CITY OF LAGUNA HILLS

CLASS 32 CATEGORICAL EXEMPTION
INFILL DEVELOPMENT PROJECT

CASE NO.: Site Development No. USE-0211-2025, Vesting Tentative Tract Map No. 19346

PROJECT APPLICANT:	Toll Brothers Aylene Chu, P.E. 350 Commerce, Suite 200 Irvine, CA 92602
PROJECT ADDRESS:	23161 Mill Creek Drive Laguna Hills, CA 92653
APN(s):	588-142-07
GENERAL PLAN DESIGNATION:	Mixed Use
ZONING:	MXU – Mixed Use

INTRODUCTION:

Article 19 of the California Environmental Quality Act (CEQA Guidelines Section 15300 to Section 15333) includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA. These are referred to as "categorical exemptions." The categorical exemptions include an urban infill exemption designed to streamline development in already-developed urban areas. This report is intended to determine if the Proposed Project is categorically exempt from the provisions of CEQA per State CEQA Guidelines 15332 (Class 32 – In-fill Development Projects).

This evaluation was prepared to determine whether the Proposed Project qualifies for the class 32 in-fill development exemption. This evaluation is supported by the attached technical appendices.

SURROUNDING LAND USES AND SETTING:

The Proposed Project will be constructed on the 2.43-acre parcel at 23161 Mill Creek Drive (APN 588-142-07) in the City of Laguna Hills, Orange County, California (Project Site). The Project Site is located on the west side of Mill Creek Drive, approximately 0.27-mile south of the Lake Forest Drive, Mill Creek Drive, and Scientific intersection (see **Figure 1** – Regional Vicinity). The Project Site is currently developed with an approximately 13,308 square feet (sq. ft.) three-story office building, surface parking lot, AT&T battery structure, and associated landscaping and pavement. The existing office building includes a concrete wall and landscaping surrounding the northern, eastern, and western wall elevations as well as overhangs along the southern building elevation. There is also a trash enclosure located east of the office building. The current Project Site includes 180 standard parking spaces and six accessible parking spaces. The Project Site currently contains one access driveway via Mill Creek Drive on the southeastern portion of the Project Site. The Project Site is surrounded by office buildings and associated surface parking lots to the north and south, Mill Creek Drive to the east, and landscaping and multi-family residential to the west (see **Figure 2** – Site Location – Aerial View). The Project Site has a General Plan land use designation of Mixed Use and a zoning district of Mixed Use (MXU) (see **Figure 3** – General Plan Land Use Designation and **Figure 4** – Zoning District). Surrounding properties to the north and south have a General Plan land use designation of Mixed Use and a zoning district of MXU. Properties to the east have a General Plan land use designation of Open Space and a zoning district of Open Space 2 – Drainage Facilities (OS-2). Properties to the west have General Plan land use designations of Medium-Low Density Residential or Open Space (Park) and zoning districts of Medium-Low Density Residential or Open Space 1 – Parks.

The Project Site is located within the United States Geological Survey (USGS) 2022 *Lake Forest, California* 7.5-minute, 24000 topographic quadrangle. The Project Site generally slopes downward towards the northeast at an approximate elevation of 334 feet above mean sea level. The Project Site is located within FEMA Flood Plain Panel 06059C0313J and is designated within Zone X, which is described as an area of minimal flood hazard (see **Figure 5** – FEMA Flood Map). The Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for both the Local Responsibility Areas (LRAs) and State Responsibility Areas (SRAs). However, the

western portion of the Project Site is located with a Moderate Fire Hazard Zone (see **Figure 6** – CAL FIRE Fire Hazard Severity Zones Map).

PROJECT DESCRIPTION:

The Proposed Project consists of the demolition of the existing office building and associated surface parking lot and landscaping to construct 36 single-family-attached condominium residential units, parking, on-site roadways, and associated infrastructure at a density of 14.8 dwelling units per acre (du/ac) (see **Figure 7** – Site Plan). Two units will be deed-restricted for very low-income households, while the remaining 34 units are designated as above-moderate income. The Proposed Project would be constructed on the 2.43-acre parcel located at 23161 Mill Creek Drive.

Architecture

The 36 residential units will feature two plan types – Plan 1 and Plan 2. Each plan type will feature four bedrooms and four bathrooms. 18 units will consist of Plan 1, which has a total unit area of 1,991 square feet, while the remaining 18 units will consist of Plan 2, which will have a total unit area of 2,033 square feet (see **Figure 8** – Duet Floor Plans). The Proposed Project has a density of 14.8 du/ac, 64 percent maximum lot coverage, 300 feet minimum lot width, and 360 feet minimum lot depth. The Proposed Project will also build to a minimum setback of 20 feet to the front, five feet to the side (interior), 20 feet to the side street, and 7.5 feet to the rear. The Proposed Project also includes 14,500 sq. ft. of private open space in the form of balconies and private yards.

Landscaping

The Proposed Project includes a landscape coverage of 20 percent and a minimum building separation of 6.5 feet. Landscaping will be distributed throughout the Project Site in the form of large accent trees, medium accent trees, perimeter screening trees, small accent trees, shrub and groundcover, and vines and espaliers (see **Figure 9** – Conceptual Landscape Plan).

Walls/Fences

The Proposed Project is designed to include a concrete masonry block wall with cap or a mechanically stabilized earth wall surrounding the Project Site, a 3-feet and 6-inch high steel cable guard rail along the western and southern Project Site boundaries, a 6-feet high split face block wall with precision cap in between each unit, and a 6-feet high tubular steel view fence along the northern and eastern Project Site boundaries. The entrance will include a 7-feet high cultured stone veneer entry wall with cap (see **Figure 10** – Conceptual Wall and Fence Plan and

Figure 11 - Elevations).

Utilities

The Proposed Project includes a series of area drains and catch basins to collect street flow. The southern half of the Project Site drains out to Mill Creek Drive through a proposed parkway culvert near the proposed driveway. The north half of the Project Site drains out to Mill Creek Drive through a second proposed parkway culvert near the northeast corner of the Project Site (see **Figure 12** – Conceptual Grading and Drainage Plan).

The El Toro Water District (ETWD) provided a will-serve letter for the Proposed Project stating that ETWD is willing to provide domestic water and sanitary sewer services to the Project Site. The Proposed Project includes installation of four new fire hydrants distributed throughout the Project Site. The fire hydrants would be accompanied by painted red curb with "Fire Lane – No Parking" stenciling and fire lane signs for emergency access and use.

The Proposed Project also received letters from AT&T and Charter Communications stating that there are no utility conflicts with the Project Site and that the Project Site is within the companies' service area. Additionally, Cox Communications provided a letter stating that Cox Communications has facilities to provide broadband cable and other telecommunication services to the Project Site. SoCal Edison (SCE) provided a letter stating that the Project Site is within SCE service territory and that SCE will serve the Proposed Project's electricity. The Proposed Project would be served by 100 percent electricity and would not utilize natural gas. CR&R provided a will-serve letter for solid waste and recycling services to the Proposed Project (**Appendix A** – Will Serve Letters).

Parking/Site Access

The Proposed Project is designed to provide 90 parking spaces in the forms of attached garages and uncovered parking stalls. Access to the Project Site is proposed via one full-access gated driveway along Mill Creek Drive. The existing driveway at the Project Site will be modified to include a gate entry with call box, a monument signage wall, separate entrance and exit points, and fire lane entrance signs. The driveway will be a minimum of 40 feet wide and features a gated entry and exit (see **Figure 13** – Parking and Access Plan).

Requested Entitlements

The Proposed Project is subject to the approval of the following entitlements:

- Approval of Tentative Tract Map 19346
- Approval of Site Development Permit No. USE-0211-2025

Construction Activities

Construction activities would include the following:

Demolition: Demolition will require the use of one concrete/industrial saw, three excavators, and two rubber tired dozers. The total days for demolition are estimated to be 40 construction days, working 8 hours a day.

Site Preparation: Site preparation will require the use of one grader and one scraper working eight hours a day and two tractors/loaders/backhoes working seven hours a day. The total time estimated for site preparation is 10 days.

Grading: Grading the project site will require the use of one excavator, one grader, one rubber tired dozer, and four tractors, loaders, or backhoes. Total estimated time for grading the site is 110 construction days, working 8 hours a day.

Building Construction: Building construction will require the use of two forklifts, one generator set, three tractors, loaders, or backhoes, and one welder. The crane and tractors, loaders, and backhoes will be operated for 7 hours a day, while the forklifts, generator set, and welder will be operated for 8 hours a day. Building construction of the 36 units is the longest part of the construction process, estimated at a time frame of 380 construction days.

Paving: The paving process will require the use of two cement and mortar mixers, one paver, two paving equipment, two vibratory rollers, and one tractor, loader, or backhoe. Cement and mortar mixers, paving equipment, and rollers will be used for 6 hours a day. The paver and tractor, loader, or backhoe will be used for 8 hours a day. The total days for paving are estimated to be 40 construction days.

Architectural Coating: The architectural coating will require one air compressor for 6 hours a day for 43 construction days.

Standard Regulatory Requirements
The Applicant is also required to follow all existing regulations during construction. These include but are not limited to the following:

South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust Control). Rule 403 requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. The Project will follow the SCAQMD rules and requirements for fugitive dust control, which include, but are not limited to the following:

- Pre-water active grading or trenching areas.
- Water all active construction areas as frequently as needed (at least twice daily) to prevent visible dust plumes from extending more than 100 feet.
- Maintain a stabilized surface or apply dust suppressants to inactive areas, disturbed surfaces, staging areas, haul routes, and unpaved roads.
- Limit on-site vehicle speeds to 15 miles per hour (mph) on unpaved areas.
- Maintain all haul trucks with covered loads and > 6 inches of freeboard (CVC §23114).
- Stabilize stockpiles with water or covers and restrict height if near occupied structures.
- Use a gravel pad at egress points (minimum 30' x 50', 1" washed gravel, 6" depth), alternatively a wheel shaker or wheel washing station.
- Remove track-out extending ≥ 25 feet onto public roadways immediately and clean daily.
- Suspend dust-generating activities and implement contingency measures during high wind events (gusts > 25 mph).
- Re-vegetate or stabilize disturbed areas within 21 days of inactivity.
- Limit construction vehicle traffic to designated haul routes only.

SCAQMD Rule 1113 and 1143. Rule 1113 governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of project must comply with Rule 1113. Rule 1143 governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule. The Project will utilize low-VOC or zero-VOC paints, coatings, and solvents consistent with the requirements of SCAQMD Rules 1113 and 1143.

California Air Resources Board, California Code of Regulations (CCR) Title 13 Section 2480 and 2485. 13 CCR 2480 & 2485 limit diesel engine idling for commercial vehicles, especially near schools, to reduce toxic diesel exhaust, setting a five-minute maximum idling limit in most locations, with specific rules for school buses (2480) and broader commercial vehicles (2485). All construction vehicles will be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

California Energy Code, CCR Title 24, Part 6 and California Green Building Code (CALGreen) CCR Title 24, Part 11. The California Green Building Standards Code—Part 11, Title 24, California Code of Regulations—known as CALGreen, is the first-in-the-nation mandatory green building standards code. In 2007, CBSC developed green building standards in an effort to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHG) to 1990 levels. The Proposed Project would comply with the mandatory requirements of the California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (CALGreen), including, but not limited to:

- Install low flow fixtures and toilets, water efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf.
- Provide the necessary infrastructure to support electric vehicle charging.
- Provide solar installations/solar readiness zones per the prescribed Energy Design Ratings.

California Building Code, CCR Title 24, Part 2, Volume 1, Section 1206. CCR Title 24 establishes acoustic regulations for both exterior-to-interior sound insultation and sound impact isolation. Title 24 regulations state that interior noise levels shall not exceed 45 dBA CNEL, with windows closed, in any habitable room for general residential uses. The Proposed Project would incorporate building construction techniques and insulation that is consistent with Title 24 Building Standards to achieve the minimum interior noise standard of 45 dBA CNEL for all residential units. Incorporated building construction techniques from Title 24 that are required to meet the 45 dBA CNEL include the windows closed condition for all residential units facing adjacent roadways and all exterior windows, doors, and sliding glass doors will have a positive seal and leaks/cracks must be kept to a minimum. Attic vents and openings are required to be oriented away from the adjacent roadway.

California Department of Resources Recycling and Recovery (CalRecycle) Senate Bill (SB) 1383. SB 1383 is a landfill waste reduction mandate that aims to reduce

organics waste landfill disposal by 75 percent by 2025. All residences and businesses are required to separate and recycle organic materials by participating in local waste management recycling and composting programs.

California Department of Industrial Relations and California Division of Occupational Safety and Health (Cal/OSHA), CCR Title 8. Construction employers must comply with Cal/OSHA regulations found in CCR Title 8, which requires construction equipment to be maintained in proper tune.

2020 US Code Title 16, Sections 703-712 (Migratory Bird Treaty Act (MBTA) Compliance). The MBTA of 1918 (16 U.S.C. 703-712) protects individuals as well as any part, nest, or eggs of any bird listed as migratory. In practice, federal permits issued for activities that potentially impact migratory birds typically have conditions which require pre-disturbance surveys for nesting birds. In the event nesting is observed, a buffer area with a specified radius must be established, within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., busy roads, intervening topography, etc.) and is based on the professional judgement of a monitoring biologist. A list of migratory bird species protected under the MBTA is published by USFWS.

State of California Fish and Wildlife Code Section 3500. Section 3503.5 of the California Fish and Wildlife Code states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Activities that result in the abandonment of an active bird of prey nest may also be considered in violation of this code. In addition, California Fish and Wildlife Code, Section 3511 prohibits the taking of any bird listed as fully protected, and California Fish and Wildlife Code, Section 3515 states that it is unlawful to take any non-game migratory bird protected under the MBTA.

California Migratory Bird Protection Act (MBPA). The MBPA was enacted in September 2019 to reinforce the MBTA at the state level. The MBTA states that "it is unlawful to take or possess any migratory nongame bird as designated in the federal Migratory Bird Treaty Act (16 U.S.C. Sec. 703 et seq.), or any part of a migratory nongame bird described in this section, except as provided by rules and regulations adopted by the United States Secretary of the Interior under that federal act."

City of Laguna Hills Municipal Code Chapter 5-24 Noise Control. The Proposed Project shall comply with the City of Laguna Hills Municipal Code requirements. No construction will occur between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, 8:00 p.m. and 8:00 a.m. on Saturday, or at any time on Sunday or a federal holiday. Furthermore, all outdoor HVAC/condenser equipment shall be shielded from the line of sight of the adjacent sensitive receptors behind noise barrier walls or enclosures.

City of Laguna Hills Tree Preservation Ordinance (Policy No. 315). The City of Laguna Hills has established the "Laguna Hills Municipal Code Tree Preservation Policy," which was last revised in May 2014. Under this ordinance, no person, other than the City, is authorized to trim, damage, or remove public (City-owned) trees without an appropriate permit. Upon request, and for the criteria described below, public trees will be inspected and authorized for removal:

- The tree is deemed hazardous, diseased, and/or declining.
- The tree is damaging the sidewalk, curb, or gutter, and is not receptive to preventative root pruning.
- The tree and/or its roots are a threat to private property.
- Trees in conflict with overhead utility lines.

A resident requesting removal of a street tree, that has been justified for removal by the City, will be requested to donate and plant another tree in its place. The size, species type, and location will be specified by the Director of Public Services or their designee. If the resident will not replace the tree, the City will do so provided the tree is determined by the Director of Public Services to enhance the tree preservation goals. A list of replacement tree species is detailed in the ordinance. Any person identified as having removed or trimmed a tree, so as to cause damage to the tree, will be responsible for the full cost of replacement of the tree.

California Administrative Code, Title 14, Section 4308 (14 CCR § 4308) (Accommodation for Unanticipated Cultural/Paleontological Resources). In compliance with the California Code of Regulations, during ground disturbance or any other construction activity, no person shall remove, injure, deface, or destroy any object of archaeological, or historical interest or value.

California Health and Safety Code, and Public Resources Code (Human Remains). In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These code provisions require notification

of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project site that are not reasonably suspected to overlie adjacent remains or archaeological resources.

National Pollution Discharge Elimination System (NPDES). Because the site is greater than one acre, the applicant is required by the Santa Ana Regional Water Quality Control Board to prepare a Stormwater Pollution Prevention Plan (SWPPP) to address water quality and runoff during construction to comply with the State of California General Construction Permit. The SWPPP will outline the source control and/or treatment control Best Management Practices (BMPs) to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable." All recommendations in the Plan shall be implemented during area grading and construction. The Project shall comply with each of the recommendations detailed in the Plan, and other such measure(s) as the City deems necessary to mitigate potential stormwater runoff impacts.

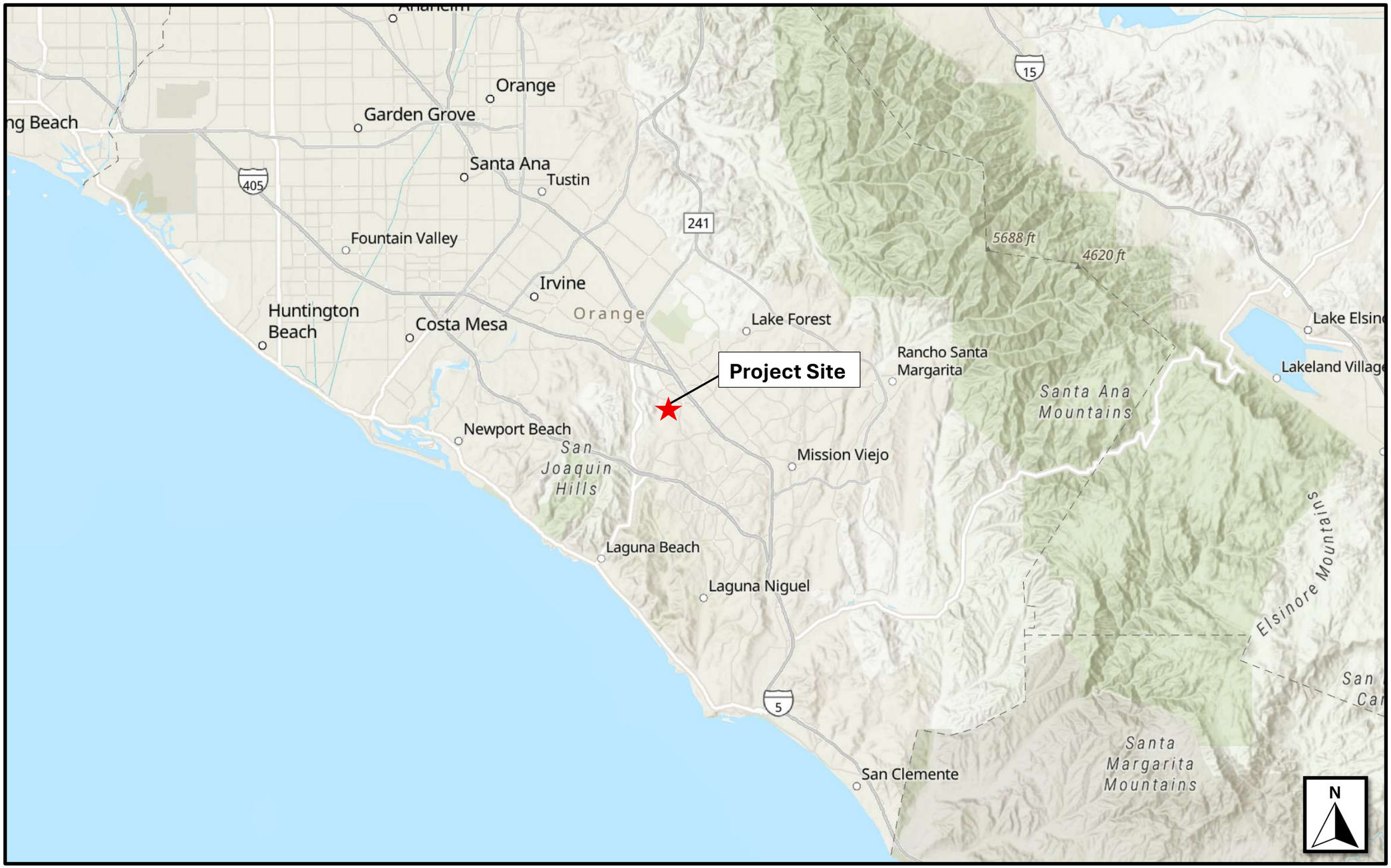


Figure 1: Regional Vicinity

Source: Orange County Public Works – Land Records GIS Map

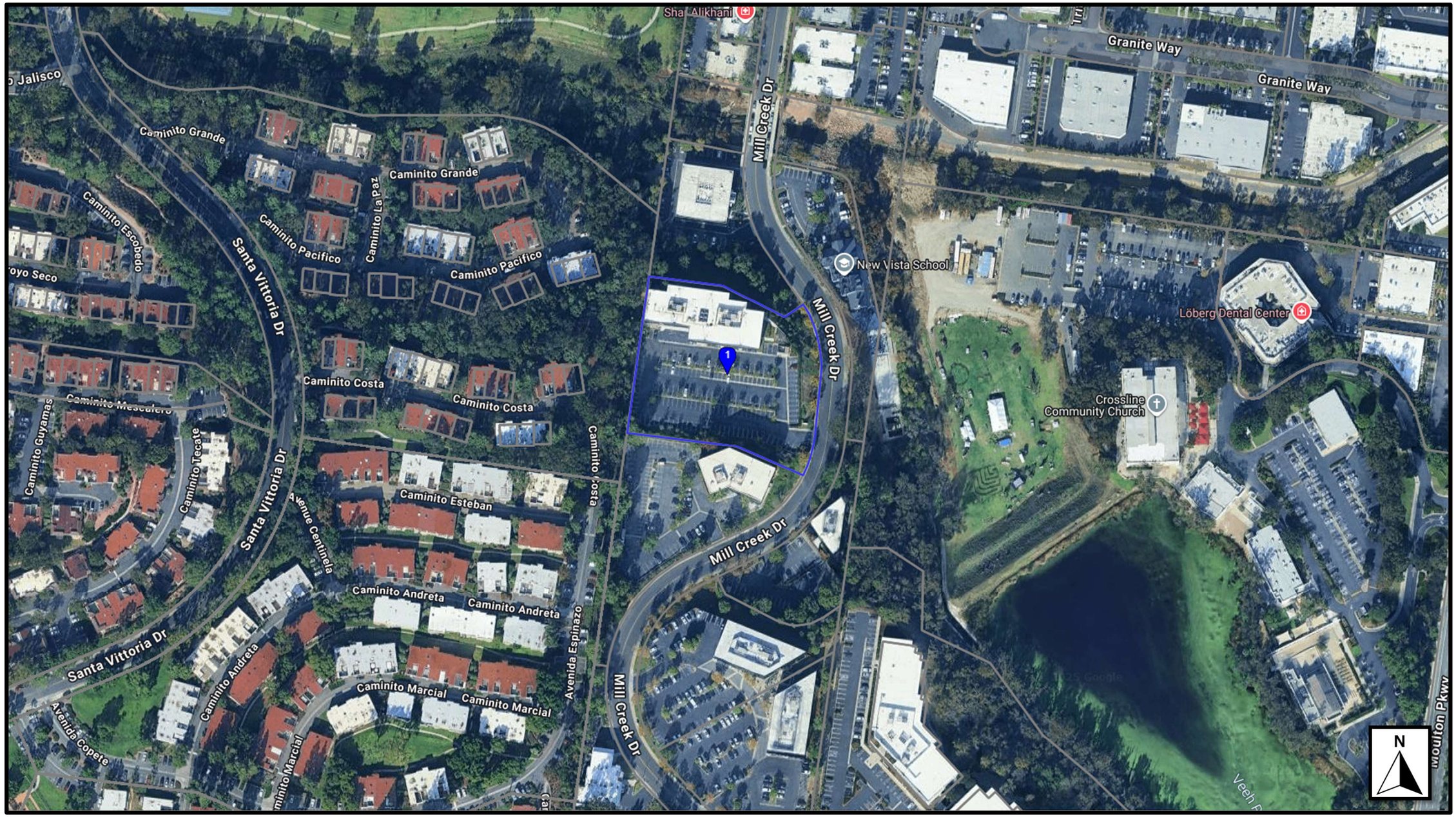


Figure 2: Site Location – Aerial View

Source: Orange County Public Works – Land Records GIS Map

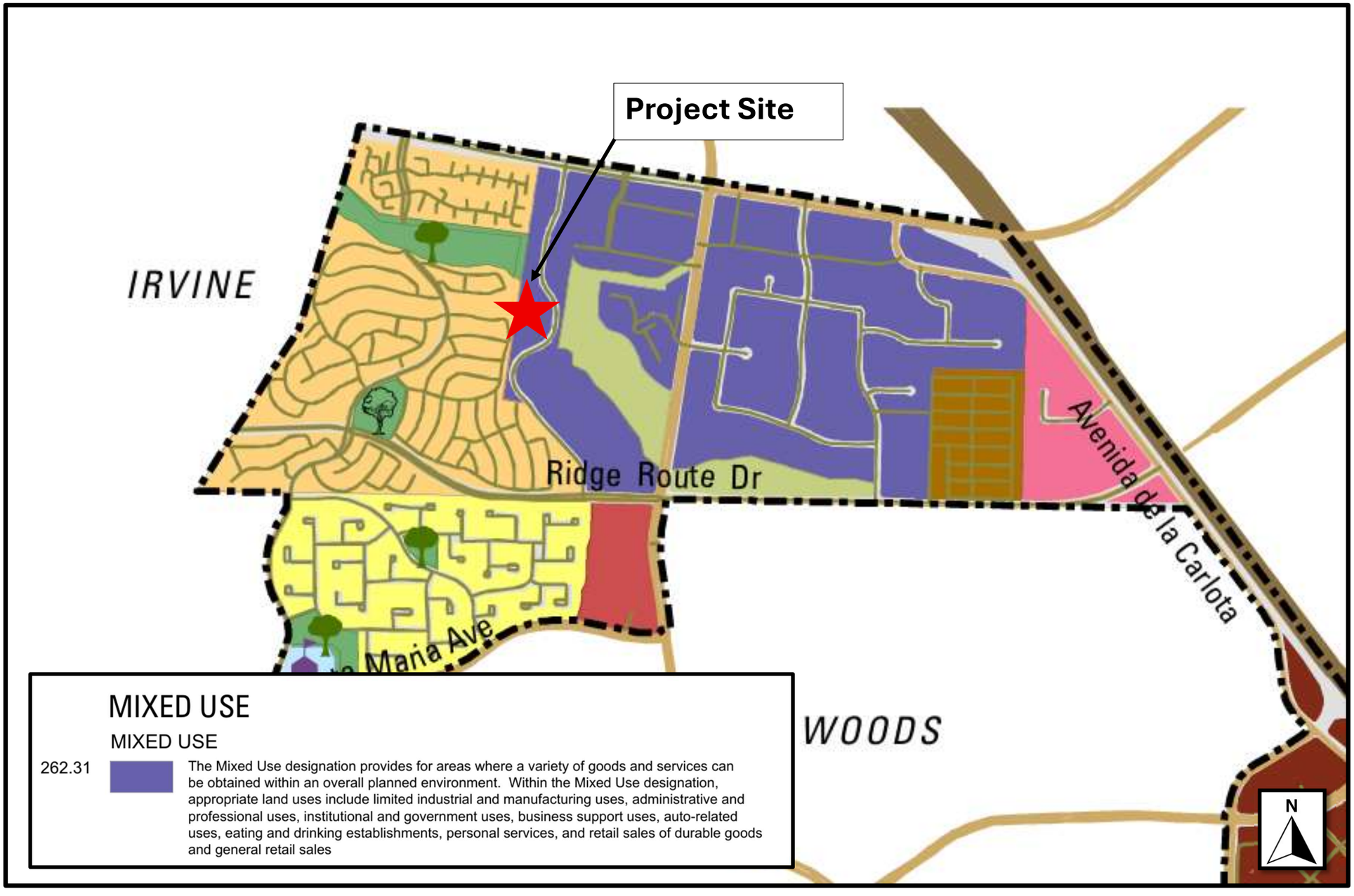


Figure 3: General Plan Land Use Designation

Source: City of Laguna Hills General Plan Land Use Map

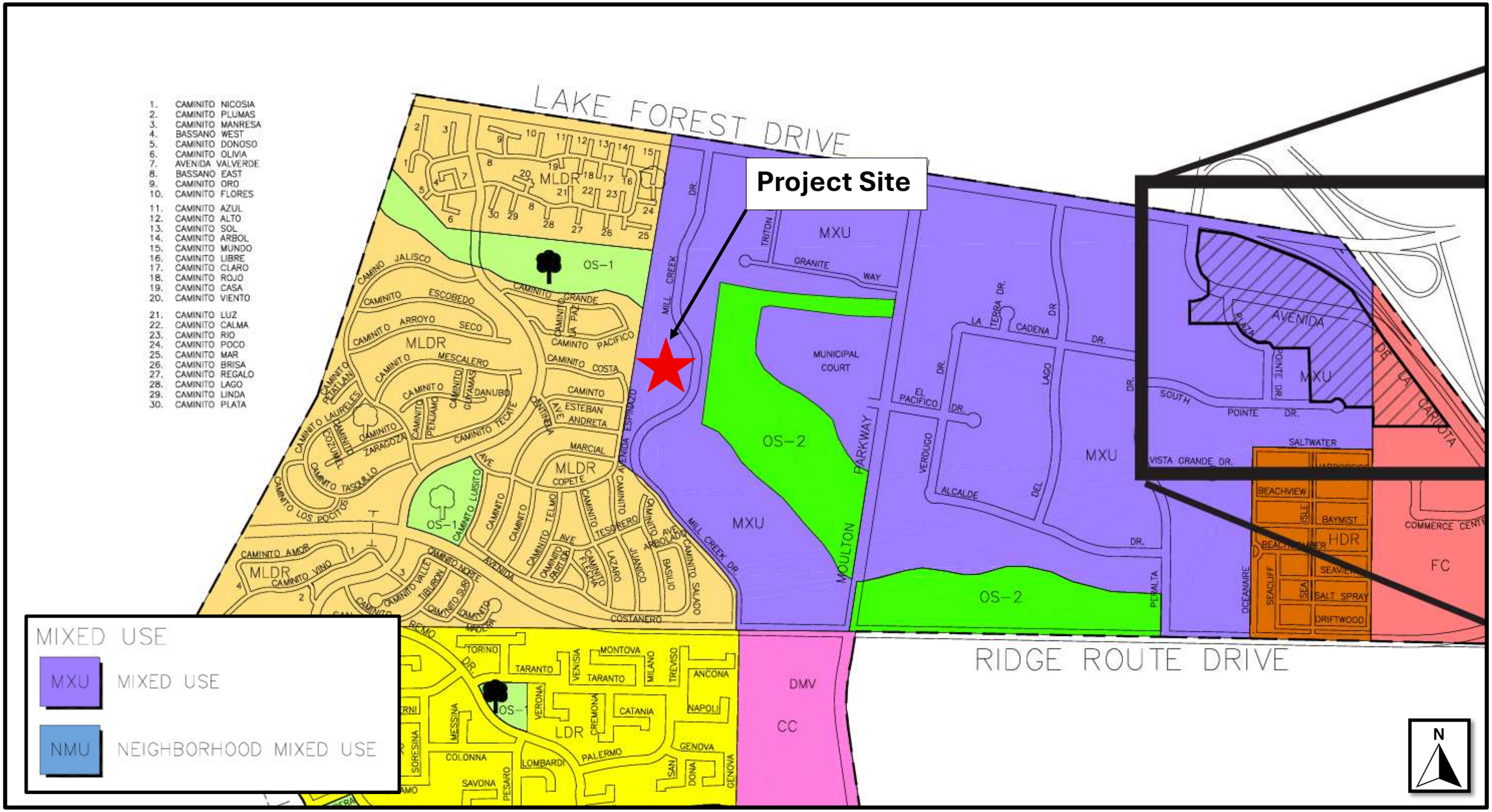


Figure 4: Zoning District

Source: City of Laguna Hills Zoning Districts Map

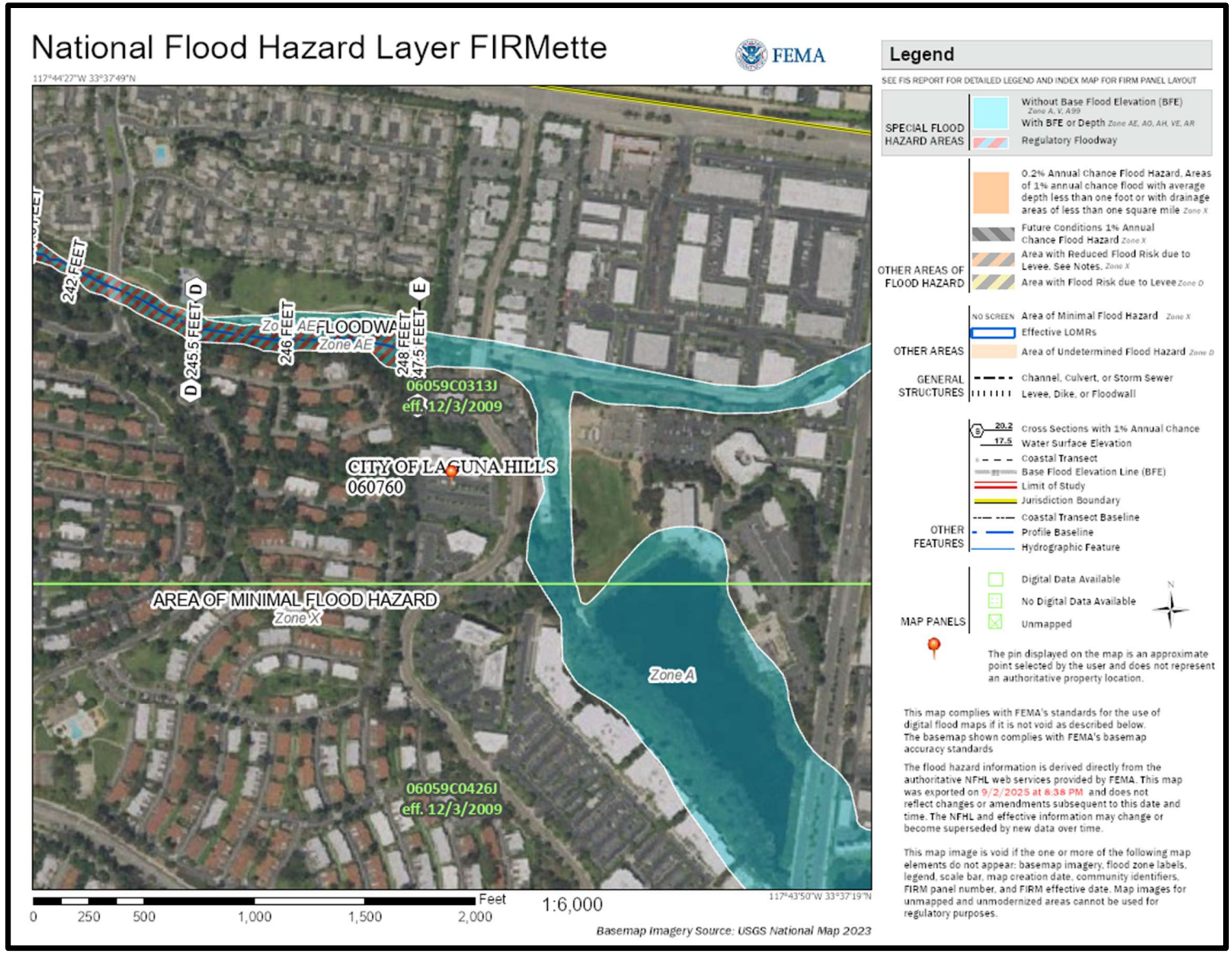


Figure 5: FEMA Flood Plan Map

Source: FEMA Flood Map Service Center

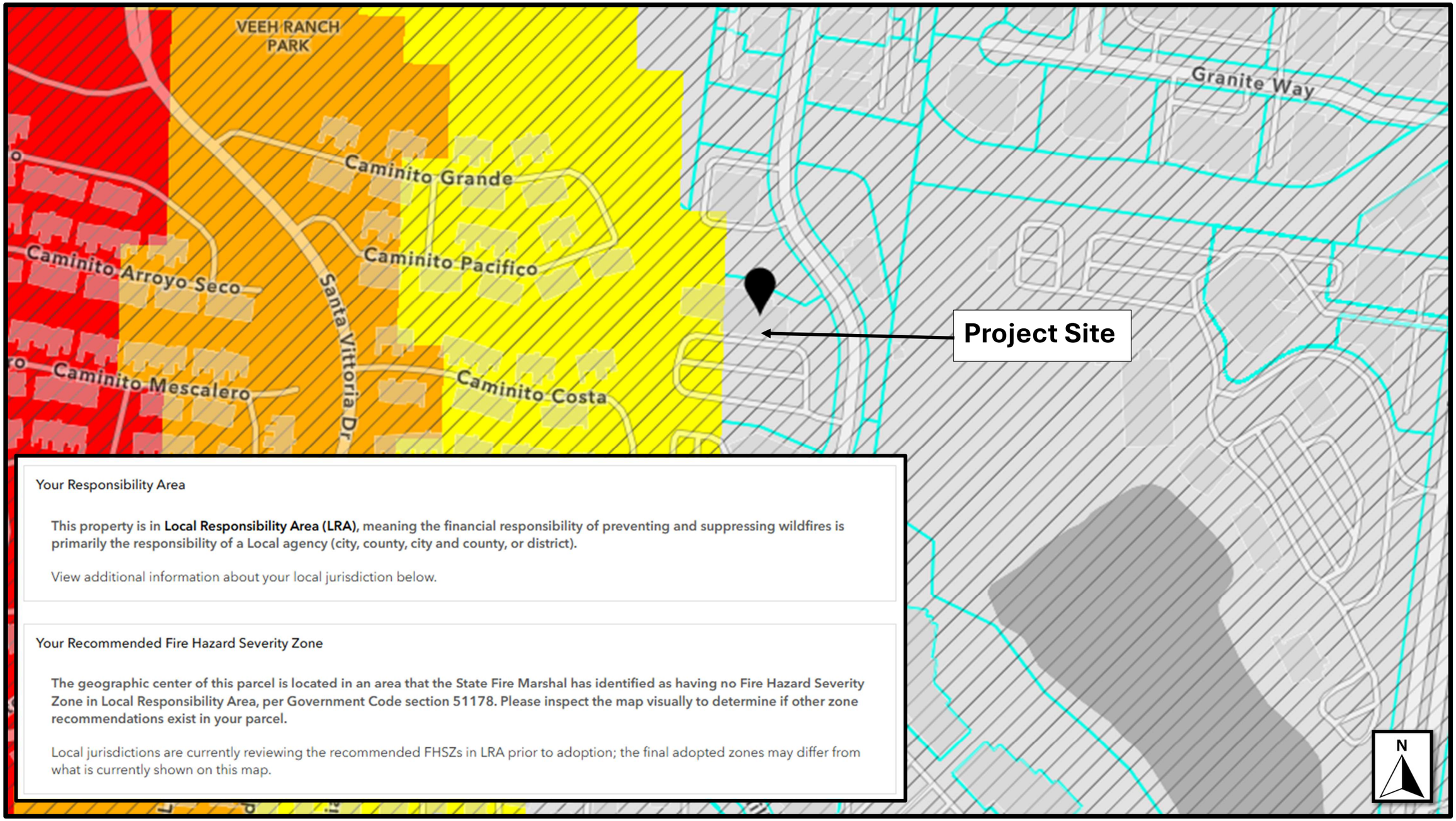


Figure 6: CAL FIRE Fire Hazard Severity Zones Map
Source: CAL FIRE LRA and SRA Map Viewer

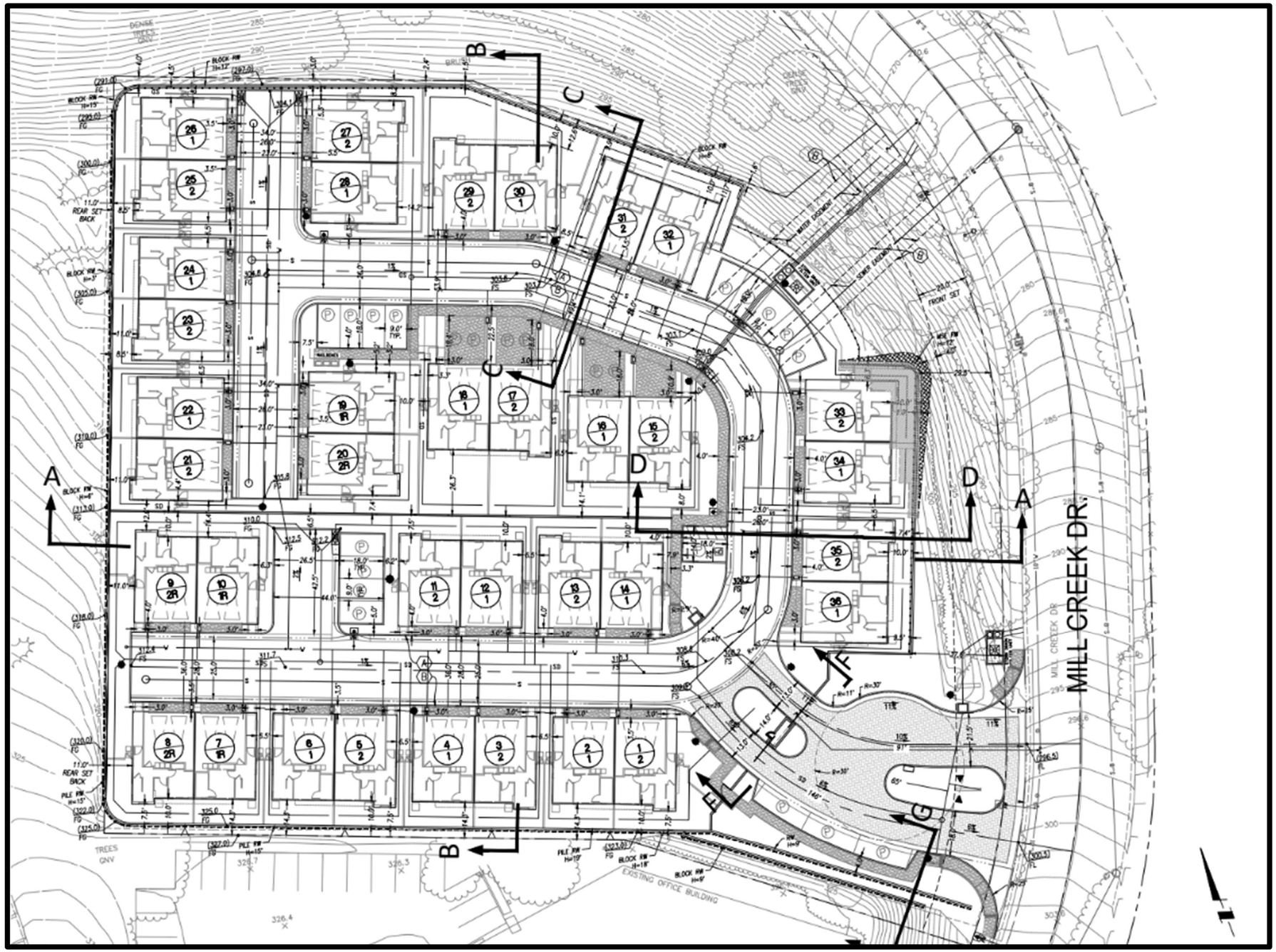
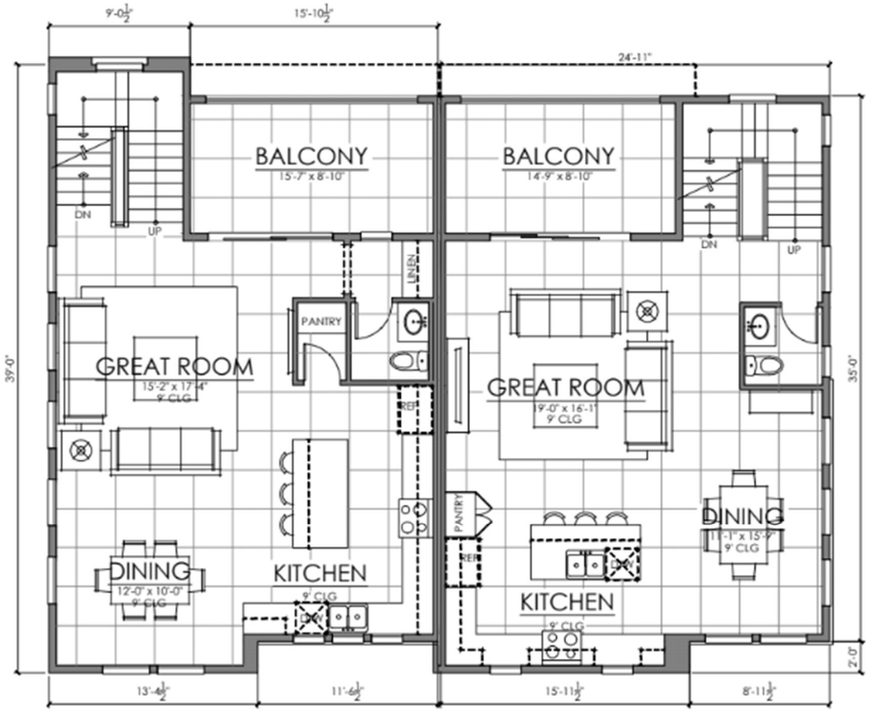
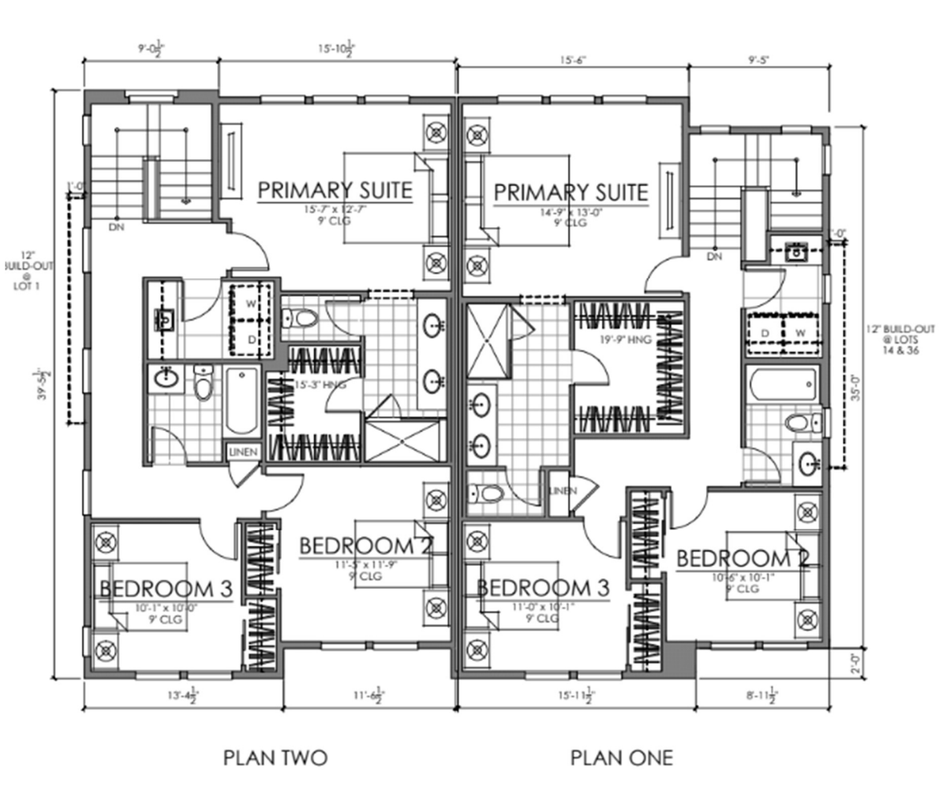


Figure 7: Site Plan
Source: Wilson Mikami Corporation

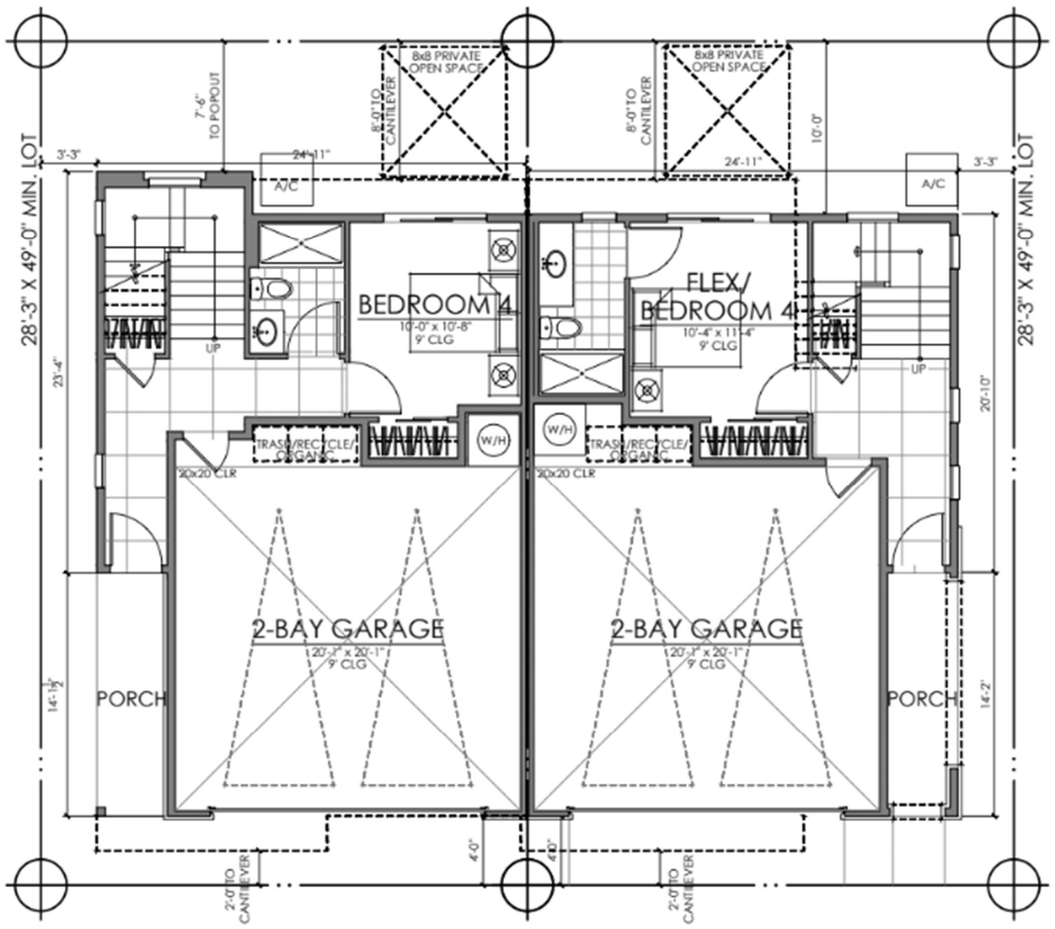
CEQA Class 32 Exemption
23161 Mill Creek Drive
Toll Brothers



PLAN TWO PLAN ONE



PLAN TWO PLAN ONE



PLAN TWO PLAN ONE

PLAN TWO	
LOWER LEVEL	378 SQ. FT.
MAIN LEVEL	776 SQ. FT.
UPPER LEVEL	879 SQ. FT.
TOTAL LIVING	**2033 SQ. FT.**
GARAGE	450 SQ.FT.

PLAN ONE	
LOWER LEVEL	363 SQ. FT.
MAIN LEVEL	770 SQ. FT.
UPPER LEVEL	858 SQ. FT.
TOTAL LIVING	**1991 SQ. FT.**
GARAGE	446 SQ.FT.

DUETS

Figure 8: Duet Floor Plans
Source: Wilson Mikami Corporation

TREES:

LARGE CANOPY TREES (48" BOX MIN.) QTY: 7

SYMBOL	SCIENTIFIC NAME	COMMON NAME
	Cercidium 'Desert Museum'	Desert Museum Palo Verde
	Pistacia chinensis	Chinese Pistache
	Platanus racemosa	Western Sycamore
	Podocarpus gracilior	African Fern Pine
	Quercus virginiana	Southern Live Oak
	Ulmus parvifolia	True Green Chinese Elm

MEDIUM ACCENT TREE (36" BOX MIN.) QTY: 19

SYMBOL	SCIENTIFIC NAME	COMMON NAME
	Cercis canadensis	Eastern Redbud
	Lagerstroemia ssp.	Crape Myrtle
	Olea europaea 'Swan Hill'	Olive
	Platanus acerfolia	London Plane Tree
	Searsia lancea	African Sumac

PERIMETER SCREENING TREE (24" BOX MIN.) QTY 5

SYMBOL	SCIENTIFIC NAME	COMMON NAME
	Arbutus 'Marina'	Marina Strawberry Tree
	Laurus nobilis	Sweet Bay
	Tristania confereta	Brisbane Box

SMALL ACCENT TREE (24" BOX MIN.) QTY 14

SYMBOL	SCIENTIFIC NAME	COMMON NAME
	Cercis occidentalis	Western Redbud
	Feijoa sellowiana	Pineapple Guava
	Podocarpus elongatus 'Monmal'	Icee Blue Podocarpus
	Podocarpus macrophyllus	Fern Podocarpus
	Prunus caroliniana 'Bright and Tight'	Carolina Cherry Laurel

SHRUBS/VINES:

SYMBOL	SCIENTIFIC NAME	COMMON NAME	SIZE
	Agave spp.	Agave	5 gal.
	Aloe spp.	Aloe	5 gal.
	Buxus japonica 'Green Beauty'	Japanese Boxwood	5 gal.
	Callistemon spp.	Bottle Brush	5 gal.
	Cistus 'Sunset'	Magenta Rockrose	5 gal.
	Dasyliron spp.	Desert Spoon	5 gal.
	Dianella ssp.	Flax Lily	5 gal.
	Dietes bicolor	Fortnight Lily	5 gal.
	Festuca mairei	Atlas Fescue	5 gal.
	Hesperaloe spp.	Yucca	5 gal.
	Heteromeles arbutifolia	Toyon	15 gal.
	Juncus patens	California Gray Rush	5 gal.
	Lavandula ssp.	Lavender	5 gal.
	Leymus condensatus 'Canyon Prince'	Canyon Prince Wild Rye	5 gal.
	Ligustrum japonicum 'Texanum'	Waxleaf Privet	5 gal.
	Lomandra spp.	Dwarf Mat Rush	5 gal.
	Olea europaea 'Montra'	Little Ollie Dwarf Olive	5 gal.
	Pittosporum tobira variegata	Vairegated Mock Orange	5 gal.
	Rhaphiolepis spp.	Indian Hawthorn	5 gal.
	Salvia 'Bees Bliss'	Bee's Bliss Sage	5 gal.
	Westringia spp.	Coast Rosemary	5 gal.
	Bougainvillea spp. [V/E]	Bougainvillea	15 gal.
	Calliandra haematocephala [V/E]	Pink Powderpuff	15 gal.
	Trachelospermum jasmnoides [V/E]	Star Jasmine	15 gal.
	Rosa banksiae [V/E]	Lady Banks Rose	15 gal.

QUANTITIES:
1 gal: 2680sf
[670 plants]

5 gal: 5375 sf
[610 plants]

15 gal: 900 sf
[80 plants]

GROUNDCOVERS:

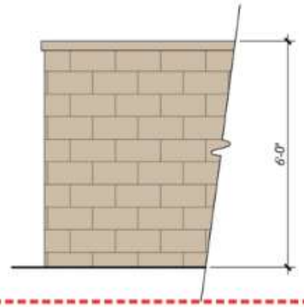
SYMBOL	SCIENTIFIC NAME	COMMON NAME	SIZE
	Acacia redolens	Prostrate Acacia	1 gal.
	Carissa 'Boxwood Beauty'	Natal Plum	1gal.
	Carex tumulicola	Foothill Sedge	1 gal.
	Lonicera japonica	Japanese Honeysuckle	1 gal.
	Myoporum p. 'Putah Creek'	Creeping Myoporum	1 gal.
	Rhaphiolepis spp.	Indian Hawthorn	5 gal.
	Rosmarinus officinalis	Rosemary	5 gal.
	Trachelospermum asiaticum	Asian Star Jasmine	1 gal.
	Westringia 'Low Horizon'	Coast Rosemary	5 gal.

QUANTITIES:
5545 sf
[1675 plants]

HOMEOWNER YARD: PLANTED AND MAINTAINED BY HOMEOWNER

Figure 9: Conceptual Landscape Plans
Source: Wilson Mikami Corporation

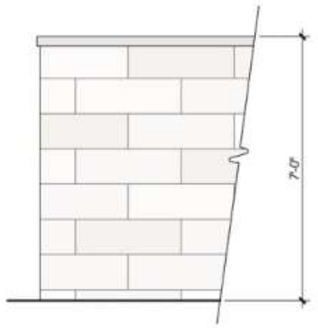
LEGEND



SIDEYARD WALL

-Split Face Block w/ Precision Cap

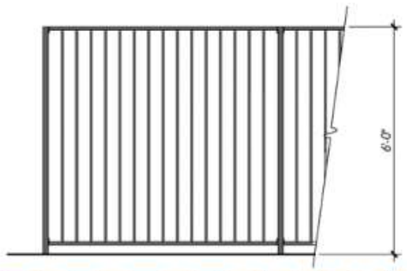
-6'-0" ht.



ENTRY WALL

-Cultured Stone Veneer with Cap

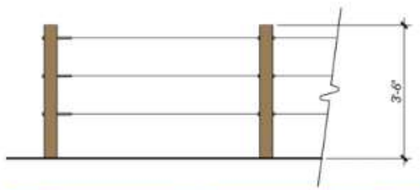
-7'-0" ht.



VIEW FENCE

-Tubular Steel

-6'-0" ht.



GUARDRAIL

-Steel Cable with Wood Posts

-3'-6" ht.

RETAINING WALL

-CMU Block with Cap or MSE Wall

-Height varies per Civil Engineer

Figure 10: Conceptual Wall and Fence Plan

Source: C2 Collaborative

CEQA Class 32 Exemption
23161 Mill Creek Drive
Toll Brothers

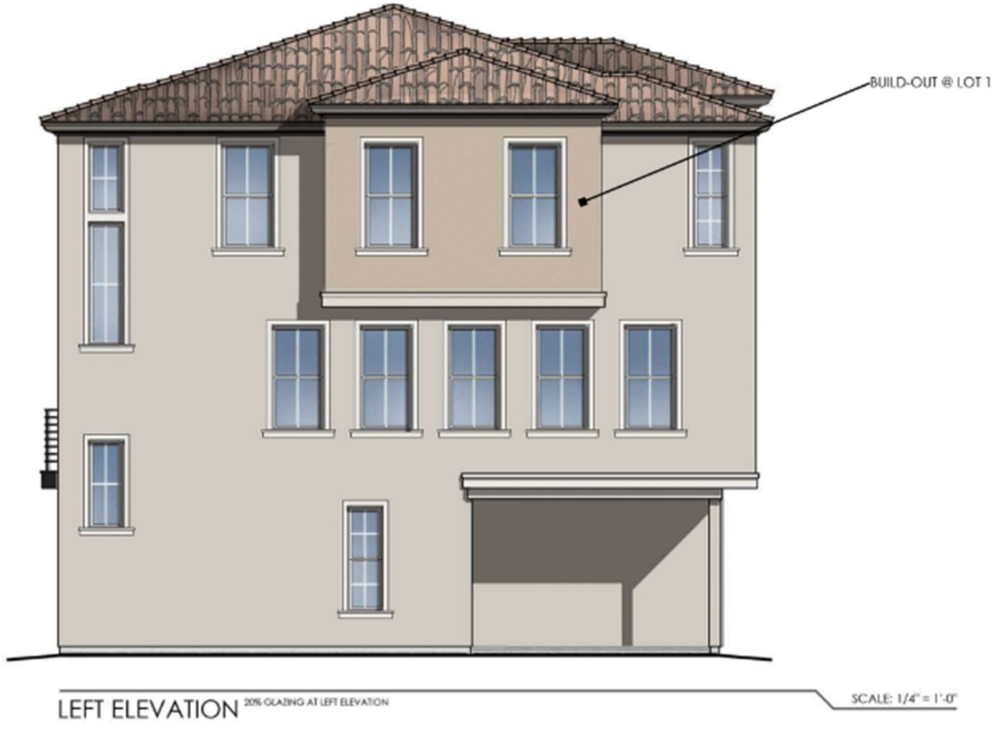
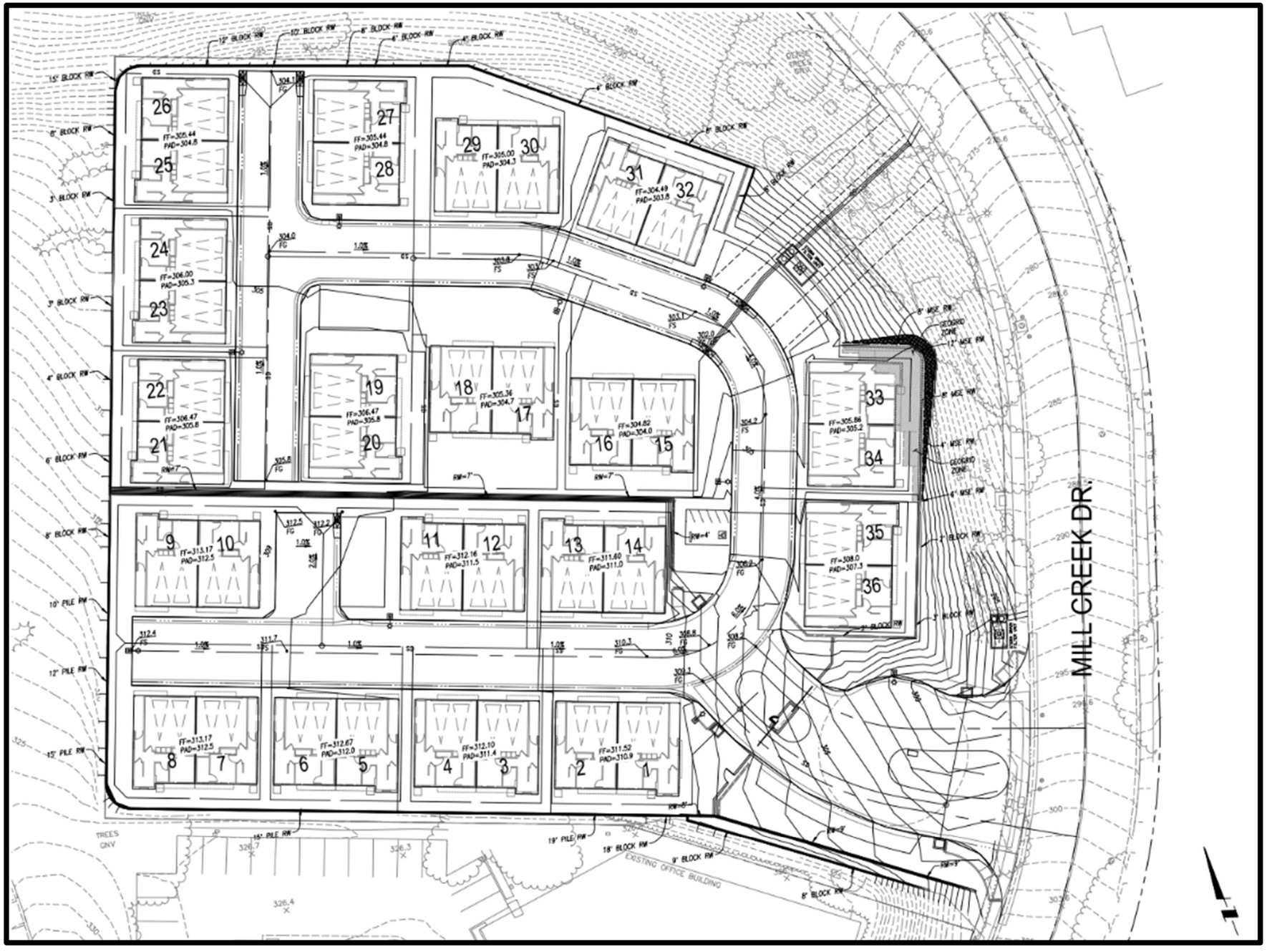


Figure 11: Elevations
Source: Woodley Architectural Group, Inc.



LEGEND

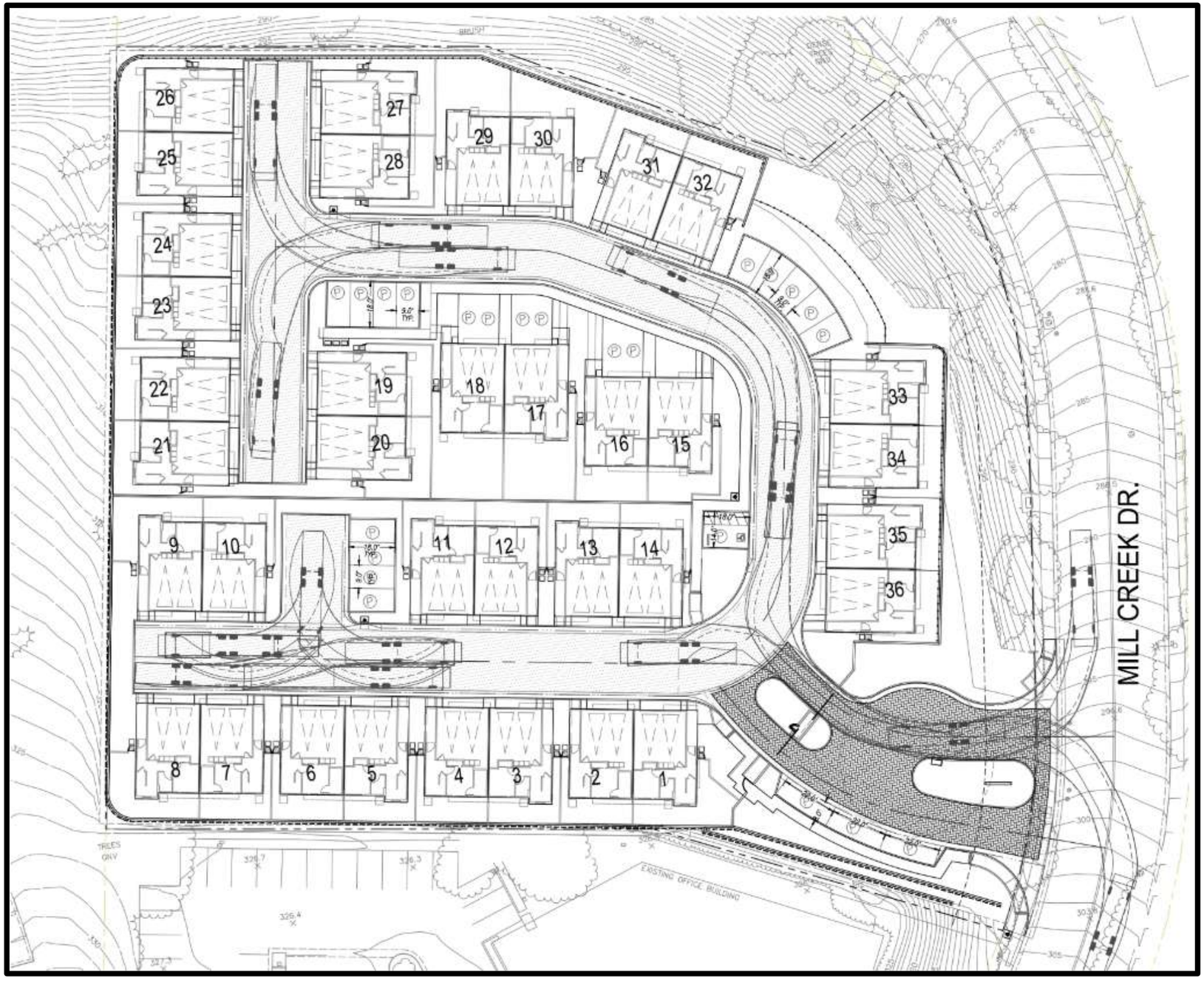
STREET CENTER LINE	
RIGHT OF WAY	
TRACT BOUNDARY	
LOT LINE	
EASEMENT	
EXISTING CONTOUR	205
PROPOSED CONTOUR	205
STREET LIGHT	
FIRE HYDRANT	
STORM DRAIN CATCH BASIN	
STORM DRAIN GRATE INLET	
VERDURA 4:1 BLOCK WALL	
VERDURA BLOCK WALL GEOGRID LIMITS	

PRELIMINARY EARTH WORK VOLUMES:

CUT VOLUME	3,109 CU. YD.
FILL VOLUME	7,889 CU. YD.
NET VOLUME	4,780 CU. YD.<FILL>

Figure 12: Conceptual Grading and Drainage Plan

Source: Wilson Mikami Corporation



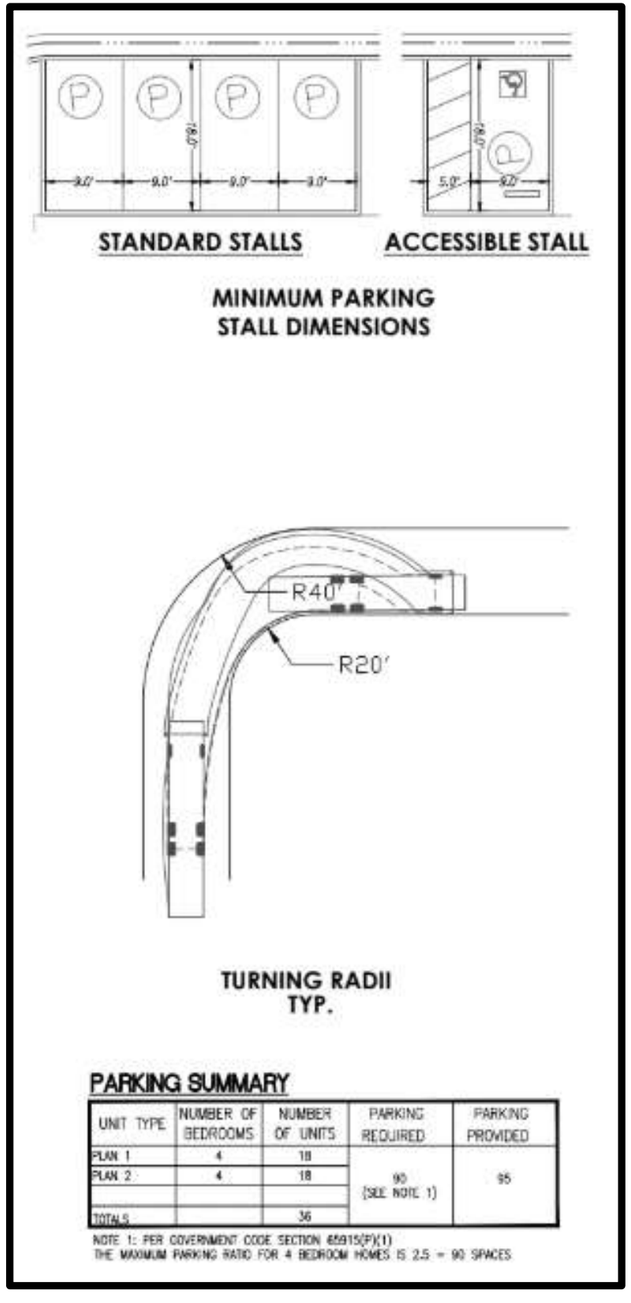


Figure 13: Parking and Access Plan
Source: Wilson Mikami Corporation

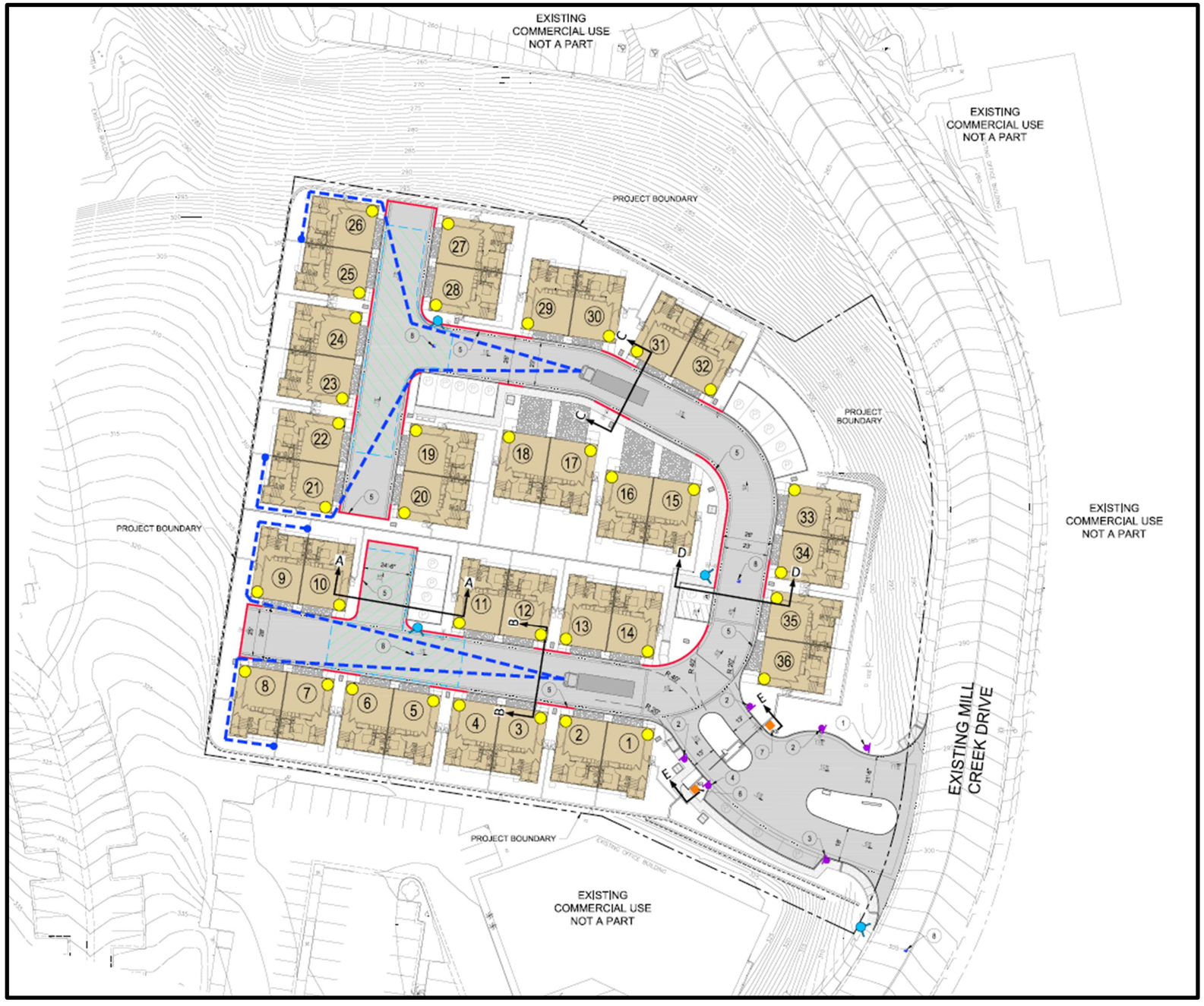


Figure 14: Fire Access Exhibit
Source: Planning Safe Fire Inc.

REQUIREMENTS TO QUALIFY FOR THE CLASS 32 EXEMPTION (14 CCR 15332):

Section 15332 of CEQA Guidelines states that "Class 32 consists of projects characterized as in-fill development meeting the conditions" described below:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
c. The project site has no value as habitat for endangered, rare, or threatened species.
d. Approval of the project would not result in significant effects relating to traffic, noise, air quality, or water quality.
e. The site can be adequately served by all required utilities and public services.

The following analysis discusses the Proposed Project in relation to each condition as listed in CEQA Guidelines Section 15332:

1. **Is the project consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations?**

General Plan:

The Project Site has a LHGP land use designation of Mixed Use, which "provides for areas where a variety of goods and services can be obtained within an overall planned environment" (LHGP, pg. LU-12). The Mixed Use designation allows for attached single-family dwellings with a Site Development Permit and a maximum residential density of 20 dwelling units per acre (du/ac). The Project proposes a total of 36 units at a density of 14.8 du/ac. **Table 1** below demonstrates the Proposed Project's consistency with the applicable General Plan policies. The Proposed Project is consistent with the existing Mixed Use LHGP land use designation and zoning district.

Table 1 – Project Consistency with Laguna Hills General Plan

Applicable General Plan Goal/Policy	Project Consistency
Goal LU-2: Ensure development is compatible and interdependent with neighboring uses.	
Policy LU-2.2: Improve connections with surrounding uses by enhancing landscaping, providing pedestrian connections, incorporating green areas, and planting street trees.	The Proposed Project includes enhanced landscaping with green space, accent trees, perimeter screening trees, shrub and groundcover, and vines and espaliers. The Proposed Project also includes enhanced concrete pavement to connect to the existing sidewalk connections on Mill Creek Drive.
Goal LU-3: Encourage infill development that involves revitalization of property in an economically and environmentally sustainable manner.	
Policy LU-3.2: Encourage new development that uses land efficiently and offers flexibility to changing resident and shopping needs, contributing to the long-term vitality of the community.	The Proposed Project adds housing to accommodate resident and housing needs within the City. The Proposed Project would provide additional housing opportunities, including affordable housing, to the City. The Proposed Project proposes to transform the existing site to build 36 residential units to replace the existing commercial office building and surface parking lot. The existing office building's footprint comprises approximately 13 percent of the total site acreage, while the Proposed Project has a maximum lot coverage of 64 percent. The addition of 36 units, including two affordable units, would provide additional housing to the City's housing stock to address housing needs and the City's Regional Housing Needs Allocation obligation.
Policy LU-3.13: Use landscaping and urban design techniques to break up large parking areas and long monotonous walls in new development and redevelopment projects.	The Proposed Project utilizes a variety of landscaping and walls/fences to encourage attractive elevations of the Proposed Project from all directions as shown in Figures 9 through 11.
Goal LU-4: Place a high priority on design, architecture, and landscaping that reflect the community's identity and gracious lifestyle.	
Policy LU-4.5: Continue to plant and maintain attractive drought-tolerant and native landscaping that enhances the character of Laguna Hills.	The Proposed Project will utilize drought- tolerant and native landscaping throughout the Proposed Project site in the forms of trees, shrub and groundcover, and vines and espaliers.
Goal COS-3: Make meaningful choices to improve local and regional air quality and address climate change.	

Policy COS-3.1: Continue to preserve important native trees and plant new low water use landscaping and trees.	The Proposed Project will install native trees and low water use landscaping. There are no protected public trees on the Project Site.
Goal S-1: Reduce the risk of injury and the loss of life and property from seismic activity and geologic conditions.	
Policy S-1.2: Apply current and proper land use planning, development engineering, building construction, and retrofitting requirements.	The Proposed Project will adhere to the latest building codes, as amended in Chapter 10.28 of the LMHC, adopted by the City. Under Density Bonus Law, the Proposed Project seeks to obtain waivers of development standards that physically preclude the development of the Proposed Project. As described below and in the Density Bonus Request Letter included in the Project's application, the site can accommodate the Project with these waivers without any adverse impacts to health or safety.
Goal S-6: Reduce injuries and danger to life, property, damage, and public health hazards associated with flooding.	
Policy S-6.2: Require that new development and redevelopment minimize stormwater and urban runoff into drainage facilities by incorporating on-site design features, such as detention basins, water features, or other suitable strategies. Where feasible, support the use of common detention facilities serving more than one development.	The Proposed Project would also adhere to the County's Drainage Area Management Plan (DAMP). The Proposed Project includes stormwater facilities, including catch basins and storm drain lines. The drainage from the Proposed Project would be collected by a series of area drains and catch basins to collect street flow. The southern half of the site would drain out to Mill Creek through a proposed parkway culvert near the proposed driveway. The northern half of the site would drain out to Mill Creek Drive through a second proposed parkway culvert near the northeast corner of the site. The flow would continue down Mill Creek to an existing storm drain system tributary to the San Diego Creek Channel, which would ultimately drain to Upper Newport Bay. Stormwater would be collected by a series of PVC pipes discharging to a proposed bio-treatment BMP and then through a parkway culvert onto Mill Creek. The Proposed Project would use LID Treatment BMPs to reduce the post development impacts, including infiltration, harvest and use, evapotranspiration, or biotreat/biofilter, the 85th percentile of a 24 hour storm event.

Policy S-6.4: Continue to implement National Pollutant Discharge Elimination System (NPDES) stormwater permits issued by the state and regional water quality control boards.	The Proposed Project will adhere to applicable NPDES and state/regional water quality control board regulations as well as LHMC Chapter 5.36 – Water Quality Control.
Goal H-2: Facilitate the development of a range of housing types, densities, and affordability levels to meet the diverse needs of the community for all economic levels and age groups and special needs groups, such as large families, female-headed households, the disabled, seniors, and the homeless.	
Policy H-2.1: Provide opportunities for higher density residential, mixed use residential/commercial development, and transit-oriented development in appropriate areas of the City.	According to the LHGP, mixed use refers to the mixing of compatible land uses, such as residential, commercial, and office in a vertical and/or horizontal configuration. The Mixed Use designation allows a variety of office, public, light industrial, residential, and commercial establishments. Construction of the Proposed Project would support mixed use residential development and will provide affordable units, and aid the City in meeting its RHNA obligation.
Policy H-2.6: Coordinate with the private sector in the development of affordable and special needs, rental, and ownership housing.	The Proposed Project includes two units deed-restricted as affordable for very low- income households.
Goal H-4: Plan for and monitor the long-term affordability of sound, quality housing.	
Policy H-4.1: Enforce and enhance the housing monitoring system to ensure compliance with funding program	As a condition of approval, the applicant is required to enter an affordable housing regulatory agreement which will require the affordable units to be sold and occupied by qualified income households. Upon resale of the affordable units the seller and future buyers would need to comply with the provisions of California Density Bonus Law. This agreement would assist the City in monitoring affordable housing.

Zoning:

When the Density Bonus Law requires a City to waive development standards (such as height limits, setbacks, or floor area ratios), those waived standards are not "applicable" for purposes of the Class 32 infill exemption. (*Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349.) The Proposed Project would comply with the MXU standards, as applicable, with the exception of the waivers requested under Density Bonus Law.

The Proposed Project proposes to deed- restrict two units as affordable for very low-income households (5.5% of the total project). Because the Proposed Project is eligible under Density Bonus Law, the Applicant seeks several waivers of development standards that physically preclude development of the Proposed Project, as well as a concession to provide for cost reductions in order to accommodate the affordable units. This allows for flexibility to develop the housing project at the Project Site. The waiver requests include reduction in setbacks and removal of requirements, such as façade composition, massing, and private open space as shown below in **Table 2**.

Table 2 – LHMC Development Standard and Requested Waiver/Concession

23161 Mill Creek Waiver List		
Citation	**Description**	**Waiver Request**
LHMC Section 9-30.040 – Rear Setback	15-foot rear seatback	Reduction in setback to 8.5-foot rear setback
LHMC Section 9-30.040 – Building Separation	Minimum building separation of 10 feet	Reduction of building separation to 6.5 feet
LHMC Section 9-30.040 – Private Open Space	10 percent minimum private open space. A minimum of 100 sq. ft. of private open space shall be provided for each ground floor unit. A minimum of 40 percent of the residential units above the ground floor shall include a minimum of 50 sq. ft. of private open space (balcony, terrace, or rooftop).	Reduce requirement to 9 percent
LHMC Section 9-30.040 – Building Height	35 feet maximum building height	Increase to 38 feet
LHMC Section 9-40.100 – Fences walls and hedges	"Perimeter tract walls which are adjacent to a public street shall have articulated planes by providing, at a minimum for every 100 feet of continuous wall, an 18 inch deep by eight-foot-long landscaped recession. Walls should be constructed with pilasters provided at every change in direction, every five feet difference in elevation, and at a minimum of every 25 feet of continuous wall.	Waive Requirement

	Fences, walls, and hedges within the front yard setback shall not exceed 42 inches in height. The height of retaining walls in the front yard shall be less than 30 inches in height. The total wall height, including the retaining wall, shall not be greater than 42 inches."	
ODS Section 2.2.2 – Pedestrian Connections	Primary entrances in buildings must be connected to a public sideway or pathway at least four feet wide for entrances serving one-to-two units.	Waive Requirement
ODS Section 2.3.1 – Active Frontage	Requires a minimum of 70 percent of the building frontage facing the publicly accessible pathway to be ground floor residential uses. The majority of the building frontages are currently proposed as garages and would not meet this requirement.	Reduce to 16 percent with porches applied as a residential use
ODS Section 2.3.1.2 – Ground Floor to Floor Height	Ground floor shall have a minimum floor-to-floor height of 12 feet.	Reduce to 10 feet
ODS Section 2.7.1.1 – Short Term Bicycle Parking	Short-term bicycle parking shall be provided at a rate of one space per 10 dwelling units	Waive Requirement
ODS Section 2.7.1.2 – Long Term Bicycle Parking	At least one long-term bicycle storage space is required for each unit. 36 required.	Waive Requirement
ODS Section 2.8.1 – Pedestrian Pathways	"All on-site buildings, entries, facilities, and vehicular and bicycle parking areas shall be internally connected with a minimum of four feet wide pedestrian pathway or pathway network. At least two amenities that include trellises and/or benches shall be provided on any pedestrian path longer	Waive Requirement

	than 200"	
ODS Section 3.1 – Massing	Buildings shall employ the specified massing strategies of modulation, roof form, or projections	Waive requirement for three sides.
ODS Section 3.2.1 – Step backs	Buildings above two stories or 35 feet are required to have a minimum of 30 percent of the frontage stepped back at a minimum of 10 feet.	Waive Requirement
ODS Section 3.4.2 – End Units	ODS Section 3.4.2 requires all end units to have at least 10 percent fenestration area. End units that face the street shall also have at least on architectural projection that is a minimum of 18 inches.	Waive requirement, except for Units 1, 14, and 36
ODS Section 3.5.1 – Window Alignment	Windows in opposing units, facing each other and located within 40 feet of each other, shall be offset by a minimum of 20 feet.	Waive Requirement
ODS Section 3.9.1 – Entrance Types	"Primary building entrances for all residential buildings shall face a public sidewalk or publicly accessibly pathway. In a porch entrance type, the porch shall be eight feet minimum and 18 inches above sidewalk.	Reduce width to four feet and waive level above sidewalk
ODS Section 3.9.3 – Parking and Access	The garage door is required to be located a minimum of one foot behind the primary façade.	Waive Requirement
ODS Section 4.3.2 – Roofs, Required Elements	Overhanging eaves (minimum 24 feet on elevation that faces a public street) with exposed rafter tails or beams are a required element and are missing from the architectural style.	Waive Requirement
ODS Section 5.3.1.3 – Walls and Fences, Visual Interests	1. Perimeter walls shall incorporate multiple textures, staggered	Waive Requirement

	setbacks, and variations in height. 2. Perimeter walls shall incorporate columns or pilasters to provide relief. The maximum unbroken length of a perimeter wall shall be 50 feet. The perimeter walls do not meet these requirements.	
OCPW Std 1107 – Guard Gate Setback from ROW	Guard gate: 100 feet minimum stacking distance	Reduce to 91 feet
OCPW Std 1107 – Location of Call box	Guard gate: the call box location should be after the turn-around	Have the turn around before the call box.
OCPW Std 1107 – Street Width	Local street: 40 feet minimum curb to curb with eight feet sidewalk + parkway both sides	Reduce to 26 inches and waive sidewalk requirement
23161 Mill Creek Concession		
Citation	**Description**	**Waiver Request**
ODS Section 4.3.3 Walls and Windows	Casement or double-hung sash with flat or arched lintels and windows shall be recessed two to 12 inches from outer wall are required elements and are missing from the architectural style. Additionally, one of the following optional elements shall be incorporated: pedimented or framed windows, paired decorative wood shutters, stepped windows at internal staircases, or balconettes.	Remove requirement

23161 Mill Creek Clarifications			
Citation	**Description**	**Clarification**	**Proposed Design**
ODS Section 4.3.5 – Decorative Accents and Details	Requires at least six of the following elements to be incorporated into the design: window	City confirmed that the project as depicted on	1. Rafter extensions – Corbels shown on the front elevation to meet this requirement. 2. Balconies

	grilles, recessed doorways, rafter extensions, balconies, wrought iron light fixtures, courtyards, wood finish doors, stucco/stone finished chimneys, awnings, overhangs, wrought iron railing, or arcade at entry.	the plans adhere to 6 elements.	3. Wrought iron light fixtures – Dark finish metal meet this requirement. 4. Wood finish doors – wood looking doors and not actual wood doors are proposed on this project. 5. Recessed doorways 6. Wrought iron railing – dark finish metal meet this requirement

2. Is the proposed development located within the city limits on a project site of no more than five acres substantially surrounded by urban uses?

The Project Site is located within City limits on a 2.43-acre parcel. The Project Site is surrounded by urban uses: office buildings and associated surface parking lots to the north and south, Mill Creek Drive to the east, and landscaping and multi-family residential to the west.

3. Does the project site have value as habitat for endangered, rare, or threatened species?

The Project Site is located within a developed urban setting with an existing commercial office building and associated surface parking, pavement, and driveways onsite. The Project Site is located within the County of Orange Central and Coastal Regional Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), but the City is not a participating entity of the NCCP/HCP, and is not subject to the policies within those plans. The Biological Resources Report dated January 2026, by South Environmental, (**Appendix B**) finds that the Proposed Project would be constructed entirely on Developed/Ornamental Landscaped cover type, which is not a sensitive natural community. The Project Site is within an area that is already developed and does not support special-status species. Additionally, no special-status plants or animal species were observed on the Project Site. Further, the Proposed Project would adhere to all applicable regulatory requirements. Existing shrubs or trees would be removed in accordance with the Migratory Bird Act and the California Fish and Game Code. Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species.

4. Would approval of the project result in any significant effects relating to traffic, noise, air quality, or water quality?

Traffic:

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

The LHGP Mobility Element discusses the City's circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Mobility Element establishes goals and policies that guide the City's mobility system, including streets, transit facilities, and the recreational trails system.

Transit Facilities

According to the Mobility Element, public bus service in the City is provided by the Orange County Transportation Authority (OCTA). OCTA's System Map[1] shows that the closest transit line to the Project Site is Route 90 along Moulton Parkway and Irvine Center Drive. The Proposed Project would continue to be served by the existing transit system. The population growth associated with the Proposed Project could increase the demand for public transit services. The Proposed Project does not propose any features that would obstruct local transit routes. There are no transit routes directly adjacent to the Project Site. The Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the transit system.

Roadway Facilities

Access to the Project Site is proposed via one full-access gated driveway along Mill Creek Drive. According to the LHGP Mobility Element, Mill Creek Drive is classified as a local street. The Project does not propose any modifications to Mill Creek Drive. The existing driveway at the Project Site would be modified to include a gate entry with call box, a monument signage wall, separate entrance and exit points, and fire lane entrance signs. The driveway would be a minimum of 40 feet wide and features a gated entry and exit.

Bicycle Facilities

There are no bicycle facilities adjacent to the Project Site. The Mobility Element does not identify Mill Creek Drive as a bikeway. The nearest bikeway is Lake Forest Drive,

[1] OCTA System Map, System Map - Orange County Transportation Authority, accessed January 4, 2026.

which is classified as a Class 1 Bikeway. The Project does not propose modifications to any bicycle facilities. Residents of the Proposed Project could incrementally increase the use of bicycle facilities within the City. The Proposed Project would not conflict with a program, plan, ordinance, or policy addressing bicycle facilities.

Pedestrian Facilities

Sidewalks are currently provided along Mill Creek Drive, adjacent to the Project Site. The Proposed Project would modify the existing driveway onsite and provide landscaping at the driveway entrance to connect to the existing sidewalk. The Proposed Project would not conflict with a program, plan, ordinance, or policy addressing pedestrian facilities.

Based on the analysis above, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

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

CEQA Guidelines Section 15064.3 states that transportation impacts of projects are, in general, best measured by evaluating the Proposed Project's VMT. Automobile delay (LOS) will no longer be considered on an environmental impact under CEQA. The City's VMT Analysis Guidelines establishes the methodology and thresholds of significance for analyzing transportation impacts pursuant to the latest requirements of CEQA regarding VMT.

Per the City's VMT Analysis Guidelines, projects located in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the citywide average, than the project is considered to be in a low VMT area. According to the Project Trip Generation and VMT Screening Analysis and Gate Queuing Study (Traffic Study), dated January 8, 2026, by RK Engineering Group, Inc. (**Appendix C**), the Project Site is located within Orange County Transportation Analysis Model (OCTAM) TAZ 1504, which has a VMT/service population of 12.9. This is less than the City's VMT Threshold of Significance of 16.1 VMT/Service Population. Because the Project Site's TAZ VMT does not exceed the citywide average VMT/capita, the Proposed Project satisfies the City's VMT Screening Type 4 – Low VMT Area Screening and can be presumed to have a less than significant impact on VMT. Per the City VMT guidelines, projects that generate less than 500 net average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and

are therefore presumed to have a less than significant impact on VMT. Therefore, with 259 average daily trips, the Proposed Project also satisfies VMT Screening Type 5 – Net Daily Trips Less Than 500 ADT. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

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

The Proposed Project does not involve any features that would increase traffic hazards due to geometric design or incompatible uses. There are no off-site roadway improvements that could substantially increase hazards due to a geometric design feature. Access to the Project Site is proposed via one full-access gated driveway along Mill Creek Drive. The existing driveway at the Project Site will be modified to include a gate entry with call box, a monument signage wall, separate entrance and exit points, and fire lane entrance signs. The driveway will be a minimum of 40 feet wide and features a gated entry and exit. Modifications to the driveway would match and connect to the adjacent sidewalks.

The Traffic Study included a queuing analysis at the proposed gated access driveway. The purpose of the queuing analysis is to determine whether adequate storage capacity is provided to allow vehicles to enter the Project Site without causing vehicles to spill back onto Mill Creek Drive. The width of the access driveway lanes is approximately 21.5 feet at the start of the median and expands to approximately 30 feet with an area for vehicles to bypass the visitor lane. This is designed in accordance with Orange County Standard Plan 110. Assuming an average car length of 19 feet (i.e. 22 feet of total spacing per vehicle), the access driveway is expected to accommodate approximately four vehicles within the resident lane, and approximately two vehicles within the visitor lane without spilling onto Mill Creek Drive. The 95th percentile vehicular queue for the proposed driveway is forecasted to be approximately two vehicles during peak hour for both the residential and visitor lane. The proposed driveway provides space that can accommodate four vehicles (resident) and two vehicles (visitor). As such, vehicles are not expected to spill back onto Mill Creek Drive. Proposed improvements, including the driveway modifications, would be reviewed and approved by the City.

d. Would the project result in inadequate emergency access?

The Proposed Project is required to comply with the City's development review process including review by OCFA for compliance with all applicable fire code

requirements for construction and access to the Project Site.

During construction, it is not anticipated that any lane closures would be required. Should any land closures be required, they would be coordinated with the City according to the City's traffic control plan guidelines. The driveways within the Project Site would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. As shown in **Figure 14** – Fire Access Exhibit, the Proposed Project includes several fire lane entry and fire lane "no parking" signs located at the driveway entrance to ensure space for adequate access in the event of an emergency. Fire hydrants would be located throughout the Project Site with fire lane painted red curbs. On-site hydrants will be public, not private, and all units will be protected by an NFPA 13-D sprinkler system. Each hydrant location allows for a 300 feet maximum hose pull distance to the furthest point of a unit. By complying with OCFA's review process and applicable fire code requirements, the Proposed Project would not result in inadequate emergency access.

Noise:

A Noise Impact Study dated January 8, 2026, by RK Engineering Group, Inc. (**Appendix D**) was prepared for the Proposed Project to analyze the Proposed Project's potential noise impacts. As discussed below, approval of the Proposed Project would not result in any significant effects relating to noise. For the purposes of this analysis, the existing baseline conditions that are compared to the proposed conditions (with the Project) are the City's existing thresholds set for the Project Site. It is assumed that the existing office use does not consistently exceed the City's set noise thresholds.

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

Construction Noise – As shown in **Tables 3** and **4** below, the worst-case construction noise level for residential receptors would be 78 dBA Leq, which does not exceed the Federal Transit Administration (FTA) Daytime General Assessment Construction Noise Criteria of 80 dBA Leq for residential receptors. The worst-case construction noise level for commercial receptors would be 82 dBA Leq, which does not exceed the FTA Daytime General Assessment Construction Noise Criteria of 85 dBA Leq for commercial receptors. As a result, construction noise impacts would be less than significant. The Proposed Project's construction noise analysis does not take into

consideration the existing operations of the office building as the Proposed Project's construction assumes demolition of the existing office building and its associated improvements. In comparison to baseline conditions of no construction at the existing site to a proposed temporary condition of construction activities, the Proposed Project would increase temporary noise. However, construction noise impacts fall below significance thresholds. The Proposed Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels during construction.

Table 3 – Project Construction Noise Levels – Residential Receptors

Phase	Equipment	Quantity	Equipment Noise Level at 215 feet (dBA Leq)	Combined Noise Level (dBA Leq)
Demolition	Concrete/Industrial Saws	1	76.9	78.0
	Tractors/Loaders/Backhoes	1	71.3	
Site Preparation	Graders	1	72.3	74.9
	Tractors/Loaders/Backhoes	1	71.3	
Grading	Graders	1	72.3	74.9
	Tractors/Loaders/Backhoes	1	71.3	
Building Construction	Cranes	1	67.9	73.0
	Tractors/Loaders/Backhoes	1	71.3	
Paving	Rollers	1	67.3	72.8
	Tractors/Loaders/Backhoes	1	71.3	
Architectural Coating	Air Compressors	1	65.0	65.0
Worst Case Construction Phase Noise Level (dBA Leq)				**78.0**
FTA Daytime General Assessment Construction Noise Criteria (dBA Leq)[1]				80.0
Noise Level Exceeds Criteria?				**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.

1. Source: Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual, Section 7: Noise and Vibration During Construction.*

Table 4 – Project Construction Noise Levels – Commercial Receptors

Phase	Equipment	Quantity	Equipment Noise Level at 135 feet (dBA Leq)	Combined Noise Level (dBA Leq)
Demolition	Concrete/Industrial Saws	1	81.0	82.0
	Tractors/Loaders/Backhoes	1	75.4	
Site Preparation	Graders	1	76.4	78.9
	Tractors/Loaders/Backhoes	1	75.4	
Grading	Graders	1	76.4	78.9
	Tractors/Loaders/Backhoes	1	75.4	
Building Construction	Cranes	1	72.0	77.0
	Tractors/Loaders/Backhoes	1	75.4	
Paving	Rollers	1	71.4	76.8
	Tractors/Loaders/Backhoes	1	75.4	
Architectural Coating	Air Compressors	1	69.1	69.1
Worst Case Construction Phase Noise Level (dBA Leq)				**82.0**
FTA Daytime General Assessment Construction Noise Criteria (dBA Leq)[1]				85.0
Noise Level Exceeds Criteria?				**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Source: Federal Transit Administration (FTA). *Transit Noise and Vibration Impact Assessment Manual, Section 7: Noise and Vibration During Construction.*

Additionally, per the LHMC, noise sources associated with construction, repair, remodeling, or grading of any real property shall be exempted from the provisions of Chapter 5-24, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, 8:00 p.m. and 8:00 a.m. on Saturday, or at any time on Sunday or a federal holiday. Therefore, potential noise and vibration impacts associated with construction would be less than significant.

Operational Noise

Stationary Noise – The main source of potential on-site noise would be HVAC equipment. These types of on-site stationary noises would not typically be categorized as loud, unnecessary, or unusual noise that disturbs the peace or quiet of any neighborhood, or that causes discomfort or annoyance to any person of normal sensitivity. **Tables 5** and **6** demonstrate the Proposed Project's stationary noise impacts at residential and commercial receptors. The Proposed Project's expected stationary noise levels do not exceed the thresholds set by the LHGP and LHMC noise standards. Therefore, the Proposed Project will not generate stationary noise levels in excess of the noise standards established by the City, and the impact

would be less than significant.

Table 5 – Stationary Noise Impacts at Residential Receptors

Noise Source	Receptor Distance from Noise Source (feet)	Noise Level at Receptor	
		dBA Leq	dBA Lmax
HVAC[1]	100	39.1	39.1
Noise Level Threshold (Day/Night)		55.0/50.0	75.0/70.0
Noise Level Exceeds Thresholds?		**No**	**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Noise level is indicative of eight units and includes the attenuation effects of the proposed noise barriers/enclosures. For the purposes of this analysis, noise associated with the simultaneous operation of all units with direct line of sight to adjacent receptors was modeled. Noise from units blocked from line of sight is assumed to be adequately attenuated by intervening onsite structures.

Table 6 – Stationary Noise Impacts at Commercial Receptors

Noise Source	Receptor Distance from Noise Source (feet)	Noise Level at Receptor	
		dBA Leq	dBA Lmax
HVAC[1]	10	49.6	49.6
Noise Level Threshold (Day and Night)		65.0	65.0
Noise Level Exceeds Thresholds?		**No**	**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Noise level is indicative of eight units and includes the attenuation effects of the proposed noise barriers/enclosures. For the purposes of this analysis, noise associated with the simultaneous operation of all units with direct line of sight to adjacent receptors was modeled. Noise from units blocked from line of sight is assumed to be adequately attenuated by intervening onsite structures.

In addition to onsite HVAC noise, the Proposed Project would generate noise associated with maintenance activities, including landscaping and trash removal. These types of on-site stationary noises would not typically be categorized as loud, unnecessary, or unusual noise that disturbs the peace or quiet of any neighborhood, or that causes discomfort or annoyance to any person of normal sensitivity. Per LHMC Section 5-24.070(I), property maintenance activities such as landscaping are exempt from noise standards when conducted between 7:00 a.m. and 8:00 p.m. on weekdays and Saturdays, or between 9:00 a.m. and 8:00 p.m. on Sundays and federal holidays. In compliance with the LHMC, no project-related maintenance activity, including landscaping, shall occur outside of the approved hours.

The Proposed Project will comply with these restrictions. The Project Site is currently occupied by an existing commercial building, which includes trash removal and landscaping operations. As a result, these activities would not be new sources of noise generated by the Proposed Project, and the Proposed Project would not

result in a substantial change in noise levels in the vicinity of the Project Site from these activities.

Mobile Source Noise – The main source of roadway noise in the vicinity of the Project Site is activity along Mill Creek Drive. As described in the LHGP Mobility Element, Mill Creek Drive is classified as a Collector (Commuter) Arterial, which can accommodate up to 10,000 vehicles per day. The Proposed Project is expected to generate approximately 259 daily trips. Per Streetlight segment volume data analyzed in the Project's noise study, the segment of Mill Creek Drive adjacent to the Project Site has an average daily traffic (ADT) of approximately 1,877. Based on the existing daily traffic on Mill Creek Drive, the 259 daily trips generated by the Proposed Project will not double the amount of traffic along adjacent streets, and the potential increase in noise from project-related roadway activity would be less than 3 dBA. Therefore, the increase in roadway noise levels as a result of the Proposed Project would be less than significant.

Noise/Land Use Compatibility

The Project's noise study included a noise/land use compatibility assessment to determine whether exterior and interior noise levels affecting the Project Site exceed the City's noise/land use compatibility threshold for residential land uses. Exterior ambient noise levels are assessed at the first-row residential building facades of each dwelling unit facing Mill Creek Drive. The first-row residential lots would be set back by a minimum of approximately 55 feet from the centerline of Mill Creek Drive.

Future exterior noise levels are estimated based on existing ambient noise level measurements collected at the existing office building site. To account for future increases in roadway volumes, a three-decibel increase has been applied to the measured noise levels. This is a conservative estimate, as a doubling of traffic volume along a roadway would be required to increase ambient noise levels by 3 dBA or more[2]. Future exterior ambient noise levels are expected to be approximately 70.4 dBA CNEL and fall within the Normally Unacceptable noise/land use compatibility category.

Per the LHGP, if new construction of Normally Unacceptable land uses proceeds, a detailed analysis of the noise reduction requirements must be made and the required noise insulation must be included in the design. The Proposed Project must

[2] Technical Noise Supplement to the Traffic Noise Analysis Protocol, California Department of Transportation (Caltrans), September 2013.

show that interior noise levels at the Project Site would not exceed the City and state's noise/land use compatibility threshold for residential land uses. The noise study conducted a preliminary interior noise analysis for the first row of habitable dwellings facing the adjacent roadways using a typical "windows open" and "windows closed" condition. A "windows open" condition assumes 12 dBA of noise attenuation from the exterior noise level. A "windows closed" condition assumes 20 dBA of noise attenuation from the exterior noise level. **Table 7** below indicates the future interior noise levels along adjacent roadways.

Table 7 – Future Interior Noise Levels (dBA CNEL)

Exterior Façade Study Location	Projected Exterior Noise Level[1]	Interior Noise Standard	Required Building Shell Noise Reduction	Interior Noise Level with Standard Windows (STC ~25)		Required STC Rating
				"Windows Open"[2]	"Windows Closed"[3]	
First-row dwelling units along Mill Creek Drive	70.4	45.0	25.4	58.4	50.4	28

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Worst-case future exterior noise levels are based on existing ambient noise level measurements collected by RK.
2. A minimum of 12 dBA noise reduction is assumed with the "windows open" condition.
3. A minimum of 20 dBA noise reduction is assumed with the "windows closed" condition.

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

The nearest structures to the Project Site are the existing residential homes located to the west of the Project Site and the existing commercial structure located to the south. The structures are located approximately 100 feet and 10 feet, respectively, from the nearest expected areas of onsite construction activity. The construction of the Proposed Project is not expected to require the use of substantial vibration - inducing equipment or activities, such as pile drivers or blasting. The main source of vibration impacts during the construction of the project would be the operation of equipment such as bulldozer activity during site preparation and loading trucks and vibratory rollers during grading and excavation. As shown in **Tables 8** and **9**, project-related construction activity is not expected to cause any potential damage to the nearest structures. Therefore, construction-related vibration will be less than significant.

Table 8 – Construction Vibration Impact Analysis – Residential Structures

Construction Activity	Distance to Nearest Structure (Feet)	Duration	Calculated Vibration Level (PPV) (in/sec)
Large Bulldozer	100	Continuous/Frequent	0.019
Loaded Trucks		Continuous/Frequent	0.017
Vibratory Rollers		Continuous/Frequent	0.046
Worst-Case Construction Vibration Level			**0.046**
Vibration Damage Potential Threshold[1]			0.200
Vibration Level Exceeds Thresholds?			**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Source: FTA Transit Noise and Vibration Impact Assessment Manual (September 2018) vibration damage potential threshold for "non-engineered timber and masonry buildings".

Table 9 – Construction Vibration Impact Analysis – Commercial Structures

Construction Activity	Distance to Nearest Structure (Feet)	Duration	Calculated Vibration Level (PPV) (in/sec)
Large Bulldozer	15	Continuous/Frequent	0.156
Loaded Trucks		Continuous/Frequent	0.133
Vibratory Rollers		Continuous/Frequent	0.368
Worst-Case Construction Vibration Level			**0.368**
Vibration Damage Potential Threshold[1]			0.500
Vibration Level Exceeds Thresholds?			**No**

Source: Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
1. Source: FTA Transit Noise and Vibration Impact Assessment Manual (September 2018) vibration damage potential threshold for "non-engineered timber and masonry buildings".

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?

Airport Noise - The John Wayne Airport, located in Santa Ana, California, is the nearest airport to the Project Site at a distance of approximately 8 miles. The Project Site is not located within the John Wayne Airport, or any other airport's, airport land use plan area. Furthermore, the Proposed Project is not expected to expose people residing or working in the Proposed Project area to excessive noise levels. Therefore, the Proposed Project would have no impact on exposing people residing or working in the area to excessive airplane noise.

Air Quality:

An Air Quality, Greenhouse Gas, and Energy Study (AQGHGE) dated January 8, 2026 by RK Engineering Group, Inc. (**Appendix E**), was conducted for the Proposed Project. The AQGHGE Study analyzes potential impacts to air quality from the Proposed Project. The analysis discussed below found that approval of the Proposed Project would not result in any significant impacts related to air quality.

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

The Project Site is located within the South Coast Air Basin (SCAB) which is characterized by relatively poor air quality and is a Federal- and State- designated nonattainment area for O3, PM10 and PM2.5 (US EPA 2012). The South Coast Air Quality Management District (SCAQMD) has established significance thresholds for both construction and operational activities relative to these criteria pollutants. The Project Site is located within the Coastal general forecasting area and Central Orange County Coastal air monitoring area (SRA-20). The SCAQMD has not published air quality monitoring data for SRA-20. Therefore, pollutant data for the most recent three-year period is derived from the nearest adjacent stations available (i.e., Saddleback Valley/SRA-19 and Central Orange County/SRA-17). These pollutant levels were used to comprise a "background" for the project location and existing local air quality. As discussed below under threshold b and threshold c, implementation of the Proposed Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant construction emissions established by SCAQMD.

Another criterion to determine consistency with SCAQMD's Air Quality Management Plan (AQMP) is if a project would not exceed AQMP's assumptions or increments based on growth forecasts. The LHGP uses Department of Finance (DOF) data to determine population growth projections. According to 2025 DOF data[3], the City's population in 2025 was 30,309 residents. Using the average family size of 3.13 persons[4], the addition of 36 single-family dwelling units would create a population increase of approximately 113 residents (0.37 percent increase[5]). The Proposed Project's forecasted population growth would increase the City's existing population by less than one percent to 30,422 persons. The LHGP

[3] California Department of Finance, State Population Report – May 2025, accessed January 4, 2025. Total population (30,309) in 2025.
[4] US Census Bureau, American Community Survey, 5-year estimates, S1101, City of Laguna Hills, accessed January 28, 2026.
[5] California Department of Finance, State Population Report – May 2025, accessed January 4, 2025. Percent increase of total population (30,309) in 2025.

anticipates a population of 36,523 by the end of the 2021-2029 planning period.

By complying with the thresholds of significance and being consistent with population growth estimates, the Proposed Project would be in compliance with the SCAQMD Air Quality Management Plan (AQMP) and the federal and state air quality standards. The Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. Thus, the Proposed Project would be within the population projections anticipated and planned for by the LHGP and would not increase growth beyond the AQMP's projections. The Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan.

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

Construction Emissions

Table 10 shows that the Proposed Project's daily construction emissions will be below the applicable SCAQMD air quality standards and thresholds of significance. As a result, the Proposed Project would not contribute to an existing or projected air quality violation. Furthermore, because the Proposed Project's emissions are below SCAQMD's thresholds, the Proposed Project would not contribute to a cumulatively considerable net increase of any criteria pollutant for which the Proposed Project's region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Therefore, the Proposed Project's short-term construction impact on regional air resources would be less than significant.

Table 10 – Regional Construction Emissions

Activity	Maximum Daily Emissions (lbs/day)[1]					
	VOC	NOx	CO	SO2	PM10	PM2.5
Demolition	0.48	6.95	17.08	0.05	4.02	0.84
Site Preparation	0.28	1.36	15.39	0.03	0.77	0.14
Grading	0.97	63.00	41.32	0.36	16.9	5.77
Building Construction	0.33	3.96	14.19	0.02	0.41	0.13
Paving	0.47	2.23	9.28	0.01	0.23	0.08
Architectural Coating	46.58	0.85	1.35	0.00	0.09	0.03
Maximum[1]	**46.58**	**63.00**	**41.32**	**0.36**	**16.90**	**5.77**
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Air Quality, Greenhouse Gas, and Energy Study, January 8, 2026, RK Engineering Group, Inc.
1. Maximum daily emissions during summer or winter; includes both onsite and offsite project emissions.
2. Modeling assumed Tier 4 equipment.

Table 11 illustrates the construction-related localized emissions of the Proposed Project in comparison to SCAQMD Localized Significance Threshold (LST) thresholds. The Proposed Project emissions will be below SCAQMD thresholds of significance for localized construction emissions. Therefore, the Proposed Project's short-term construction impacts on localized air resources will be less than significant.

Table 11 – Localized Construction Emissions

Activity	Maximum Daily Emissions (lbs/day)[1]			
	NOx	CO	PM10	PM2.5
Onsite Emissions	3.74	15.05	2.93	1.40
SCAQMD Localized Threshold[2]	110.5	800.7	5.5	4.0
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Air Quality, Greenhouse Gas, and Energy Study, January 8, 2026, RK Engineering Group, Inc.
1. Maximum daily emissions during summer or winter; includes both onsite and offsite project emissions.
2. Source: SCAQMD Mass Rate LSTs for 2 acres/day in SRA-20 at 25 meters
3. Modeling assumed Tier 4 equipment.

Operational Emissions

As shown in Tables 12 and **13**, the Proposed Project's emissions will be below the SCAQMD thresholds of significance. The Proposed Project's daily unmitigated operational emissions will be below the applicable SCAQMD regional air quality standards and thresholds of significance, and the Proposed Project would not contribute substantially to an existing or projected air quality violation. Furthermore,

by complying with the SCAQMD standards, the Proposed Project would not contribute to a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Therefore, the Proposed Project's long-term regional air quality impacts will be less than significant.

Table 12 – Regional Operational Emissions

Activity	Maximum Daily Emissions (lbs/day)[1]					
	VOC	NOx	CO	SO2	PM10	PM2.5
Mobile Sources	0.97	0.71	8.49	0.02	2.08	0.54
Area Sources	1.86	0.02	2.04	0.00	0.00	0.00
Energy Sources	0.01	0.22	0.09	0.00	0.02	0.02
Total	**2.84**	**0.95**	**10.62**	**0.02**	**2.10**	**0.56**
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Air Quality, Greenhouse Gas, and Energy Study, January 8, 2026, RK Engineering Group, Inc.
1. Maximum daily emissions during summer or winter; includes both onsite and offsite project emissions.
2. Modeling assumed Tier 4 equipment.

Table 13 – Localized Operational Emissions

Activity	Maximum Daily Emissions (lbs/day)[1]			
	NOx	CO	PM10	PM2.5
Onsite Emissions	1.92	2.56	0.12	0.05
SCAQMD Localized Threshold[2]	131.0	962.0	2.0	2.0
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Air Quality, Greenhouse Gas, and Energy Study, January 8, 2026, RK Engineering Group, Inc.
1. Maximum daily emissions during summer or winter; includes both onsite and offsite project emissions.
2. Source: SCAQMD Mass Rate LSTs for 2 acres/day in SRA-20 at 25 meters
3. Modeling assumed Tier 4 equipment.

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

The Proposed Project consists of residential land uses and does not include major sources of toxic air contaminants (TAC) emissions that would result in significant exposure of sensitive receptors to substantial pollutant concentrations. Examples of land uses that are major sources of TACs include distribution centers with heavy truck traffic, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing stations. The Proposed Project does not include those uses, hence the Proposed Project would not expose sensitive receptors to substantial

pollutant concentrations.

The Proposed Project would generate diesel particulate matter (DPM) during construction from off-road diesel equipment and trucks. The California Office of Environmental Health Hazard Assessment (OEHHA) adopted the Guidance Manual for Preparation of Health Risk Assessments (HRA Guidelines) to provide procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources. A Health Risk Assessment dated January 12, 2026 by RK Engineering Group, Inc. (**Appendix F**), was conducted for the Proposed Project. Construction-related PM10 exhaust emissions were quantified using the CalEEMod outputs provided in Appendix E and used as a surrogate for modeling DPM emissions. DPM emissions sources associated with project construction include onsite construction activity and offsite hauling trips. The calculations used to calculate cancer risk are based on the methodology published by the SCAQMD and OEHHA. For the purposes of this analysis, potential health risks to the adjacent receptors are expressed in terms of increased cancer and non-cancer health risks as a result of exposure to DPM emissions.

Because construction of the proposed project would occur over a relatively short duration of approximately six years, a full 30-year adult exposure scenario is not applicable. Instead, conservatively, this analysis evaluates third trimester (0.25-year), infant (0-2 years), and child (2-16 years) exposure scenarios, which together represent the most sensitive potential life stages during the construction period. Excluding the adult exposure scenario is appropriate in this case, as no long-term operational source of DPM emissions would remain after construction is complete. **Table 14** shows the Project's construction health risk results at each of the modeled sensitive receptor locations, as shown in Appendix F. The cancer health risks shown in Table 14 represent the total cumulative risk, which is calculated by summing across all age-specific exposure periods. The hazard indices are reported as the highest hazard index from any single exposure period at each receptor.

Table 14 – Construction Health Risk Levels

Sensitive Receptor	AERMOD Receptor ID	Cancer Risk (per one million)	Hazard Index
1	1	0.3498	0.0006
	2	0.3308	0.0012
	3	0.8651	0.0039
	4	2.3000	0.0027
	5	2.6625	0.0032
	6	1.3925	0.0017
	7	0.7525	0.0009
	8	0.5747	0.0034
	9	0.3306	0.0021
	10	0.1506	0.0008
	11	0.0972	0.0002
Maximum Risk		**2.6625**	**0.039**
SCAQMD Threshold		10	1
Exceeds Threshold?		**No**	**No**

Source: Health Risk Assessment, January 12, 2026, RK Engineering Group, Inc.

In addition to the above assessment of maximum incremental cancer and non-cancer risk at the adjacent receptors, SCAQMD requires an assessment of cancer burden. Cancer burden is defined as the estimated number of excess cancer cases in the exposed population over a 70-year lifetime. It is calculated by multiplying the maximum incremental cancer risk (expressed per one million) by the estimated exposed population and then dividing by one million, to convert the rate to the expected number of cases. **Table 15** below summarizes the cancer burden calculations for the construction of the Project. As shown below, the estimated total cancer burden is well below the SCAQMD significance threshold of 0.5 excess cancer cases under CEQA.

Table 15 – Estimated Cancer Burden

Maximum Incremental Cancer Risk (per one million)	Estimated Exposed Population	Estimated Cancer Burden
2.6625	508[1]	0.0014
SCAQMD Cancer Burden Threshold		0.5
Exceeds Threshold?		**No**

Source: Health Risk Assessment, January 12, 2026, RK Engineering Group, Inc.

1. Based on aerial imagery and parcel counts, there are a maximum of approximately 175 households located within the HRA study area. The estimated exposed population is approximately 508 residents.

As shown above, the construction of the Proposed Project is not expected to result in a cancer health risk, non-cancer hazard index, or cancer burden that would exceed the applicable SCAQMD thresholds. As a result, the Proposed Project impact from construction-related DPM emissions would be less than significant. The Proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

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

Land uses that commonly receive odor complaints include agricultural uses (farming and livestock), chemical plants, composting operations, dairies, fiberglass molding facilities, food processing plants, landfills, refineries, rail yards, and wastewater treatment plants. The Proposed Project consists of residential uses and does not contain land uses that would typically be associated with significant odor emissions.

Furthermore, the Proposed Project is required to comply with standard building code requirements related to exhaust ventilation as well as SCAQMD Rule 402. Rule 402 requires that a person may not discharge from any source whatsoever such quantifies 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, response, 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 Proposed Project related odors would not create a nuisance. Therefore, the Proposed Project's operation would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Water Quality:

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

Construction Impacts

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). Construction projects that disturb one acre or more of soil, including the Proposed Project, are regulated under the Construction General Permit (CGP, Order No. 2022-0057-DWQ) issued by the State

Water Resources Control Board (SWRCB). Projects obtain coverage under the CGP by developing and implementing a stormwater prevention pollution plan (SWPPP), estimating sediment risk from construction activities to receiving waters, and specifying best management practices that would be implemented as a part of the Proposed Project's construction phase to minimize pollution of stormwater prior to and during grading and construction.

The Property Owner/Developer and its construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs that would be implemented for the Proposed Project to protect the water quality of receiving waters. Other construction BMPs that may be incorporated into the Proposed Project's SWPPP and implemented during the construction phase include but are not limited to:

- Installation of perimeter silt fences and perimeter sandbags and/or gravel bags
- Stabilized construction exits with rumble strip(s)/plate(s)
- Installation of storm drain inlet protection on affected roadways
- Installation of silt fences around stockpile and covering of stockpiles
- Stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one week) with erosion controls
- Installation of temporary sanitary facilities and dumpsters

Adherence to the BMPs in the SWPPP would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters; reduce or avoid contamination of urban runoff with sediment; and reduce or avoid contamination with other pollutants such as trash and debris, oil, grease, fuels, and other toxic chemicals.

Therefore, with implementation of the BMPs in the required SWPPP, water quality or waste-discharge impacts from Project-related grading and construction activities would be less than significant, and no mitigation would be required.

Operational Impacts

The Preliminary Water Quality Management Plan (PWQMP) (**Appendix G**) identifies stormwater management for post construction building operations. The Project would incorporate low-impact development (LID) BMPs to reduce the quantity of rainfall runoff and improve the quality of water that leaves the Project Site.

The Proposed Project would use LID Treatment BMPs to reduce the post development impacts including infiltration, harvest and use, evapotranspire, or

biotreat/biofilter, the 8th percentile of a 24-hour storm event. The Proposed Project includes LID Treatment BMP of impervious area dispersion through the use of a proprietary media biofiltration unit.

The proposed operational conditions would be comprised of two Drainage Management Areas (DMAs). DMA A includes the surface drainage, proposed inlets, and an underground piping system in the southern half of the Project Site. The piping discharges to a proposed BMP biofiltration basin with an underdrain. The underdrain connects to a parkway culvert discharging onto Mill Creek near the driveway entrance. DMA B includes the surface drainage, proposed inlets, and an underground piping system in the northern half of the Project Site. The piping discharges to a proposed BMP biofiltration basin with an underdrain. The underdrain connects to a proposed parkway culvert further down Mill Creek Drive.

Additionally, non-structural source control BMPs for the Proposed Project include:

- Education for Property Owners, Tenants and Occupants
- Activity Restrictions – activity and use restrictions will be developed and enforced by the HOA through Covenants, Conditions, and Restrictions (CC&Rs)
- Common Area Landscape Management
- BMP maintenance
- Common Area Litter Control
- Common Area Catch Basin inspection
- Street Sweeping Private Streets and Parking Lots

Structural Source Control BMPs for the Proposed Project include:

- Provide storm drain system stenciling and signage
- Use efficient irrigation systems & landscape design, water conservation, smart controllers, and source control
- Protect slopes and channels and provide energy dissipation
- Hillside landscaping

Because Newport Bay has an approved Watershed Infiltration & Hydromodification Plan, the Proposed Project would use the above-described LID Treatment BMPs to reduce post development impacts. Therefore, implementation of the BMPs in the WQMP and compliance with NPDES MS4 permit requirements, potential impacts associated with water quality and waste-discharge impacts would be less than significant.

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

According to the PWQMP, groundwater at the Project Site under existing conditions is likely greater than 50 feet below the ground surface. Groundwater is relatively shallow (generally less than 20 feet below the ground surface) in the large alluvial valley north and northeast of the Project Site.

The Proposed Project would not deplete or substantially interfere with the groundwater supplies because no groundwater wells are proposed and because the Proposed Project would not substantially interfere with groundwater recharge. Post-development runoff from the property would be directed into proprietary underground biofiltration BMP structures that will treat the runoff and then discharge it into the on-site storm drain system that is connected to the parkway drains on Mill Creek Drive.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

The existing Project Site is developed for an office building and its associated surface parking lot and landscaping. The existing drainage pattern consists of a series of v-gutters down the driveway entrance onto Mill Creek Drive. There are currently no underground storm drainpipes. According to the Final Hydrology Report (**Appendix H**), the storm volume and peak flow rates in the existing condition does not exceed the expected storm volume or peak flow rates in the proposed condition (with Project) and no on-site detention is required.

- *Result in substantial erosion or siltation onsite or offsite?*

Grading and construction associated with site work on the Project Site would result in temporary disturbance of surface soils, which could potentially result in erosion or sedimentation onsite, and potential water quality impacts attributable to construction activities. Any stockpiles of excavated areas would be susceptible to

erosion from wind and rain and, if not managed properly, could result in increased sedimentation in local drainage ways. However, all construction and grading activities are required to comply with the LHMC and NPDES best practices using BMPs, such as the use of fiber rolls, street sweeping, sandbag barriers, straw bale barriers, and storm drain inlet protection. The Proposed Project would construct 36 residential units and associated runoff infrastructure, including on-site treatment structures, which would prevent substantial erosion from occurring. Similar to existing conditions with the office building, runoff would ultimately drain out to the existing system in Mill Creek Drive. Therefore, the Proposed Project would not alter the existing drainage pattern of the site and would not result in substantial erosion or siltation.

- *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- *Impede or redirect flood flows?*

According to the PWQMP, the post development volume for the two year storm event does not exceed that of the predevelopment condition by more than five percent. The time of concentration of post-development runoff is less than the pre-development conditions. As discussed above, drainage from the Proposed Project would be collected by a series of area drains and catch basins to collect street flow. The BMPs described above would retain runoff generated on-site to ultimately connect to the existing system on Mill Creek Drive. The LID Treatment BMPs would include infiltration, harvest and use, evapotranspire, or biotreat/biofilter, the 85th percentile of a 24-hour storm event. The infiltration system ensures that the capacity of the City's storm drain system is not exceeded by the development of the Proposed Project. At its pre-development condition, the site has an impervious surface percentage of 78.91 percent. The Proposed Project would decrease the impervious surface percentage to 66.99 percent post-development. Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site, nor would the Proposed Project impede or redirect flood flows.

- *Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The Project Site is located with an urbanized area with existing infrastructure to support the Project Site's stormwater drainage needs. The existing site surface drains through a series of v-gutters down the drive entrance onto Mill Creek Drive. There are currently no underground storm drain system improvements at the site.

Under the proposed conditions, drainage from the Proposed Project would be collected by a series of area drains and catch basins to collect street flow. The south half of the property drains out to Mill Creek through a proposed parkway culvert near the proposed driveway. The north half of the property drains out to Mill Creek Drive through a second proposed parkway culvert near the northeast corner of the site. The flow continues down Mill Creek to an existing storm drain system tributary to San Diego Creek Channel. San Diego Creek channel drains to Upper Newport Bay. The LID Treatment BMPs would include infiltration, harvest and use, evapotranspire, or biotreat/biofilter, the 85th percentile of a 24-hour storm event. Biotreatment would be utilized for the remaining volume. Non-structural BMPs such as activity restrictions, street sweeping, and common area landscape maintenance and litter control would also contribute towards runoff control and water quality protection. In addition, the Property Owner/Developer would be required to comply with the NPDES permit requirements to reduce any potential water quality impacts. Therefore, the Proposed Project would not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems and would not provide substantial additional sources of polluted runoff.

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

The Project Site is located within FEMA Flood Plain Panel 06059C0313J and is designated within Zone X, which is described as an area of minimal flood hazard. The Project Site is located outside of the 100-year flood plain, and would not impede or redirect flood flows. According to the Preliminary Geotechnical Investigation (**Appendix I**), due to the elevation of the site relative to existing drainages in the area, flooding at the site is not considered to be reasonably foreseeable at the Project Site. Therefore, the Proposed Project would not risk release of pollutants due to project inundation. Furthermore, as described above, runoff would be captured and treated on-site and ultimately drained to the system in Mill Creek Drive.

Seiches are surface waves created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to development near large water bodies and 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 geotechnical study, due to the elevation of the Proposed Project at the site with respect to sea level and its distance from large open bodies of water, the potential of seiches and/or tsunami is considered to be none. Because the Project Site is not

located in a high flood risk, tsunami, or seiche zone, the Proposed Project would not risk release of pollutants due to project inundation.

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

The City participates in the South Orange County Watershed Management Area (SOWMA) and its Integrated Regional Water Management Plan (IRWMP) to comply with National Pollutant Discharge Elimination System (NPDES) permits, requiring project-specific Water Quality Management Plans for development. According to the California Department of Water Resources Groundwater Sustainability Plan (GSP) Status Map, there are no applicable GSPs for the Project Site. The Proposed Project involves the construction of 36 single-family-attached condominium residential units, parking, roadways, and associated infrastructure. The Proposed Project does not feature any groundwater wells. The Property Owner/Developer is required to implement storm water and urban runoff pollution prevention controls, and Best Management Practices (BMPs) on construction sites in accordance with Chapter 5-36, Water Quality Control of the LHMC. The Project Site is more than one acre; therefore, the Property Owner/Developer would be required to comply with the requirements of the NPDES MS4 Permit and General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009- DWQ) and prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would generally contain a site map showing the construction perimeter, existing and proposed buildings, storm water collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways.

Therefore, with compliance with Chapter 5-36 of the LHMC, compliance with the MS4 and Construction General Permit, and implementation of a SWPPP, the Proposed Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

5. Can the project site be adequately served by all required utilities and public services?

The existing site contains an office building with an associated surface parking lot and landscaping. The existing site currently receives utilities and public services to accommodate the existing office building. The Proposed Project would connect to existing utilities and public services in the project area. The Proposed Project would add 36 residential units to the City's housing stock. Using the average family

size of 3.13 persons[6], the addition of 36 single-family dwelling units would create a population increase of approximately 113 residents (0.37 percent increase[7]).

a. Fire Protection:

The Proposed Project does not introduce any features that would require additional fire services beyond what is already serviced to the City. Fire services are provided to the City by the Orange County Fire Authority (OCFA). This includes the existing Project Site. The two closest fire stations to the Project Site are OCFA Stations #51 and #22. OCFA Station #22 is located approximately 2.3-miles from the Project Site and OCFA Station 55 is located approximately 9.2-miles from the Project Site. OCFA has a regional Prevention Field Service office that allows greater focus of prevention efforts to individual communities, which includes the City. OCFA's average response time[8] for emergency calls averages between 5-7 minutes for engines to arrive on scene after a 9-1-1 call has been placed. According to OCFA's 2025-2026 Fiscal Year Adopted Budget[9], OCFA's ratio of firefighters per 10,000 residents has remained steady over the last seven fiscal years ranging from 5.80 to 6.22 firefighters. During the past decade, OCFA's emergency call load has increased 42 percent, due in part to the City of Garden Grove joining in August 2019. According to CAL FIRE's Fire Hazard Severity Zone Viewer[10], the Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) for both the Local Responsibility Areas (LRAs) and State Responsibility Areas (SRAs). Fire Hazard Severity Zones classify zones as Moderate, High, or Very High fire hazard based on hazard factors, such as fuel loading, slope, fire weather, and other relevant factors present. The western portion of the Project Site is designated as part of a Moderate Fire Hazard Severity Zone (FHSZ), while the remaining majority of the Project Site is not located within a FHSZ.

While the Project Site is located within a Moderate FHSZ, the Proposed Project would adhere to Chapter 5-16 Fire Code of the LHMC. Chapter 5-16 requires new development to adhere to the latest California Fire Code, which is enforced by OCFA. The Proposed Project includes a fire access plan (see **Figure 14**), which demonstrates compliant fire access throughout the Project Site in the event of an emergency. Additionally, due to the minimal increase in population, the Proposed Project would not result in the need for new or physically altered fire protection

[6] US Census Bureau, American Community Survey, 5-year estimates, S1101, City of Laguna Hills, accessed January 28, 2026.
[7] California Department of Finance, State Population Report – May 2025, accessed January 4, 2025. Percent increase of total population (30,309) in 2025.
[8] FAQs | OCFA, OCFA, accessed August 8, 2025.
[9] OCFA 2025/2026 Fiscal Year Adopted Budget, accessed August 8, 2025.
[10] Fire Hazard Severity Zones Map, CAL FIRE, March 2025, accessed August 8, 2025.

facilities. As of October 10, 2025, OCFA has reviewed the Proposed Project, and approved the Project's Fire Master Plan. The review included conditions of approval (**Appendix J**). Additionally, OCFA would receive an 11.83 percent of the increased basic one percent property tax levy, yielding an estimated $64,200 per year (**Appendix K**). Therefore, impacts to fire protection are less than significant.

b. Police Protection:

Police Protection for the Project Site would be provided by the Orange County Sheriff's Department. The closest police station to the Project Site is the Laguna Hills Police Services station, which is located approximately 1.52-mile from the Project Site. According to the LHGP Safety Element, adopted in June 2022, emergency calls with Laguna Hills Police Services had an average reconciled response time of 4 minutes and 57 seconds for emergency response calls and an average response time of 15 minutes and 6 seconds for priority 2 (serious crime) calls from when the call was received to deputies arriving at the location. These response times are within the average and reflect an appropriate staffing level for police services (LHGP Safety Element, pg S-17). The Proposed Project would minimally increase the City's population by 113 persons, or 0.37 percent. Development of the Project Site would not result in the need for new or physically altered police protection facilities. As discussed in Appendix K, the Proposed Project is estimated to generate an annual fiscal revenue of approximately $58,500. At full buildout, the Proposed Project is estimated to generate an estimated $17,600 in property taxes to the City compared to $4,900 in property taxes generated by the existing office property. The Proposed Project would contribute more to property taxes compared to the existing office property. The property taxes would contribute to the City's General Fund, which funds public safety services, such as police and fire services. Therefore, impacts to police services would be less than significant.

c. Schools:

The school district that serves the City is Saddleback Valley Unified School District. In the 2023-2024 school year, the school district saw a decrease of 3,111 students since the 2019-2020 school year[11]. As discussed above, the Proposed Project would minimally increase the City's population by 113 persons, or 0.37 percent. Construction of the Proposed Project could increase enrollment.

The Saddleback Valley Unified School District contains a total of 34 schools,

[11] Education Data Partnership, Fiscal, Demographic, and Performance Data, Saddleback Valley United School District, accessed March 1, 2025.

ranging from preschools to high schools. According to the US Census Bureau, the average family size is 3.13 persons and 19.6 percent of the City's population consists of persons under 18-years old[12]. Therefore, extrapolation of this would result in approximately 23 persons of the potential 113 additional persons from the Proposed Project would be under 18 years old (school-aged).

Furthermore, according to a Fee Justification Study[13] conducted for SVUSD, the student generation factor, including elementary school, intermediate school, and high school, is 0.3969 for single-family detached units and 0.3911 for multi-family attached units. Therefore, by multiplying the anticipated population increase by the Proposed Project (113 persons) by the student generation factor for single-family units (0.3969), the Proposed Project would generate approximately 45 students. Due to the nominal number of potential students and anticipated decrease in student enrollment[14], no impacts are anticipated to the schools. Furthermore, SB 50, established in 1998, capped developer fees for new construction to fund school facilities at a base fee of $1.93 per square foot for residential projects. School districts were allowed to charge higher, "Level Two" fees if the school district conducted a needs analysis and were eligible for state funds. Based on the Net Fiscal Impact Study (**Appendix K**) prepared for the Proposed Project, the School District is estimated to receive one-time developer school impact fees of approximately $9,660 per unit, or a total of $347,800. SB 50 addresses all potential impacts related to school services.

d. Parks:

Chapter 8-06 Park Dedication and In-Lieu Fee Requirements of the LHMC establishes procedures for requiring the dedication of land or the payment of in-lieu fees to serve new residential subdivisions that are approved by the City Council. Chapter 8-07 Citywide Park and Recreation Fees establishes a program for requiring payment of fees for parks, recreation, and open space facilities to accommodate new residential development projects. The Proposed Project includes 20 percent landscape coverage in the forms of large accent trees, medium accent trees, perimeter screening trees, small accent trees, shrub and

[12] City of Laguna Hills, American Community Survey 5-year estimates, S1101, US Census Bureau, accessed March 1, 2025.
[13] Residential and Commercial/Industrial Development School Fee Justification Study, Saddleback Valley Unified School District, March 2022, accessed August 5, 2025.
[14] The school district that serves the City is Saddleback Valley Unified School District. In the 2023-2024 school year, the school district saw a decrease of 3,111 students since the 2019-2020 school year. Education Data Partnership, Fiscal, Demographic, and Performance Data, Saddleback Valley United School District, accessed March 1, 2025.

groundcover, and vines and espaliers. Section 2.5.1 of the Objective Design Standards (ODS) requires all projects on sites of two or more acres in size to provide public open space of at least a quarter of the minimum open space required for the project under the LHMC. As part of the Project's Density Bonus Law Request, the Proposed Project requests a waiver to eliminate private and public open space as required by LHMC for developments in the MXU zone. The Project Site is constrained by steep slopes along its northern and southern boundaries, as well as along Mill Creek Drive, limiting the buildable area on the property. Compliance with this standard would require dedicating land for open space where either housing, infrastructure, or parking is planned. Therefore, compliance with this standard would reduce the overall density of the Project and therefore would physically preclude development of the Project.

Additionally, according to the LHGP Community Services and Facilities Element, all new development and redevelopment in the City are required to meet a Park Facilities Service Standard of five acres of active or passive park land per 1,000 residents. According to 2025 Department of Finance data, the City's total population was 30,309 persons. Therefore, per the Park Facilities Service Standard, the City has a minimum requirement of approximately 155 acres of park land[15] to accommodate the City's population. The LHGP Conservation and Open Space Element states that approximately 590 acres are dedicated and used for a variety of open space and/or recreational purposes, including 14 public parks and 15 private parks within the City. Existing facilities within the City exceed the Park Facilities Service Standard's minimum requirements.

The Proposed Project would create a population increase of approximately 113 persons. Because the City has a surplus of approximately 435 acres of open space and/or recreational facilities, the Proposed Project would be adequately served by existing park facilities.

e. Other Public Facilities:

The Proposed Project could add approximately 113 new residents to the City, increasing the population by 0.37-percent. The nominal increased demand would be met with existing public facilities. According to the Net Fiscal Impact Analysis conducted by Kosmont for the Proposed Project (**Appendix K**), the Proposed Project is estimated to generate an annual fiscal revenue of approximately $58,500 at full buildout in 2024 dollars, yielding a positive annual net fiscal impact of $9,800. The existing office properties yield a current negative annual fiscal

[15] City of Laguna Hills General Plan – Community Services and Facilities – Table CSF-1.

impact of $5,900. When compared to the existing use on the Project Site, the Proposed Project would provide greater indirect and direct benefits to the City's General Fund and local agencies, including the school district. During existing conditions, there are no new residents to utilize library facilities. However, construction of the Proposed Project could increase the population by 113 new residents. However, the Proposed Project would be required to pay all applicable fees set forth by the City's Municipal Code. Any potential impacts to libraries would be adequately funded through the Proposed Project's revenues to the General Fund. The Proposed Project's revenues exceed the cost of expenditures to community services. Therefore, no impacts to public facilities would be anticipated.

f. Wastewater/Sewer:

According to the LHGP Final Program Environmental Impact Report (EIR), properties within the City are served by a public sewage collection system maintained by the South Orange County Wastewater Authority (SOCWA) and carried by the Moulton Niguel Water District (MNWD) and El Toro Water District (ETWD). The existing office building and Project Site are served by ETWD for sanitary sewer and domestic water services. ETWD also provides potable water to the Project Site. Therefore, the Proposed Project would be served by ETWD for domestic water and sanitary sewer water services.

Existing sewer/wastewater infrastructure at the Project Site consists of an 8-inch sewer line and 10-inch water line at Mill Creek Drive. ETWD's wastewater collection system includes approximately 158 miles of sewer pipelines ranging from 4-inches to 24-inches in diameter and 11 sewer lift stations[16]. ETWD's existing wastewater treatment plant has a capacity of 6 mgd. The existing water tertiary treatment plant has a capacity of 3.7 mgd. The Proposed Project would construct new sewer and water lines throughout the Project Site's internal driveways to ultimately connect to the existing sewer and water lines on Mill Creek Drive. The Applicant received a letter from ETWD that states that the Project would flow to the existing eight-inch sewer main in Mill Creek Drive. Based on the project assumptions, ETWD concluded that there is no impact to the collection system or the receiving lift station under both average dry weather and 10-year design storm conditions (**Appendix A**).

ETWD has provided a will-serve letter for the Proposed Project that indicates that ETWD is willing to provide domestic water and sanitary sewer services to the Project

[16] 2020 Urban Water Management Plan, El Toro Water District, accessed August 23, 2025.

Site (**Appendix A**). Therefore, impacts to wastewater/sewer would be less than significant.

g. Storm Water Drainage:

The Proposed Project involves the construction of 36 single-family residential dwelling units. Per Chapter 5-36 Water Quality Control of the LHMC, the Proposed Project would be required to include specific design Best Management Practices (BMPs) to ensure that no storm water runoff generated on the Project Site would leave without pre-treatment for urban pollutants. The Applicant has prepared a Preliminary Water Quality Management Plan (PWQMP) (**Appendix G**), which includes specific design features during construction and operations as part of the Proposed Project's BMPs. The existing Project Site surface drains through a series of v-gutters down the drive entrance onto Mill Creek Drive. There are currently no underground storm drain pipes at the existing site. Under existing conditions, the site has a total storm volume of 1.054 acre-feet. Under proposed conditions, the drainage from the project is collected by a series of area drains and catch basins to collect street flow. The south half of the property drains out to Mill Creek through a proposed parkway culvert near the proposed driveway. The north half of the property drains out to Mill Creek Drive through a second proposed parkway culvert near the northeast corner of the site. The total storm volume under proposed conditions would be 1.048 acre-feet. The Applicant would be required to comply with Chapter 5-36 of the LHMC and implement all recommendations contained within the PWQMP, including usage of the Project's BMPs as detailed in question 4.

The Project Site is more than one acre; therefore, the Property Owner/Developer would be required to comply with the requirements of the NPDES MS4 Permit Construction General Permit Order 2009-0009- DWQ and prepare a SWPPP. The SWPPP would generally contain a site map showing the construction perimeter, existing and proposed buildings, storm water collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. Therefore, with compliance with Chapter 5-36 of the LHMC, potential impacts associated with storm water drainage would be less than significant.

h. Water Supplies:

ETWD is responsible for providing a clean, safe, and potable water supply to the City.

Based on ETWD's 2020 Urban Water Management Plan (UWMP), water demands

for portable and non-potable water for single-family homes was 1,943 acre-foot (AF). Commercial uses demanded 782 AF. ETWD projects total water demand to increase 8.5 percent between 2020 and 2045 and determined that ETWD has sufficient supply through 2045.Furthermore, on July 31, 2024, the Proposed Project received a will-serve letter from ETWD which states that ETWD is "willing to provide Domestic Water and Sanitary Sewer Water services to the subject project" (Proposed Project). Therefore, ETWD has capacity in its water supplies to serve the Proposed Project. The provisions of ETWD's service are contingent upon the Applicant completing the necessary requirements in accordance with ETWD Rules and Regulations. With adherence to ETWD Rules and Regulations, the Proposed Project would not result in a significant impact to ETWD's water supplies.

i. Solid Waste Disposal:

The Proposed Project is required to comply with the provisions of Chapter 5-32 Solid Waste and Recycling of the LHMC, which regulates solid waste in the City. According to Chapter 5.32 of the LHMC, single-family generators are required to subscribe to the City's organic waste collection services for all organic waste generated. Single-family waste generators are required to place designated materials in designated containers and shall not contaminate collection containers. Food scraps and yard trimmings would go in the green container, recyclable materials in the blue container, and municipal solid waste in the gray container that is provided by the terms of the City's franchise agreement. Each household would be provided with one trash cart, one recycling cart, and one green waste/food waste cart. CR&R provides solid waste services to the City. The Proposed Project's contribution of solid waste would be minimal and would not significantly impact solid waste collection or landfill operations. According to CalReycle, commercial sites, such as the existing office use at the Project Site, would generate approximately 10.53 pounds per employee per day[17]. While the employee numbers are not known at the existing office building, CalRecycle also states that a professional office could generate 0.084 pounds per square foot per day. Thus, the existing 13,308 sq. ft. office building would generate approximately 1,159.88 pounds of waste per day. Residential uses have a waste generation rate of 12.23 pounds per household per day. With the construction of 36 units, the Proposed Project would generate approximately 440 pounds of waste per day, which is less than the existing office use. Furthermore, as with all residences in the City, the individual units are subject to curbside recycling and green waste separation requirements. Therefore, no impacts are anticipated to solid waste disposal.

[17] Estimated Solid Waste Generation Rates, CalRecycle, accessed August 14, 2025.

j. Electricity: k. Natural Gas: l. Telephone Service: m. Television Service:

The Project Site is in a built-out, urban setting. The Project Site and the surrounding properties are fully served by various utility service providers, including:

- Electric: Southern California Edison (SCE)
- Natural Gas: Southern California Gas (SoCalGas)
- Telecommunications: Charter, AT&T, and Cox

There are no anticipated significant service or system upgrades needed to serve the proposed single-family residential development. Additionally, the Proposed Project received letters from AT&T, Charter, and Cox stating that AT&T, Charter, and Cox have capacity to serve the Proposed Project and Project Site area (**Appendix A**). Natural gas service will not be required as part of the Proposed Project; therefore, a will-serve letter from SoCalGas was not requested. Therefore, no impacts are anticipated.

EXCEPTIONS:

CEQA Guidelines Section 15300.2 outlines exceptions, to the categorical exemptions that would disqualify a project from a Categorical Exemption.

The following analysis discusses the Proposed Project in relation to CEQA Guidelines Section 15300.2 – Exceptions.

a. Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The Proposed Project is not seeking Class 3, 4, 5, 6, or 11 categorical exemptions. Therefore, exception A of Section 15300.2 is not applicable to the Proposed Project.

b. Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The Proposed Project is consistent with the LHGP goals and policies and helps fulfill the Housing Element RHNA goal and addresses housing need in the City. The Proposed Project provides housing to an existing commercial office site. Impacts during construction would be temporary and confined to the vicinity of the Project Site. Furthermore, as discussed above under threshold questions three through five, the Proposed Project does not exceed any regulatory thresholds and qualifies for a Class 32 categorical exemption. The Proposed Project is subject to conditions of approval and local, regional, and state regulations. No prior or successive projects in the Project Site vicinity are known or expected to occur over time that would result in cumulatively considerable impacts. The Proposed Project would not have a cumulative impact due to prior or successive projects of the same type in the same place, over time.

c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The project calls for the construction of residential units in an urban, developed city. The project does not include any unusual circumstances. As discussed above under threshold questions three through five, the Proposed Project would not have any significant effect related to traffic, noise, air quality, water quality, and biological and cultural resources. The Proposed Project falls below regulatory thresholds and would adhere to all applicable regulations, such as the City's Municipal Code.

d. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Department of Transportation (Caltrans) manages the State Scenic Highway Program and provides a State Scenic Highway Map tool on the Caltrans website. According to the Caltrans State Scenic Highway Map tool, there are no scenic highways on or adjacent to the Project Site. The closest scenic highway is State Route (SR) 1, which is located approximately 6.7 miles southwest of the Project Site. Additionally, according to the LHGP Conservation and Open Space Element, the Project Site is not designated as a scenic vista. The closest designated scenic vista is the Veeh Reservoir, which is located approximately 0.13-mile southeast of the Project Site. The Proposed Project does not propose any features that would interfere with scenic resources. Therefore, exception D is not applicable to the

Proposed Project.

e. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

According to the California Environmental Protection Agency (CalEPA) and the Department of Toxic Control Substances (DTSC)'s Cortese List (Section 65962.5 of the Government Code) the Project Site is not located on the Cortese List or on any database of hazardous substance release sites, such as the EnviroStor database. Therefore, exception E is not applicable to the Proposed Project.

f. Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As discussed in the Phase I Cultural Report (**Appendix L**), no archaeological resources were identified within the Project Site as a result of the CHRIS records search, NAHC Sacred Lands File search, informational letters and coordination to local tribes, or pedestrian survey by a qualified archaeologist. The Phase I Cultural Report's research within the above-stated databases did not find the existing office building to be a historical resource based on California PRC Section 5020.1(j)'s definition of a historical resource. Further, significant portions of the Project Site have been disturbed by grading and the development of the existing office building and parking lot. Therefore, the Project Site is unlikely to contain intact buried archaeological deposits. Additionally, the Proposed Project is required by law to adhere to Section 7050.5 of the California Health and Safety Code, Title 14 Section 4308 of the California Administrative Code, and Section 5097.98 of the Public Resources Code. Therefore, exception F is not applicable to the Proposed Project.

CONCLUSION:

Therefore, based on the analysis above, the Proposed Project is classified as a Class 32 pursuant to CEQA Guidelines Section 15300 and is categorically exempt from CEQA.

APPENDICES:

Appendix A	Will-Serve Letters and ETWD Sewer Study
Appendix B	Biological Resources Report, January 2026, South Environmental
Appendix C	Project Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis and Gate Queuing Study (Traffic Study), January 8, 2026, RK Engineering Group, Inc.
Appendix D	Noise Impact Study, January 22, 2026, RK Engineering Group, Inc.
Appendix E	Air Quality, Greenhouse Gas, and Energy Study, January 8, 2026, RK Engineering Group, Inc.
Appendix F	Health Risk Assessment, January 12, 2026, RK Engineering Group, Inc.
Appendix G	Preliminary Water Quality Management Plan, January 15, 2025, Wilson Mikami
Appendix H	Final Hydrology Report, October 2025, Wilson Mikami
Appendix I	Preliminary Geotechnical Investigation, August 15, 2024, LGC Valley Inc.
Appendix J	OCFA Conditions of Approval
Appendix K	Net Fiscal Impact Analysis, January 2025, Kosmont
Appendix L	Phase I Cultural Resources Report, September 2025, South
Appendix M	Phase I Environmental Site Assessment, May 10, 2024, Thornburgh Consulting, Inc.

DETERMINATION:

The analysis adequately supports each criteria of the Class 32 – Infill Development Projects exemption.

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