

The Village at Laguna Hills

Attachment j

City and SVUSD Correspondence





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February 8, 2021

Jay S. Wu, AICP, Senior Planner
City of Laguna Hills
24035 El Toro Road
Laguna Hills, CA 92653

Via Email: jwu@lagunahillca.gov

Subject: Response to the Proposed Tentative Tract Map No. 19123 for Residential and Commercial Purposes,
The Village at Laguna Hills Project (USE-001-2019)

Dear Mr. Wu:

Thank you for the opportunity to comment on The Village at Laguna Hills project (Tentative Tract Map No. 19123). The 65.93-acre project site is at 24155 Laguna Hills Mall, Laguna Hills, CA 92653 (APNs 621-051-038, 39, and 41; 621-141-58; 621-221-02 through 14). The project will redevelop the Laguna Hills Mall, which opened in 1973 but is now nearly vacant; the food court closed in 2011 due to declining visitors.

The project will demolish 449,611 square feet of mall space—the department stores, anchor stores, and automobile service centers—and construct new commercial/retail buildings and a cinema, a 125-room boutique hotel, office buildings, two parking structures, and up to 1,500 multifamily residential units in five 5- and 6-story buildings.

The project site is in the Urban Village Specific Plan (UVSP) and designated Village Commercial by the City's general plan and the zoning map. The 240-acre UVSP is intended as a community core with commercial, civic, and high-density residential, with enhanced pedestrian areas that link the uses. It is our understanding that the UVSP was first adopted in November 2002 and was amended in 2011 to include an additional 300,000 square feet of retail, a 250-room hotel, 200 dwelling units, and 380,000 square feet of general office uses.

The project's description says that the land use mixes and intensities described in the 2011 amendment to the UVSP are neither prescriptive nor limiting, and that the UVSP provides for flexibility so that a mixture of various new land uses can be developed at different intensities, provided that the overall AM and PM peak hour vehicle trip budgets established by the UVSP are not exceeded.

The project's description says that the City's general plan update (GPU) and its program EIR assumed 300,000 square feet of new retail, a 250-room hotel, 200 dwelling units, and 380,000 square feet of office in the UVSP, and that the 2011 amendment to the UVSP was approved with an addendum to the GPU EIR.

The project description also states that in 2016 the city approved a series of entitlements to redevelop the Laguna Hills Mall into a mixed-use development known as Five Lagunas, with about 880,000 square feet of new and renovated commercial retail, a cinema, restaurants, health club, flex retail/office space, and 988 residential units. Though the project description does not say so explicitly, it implies that this 2016 amendment to the UVSP was also approved through an addendum to GPU EIR.

The project site is in the Saddleback Valley Unified School District but is not currently assigned to any school. Based on current student generation factors, at buildout, the project would generate about 323 elementary school students, 96

intermediate school students, and 170 high school students, for a combined total of 587 students.¹ Schools close to the project site that serve Laguna Hills are listed in the following table with their capacities. As shown, District schools have sufficient capacities to serve the intermediate and high school students that would be generated by the project. However, the elementary schools lack capacity to accommodate all the students generated by the project, falling short by 245 seats.

| SVUSD Schools Serving The Village at Laguna Hills Enrollment and Capacity | | | | | |
|---|--------------|--------------------------------|-----------------------------|-----------------------------------|-----------------------------|
| | Capacity | 2019/20 School Year Enrollment | Surplus/(Shortage) of Seats | Students Generated by the Project | Surplus/(Shortage) of Seats |
| San Joaquin ES | 449 | 317 | 132 | n/a | n/a |
| Lomarena ES | 525 | 618 | (93) | n/a | n/a |
| Valencia ES | 626 | 587 | 39 | n/a | n/a |
| ES Total | 1,600 | 1,522 | 78 | 323 | (245) |
| Los Alisos IS | 1,215 | 776 | 439 | n/a | n/a |
| IS Total | 1,215 | 776 | 439 | 96 | 343 |
| Laguna Hills HS | 2,403 | 1,500 | 903 | n/a | n/a |
| HS Total | 2,403 | 1,500 | 903 | 170 | 733 |
| | | | Student Total | 589 | n/a |

Source: Residential and Commercial/Industrial Development School Fee Justification Study, SVUSD, March 18, 2020.

The project description states that the amendments to the UVSP were approved with addenda to the GPU EIR but does not identify the UVSP's original CEQA documentation when it was approved in 2002. The GPU EIR assumed 457 new dwelling units (7 detached units and 450 multifamily units) in the city's planning area at buildout, which would generate 47.4 elementary school students, 21.8 intermediate school students, and 46.1 high school students. The GPU EIR found school impacts less than significant with payment of the required school fees. We understand that the less than significant finding for the school impact would not have changed in the previous addenda, but we request a school impact discussion for the currently approved project be included in the new addendum for comparison purposes.

Multifamily units under the proposed project would increase from 988 of the 2016 amendment to 1,500 units, an increase of 512 units. The city plans to prepare a fourth addendum to the GPU EIR for the project, and we anticipate that the new residential units will pay the school facility developer fee when building permits are issued. But because there is not enough capacity at the current elementary schools to accommodate the proposed project, the District may have to construct more facilities. We request that the proposed addendum evaluate whether the proposed increase in students and the need for more elementary school facilities would result in additional environmental impacts compared to the certified GPU EIR. We also request that the time frame for the three phases of residential development be provided in the environmental documentation.

The Saddleback Valley USD requests that the City continue to notify the District of all actions on this project and give the District an opportunity to review future environmental documentation.

Our mission is to provide all students with a high-quality education in a safe and nurturing environment so they can reach their full potential and become contributing and compassionate citizens in the world community. It is critical that the District remain involved in the planning process.

We look forward to working cooperatively with the City to create the best environment for our students and staff and the larger community. Please contact the undersigned if you have any questions or require additional information.

Sincerely,



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

¹ Multifamily attached units: 0.215 for elementary school, 0.0634 for intermediate school, and 0.1127 for high school (Table 5, Adjusted Student Generation Factors, Residential and Commercial/Industrial Development School Fee Justification Study, Saddleback Valley Unified School District, March 18, 2020, Cooperative Strategies).



CITY OF LAGUNA HILLS

April 5, 2021

Ms. Stella Escario-Doiron
Chief of Facilities, Construction & Maintenance
Saddleback Valley Unified School District
25631 Peter A. Hartman Way, Mission Viejo CA 92691

Re: The Village at Laguna Hills Project

Dear Ms. Escario-Doiron:

Thank you for your comment letter dated February 8, 2021 regarding the Village at Laguna Hills Project (the "Project"). Your letter expresses concern about potential increases in student populations and the associated impacts on local schools. The letter includes three (3) requests which are discussed below.

First, the Saddleback Valley Unified School District (the "District") requests that the City include "a school impact discussion for the currently approved project" in the environmental review for the Project. The "currently approved project" is the Five Lagunas Project that was approved in 2016. The "currently approved project" was evaluated in the Addendum to the City of Laguna Hills General Plan Update Environmental Impact Report for the Five Lagunas Project (State Clearinghouse No. 20080811100) (the "2016 Addendum"). For the District's convenience, the 2016 Addendum disclosed that the Five Lagunas project would generate approximately 99 elementary school students, 46 middle school students, and 99 high school students. (2016 Addendum, p. 137.) Compared to the Five Lagunas Project, the Project would generate an additional 103 elementary school students, 31 middle school students, and 58 high school students. (2021 Addendum, p. 236.)

Second, the School District requests that the City analyze the impacts of potential additional school facility construction. Notably, as discussed in both the 2016 and 2021 Addenda, the Project applicant will pay school fees pursuant to Senate Bill 50. Senate Bill 50 provides that payment of such fees satisfies all CEQA analysis and mitigation requirements concerning schools.

Lastly, the District requests that the City provide the time frame for the three residential development phases for the Project. To provide a conservative air quality analysis, the 2021 Addendum assumes that all phases could be completed by 2024, but the currently estimated phasing, which is subject to change, would provide approximately 805 dwelling units by 2028 and the remaining approximately 695 units by 2041.

Finally, it would be speculative for the City to try to predict or project school construction in response to this Project.

Thank you again for sharing the School District's concerns. The City hopes to continue a cooperative relationship with the School District moving forward.

Sincerely,

David Chantarangsu, AICP
Community Development Director