would lead to significant hazard to the public or the environment—in relatively small quantities. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant Impact.** The project site currently operates as a school and would continue to operate as such with expanded capacity. It would not emit hazardous emissions or handle hazardous materials or substances other than discussed in 3.9(a). There are no other schools located within 0.25 mile of the project site. Impacts would be less than significant.

**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?**

**No Impact.** A significant impact would occur if the project site were included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would create a significant hazard to the public or the environment. Five environmental databases were searched for hazardous material sites on or within 0.25 mile of the project site:

- GeoTracker. State Water Resources Control Board (SWRCB 2023)
- EnviroStor. Department of Toxic Substances and Controls (DTSC 2023)
- EJScreen. US Environmental Protection Agency (EPA 2023a)
- EnviroMapper. US Environmental Protection Agency (EPA 2023b)
- Solid Waste Information System (SWIS). CalRecycle (CalRecycle 2023)

There were no hazardous waste sites located on or within 0.25 mile of the project site (SWRCB 2023; DTSC 2023; EPA 2023a; EPA 2023b; CalRecycle 2023). The proposed project would not create a hazard to the public or the environment because of a hazardous materials site pursuant to Government Code Section 65962.5. No impact would occur.

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- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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.** The closest airport is John Wayne Airport in Santa Ana, which is approximately 11 miles northwest of the project site. The project site is not within an airport land use plan nor within any airport influence area (AELUP 2008). Therefore, no impacts would occur.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and post-construction. Both the City Fire Marshal and DSA would be required to approve fire access at the site. As part of the DSA process, a Fire and Life Safety Review would be conducted, and the DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access. Impacts would be less than significant.

- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** The project site is not located in a very high fire hazard severity zone (CAL FIRE 2023). The proposed project and site conditions would not contribute to an increase in exposure to wildfire risk. The proposed project would also comply with the California Building and Fire Codes, which would ensure impacts are less than significant.

### 3.10 HYDROLOGY AND WATER QUALITY

Would the project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less Than Significant Impact.** Lake Forest falls within the jurisdiction of two Regional Water Quality Control Boards: Santa Ana and San Diego. The project site falls within the Santa Ana Region, which covers the northwestern portion of the city north of El Toro Road (Lake Forest 2020). Drainage and surface water discharges during construction and operation of the proposed project would not violate any water quality standards or waste discharge requirements. Site preparation and other soil-disturbing activities during construction of the project could temporarily increase the amount of soil erosion and siltation entering the local stormwater drainage system; however, impacts would be less than significant.

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

**Less Than Significant Impact.** Lake Forest is within the Coastal Plain of Orange County Groundwater Basin managed by the Municipal Water District of Orange County (MWDOC) (Lake Forest 2023). The proposed project does propose wells that would extract from this basin, nor would project operation substantially interfere with groundwater recharge. The site is already an operating school, and the proposed project would add classrooms but would not substantially decrease groundwater supplies. Impacts would be less than significant.

- 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:**

- i) **Result in a substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** As discussed in Section 3.10(a), the proposed project would include temporary site disturbance and would be within the previously developed school site. The proposed project does not result in substantial erosion or siltation on- or off-site. Once the construction phase is completed, no untreated or exposed soils that are susceptible to erosion or siltation would remain. Impacts would be less than significant.

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

**Less Than Significant Impact.** The proposed project would replace turf with impervious surfaces like buildings and paved courtyards. Compliance with the State Water Resources Control Board regulations and best management practices would ensure the rate and amount of surface runoff remains the same as current operations, making this impact less than significant.

- 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?**

**Less Than Significant Impact.** Project implementation would increase impervious surfaces on-site, but the required best management practices would reduce impacts associated with impervious surfaces. The proposed project would be required to comply with local, State, and federal regulations pertaining to stormwater. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

- iv) **Impede or redirect flood flows?**

**No Impact.** The project site is designated by the Federal Emergency Management Agency in Flood Zone X: Area of Minimal Hazard (FEMA 2009). Additionally, the project site is not within a dam inundation area (DWR 2023). No impact would occur.

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

**No Impact.** As noted in Section 3.10(c)(iv), above, the project site is in Flood Zone X, an area of minimal flooding hazard. Therefore, there is no risk of pollutant release due to flooding.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The campus is approximately nine miles inland of the Pacific Ocean, at an elevation of approximately 489 feet above sea mean sea level, outside of the tsunami hazard zone identified by the California Department of Conservation's Orange County Tsunami Hazard Area map (DOC 2023e). Therefore, the proposed project would not risk release of pollutants due to tsunamis.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. According to the California Department of Water Resources' Dam Breach Inundation Map, the campus is not within any dam's inundation area (DWR 2023). Therefore, there is no risk of pollutant release due to inundation from a seiche. No impact would occur.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No Impact.** The proposed project would not conflict or obstruct the implementation of water quality management plans or suitable groundwater management plans. Lake Forest's water is controlled by the MWDOC, specifically the El Toro Water District (MWDOC 2023). Implementation of the proposed project would not involve any activities that would affect or could potentially affect the city's or MWDOC's water supply sources or systems, nor would it conflict with or obstruct implementation of a water quality control plan. Additionally, the proposed project would adhere to and not conflict with the El Toro Urban Water Management Plan. Therefore, the proposed project would not involve any activities that could adversely affect any water quality control plans or sustainable groundwater management plans. No impact would occur.

### 3.11 LAND USE AND PLANNING

Would the project:

**a) Physically divide an established community?**

**No Impact.** The proposed project would add classrooms on the existing developed campus. The proposed project would occur entirely within the campus boundaries and would not create any new land uses or divide or disrupt the physical arrangement of any surrounding community. No impact would occur.

**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?**

**No Impact.** The proposed project would add buildings to an existing, fully operating school. It has a land use designation of Public Facility and a zoning designation of Single Family Residential (R1) (Lake Forest 2023).

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The proposed project would not alter or modify the site's current land use and zoning designations. Development of the proposed project would not conflict with any applicable land use plans, policies, or regulations. No impact would occur.

#### 3.12 MINERAL RESOURCES

Would the project:

**a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?**

**No Impact.** In 1975, the State legislature adopted the Surface Mining and Reclamation Act. This designated Mineral Resources Zones (MRZ) that were of statewide or regional importance. The classifications used to define MRZs are:

- **MRZ-1:** Adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2:** Adequate information indicates that significant mineral deposits are present, or the likelihood of their presence, and development should be controlled.
- **MRZ-3:** The significance of mineral deposits cannot be determined from the available data.
- **MRZ-4:** Insufficient data to assign any other MRZ designation.

The California Department of Conservation, Division of Geological Survey produces Mineral Land Classification studies that identify areas with potentially important mineral resources. The Generalized Mineral Land Classification of Orange County shows the project site is mapped in MRZ-1 (DOC 1994). The project site and surroundings are in an area where adequate information indicates that no significant mineral deposits are present or likely to be present. Additionally, the project site is an existing school campus that has had previous earthwork, and no mineral resources are being extracted. The proposed project would not result in the loss of availability of a known mineral resource valuable to the region and the state. No impact would occur.

**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?**

**No Impact.** As previously mentioned in Section 3.12 (a), the project site is in MRZ-1, an area where adequate information indicates that no significant mineral deposits are present or likely to be present. The Lake Forest General Plan does not mention or indicate any mines in the city (Lake Forest 2020). The project site is surrounded by urban development and is not a locally important mineral resource site. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. No impact would occur.

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### 3.13 NOISE

#### Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects, federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are in Appendix B.

#### Environmental Setting

The project site is proposed to be developed within an existing school (OPA) and is in a predominantly residential area with residences to the north, east, south, and west of the project site. The nearest major source of transportation noise to the project site is Ridge Route Drive and Muirlands Boulevard, to the north and to the west, respectively. Intermittent noise from nearby residential uses (e.g., property maintenance and parking lot noise) also contribute to the overall noise environment in the project vicinity.

The existing noise environment consists primarily of noise from the school activity when it is in operation, with secondary noise associated with residential activity because the project site is in a residential neighborhood. Therefore, ambient noise levels would be typical of those of a residential neighborhood, which ranges from 45 to 60 dBA. Additionally, intermittent rail operations may influence the ambient environment from the railroad tracks that are approximately 650 feet to the east of the OPA school boundary.

#### *Sensitive Receptors*

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. As stated previously, there are sensitive receptors (residences) on all sides of the school site. The nearest sensitive receptors selected to show impacts from implementation of the project include the residence northwest of the school at 22891 Loumont Drive, residence to the east of the school at 24662 Coleford Street, residence to the south of the school at 23022 Dune Mear Road, and the residence to the southwest of the school at 24552 Blackfoot Drive.

#### Applicable Standards

##### *California Building Code*

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code. CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher.

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Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA  $L_{eq(1hr)}$ .

#### *Title 5, Section 14040(q).*

Under Title 5, CDE regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

#### *City of Lake Forest General Plan*

##### ***Construction***

The City of Lake Forest General Plan provides hours in which temporary construction may occur which provides the following statement: Restrict construction activities to the hours of 7:00 am to 7:00 pm on Monday through Friday, and 8:00 am to 6:00 pm on Saturdays. No construction shall be permitted outside of these hours or on Sundays or legal City of Lake Forest holiday, without a specific exemption issued by the City.

##### ***Stationary Sources of Noise***

Stationary sources of noise are governed under the Lake Forest General Plan (Table PS-2). The General Plan states that no person shall, within the city, create any sound, radiated for extended periods from any premises which produces a sound pressure level at any point on the property in excess of 55 dBA  $L_{eq}$  from 7:00 am to 10:00 pm and 50 dBA  $L_{eq}$  from 10:00 pm to 7:00 am.

##### ***Vibration Noise***

The City of Lake Forest General Plan requires vibration from construction to not exceed the following standards for vibration damage and annoyance, which are adopted standards from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual (FTA 2018):

A vibration noise impact would occur if:

- Vibration levels would exceed 0.30 inches/second (in/sec) peak particle velocity (PPV), which typically applies to a structure of normal conventional construction for the nearby sensitive receptors.
- The City shall require new residential projects located adjacent to major freeways, hard rail lines, or light rail lines to follow the FTA vibration screening distance criteria to ensure that residential uses are not exposed to vibrations exceeding 72 VdB for frequent events (more than 70 events per day), 75 VdB for occasional events (30-70 events per day), or 80 VdB for infrequent events (less than 30 events per day).

#### ***Federal Transit Administration***

The City of Lake Forest does not have a quantified threshold for temporary construction noise. Therefore, to determine impact significance, the following FTA criteria are adopted.

A construction noise impact would occur if:

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- Project construction activities would generate noise levels greater than 80 dBA Leq at the sensitive receptor property line.

Would the project result in:

- a) **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?**

**Less Than Significant Impact.** Following is a discussion of the temporary and permanent noise impacts as a result of the proposed project's construction and operational phases.

#### **Construction Noise**

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment on the project site.

#### *Construction Vehicles*

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA  $L_{max}$  at 50 feet from the worker and vendor vehicles. However, these occurrences would generally be infrequent and last a short time.

Worker and vendor trips would total a maximum of approximately 32 daily vendor and worker trips during overlapping construction activity phases. Site access would be through Dune Mear Road, Blackfoot Drive, or Loumont Drive. The lowest existing ADT was found to be 850 (see Table 8). The addition of 32 daily construction trips would result in a temporary noise increase of 0.2 dBA CNEL or less, which would not be perceptible or permanent. Therefore, construction-vehicle noise impacts would be considered less than significant.

#### *Construction Equipment*

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors in the project vicinity, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the  $L_{eq}$  contributions from each piece of equipment used at a given time, while accounting for the ongoing time variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from

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construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors in the project vicinity could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

#### *On-Site Construction Noise*

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. For the nearby residences analyzed, this was measured from the center of the portable classrooms/bathroom installation. Similarly, construction noise from paving activities, building construction, and utility trenching is modeled from the edge of the proposed portables/bathroom to the nearest sensitive receptors.

The project’s expected construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 1, *Project Related Construction Noise, dBA Leq*. RCNM modeling input and output worksheets are in Appendix B.

As shown in Table 7, *Project Related Construction Noise, dBA Leq*, on-site construction-related noise levels would not exceed the 80 dBA Leq threshold at the nearest sensitive receptors at any point. Therefore, construction-equipment noise impacts would be considered less than significant.

**Table 7 Project-Related Construction Noise, dBA Leq**

Construction Activity Phase	RCNM Reference Noise Level	Residence to the Northwest at 22891 Loumont Drive	Residence to the East at 24662 Coleford Street	Residence to the South at 23022 Dune Mear Road	Residence to the Southwest at 24552 Blackfoot Drive
<i>Distance in feet</i>	50	600	440	245	245
Site Preparation	84	62	65	70	70
Rough Grading	85	63	66	71	71
Fine Grading	85	63	66	71	71
<i>Distance in feet</i>	50	540	195	310	115
Building Construction	82	61	70	66	75
Paving	83	62	71	67	76
Utilities Trenching	77	56	65	61	70
<b>Maximum dBA Leq</b>		<b>63</b>	<b>71</b>	<b>71</b>	<b>76</b>
<b>Exceed 80 Leq dBA Threshold?</b>		<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: Calculations performed with the FHWA RCNM software are included in Appendix B.

### 3. Environmental Analysis

#### Operational Noise

##### *Traffic Noise*

A project will normally have a significant effect on the environment related to noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- For project-related traffic noise, the project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories; or
- The Project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more within the “normally acceptable” or “conditionally acceptable” categories.

With the additional classroom capacity, student enrollment would also increase, resulting in more trips overall to and from the OPA. Traffic volume data for the new trips associated with the planned classrooms are provided by Garland Associates (Appendix C). The data show the traffic volumes of 15 local roadway segments and the existing, existing with project, future without project, and future with project values that were modeled; see Table 8, *Traffic Noise Increase from Project, dBA CNEL*. Overall, implementation of the project would produce at most 390 trips along the local roadway segments to as low as 70 trips. As shown in Table 8, the project would not result in a 3 dBA increase over existing, future, and cumulative conditions. Since the project would not result in a 3 dBA increase, which as stated before is the threshold for the human ear to perceive over ambient conditions, impacts would be less than significant.

**Table 8 Traffic Noise Increase from Project, dBA CNEL**

Roadway Segment	ADT Traffic Volumes				Project Increase (dBA CNEL)		
	Existing	Existing plus Project	Future No Project	Future Plus Project	Existing No Project	Cumulative Increase	Project Cumulative Contribution
Blackfoot Drive North of Loumont Drive	1,200	1,520	1,240	1,560	1.03	1.14	1.00
Blackfoot Drive South of Loumont Drive	1,300	1,570	1,340	1,610	0.82	0.93	0.80
Costa Bella Drive West of Blackfoot Drive	850	990	880	1,020	0.66	0.79	0.64
Costa Bella Drive East of Blackfoot Drive	850	1,030	880	1,060	0.83	0.96	0.81
Loumont Drive East of Blackfoot Drive	1,000	1,340	1,030	1,370	1.27	1.37	1.24

### 3. Environmental Analysis

**Table 8 Traffic Noise Increase from Project, dBA CNEL**

Roadway Segment	ADT Traffic Volumes				Project Increase (dBA CNEL)		
	Existing	Existing plus Project	Future No Project	Future Plus Project	Existing No Project	Cumulative Increase	Project Cumulative Contribution
Loumont Drive East of Muirlands Boulevard	850	990	880	1,020	0.66	0.79	0.64
Dune Mear Road West of Blackfoot Drive	2,000	2,390	2,060	2,450	0.77	0.88	0.75
Dune Mear Road East of Blackfoot Drive	1,000	1,120	1,030	1,150	0.49	0.61	0.48
Entradas Drive East of Muirlands Boulevard	1,900	2,290	1,960	2,350	0.81	0.92	0.79
Coleford Street South of Ridgeroute Drive	700	880	720	900	0.99	1.09	0.97
Muirlands Boulevard North of Loumont Drive	17,600	17,960	18,130	18,490	0.09	0.21	0.09
Muirlands Boulevard Between Loumont Drive and Entradas Drive	17,600	17,810	18,130	18,340	0.05	0.18	0.05
Muirlands Boulevard South of Entradas Drive	17,600	17,780	18,130	18,310	0.04	0.17	0.04
Ridgeroute Drive West of Coleford Street	7,200	7,270	7,420	7,490	0.04	0.17	0.04
Ridgeroute Drive East of Coleford Street	7,200	7,310	7,420	7,530	0.07	0.19	0.06

Source: Appendix C.

#### *Mechanical Equipment Noise*

Heating, ventilation, and air conditioning (HVAC) systems are anticipated to be installed on the roofs of the proposed buildings/portables. The nearest sensitive receptor property line to the nearest proposed school building is approximately 150 feet to the west of the proposed portable buildings. Typical HVAC equipment generates noise levels ranging up to 72 dBA at a distance of three feet. At a distance of 150 feet from the nearest proposed portable, noise levels would attenuate to 38 dBA and would, therefore, not exceed the City of Lake Forest stationary noise standards at any time of the day. Therefore, impacts would be less than significant impact.

#### **b) Generation of excessive groundborne vibration or groundborne noise levels?**

*Less Than Significant Impact.*

#### *Operational Vibration*

Project operation would not include any substantial long-term vibration sources. Therefore, no significant vibration impacts would occur.

### 3. Environmental Analysis

#### *Vibration Annoyance*

Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. Since construction activities are distributed throughout the project site, vibration annoyance impacts are typically based on average vibration levels (levels that would be experienced by sensitive receptors most of the time). Therefore, to represent the worst-case scenario for vibration annoyance, distances to the nearest sensitive receptor buildings are measured from the closest distances the equipment might occur to the sensitive receptor. As a result, the calculations were measured from the edge of the closest portable installation. For vibration annoyance, the FTA vibration level limit of 72 VdB will apply to the surrounding residential receptors.

Table 9, *Worst Case Annoyance Vibration Levels from Construction Equipment*, shows the vibration levels from typical earthmoving construction equipment at the nearest sensitive receptors in the project vicinity. As shown in the table, construction-generated vibration levels would not exceed 72 VdB for the residences surrounding the project site. Therefore, the impact related to construction vibration annoyance is less than significant.

**Table 9 Worst-Case Annoyance Vibration Levels from Construction Equipment**

Equipment	Vibration Levels (VdB)				
	Reference Levels at 25 feet	Residence to the Northwest at 22891 Loumont Drive at 565 feet	Residence to the East at 24662 Coleford Street at 330 feet	Residence to the South at 23022 Dune Mear Road at 175 feet	Residence to the west at 24552 Blackfoot Drive at 150 feet
Vibratory Roller	94.0	53.4	60.4	68.6	70.7
Static Roller	82.0	41.4	48.4	56.6	58.7
Large Bulldozer	87.0	46.4	53.4	61.6	63.7
Caisson Drilling	87.0	46.4	53.4	61.6	63.7
Loaded Trucks	86.0	45.4	52.4	60.6	62.7
Jackhammer	79.0	38.4	45.4	53.6	55.7
Small Bulldozer	58.0	17.4	24.4	32.6	34.7
FTA Threshold	-	72	72	72	72
Exceeds Threshold?	-	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. New Zealand Transport Agency 2012.

**Bold** numbers indicate values that exceed the FTA annoyance criteria.

NA= Not Applicable

Distances are from the nearest distance from where these equipment pieces may be used to the nearest receptor building within each land use type.

#### *Vibration Damage*

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight architectural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

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For reference, a vibration level of 0.3 in/sec PPV is used as the limit for structures with normal conventional construction methods (which would apply to the surrounding residential structures). Vibration damage is measured from the edge of the project site (nearest proposed building/portable) to the nearest structure (home) façade because vibration damage, unlike human vibration perception or annoyance, is determined by measuring instantaneous peak particle velocity generated by equipment. Table 10, *Vibration Damage Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and at the nearest sensitive receptors. The nearest structure to proposed construction activities is the residence approximately 150 feet or less to the west of the project site. If paving, demolition, grading, and earthwork equipment operates within approximately 20 feet or less of the residence, the 0.3 in/sec PPV threshold would be exceeded, in which case alternative construction methods (that produce less vibration) or vibration monitoring and post-construction survey would be necessary.

**Table 10 Vibration Damage Levels for Typical Construction Equipment**

Equipment	PPV (in/sec)				
	FTA Reference at 25 feet	Residence to the Northwest at 22891 Loumont Drive at 565 feet	Residence to the East at 24662 Coleford Street at 330 feet	Residence to the South at 23022 Dune Mear Road at 175 feet	Residence to the West at 24552 Blackfoot Drive at 150 feet
Vibratory Roller	0.21	0.002	0.004	0.011	0.014
Static Roller	0.05	0.000	0.001	0.003	0.003
Hoe Ram	0.089	0.001	0.002	0.005	0.006
Large Bulldozer	0.089	0.001	0.002	0.005	0.006
Caisson Drilling	0.089	0.001	0.002	0.004	0.005
Loaded Trucks	0.076	0.000	0.001	0.002	0.002
Jackhammer	0.035	0.000	0.000	0.000	0.000
Small Bulldozer	0.003	0.002	0.004	0.011	0.014

Sources: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. New Zealand Transport Agency 2012.

NA= Not Applicable

**Bold** = Threshold exceedance

As shown in Table 10, vibration levels would not result in an exceedance of 0.3 in/sec PPV at nearby sensitive receptors, resulting in a less than significant impact.

- 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 two 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 nearest airport to the Project site is John Wayne Airport, approximately 9.7 miles northwest (AirNav 2023). The proposed project would not expose people residing or working in the project area to excessive aircraft noise levels. Therefore, no impact would occur.

### 3. Environmental Analysis

#### 3.14 POPULATION AND HOUSING

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)?**

**No Impact.** The campus is in a built-out, urbanized community, and no new roads or extensions of existing roads are proposed. The proposed project does not include the construction of any new homes or businesses or changes to the existing land uses on-site. The proposed project would add classroom buildings within the boundaries of the existing campus. The proposed project would increase the current capacity of OPA, but students are expected to come from other schools in the district. This project would not increase the overall capacity of the District. Additionally, the project would continue to utilize the existing roads and infrastructure; no new roads, expanded utilities, or housing would be developed. Therefore, project development would not induce unplanned population growth in the area, either directly or indirectly. No impact would occur.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The proposed project is in the existing OPA campus, and improvements would occur within the boundaries of the project site. The proposed project would not involve the removal or relocation of any housing and would therefore not displace any people or necessitate the construction of any replacement housing. No existing residences would be displaced or removed as a result of the proposed project. No impact would occur.

#### 3.15 PUBLIC SERVICES

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:

- a) **Fire protection?**

**Less Than Significant Impact.** Fire services in Lake Forest are provided by the Orange County Fire Authority, Division 5. The project site is served by Station 19 at 23022 El Toro Road, Lake Forest, CA, a mile southeast of the campus. Station 19 is staffed daily by one fire captain, one fire apparatus engineer, and two firefighters (OCFA 2023).

The proposed project would be subject to DSA review to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire and emergency vehicle access roadways and school drop-off and pick-up areas to ensure adequate emergency access is maintained. The proposed

### 3. Environmental Analysis

project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

#### b) Police protection?

**Less Than Significant Impact.** Lake Forest currently contracts with Orange County's Sheriff's Department for law enforcement services. There are 5 sergeants, 3 investigators, 37 deputies, an investigative assistant, 5 community services officers, and a crime prevention specialist on staff. The Lake Forest policing center is at 25550 Commercentre Dr., Lake Forest, CA, four miles northeast of the project site. The county sheriff's Southeast Operations are headquartered at 20202 Windrow Dr., Lake Forest, CA (OCSD 2023). The proposed project would add students to the existing campus but would not require the provision of new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant.

#### c) Schools?

**No Impact.** School service needs are related to the size of a residential population, geographic area served, and community characteristics. The proposed project would add buildings to the existing OPA campus and increase enrollment capacity. The new school facilities would continue to serve the existing OPA students and allow more students from the District to attend. The proposed project would not generate additional school demands within the District boundaries, and no impact would occur.

#### d) Parks?

**Less Than Significant Impact.** The proposed project would not generate a demand for park space, which is typically caused by population and or employment growth. The proposed project would add buildings to the existing campus as well as additional courtyards due to the increase in student capacity. The proposed plan also shows the removal of a portion of an unused baseball diamond to be replaced with asphalt. The additional students served by the proposed project are already served by the District and the Community Service Parks and Recreation division already, and therefore would not increase the overall demand for parks. Impacts would be less than significant.

#### e) Other public facilities?

**No Impact.** The proposed project does not include development of residential or commercial uses and would not contribute to population growth in the City of Lake Forest. Therefore, the proposed project would not increase the demand for public facilities, such as library services or other administrative services in the City of Lake Forest. The proposed project would not induce population growth. No impact would occur.

## 3. Environmental Analysis

### 3.16 RECREATION

- 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?**

**Less Than Significant Impact.** Typically, the demand for parks is created by the development of new housing and/ or actions that generate additional population. The proposed project is not a population-increasing or growth including project. There are 31 parks in the city, and 2 are within a mile of the project site: Mountain View Park and Veteran's Park (Lake Forest 2020b). The proposed project would serve the existing student population and staff that are already served by the District, local, and regional recreational facilities. Existing play areas will remain on campus, and as mentioned in 3.15.d, the unused OPA baseball field would be removed and replaced with asphalt. The addition of new classroom buildings would not increase the demand for off-site recreational resources, parks, and other facilities within the city. Therefore, the proposed project would not result in the need for construction of new recreational facilities. Impacts would be less than significant.

- 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.** As discussed in Section 3.16.a, the proposed project would not require construction of off-site recreational facilities. The proposed project would add new classroom buildings to the existing OPA campus and would not induce any significant population generation. No construction of new recreational facilities would be required; therefore, no impact would occur.

### 3.17 TRANSPORTATION

Would the project:

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Less Than Significant Impact.** The proposed project includes the renovation of the existing OPA in the City of Lake Forest. Since all improvements would be made within the existing site and along private streets with no planned changes to the existing circulation system, the proposed project would not cause conflicts with proposed programs or plans to improve the circulation system for all users, including transit passengers, vehicles, bicyclists, and pedestrians. The proposed project would be required to comply with applicable provisions of the Lake Forest Municipal Code. Additionally, as further discussed under Threshold 3.17(c), the proposed project would be required to comply with CDE and DSA guidelines for site design and circulation and the Orange County Fire Authority's design standards, which are imposed on project developments by the State and City during the building plan check and development review process. Since the proposed project would not make off-site improvements that would conflict with planned programs and plans and would also not conflict with policies governing the local circulation system, the proposed project would not conflict with programs, plans, and ordinances addressing the circulation system. As described in the Traffic Impact Analysis (Appendix C), the intersection levels of service would not be exceeded as a result of the proposed project; the

### 3. Environmental Analysis

proposed project would not adversely affect the performance or safety of any transit or non-motorized transportation facilities (pedestrians and bicycles); and the proposed project would not conflict with any adopted plans, policies, or programs relative to these alternative transportation modes. Therefore, impacts would be less than significant.

#### **b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

##### **Less Than Significant Impact.**

##### **Significance Criteria**

###### *Vehicle Miles Traveled*

The “VMT Impact Analysis” section of the City of Lake Forest “Transportation Analysis Guidelines” states that public facilities that are publicly owned or controlled, such as K-12 schools in established communities and serving local needs, are assumed to cause a less-than-significant transportation impact. Because the proposed project—expansion of an existing K-6 school to include grades 7 and 8—falls into this category of a local-serving public facility, it can be screened from requiring a detailed VMT analysis.

###### *Level of Service*

The “City of Lake Forest Transportation Analysis Guidelines” indicates that the level of service performance standard for streets and intersections is level of service (LOS) D or better. Based on the LOS D threshold of significance, an intersection would be significantly impacted and mitigation would be required if a project would result in a change from LOS A through D to LOS E or F or if the project would result in an increase of 0.02 or greater in the ICU value at an intersection that is projected to operate at LOS E or F. The impacts would not be significant at intersections that are projected to operate at LOS A through D.

With regard to the CEQA thresholds of significance, Appendix G of the CEQA Guidelines states that a project would normally have a significant effect on the environment if the project could:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,
- T-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), which addresses vehicle miles traveled (VMT),
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or
- T-4 Result in inadequate emergency access.

##### **Analysis**

As shown in Appendix C, the analysis indicates all six of the study area intersections are projected to operate at an acceptable level of service A (LOS A) during the morning peak period based on the intersection capacity utilization (ICU) calculations. The City of Lake Forest guidelines indicate that LOS A through D represent acceptable conditions. The afternoon peak hour was not addressed because the school-generated traffic does

### 3. Environmental Analysis

not coincide with the afternoon commuter peak period. Additionally, an analysis of average vehicle delays at the study area intersections indicates that the most critically impacted turning movements at the intersections would operate at LOS B, C, and D for the “2024 with project” scenario. These represent acceptable levels of service. Therefore, the levels of traffic generated by the project would not result in a significant impact at any of the study area intersections based on the projected levels of service and the significance criteria used by the City of Lake Forest for evaluating significant traffic impacts. The impact would be less than significant because the proposed project is a local-serving public use and would not result in an overall increase in student-related vehicle trips.

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

**Less Than Significant Impact.** The proposed project includes the addition of 7th and 8th grade classrooms to the existing OPA campus. The project site currently operates as the OPA, and operation of the proposed project would continue this use. Therefore, the operation of the proposed project does not represent an incompatible use. The proposed project is not proposing to make off-site improvements to the local transportation network that would result in sharp curves, dangerous intersections, or other hazards. As shown in Appendix C, the analysis indicates that the streets, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity and that the streets have been readily accommodating the traffic generated by the existing OPA. The addition of the proposed relocatable classrooms would be compatible with the neighborhood, and the proposed project would not result in any major hazards for vehicular traffic, pedestrians, or bicyclists. The proposed project would not, therefore, substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

**d) Result in inadequate emergency access?**

**Less Than Significant Impact.** As discussed in Appendix C, the existing access and circulation features at the school, including the driveways, on-site roadways, parking lots, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. Emergency vehicles would be able to access the school grounds, the buildings, and all other areas of the school, including the play fields, via on-site travel corridors. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

### 3.18 TRIBAL CULTURAL RESOURCES

- 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**

### 3. Environmental Analysis

**Less Than Significant Impact with Mitigation Incorporated.** Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources. As part of the AB 52 process, Native American tribes must submit a written request to the District (lead agency) to be notified of projects within their traditionally and culturally affiliated area. The District must then provide written, formal notification to those tribes, and the tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project. When these steps are completed, the District must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The project site is not currently listed in the California Register of Historical Resource or in a local register of historical resources (NPS 2020). Public Resources Code Section 5020.1(k) defines a local register of historical resources as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. There is no local ordinance or resolution that identifies the project site as a historical resource. The proposed project would not result in potential impacts to sensitive tribal resources.

However, development of the proposed project could unearth previously unknown archeological resources and human remains. Although no known tribal cultural resources have been identified on the project site, the proposed project has the potential to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities. With implementation of mitigation measure CUL-1 in Section 3.5, *Cultural Resources*, potential impacts to tribal cultural resources would be less than significant.

- 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.**

**Less Than Significant Impact with Mitigation Incorporated.** AB 52 took effect July 1, 2015, and requires inclusion of a new section in CEQA documents titled "Tribal Cultural Resources," which include heritage sites. Under AB 52, a tribal cultural resource is defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources, or the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a tribal cultural resource.

### 3. Environmental Analysis

AB 52 requires consultation with tribes at an early stage to determine whether the project would have an adverse impact on the tribal cultural resource and define mitigation to protect them. Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it. The tribe then has 30 days of receiving the notification to respond if it wishes to engage in consultation. The lead agency must initiate consultation within 30 days of receiving the request from the tribe. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

AB 52 requires that tribes interested in consulting submit or have submitted a general request letter to the lead agency to consult under AB 52 on projects requiring the preparation of a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report. The District has not been contacted by tribes regarding the AB 52 consultation process.

The district contacted 25 Native American individuals and groups provided by the NAHC to inform them of their involvement with the proposed project. This contact does not constitute consultation with tribes. These 25 Native American individuals and groups include: Campo Band of Diegueno Mission Indians, Ewiiapaayp Band of Kumeyaay Indians, Manzanita Band of Kumeyaay Nation, Mesa Grande Band of Diegueno Mission Indians, La Posta Band of Diegueno Mission Indians, La Jolla Band of Luiseno Indians, Pala Band of Mission Indians, Pauma Band of Luiseno Indians, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseno Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino-Tongva Tribe, Juaneno Band of Mission Indians, and Juaneno Band of Mission Indians Acjachemen Nation.

The District invited all tribes on NAHC's list (listed above) to consult pursuant to AB 52 on July 14, 2023. The District received a response from the Gabrieleno Band of Mission Indians – Kizh Nation requesting consultation. The District conducted consultation with the tribe via phone call and the tribe did not have any concerns or requested mitigation measures for the proposed project. The District did not receive a response to the invitation letter from any other tribes.

The project site is currently developed, and project construction work would occur within the boundaries of the project site. No extensive subterranean earthwork is proposed, therefore, the probability of encountering tribal cultural resources is low. Nevertheless, in the event that unearthed tribal cultural resources are uncovered during ground-disturbing activities, the District will comply with CEQA Guidelines Section 15064.5, which provides that work in the area of a discovery shall be suspended until a qualified archaeologist can assess the significance of the find, and, if necessary, develop appropriate avoidance and/or recovery. In the event that tribal cultural resources are inadvertently discovered, the proposed project would implement Mitigation Measure TCR-1. With the implementation of Mitigation Measure TCR-1, the proposed project would not adversely affect the significance of a tribal cultural resource. Impacts would be less than significant with mitigation incorporated.

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#### Mitigation Measure

TCR-1            If tribal cultural resources are inadvertently discovered during ground disturbing activities for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

- Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed.
- All tribal cultural resources unearthed by project activities shall be evaluated by the qualified archaeologist. If the resources are Native American in origin, the proper tribe(s) will retain it/them in the form and/or manner the tribe(s) deems appropriate, for educational, cultural and/or historic purposes.
- If human remains and/or grave goods are discovered or recognized at the project site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
- Work may continue on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource,” time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Section 21083.2(b) for unique archaeological resources.
- Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, nonprofit institution with a research interest in the materials if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

## 3. Environmental Analysis

### 3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less Than Significant Impact.**

#### **Water Expansion**

The project site is currently operating as the OPA campus and served by adequate water facilities. El Toro Water District provides water to the project site as a member of the MWDOC (MWDOC 2023). The proposed project would connect to the existing water system to serve the additional classroom buildings and would comply with CALGreen standards, including mandatory water-conserving measures for plumbing fixtures to reduce water usage, and City code requirements. The proposed project would not increase the student population within the district. However, the proposed project would increase student capacity at OPA to approximately 700 students, a 364-student increase. The proposed project includes the addition of a new restroom building that would increase water usage but would continue to comply with CALGreen standards. The proposed project would not require the construction of new or expanded water facilities that could cause significant effects. Impacts would be less than significant.

#### **Wastewater Treatment**

El Toro District also provides wastewater collection and conveyance services to the project site. Wastewater generated by the campus is conveyed to El Toro District Water Recycling Plant (ETSD 2023). The proposed project is not expected to substantially increase wastewater as District enrollment would not increase; however, an increase of approximately 364 student capacity would increase wastewater on site. Wastewater generated at the new buildings will be conveyed to the existing sanitary sewer main. The negligible increase of wastewater from the proposed project's development would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Impacts would be less than significant.

#### **Stormwater Drainage**

Development of the new classrooms and courtyards would increase impervious surfaces which would be serviced by the existing runoff pattern and would be discharged to the existing City storm drains. Any increased runoff would be negligible as the disturbance area is already surrounded by paved surfaces. The proposed project would not result in the relocation of stormwater drainage. Impacts would be less than significant.

#### **Electric Power**

Electricity to the project site is provided by Southern California Edison. The project site is already a developed school. Trenching for power lines would be necessary to connect to existing electrical facilities within the campus. Although the proposed project would result in a higher electricity demand than existing conditions,

### 3. Environmental Analysis

the increase would be negligible to a regional provider like Southern California Edison. Development of the new classroom buildings would be required to comply with energy efficiency standards set forth by California Administrative Code (Title 24, Part 6) and CALGreen standards (Title 24, Part 11). Implementation of the proposed project would not result in major construction related to electrical power facilities that could cause significant environmental impacts. Impacts would be less than significant.

#### Natural Gas

Natural gas service is provided by the Southern California Gas Company. The proposed project would not require the use of natural gas during operation. The proposed project would not require the construction of new or expanded facilities. No impact would occur.

#### Telecommunications

Various private services, which include AT&T, HughesNet, Lake Forest DIRECTV, Planet DISH, Cox, and Frontier communications, provide telecommunication services to the city, including OPA campus (Lake Forest 2023). The proposed project, if necessary, may connect to the existing telecommunications on-site. Facilities and infrastructure from the various telecommunication providers are adequate to serve the needs of the proposed project. The proposed project would not require construction of new or expanded telecommunication facilities. Impacts would be less than significant.

#### **b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less Than Significant Impact.** El Toro Water District prepared an Urban Water Management Plan (UWMP) in 2020 that outlines the water district's water usage, including the project site. Water usage within the district has been relatively stable over the past 10 years with an average of 8,972 acre-feet used annually. Water usage of the water district is projected to increase 8.5 percent between 2020 and 2045, with recycled water use increasing and potable water demand remaining the same (ETWD 2021).

The proposed project operation would require water use and installation of utility improvements necessary to serve the new buildings. The increases in demand for water would be negligible and captured by the projected demand of El Toro Water District UWMP. Development of the proposed project would be required to comply with the provisions of CALGreen, specifically Division 5.3, Water Efficiency and Conservation, including Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use. Based on the UWMP, the City has adequate water supplies to meet the water demands of the proposed project during normal, dry, and multiple dry years. Impacts would be less than significant.

#### **c) Result in a determination by the waste water 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?**

**Less Than Significant Impact.** As discussed in 3.19a, El Toro District Water Recycling Plant serves the project site and has a capacity of six million gallons per day (ETWD 2023). The proposed project's increase of capacity at the school would cause a negligible increase in wastewater; therefore, it is anticipated that the

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wastewater facilities would continue to have adequate capacity to serve the proposed project. Impacts would be less than significant.

**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?**

**Less Than Significant Impact.** The proposed project would add classroom buildings at the OPA site. During construction the proposed project may generate some waste debris, though no buildings are proposed to be demolished, so construction solid waste generation would be minimal. In accordance with Section 16.12.015 of the Lake Forest municipal code, prior to starting a project, the applicant shall submit a properly completed waste reduction and recycling plan to the City (Lake Forest 2022). Solid waste from all District schools is transported to the Prima Deshecha Landfill, a member of County or Orange Waste and Recycling that permits 4,000 tons daily. The proposed project would not increase District capacity but would increase waste at this location. The increase in waste generation would be negligible and would continue to be serviced by Prima Deshecha Landfill. The proposed project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Impacts would be less than significant.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The City of Lake Forest and the District shall comply with state requirements to reduce the volume of solid waste through recycling and organic waste diversion. The District currently complies with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Hazardous waste, such as paint used during construction, would be disposed of only at facilities permitted to receive them in accordance with local, state, and federal regulations. The proposed project would comply with all applicable federal, state, and local statutes and regulations related to solid waste disposal. Impacts would be less than significant.

## 3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones (FHSZ), would the project:

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The OPA campus is in a local responsibility area and is not designated a very high FHSZ (CAL FIRE 2023). The campus is not in or near a state responsibility area (SRA), federal responsibility area (FRA), or lands classified as very high FHSZ. The nearest FHSZ to the project site is approximately three miles east

### 3. Environmental Analysis

in Laguna Woods. The proposed project would not impair an adopted emergency evacuation or response plan in the area. No impact would occur.

- 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?**

**No Impact.** The OPA campus is not in or near an SRA or lands classified as very high FHSZ (CAL FIRE 2023). The project site is generally flat with no significant topography, and there are no steep slopes where high winds can exacerbate wildfire risk. The project is in an existing school in an urban and residential area. Construction of the proposed project would not result in increased exposure to pollution concentration from a wildfire or uncontrolled spread of wildfire or the uncontrolled spread of a wildfire. No impact would occur.

- 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?**

**No Impact.** The OPA campus is not in or near an SRA or lands classified as very high FHSZ (CAL FIRE 2023). The proposed project would add classrooms to a current school, and the new buildings would use the existing infrastructure. No new roads, fuel breaks, emergency water sources, power lines, or other utilities would be required. Therefore, construction of the proposed project would not exacerbate wildfire risk or result in temporary or ongoing impacts to the environment, and no impacts would occur.

- 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?**

**No Impact.** The OPA campus is not in or near an SRA or lands classified as very high FHSZ (CAL FIRE 2023). The project site is flat with no significant topography; therefore, the proposed project would not lead to a significant risk of post-fire slope instability leading to flooding or landslides, drainage changes, or runoff. No impact would occur.

#### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

- 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?**

**Less Than Significant Impact With Mitigation Incorporated.** The proposed project area is already developed and would add buildings to the existing school. As discussed in Section 3.4, there is no native or suitable habitat for listed species due to the frequent disturbances on-site making it rare that any species would occur within the project area. The project must comply with MBTA and respect nesting bird season. Due to

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the minimal habitat in this already-disturbed project area, impacts to plant and animal communities would be less than significant.

As discussed in Sections 3.5 and 3.7, to protect California history, mitigation measures CUL-1 and GEO-1 will be implemented if any culturally or paleontologically sensitive material is discovered during project construction. With these mitigation measures incorporated, impacts would be less than significant.

- 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.)**

**Less Than Significant Impact.** The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects that would create impacts that are greater than those of the project alone. Related projects include past, current, and/or probable future projects in the vicinity of the proposed project site whose development could contribute to potentially significant cumulative impacts. As analyzed throughout this IS/MND, any construction or operational-related impacts would either be less than significant or mitigated to a less than significant level. Additionally, this proposed project’s disturbance area is small and localized on an already developed campus, and since no other cumulative projects are identified in the area, the proposed project would not result in impacts that are individually limited but cumulatively considerable.

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

**Less Than Significant Impact.** The proposed project would add new classrooms and increase the capacity of the currently operating OPA. As shown in this analysis, no significant impacts would cause substantial adverse effects on human beings. Impacts would be less than significant.

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