



CITY OF LAGUNA HILLS

July 30, 2024

Matthew R. Haugen
Buchanan Street Partners
3501 Jamboree Road, Suite 4200
Newport Beach, CA 92660

**SUBJECT: TENTATIVE PARCEL MAP/SITE DEVELOPMENT PERMIT/PRECISE PLAN/PARKING USE
PERMIT NO. 0166-2023 (OAKBROOK PLAZA)
ADDITIONAL TECHNICAL REVIEW COMMENTS**

Dear Mr. Haugen,

On June 7, 2023, Buchanan Street Partners (the "Applicant") submitted a preliminary application for a housing development project at 24422 Avenida De La Carlota (APN No. 620-429-04) consisting of 240 age restricted multiple-family residential units. On December 12, 2023, the Applicant submitted a formal application to the City for the proposed Oakbrook Plaza project (the "proposed Project"). On January 10, 2024, the City's Community Development Director provided notice to the Applicant that the application was incomplete. On February 12, 2024, the City received supplemental application materials from the Applicant for the proposed Project. On March 11, 2024, the City's Community Development Director provided notice to the Applicant that the supplemented application remained incomplete. On March 12, 2024, the City received supplemental application materials from the Applicant for the proposed Project. On April 11, 2024, the City's Community Development Director deemed the subject application complete. On June 10, 2024, the City's Community Development Director provided the Applicant with a letter identifying several City plans, programs, policies, ordinances, standards, and requirements that the proposed Project is, or potentially is, inconsistent, not in compliance, or not in conformity with per the requirements of Government Code §65589.5(j)(2).

This purpose of this letter is to transmit additional comments based on a further technical review of the proposed Project application and submitted plans by City Staff and consultants. These comments must be addressed before the proposed Project can be scheduled for hearing.

Landscaping

1. Section 9-46.050.H (Landscape Design Standards) of the Laguna Hills Municipal Code ("LHMC") states, "Landscape design shall address the retention of existing mature landscaping that is in good, healthful condition, incorporating such landscaping into the landscape plan where feasible." The submitted landscape plans do not indicate either the existing landscaping proposed to remain or the existing landscaping proposed to be removed as part of the Project. Please

update the landscaping plans to indicate what existing landscaping is proposed to be retained, if any, and the existing landscaping proposed to be removed.

2. Section 9-47.030.B.1 (Implementation Procedures) of the LHMC states, "Landscape and irrigation plans shall be submitted to the city for review and approval with appropriate water use calculations. Water use calculations shall be consistent with calculations contained in the Guidelines and shall be provided to the local water purveyor, as appropriate, under procedures determined by the city." The submitted landscaping plans do not include preliminary water use calculations. Please submit revised landscaping plans that include preliminary water use calculations.
3. Section 9-47.040.A (Landscape Water Use Standards) of the LHMC states, "For applicable landscape installation or rehabilitation projects subject to Section 9-47.020A, the estimated applied water use allowed for the landscaped area shall not exceed the MAWA calculated using an ET adjustment factor of 0.55 for residential areas and 0.45 for nonresidential areas, except for special landscaped areas where the MAWA is calculated using an ET adjustment factor of 1.0; or the design of the landscaped area shall otherwise be shown to be equivalently water-efficient in a manner acceptable to the city, as provided in the Guidelines." The submitted landscaping plans do not include preliminary water use calculations to confirm conformance with the Maximum Applied Water Allowance (MAWA). Please submit revised landscaping plans with preliminary water use calculations and the associated MAWA.

Urban Village Specific Plan Streetscape Improvements

The Urban Village Specific Plan includes streetscape features identified for Los Alisos and Avenida de la Carlota. Figures 9 and 9.1 of the UVSP identify edge treatments and street sections to be employed for perimeter streets, including Los Alisos and Avenida de la Carlota. The requirements for the streetscape features are described on page 11 of the UVSP. The plans submitted by the Applicant do not include the required streetscape improvements for the adjacent perimeter streets. Please coordinate with staff regarding the specific requirements that would need to be implemented as part of the proposed Project.

CEQA

The City has determined that an Initial Study is required to assess the potential impacts of the proposed project. As discussed in the City's April 11, 2024 letter, the City has retained a CEQA consultant, Dudek, to conduct the Initial Study. The results of the Initial Study, and the corresponding required CEQA document, are unknown at this time. For practical purposes, the City is requiring a deposit for the preparation of an Initial Study in the amount of \$126,496.29. The baseline for this analysis will be the existing conditions at the time environmental review commences. Should the results of the Initial Study indicate that a document other than a Mitigated Negative Declaration is required, the City will request an additional deposit. The applicant shall submit the deposit to the City as soon as possible in order for the CEQA Initial Study process to commence.

If you have any questions or would like to schedule a meeting to review these comments, please feel free to contact me at (949) 489-1442 ext. 133 or at pisarkiewicz@civicsolutions.com.

Sincerely,

A handwritten signature in black ink that reads "Adam Pisarkiewicz". The signature is written in a cursive, flowing style.

Adam Pisarkiewicz, AICP
Contract Planner

Cc: Community Development Director
City Manager
City Attorney

Attachment 1: Inconsistency Determination Letter dated June 10, 2024
Attachment 2: Dudek CEQA Services Proposal



CITY OF LAGUNA HILLS

June 10, 2024

VIA E-MAIL

Matthew R. Haugen
Buchanan Street Partners
3501 Jamboree Road, Suite 4200
Newport Beach, CA 92660

**SUBJECT: TENTATIVE PARCEL MAP/SITE DEVELOPMENT PERMIT/PRECISE PLAN/PARKING USE
PERMIT NO. 0166-2023 (OAKBROOK PLAZA)
GOVERNMENT CODE §65589.5(j)(2) 60-DAY NOTICE**

Dear Mr. Haugen,

On June 7, 2023, Buchanan Street Partners (the "Applicant") submitted a preliminary application for a housing development project at 24422 Avenida De La Carlota (APN No. 620-429-04) consisting of 240 age restricted multiple-family residential units. On December 12, 2023, the Applicant submitted a formal application to the City for the proposed Oakbrook Plaza project (the "proposed Project"). On January 10, 2024, the City's Community Development Director provided notice to the Applicant that the application was incomplete. On February 12, 2024, the City received supplemental application materials from the Applicant for the proposed Project. On March 11, 2024, the City's Community Development Director provided notice to the Applicant that the supplemented application remained incomplete. On March 12, 2024, the City received supplemental application materials from the Applicant for the proposed Project. On April 11, 2024, the City's Community Development Director deemed the subject application complete.

The proposed Project generally consists of (1) the subdivision of an existing 8.42 acre parcel containing an approximately 35,000 square foot office building and surface parking into one 4.26 acre parcel ("Lot 2" or the "commercial parcel") and one 4.16 acre parcel ("Lot 1" or the "residential parcel"); (2) conversion of the existing commercial office building located on proposed new Lot 2 to a 100% medical office building; and (3) demolition of existing surface parking spaces serving the existing commercial office building and the construction of a new, approximately 83 foot tall, structure on proposed new Lot 1 containing three levels of podium parking and 240 age restricted multiple-family senior citizen apartment units. The proposed Project includes a total of 731 parking spaces to serve both the medical office building and the senior citizen housing units, the majority of which will be contained in a new parking structure within the multiple-family building proposed to be constructed on Lot 1.

The Applicant has requested approval of the following discretionary land use entitlements for the proposed Project:

1. Approval of a Tentative Parcel Map to subdivide an existing 8.42-acre parcel into two new separate parcels, a 4.16-acre parcel on which a new structure containing 240 residential

apartments over three levels of podium parking will be constructed (Lot 1), and a 4.26-acre parcel containing the converted medical office building (Lot 2).

2. Approval of a Site Development Permit to demolish existing surface parking for the existing office building and to develop the site with a new structure containing 240-unit residential apartments over three levels of podium parking, a surface parking lot, dog park, landscaping, walkways, and associated development.
3. Approval of a Precise Plan due to the proposed Project incorporating a mix of land uses on a single property or contiguous properties.
4. Approval of a Parking Use Permit to permit the proposed parking structure, a reduction in required parking for the medical office building on proposed Lot 2 and the shared use of the proposed parking structure located on proposed Lot 1 by the medical office uses located on proposed Lot 2 and the residential use located on proposed Lot 1.

The Housing Accountability Act¹, at Government Code §65589.5 (j)(2)(A)(ii), states in pertinent part:

“If the local agency considers a proposed housing development project to be inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision as specified in this subdivision, it shall provide the applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity...within 60 days of the date that the application for the housing development project is determined to be complete, if the housing development project contains more than 150 units.”

City staff has reviewed the application materials submitted and compared them to potentially applicable City plans, programs, policies, ordinances, standards, and requirements in effect as of June 7, 2023. In accordance with Government Code Section 65589.5(j)(2)(A), City staff has identified several City plans, programs, policies, ordinances, standards, and requirements that the proposed Project is, or potentially is, inconsistent, not in compliance, or not in conformity with. Following is an explanation of the reason or reasons the proposed Project is, or potentially is, inconsistent, not in compliance, or not in conformity with the identified City plans, programs, policies, ordinances, standards, and requirements.

¹ For purposes of this letter, the City has assumed that the proposed Project constitutes a “housing development project” as defined in the Housing Accountability Act (“HAA”) and that the HAA applies to the proposed Project, as the Applicant has contended by filing a preliminary housing application. The Housing Accountability Act applies to “a use consisting of . . . [r]esidential units only,” as well as “[m]ixed-use developments consisting of residential and nonresidential uses with at least two-thirds of the square footage designated for residential use.” Gov’t Code §65589.5(h)(2). The City does not intend to concede by virtue of providing this letter that the proposed Project satisfies the HAA’s definition of a “housing development project” and/or that the HAA applies to the proposed Project, and the City hereby reserves, and does not waive, the right to determine and assert otherwise.

Density

According to the plans submitted by the Applicant, the proposed Project would have a residential density of 57.7 dwelling units per acre. (See Sheet G1.1 of submitted plans). This density is derived by dividing the total number of proposed residential units (240) by the gross acreage of proposed Lot 1 (4.16) acres.²

The Project site has a General Plan Land Use Designation of Village Commercial and is within the Urban Village Specific Plan ("UVSP") area and the Village Commercial zoning district. Pursuant to Laguna Hills Municipal Code ("LHMC") Section 9-24.100, all development within the Village Commercial zoning district is subject to the Urban Village Specific Plan,

For residential projects within the UVSP area, a minimum density of 30 dwelling units per acre is required and a maximum density of 50 dwelling units per acre is permitted. (See UVSP, Table 2 (Development Standards), pg. 37). The proposed Project's density of 57.7 dwelling units per acre on Lot 1 exceeds the maximum density of 50 dwelling units per acre permitted on properties located within the Urban Village Specific Plan Area.

The Applicant has invoked the State Density Bonus Law (Gov't Code §65915) allowance of an up to 20% density bonus for a qualifying senior citizen housing development.

Maximum Building Height

According to the plans submitted by the Applicant, the proposed Project would have a height of 83 feet to the top of the parapet and 89 feet to the top of stair towers. (See Sheet G1.1 of submitted plans).

The UVSP establishes a maximum height limit of 75 feet for all structures (See UVSP, Table 2 (Development Standards), pg. 37) while LHMC Section 9-40.030.B establishes accessways such as stairwells or elevators to rooftops may extend above the maximum building height up to a maximum of five feet. The proposed Project's height of 83 feet to the top of the parapet and 89 feet to the top of stair towers exceeds the maximum height of 75 feet and 80 feet, respectively.

The applicant is invoking the use of a State Density Bonus Waiver in proposing a height over the permitted maximum.

Location

The proposed Project consists of a senior citizen housing project, and the proposed Project site is located directly adjacent to Interstate 5, which is a significant pollution source as a result of the tailpipe emissions of vehicles traveling along it.

General Plan Policy S-7.2 states, "Encourage the siting of new developments for sensitive receptors, such as schools, playgrounds, childcare centers, senior services and housing, and health care facilities, away from significant pollution sources. When this is not possible, consider appropriate mitigation measures to

² This density calculation assumes the proposed residential senior apartments on proposed Lot 1 are not treated as part of a "mixed use development" on the entire 8.42 acre site that is inclusive of the commercial / medical office building located on proposed Lot 2. If the entire 8.42 acre site is used as the basis for calculating density, the proposed Project would have a residential density of approximately 28.5 dwelling units per acre.

protect human health (e.g., enhanced indoor air filtration systems).” The Applicant has not proposed enhanced indoor air filtration systems or other appropriate mitigation measures to protect human health within the proposed senior housing structure as part of its submittal. The Applicant should specify the type of enhanced air filtration system or other appropriate mitigation measures it intends to incorporate into its building plans in order to demonstrate consistency with General Plan Policy S-7.2.

Tentative Parcel Map Requirements

The applicant submitted a Vesting Tentative Parcel Map (“VTPM”) as part of its submission for Tentative Parcel Map approval. The City has adopted the County of Orange subdivision ordinance and manual as the City’s subdivision ordinance of record. (See LHMC §9-86.030). Any Tentative Parcel Map application is reviewed for compliance with the County of Orange Subdivision Code (the “Subdivision Code”). Several areas of inconsistency or lack of conformity with applicable standards and/or requirements must be addressed before the City can approve the proposed VTPM.

1. Section 7-9-254 (Zoning Conformance) of the Subdivision Code provides, in pertinent part, that the City “shall not approve or conditionally approve a tentative map which does not conform with applicable zoning . . . [and that] [a] tentative map shall not be approved if it is apparent that any proposed parcel cannot be developed to its intended use without the modification of site development standards.” In addition, LHMC Section 9-86-050 and 9-86.060 provide that all subdivisions are required to be consistent with the City’s General Plan and all applicable zoning and development standards contained in the Development Code. The General Plan, UVSP, and zoning inconsistencies and/or potential inconsistencies identified elsewhere in this letter must be resolved and compliance demonstrated by the Applicant in order for the City to make the findings required to approve the proposed Vesting Tentative Parcel Map.
2. The proposed Vesting Tentative Parcel Map may only be approved by the City if the findings set forth in Sections 7-9-255 and 7-9-256 (Findings Required) of the Subdivision Code and any additional findings required by the State Subdivision Map Act are made. In addition to consistency with applicable General Plan and zoning provisions, amongst other findings, Section 7-9-255 requires that the City be able to find “(4) that the requirements of the California Environmental Quality Act have been satisfied,” “(6) that the design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantial and avoidable injury to fish or wildlife or their habitat,” and “(7) that “the design of the subdivision and the type of improvements proposed are not likely to cause serious public health problems.” The proposed Project is potentially inconsistent and not in conformance with each of these requirements, but it is too soon for the City to make a final determination at this stage of the process. Conformance with these requirements will be evaluated in conjunction with review of the proposed Project pursuant to the California Environmental Quality Act (CEQA), which has not yet been completed.
3. Pursuant to Section 7-9-256 of the Subdivision Code, the City is also required to disapprove a proposed tentative map if it is determined that the discharge of waste from the proposed subdivision into an existing community sewer system would result in or add to a violation of existing requirements prescribed by either the Santa Ana or San Diego Regional Water Quality Control Board. The proposed Project could result in the runoff of waste into the municipal separate storm sewer system (MS4) owned by the City. As discussed below in the “Water Quality

Management Plan” discussion, the San Diego Regional Water Quality Control Board requires that all development projects, regardless of the use of biofiltration structural low impact development (LID) Best Management Practices (BMPs), must maximize the use of low impact development BMPs, such as disconnected roof downspouts, use of pervious pavements, landscape planter areas, etc., to the extent feasible, and not rely solely on biofiltration BMPs. The Preliminary WQMP submitted by the Applicant instead relies solely on biofiltration LID BMPs to comply with the MS4 Permit’s LID implementation requirement for priority development projects, and the proposed Project is therefore currently inconsistent with this requirement.

4. The submitted Vesting Tentative Parcel Map does not contain the information needed for the City to determine whether the proposed Tentative Parcel Map and proposed new Lot 2 conform to the following applicable lot standards:

Item	Standard	Reference
Maximum Lot Coverage	70%	UVSP Table 2
Maximum building height	75 ft.	UVSP Table 2
Minimum setback—front		UVSP Table 2
Parking lot	10 ft.	
Parking structure	20 ft.	
building	20 ft.	
Minimum setback – side (interior)	10 ft. abutting residential 0 ft. commercial abutting non-residential	UVSP Table 2
Minimum setback – rear	20 ft. abutting residential 10ft. abutting non-residential	UVSP Table 2
Minimum landscape coverage	15%	UVSP Table 2

Please revise the Vesting Tentative Parcel Map to include the required and proposed lot standards for both lots proposed to be created in order to demonstrate compliance.

5. Based upon the Subdivision Code and professional map preparation standards, City staff has also determined that the Vesting Tentative Parcel Map, Sheet C-1, contains several errors that must be remedied before the map is suitable for approval as a Vesting Tentative Parcel Map.
 - a. Applicant (and/or its Land Surveyor or Civil Engineer) did not correctly plot easements shown on the ALTA survey onto the Tentative Parcel Map. On the Vesting Tentative Parcel Map, Sheet C-1, Easement No. 14 is called out as “an easement for pipelines and incidental purposes...” but the hexagon No. 14 has been placed on the plan view of Sheet C-1 within the roadway for Avenida de la Carlota and on Los Alisos Boulevard. The actual location of the pipeline easement should be along Interstate 5 on the Vesting Tentative Parcel Map and not within the street right-of-way. In addition, the ALTA Survey shows there should be two easements plotted for Avenida de la Carlota and Los Alisos Boulevard street right-of-way that appear to be incorrectly labeled on the Map:
 - Easement No. 13 “An easement shown or dedicated on the map of Parcel Map recorded December 24, 1974 and on file in Book 65, Page 44, of Parcel Maps for

future streets, Avenida de la Carlota and Los Alisos Boulevard and incidental purposes,” and

- Easement No. 15, “An easement for street, highway, and incidental purposes in the document recorded December 18, 1977 as Book 12967, Page 1116 of Official Records.”
- b. The Vesting Tentative Parcel Map also depicts, on Sheet C-1, “proposed lot lines” labeled at both the centerline of Los Alisos Boulevard and at the edge of right-of-way on Avenida de la Carlota. This creates (or implies the creation of) lots which have not been numbered or lettered within the existing right-of-way. This shall be corrected.
- c. The Vesting Tentative Parcel Map must show both proposed utilities and proposed easements on the same Map.
- d. Acreage (gross and net) of each lot, both before and after the proposed parcel map filing, must be shown.
- e. Please use a different line weight/symbol for “lot line” versus “right of way.”
- f. The “Existing 10’ Water Easement to be Quitclaimed” does not appear in the List of Easements on Sheet C-1.

Traffic Impact Analysis

Section 9-76.050 of the Laguna Hills Municipal Code requires all development applications to be reviewed in conformance with the growth management program and Transportation Demand Management (TDM) requirements. Section 9-76.060 of the Code requires all development applications to be consistent with the growth management program and the City’s general plan. This requires applicants for development projects to prepare traffic impact analysis reports. The UVSP and LHMC Chapter 9-102 also require the preparation a traffic impact analysis. The Applicant has submitted a Traffic Impact Analysis prepared by RK Engineering Group, dated November 30, 2023. The City’s consulting traffic engineer, Hartzog & Crabill, on February 7, 2024, documented the following:

The [Traffic Impact] analysis determined that one of the eight study intersections, the project access driveway No. 2 at Avenida de La Carlota would result in a significant impact as a result of the project. To restore the intersection to acceptable levels of service (LOS), the TIA recommended restriping the existing median on the easterly leg along Avenida de La Carlota to provide an acceleration lane for southbound left-turning (exiting) vehicles. In addition, HCI conducted a traffic signal warrant analysis at the subject driveway. Based upon the existing plus project related traffic volumes, a new traffic signal is warranted. The remaining 7 study intersections will continue to operate at acceptable LOS.

The proposed Project plans and Vesting Tentative Parcel Map submitted by the Applicant should be revised to recognize and reflect the installation of a traffic signal and related improvements at Project access driveway No. 2, as well as any resulting on-site changes.

In addition, the Traffic Impact Analysis submitted by the Applicant for the proposed Project, dated November 30, 2023, is now out of date. In order to determine the impacts of the additional traffic generated by the proposed project, the Traffic Impact Analysis must be updated and include a recalculation of the Urban Village Specific Plan's (UVSP) trip budget based on current entitlement approval status in the UVSP area in accordance the requirements of the Trip Budget Allocation for Future Development subsection within Section V of the UVSP.

Parking Facilities

According to the plans submitted by the Applicant, the Project proposes a new multi-level parking structure, as well as a new surface parking lot. Pursuant to LHMC Section 9-44.110, parking structures, including underground or subterranean structures, shall require a parking use permit and shall be designed to meet the guidelines in Section 9-44.110 in addition to standards contained in chapter 9-44. Upon review, the plans are potentially inconsistent with the Laguna Hills Municipal Code standards listed below:

1. LHMC Section 9-44.040.F.1 (Access and Parking – General Provisions) states, “Within all zones, at least ten percent of any common parking area shall be landscaped.” The submitted landscape plans appear to show less than ten percent of the surface parking area in the northeast corner of the subject property to be landscaped. Please revise the landscape plans to include a minimum of ten percent landscaping along with the associated dimensions and calculations to display conformance with the standard.
2. LHMC Section 9-44.040.4.F.2 (Access and Parking – General Provisions) states, “Landscaping shall be spread throughout the entire parking lot. Not more than sixty (60) percent shall be included as perimeter landscape. Forty (40) percent shall be distributed interior to the parking facility.” The submitted landscape plans appear to show less than 40 percent of the interior parking area of the surface parking area in the northeast corner of the subject property to be landscaped. Please revise the landscape plans to include a minimum of 40 percent landscaping within the interior parking area and include the square footage calculations of both the interior and perimeter landscaping to display conformance with the standard.
3. LHMC Section 9-44.050 (Required Parking), Table 9-44.A (Number of Parking Stalls Required) requires a Senior Citizen Housing Complex to provide a minimum of one covered and assigned parking stall plus ½ guest parking stall per dwelling unit, plus one stall for the resident manager. The proposed 240-unit senior housing development would require a minimum of 361 parking stalls pursuant to this standard, but the Applicant is proposing a total of 281 parking stalls pursuant to State Density Bonus Law's provisions for lowered parking requirements of 1 parking stall per studio and one-bedroom unit, 1.5 parking stalls for each two-bedroom unit, and no required guest parking stalls.
4. LHMC Section 9-44.050 (Required Parking), Table 9-44.A (Number of Parking Stalls Required) requires a Medical and Dental Office to provide one parking stall for every 150 gross square feet (GSF). Pursuant to this standard, the existing 121,000 (GSF) office building on proposed Lot 2 would require a total of 806 parking stalls once converted to a medical office building. However, the Applicant is proposing only 662 total parking spaces to serve the medical office building. Pursuant to LHMC Section 9-44.050, “Except as determined by a special parking and use study to

permit joint or shared parking, parking for one use shall not be credited as serving any other use.” The Applicant has requested approval of a Parking Use Permit to allow the joint use of parking facilities between the commercial office building on Lot 2 and the residential structure on Lot 1 pursuant to LHMC Section 9-44.070. In the event the requested Parking Use Permit is not approved, the number of parking spaces proposed to serve the medical office building will be inconsistent with the LHMC parking standards that apply to this type of use.

5. LHMC Section 9-44.060.G.1 (Design Standards for Parking Facilities) states, “All landscaping within parking lots shall be located in planter areas which are bounded by concrete curbing at least six inches high and six inches wide.” The landscape plans do not show any proposed landscaping within the new surface lot in the northeast corner of the subject property. Please revise the landscape plans to include the required landscaping with the associated dimensions to demonstrate conformance with this standard.
6. LHMC Section 9-44.060.G.5 (Design Standards for Parking Facilities) states, “Landscape planters shall be placed at the end(s) of any parking stalls located at the end of a row of parking. Planters shall be not less than five feet in width no less than the length of the parking stall adjacent thereto exclusive of curb width, and shall be installed in a ratio of one planter for each fifteen (15) consecutive parking stalls in order to eliminate the amount of continuous paving within a parking lot.” The landscape plans do not show any proposed landscape planters at the end of the parking stalls within the new surface lot in the northeast corner of the subject property. Please revise the landscape plans to include the required landscape planters with the required dimensions to demonstrate conformance with this standard.
7. LHMC Section 9-44.060.G.7 (Design Standards for Parking Facilities) states, “Landscape planters shall be incorporated between each module of parking.” The landscape plans do not show any proposed landscape planters between each module of parking within the new surface parking lot in the northeast corner of the subject property. Please revise the landscape plans to include the required landscape planters between each module of parking to demonstrate conformance with this standard.
8. LHMC Section 9-44.060.G.8 (Design Standards for Parking Facilities) states, “A minimum of one fifteen (15) gallon tree for every six parking stalls shall be installed in the parking lot.” While the landscape plans show two new trees being planted along the outer edge of the new surface parking lot in the northeast corner of the subject property, the development standard requires a minimum of three 15-gallon trees to be installed in the parking lot relative to the 21 proposed parking stalls. Please revise the landscape plans to include the required trees along with their associated details to confirm conformance with the development standard.
9. LHMC Section 9-44.060.G.10 (Design Standards for Parking Facilities) states, “Parking lot landscaping shall include shade trees located so as to provide for adequate shade canopies within fifteen (15) years of planting as follows. The Community Development Director may determine that the size of the trees to be installed shall be increased. The percentage of area required to be shaded shall be based on the area of uncovered parking stalls only and shall not include driveways and interior traffic circulation aisles.” The landscaping plans do not propose any shade trees and therefore the new surface parking lot in the northeast corner of the subject property does not provide adequate shade canopies for the uncovered parking stalls. Please revise the landscape

plans to include shade trees for the uncovered parking stalls which provide for adequate shade canopies within 15 years of planting to demonstrate conformance with this standard.

10. LPMC Section 9-44.060.H (Design Standards for Parking Facilities) states, "Paving shall be required for all permanent parking, access, and loading facilities. Decorative paving, colored concrete, and asphalt surfacing materials shall be used and shall conform to the City's adopted standards and requirements." The submitted plans do not demonstrate that the new surface lot and driveways will include decorative paving or colored concrete. Please revise the site plan(s) to include decorative paving and/or colored concrete to demonstrate conformance with this standard.
11. LPMC Section 9-44.060.K (Design Standards for Parking Facilities) states, "Striping and signage shall be provided to each parking lot, aisle, ramp and stall in such a manner that persons in vehicles can quickly identify the direction of flow, stall location, and limitations of use as appropriate. Stalls shall be delineated by the use of six-inch stripes or hairpin patterns affixed to the pavement with the required stall size measured from the centerline of the stripe or pattern between successive stalls. Directional arrows shall be affixed to the pavement in the direction of flow permitted within the driveway or aisle. Where the aisle is designed for one-way traffic appropriate wording warning users of the restriction and signs shall be provided. Signage within the parking lot or structure shall be included as part of a master sign plan. Where no master sign plan is required, parking lot plans shall incorporate detail sheets to clearly identify information, safety, handicapped, and directional signs intended for use in the lot or structure." The submitted floor plans for each level of structured parking do not include the measurements of stalls or stripes, nor do they include directional arrows for the flow of traffic. Please revise the floor plans of each level of structured parking to include the measurements of stalls and stripes, as well as the required directional arrows.
12. LPMC Section 9-44.060.L (Design Standards for Parking Facilities) states, "Curbs or wheel stops shall be provided at each parking space in a parking lot or structure where the parking space abuts a wall or landscape planter. These restraints shall be at least six inches high and six inches thick and shall be spaced and securely affixed to the surface of the lot such that the vehicle will not contact building walls. Overlap to landscaping or walkways shall not exceed two feet." The site plan for the surface parking lot in the northeast corner of the property does not include curb or wheel stops. In addition, only a select few parking spaces within the parking structure are shown to include wheel stops, and no dimensions for the proposed wheel stops are included on the plans. Please revise the site plan and parking structure floor plans to include the required curb or wheel stops and their associated dimensions to display compliance.
13. LPMC Section 9-44.060.L (Design standards for parking facilities) requires the minimum distance from a parking stall adjacent to a wall to be 2 ft 5 in. The Applicant is proposing a distance of 1 foot between some parking stalls and the adjacent to walls within the parking structure. The Applicant is invoking the State Density Bonus Law's provisions for a waiver to deviate from the required minimum.
14. Section 9-44.110.B. (Parking Structure Design Standards) states "The edge of structure support columns shall be located a minimum of two feet and a maximum of four feet from the parking aisle and shall not be located within the area of a parking stall." The parking structure floor plans appear to show support columns located closer than two feet to the parking aisle. Please revise

the parking structure floor plans (Sheets A2.0 and A2.1) to show at least eight support columns one each parking level located a minimum of two feet and a maximum of four feet from the parking aisle along the associated dimensions.

15. Section 9-44.110.E (Parking Structure Design Standards) states “All ramps shall be provided with transition zones at the top and bottom of the ramp. Ramps with a grade of ten percent or less shall have a transition zone at least eight feet in length. Ramps with a grade of greater than ten percent shall have transition zones at least twelve (12) feet in length. The grade of transition zone shall not exceed one-half the grade of the ramp it serves.” All ramps shown in the parking structure floor plans display a grade of five percent, but no transition measurements or gradients are given. Please revise the parking structure floor plans to include transition measurements and gradients to demonstrate compliance with these standards.
16. Section 9-44.110 (Parking Structure Design Standards), Table 9-44.D (Parking Facility Design Standards) requires parking structures to have a minimum of 7-foot unobstructed vertical clearance for automobiles. Sheet A3 shows the upper parking level having a vertical clearance of 6'-4". Please revise Sheet A3 to conform to the required 7-foot minimum clearance.

Joint Use of Parking Facilities

According to the plans and documents submitted by the Applicant, the proposed new senior housing structure on proposed Lot 1 will contain parking to be utilized by the existing medical office building uses on proposed Lot 2. Pursuant to LHMC Section 9-44.050, “Except as determined by a special parking and use study to permit joint or shared parking, parking for one use shall not be credited as serving any other use.” In addition, Pursuant to LHMC Section 9-44.070, the joint use of parking facilities for multiple uses on multiple building sites requires the submittal of a detailed “Joint Use Parking Plan,” approval of a Parking Use Permit pursuant to LHMC Chapter 9-92, and that several enumerated requirements be met. The Applicant submitted a document entitled “ULI Shared Parking Analysis,” dated November 30, 2023, which the City construes to be the Applicant’s intended Joint Use Parking Plan. This document and the proposed Project are inconsistent and/or not in conformance with the following requirements set forth in LHMC Section 9-44.070:

1. Section 9-44.070.A (Joint Use of Parking Facilities) states “A detailed joint use parking plan shall be submitted and an application made for a parking use permit pursuant to the requirements contained in this section and the findings in Chapter 9-92 of this title. The plan shall show and explain all parking facilities, uses and structures that will use the parking, and the pedestrian access from the parking facilities to the uses and structures.” The submitted “ULI Shared Parking Analysis” is inconsistent with this requirement as the submitted document does not show and explain all uses that will use the parking facilities, particularly each of the proposed uses in the medical office building on proposed Lot 2. Without a detailed breakdown of the uses that will be in the commercial building, the City may not be able to make the findings required in Subsection D. of Section 9-44.070 or the required Parking Use Permit finding “[t]hat the requirement for parking established by the joint parking use permit shall assure that parking demands for the participating uses are continually met.” (See LHMC §9.92-080.E). Please submit a revised Joint Use Parking Plan that includes a description of the proposed uses within the commercial building and how those uses will utilize the shared parking.

2. Section 9-44.070.B (Joint Use of Parking Facilities) states, “The parking facilities shall be within three hundred (300) feet of the uses they are intended to serve. A pedestrian pathway is required to provide a means for pedestrian linkage between immediately adjacent land uses and uses within the parking facility.” Sheet A1.0 of the submitted plans appears to show some structured parking on Lot 1 for medical office use is greater than 300 feet from the medical office building on Lot 2. To demonstrate compliance with this requirement, the Applicant should revise the site plans to display measurements from the medical office use parking to the entrance to the medical office use building and confirm they are no greater than 300 feet.
3. Section 9-44.070.D (Joint Use of Parking Facilities) states, “Findings for approval of a shared parking plan shall include that the shared parking plan provides a reasonable and enforceable means for all uses to share common parking and that the city’s minimum requirements assure parking demand is continually met.” The Shared Parking Analysis / Joint Use Parking Plan submitted does not include justification or sufficient information for the City to make these required findings. For example, no or insufficient details have been provided regarding the uses that will occupy the commercial building on Lot 2 and their hours of operation, how common parking will be shared amongst uses, what enforceable means for the sharing of common parking will be put in place. Please submit a revised Joint Use Parking Plan that addresses these inconsistencies and provides justification and sufficient information supporting the required findings set forth in Section 9-44.070.D.
4. Section 9-44.070.E.1 (Joint Use of Parking Facilities) states, “The joint use parking plan shall include: Written verification from the involved property owners and tenants acknowledging acceptance of and compliance with the requirements of the joint use parking plan.” No written verification from the involved property owners and tenants acknowledging acceptance of and compliance with the requirements of the joint use parking plan were provided to the City. Please submit a revised Joint Use Parking Plan that includes the required written verification.
5. Section 9-44.070.E.4 (Joint Use of Parking Facilities) “The joint use parking plan shall include: A site plan showing all parking spaces, building square footage and tenant spaces within the complex or area participating.” The Shared Parking Analysis / Joint Use Parking Plan submitted by the Applicant does not include a site plan showing the building square footage and tenant spaces within the commercial medical office building. Please submit a revised Joint Use Parking Plan that includes a site plan showing the building square footage and proposed tenant spaces within the medical office building.
6. Section 9-44.070.E.5.c (Joint Use of Parking Facilities) states, “The joint use parking plan shall include a joint use parking matrix with the following information: Gross square footage of all building and tenant spaces.” The Shared Parking Analysis / Joint Use Parking Plan submitted by the Applicant does not include gross square footage calculations for each tenant space within the medical office building. Please include the gross square footage calculations for each tenant space within the medical office building in an updated parking analysis.
7. Section 9-44.070.E.5.d (Joint Use of Parking Facilities) states, “The joint use parking plan shall include a joint use parking matrix with the following information: The name, type of use, and the days and hours of operation for each tenant.” The parking analysis does not include the days and hours of operation for each tenant in the existing medical office building. Please submit a revised

Joint Use Parking Plan that includes the days and hours of operation for each tenant in the medical office building.

8. Section 9-44.070.E.5.e (Joint Use of Parking Facilities) states, “The joint use parking plan shall include a joint use parking matrix with the following information: The number of parking stalls required by the development code for each tenant based on each tenant’s gross square footage and type of use.” While the Shared Parking Analysis / Joint Use Parking Plan submitted by the Applicant includes a table summarizing the primary land use(s) of the medical office building, the individual tenant uses are not specified. Please submit a revised Joint Use Parking Plan that includes the individual tenant uses and their associated number of parking stalls based on the gross square footage and type of use in an updated parking analysis.
9. Section 9-44.070.E.5.f (Joint Use of Parking Facilities) states, “The joint use parking plan shall include a joint use parking matrix with the following information: The hourly parking demand for all tenants on: Weekdays (M-F), Saturday, and Sunday.” While the Shared Parking Analysis / Joint Use Parking Plan submitted by the Applicant includes observed hourly parking demand for example senior housing developments in the appendices, as well as the ULI Month/Daily Time parking demand for Senior Housing, no hourly parking demand is provided for the uses or for each individual tenant of the medical office building. Further, the analysis provided utilizes the terms “Urgent Care” and “Nonurgent Care” and differentiates between these two terms as to parking requirements, but these terms are not used in Chapter 9-44 of the LHMC. Please submit a revised Joint Use Parking Plan that includes the hourly parking demand for each use associated with each individual tenant of the existing medical office building in an updated parking analysis and conform the description of such uses to the terminology used in Table 9-44.A for Medical and Dental office uses, as appropriate.
10. Section 9-44.070.E.5.f (Joint Use of Parking Facilities) states, “The joint use parking plan shall include a joint use parking matrix with the following information: A comparison between hourly parking demand and the parking supply to show that demand will not exceed parking supply.” While Table 7 of the Shared Parking Analysis / Joint Use Parking Plan submitted by the Applicant displays a shared parking demand summary between the Senior Housing use and the “Urgent Care” and “Nonurgent Care” uses, they are only analyzed at peak hours and peak months. Please submit a revised Joint Use Parking Plan that revises Table 7 to include the hourly parking demand and associated parking supply to establish that the demand will not exceed parking supply.

Urban Village Specific Plan Design Guidelines

The Urban Village Specific Plan includes design guidelines for new residential developments in order to aesthetically integrate the new developments within the Plan area as well as the adjacent residential and commercial areas outside of the Plan area. The plans submitted by the applicant are inconsistent with the following residential design guidelines:

1. The Residential Development section states, “Roofs should incorporate pitches, ridges, rakes, ridgelines, and materials that are common to the area” (pg. 24). The proposed Project contains a flat roof without variation. Please revise the building design to incorporate pitches, ridges, rakes, or ridgelines.

2. The Residential Development section states, “Building massing should respect the surrounding structures and step down at the corners” (pg. 24). The proposed Project maintains a consistent height throughout the structure and does not step down at each corner. Please revise the building design to step down at the corners.
3. The Screening section states, “Any equipment, whether on the roof, side of a structure or ground mounted, shall be screened from view. The method of screening shall be architecturally compatible in terms of materials, color, shape, and size. The screening design shall blend with the building design and include landscaping when on the ground” (pg. 41). Sheet C-3 shows proposed transformers adjacent to the north and south sides of the proposed building, while Sheet L.1 shows proposed transformers, but also shows landscaping over the transformers, and does not show any landscape screening. Please revise the plans to show landscape screening and associated dimensions of all ground mounted equipment.

Urban Village Specific Plan Entry Feature and Wayfinding Signage

The Urban Village Specific Plan includes locations and design guidelines for perimeter entry features and wayfinding signage within the Plan area. Figure 21 of the UVSP identifies locations of entry features and wayfinding signage throughout the Plan area and identifies a “Perimeter Entry Feature and “Vehicular Wayfinding Signage” to be located on the proposed Project site. The requirements for the Perimeter Entry Feature and Vehicular Wayfinding Signage are described on page 20 and Figures 25 and 26 of the UVSP. The plans submitted by the Applicant not include the required Perimeter Entry Feature or Wayfinding Signage, and the proposed Project is therefore inconsistent with this requirement. Please revise the Site Plan or incorporate the required signage into a Master Sign Program.

Public Art

The Urban Village Specific Plan contains a requirement for Public Art in all new developments with a total construction cost of \$250,000 or more or a contribution to a Public Art In-Lieu Fund. The applicant has not submitted any documentation indicating how the project will comply with the UVSP Public Art requirements.

In a separate document, please indicate whether the proposed development will include public art or a contribution to the City’s Public Art In-Lieu Fund utilizing the Public Art value formula described in Section V, page 39 of the Urban Village Specific Plan.

Water Quality Management Plan

LHMC Chapter 5-36 (Water Quality Control) provides that the NPDES permit(s) issued to the City require that the City ensure compliance with stormwater management programs and implementation plans, including compliance by all dischargers subject to the provisions of the state construction general permit, as determined through the project water quality management plan (WQMP). The Applicant’s submittal is inconsistent with the stated requirement. The San Diego Regional Water Quality Control Board requires the City to require all new development projects, regardless of the use of biofiltration structural low impact development (LID) Best Management Practices (BMPs), to maximize the use of low impact development BMPs, such as disconnected roof downspouts, use of pervious pavements, landscape planter areas, etc., to the extent feasible, and not rely solely on biofiltration BMPs. The Preliminary WQMP

submitted by the Applicant instead relies solely on biofiltration LID BMPs to comply with the NPDES Permit's LID implementation requirement for priority development projects, and the proposed Project is therefore currently inconsistent with this requirement. Therefore, to achieve compliance, the Preliminary WQMP and site design plans must provide for additional LIDs, or provide adequate justification for not using additional BMPs. The Preliminary WQMP indicates infiltration capabilities of the soil have yet to be assessed, but the WQMP indicates a conservation scenario where no infiltration can occur. For completeness, this evaluation must be conducted so compliance with the NPDES MS4 Permit can be ascertained.

Grading, Building, and Fire Code Compliance

The application plans do not include details adequate to determine compliance with applicable Building, Grading, and Fire Codes. The proposed Project must comply with the following Parts of the California Building Code and all local amendments adopted by the City pursuant to Chapter 5.16 and Title 10 of the LHMC:

- California Code of Regulations, Title 24:
 - Part 2, 2022 California Building Code
 - 2022 California Building Code Chapter 11A, Private Housing Accessibility. Please indicate if public funding is being utilized for the proposed project.
 - 2022 California Building Code Chapter 11B, Public Housing/Public Accommodation.
 - Part 3, 2022 California Electrical Code
 - Part 4, 2022 California Mechanical Code
 - Part 5, 2022 California Plumbing Code
 - Part 6, 2022 California Energy Code
 - Part 9, 2022 California Fire Code
 - Part 11, 2022 California Green Building Standards Code (CalGreen)
 - California Senate Bill (SB) 7 – Water Meter.

In addition, the proposed project will be required to comply with LHMC Chapter 10-16 (Grading and Excavation Code). The plans submitted by the Applicant as part of its land use entitlement application are not detailed enough for the City to determine compliance with all applicable Grading, Building, and Fire Code standards. Therefore, it is possible the proposed Project does not conform to all said standards. If the requested land use entitlements for the proposed Project are approved, more detailed plans will be required to be submitted in order to obtain post-entitlement permits and conformance to these standards will be evaluated during the post-entitlement permit review phase.

As noted above, the proposed Project must comply with all applicable provisions of the California Fire Code and local amendments adopted pursuant to LHMC Chapter 5.16. This includes, without limitation, approval of a Fire Master Plan for Commercial and Residential Development pursuant to Orange County Fire Authority ("OCFA") Guideline B-01. (See LHMC Section 5.16.030). The Applicant has not yet obtained OCFA approval of its proposed Fire Master Plan, and the proposed Project will be inconsistent and not in conformance with this requirement until such approval is obtained. In a letter dated February 15, 2024, OCFA provided comments on the Applicant's submitted plan set. All comments must be addressed in order to confirm consistency with relevant OCFA standards and guidelines. See Attachment 1.

Items for Potential Future Discussion

The proposed Project site is identified as an underutilized site suitable for the development of housing in the City's General Plan Housing Element Sites Inventory (Site ID No. 116). The Underutilized Sites Analysis on pages H-205 and H-206 of the Housing Element contains the following discussion regarding this site:

"Site 116: 24422 Avenida de la Carlota

This 6.73-acre site is known as Oakbrook Plaza. Existing uses are commercial. According to LoopNet, a commercial broker website, the site is improved with a 119,900-square-foot, four-story office building constructed in 1983. There are approximately 478 surface parking spaces occupying 85 percent of the site. There is a low as-built FAR of 0.41, where no maximum is prescribed, indicating that the site is underutilized. Lot coverage is 10 percent; however, 70 percent lot coverage is allowed on the site. Online listings (commercialcafe.com) indicate the building occupancy is more than 1/3 vacant. Buchanan Street Partners, which purchased the site in December 2022, corresponded with City staff prior to and during the purchase process, indicating their plans to add approximately 250 units to the site, while preserving the existing office building. Buchanan Street Partners has submitted a letter of explanation provided in Appendix C. There is an opportunity with this site to use all or some of the 6-acre parking lot to develop housing. Because the site may be redeveloped with mixed-uses, the realistic unit yield is calculated at 70 percent of the maximum allowed (50 units per acre) under current zoning, which is consistent to the yield indicated by new owners Buchanan Street Partners."

Site 116 is listed in Table 48.A (Underutilized Sites, VC Zone) of the Housing Element as an underutilized site suitable for the development of 236 lower income housing units to assist the City in meeting its lower income Regional Housing Needs Allocation (RHNA). It was the City's expectation that a future project on the site would include units affordable to lower income households. However, the proposed Project does not include *any* affordable units. City staff encourages the Applicant to consider including affordable units, consistent with the Housing Element.

* * * * *

The foregoing explanations of the reasons the proposed Project is, or potentially is, inconsistent, not in compliance, or not in conformity with each of the identified City plans, programs, policies, ordinances, standards, and requirements does not constitute a final determination by the City or disapproval of the proposed Project. The City may revise these conclusions based on subsequent plan revisions, further analysis, the receipt of additional information, completion of environmental review of the proposed Project, and/or evidence presented at the public hearing.

If you have any questions, please feel free to contact me at (949) 707-2675 or llongenecker@lagunahillscsca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Longenecker". The signature is fluid and cursive, with the first name "Larry" and last name "Longenecker" clearly distinguishable.

Larry Longenecker
Community Development Director

cc: City Manager
City Attorney
Public Works Director/City Engineer
Assistant City Engineer
Building Official
Senior Planner
Dudek

Attachments:

- 1.) OCFA Comment Letter dated February 15, 2024



ORANGE COUNTY FIRE AUTHORITY

Fire Prevention Department

P. O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602

Planning and Development Services • www.ocfa.org • (714) 573-6100 / Fax (714) 368-8843

Date: 02/15/2024

Page 1 of 1

To: Jay Wu
City of Laguna Hills

From: Ben Ver Burg, Fire Prevention Analyst

Subject: **City Reference**
OCFA Service Request SR #535805

Oakbrook Plaza
24422 Avenida De La Carlota
Laguna Hills

Service Code: PR105 Site Development Review

The applicant must address the comments, corrections, and/or concerns listed below before conditions can be issued for this project. If you need additional information or clarification, please contact me by phone or email: (714) 573-6110, benverburg@ocfa.org.

1. Provide a laddering and firefighter access exhibit to show the locations for aerial roof laddering as required by OCFA Guideline B-01. Aerial laddering must be clear of all trees, powerlines, or any other obstructions.
2. Provide a Water Availability Form signed by the local water purveyor to show the results of a recent flow test (within 6 months) near the project site. The available water must meet or exceed the required fire flow of the most demanding structure. The test shall be completed at the fire hydrants nearest to the job site, on the side where water service will be provided. The flow test results provided are for a location too far north.
3. Provide a traffic analysis from the local traffic engineer's office or public works department to show the average daily trip (ADT) count for the surrounding roads being proposed for fire department access and laddering to the building.
4. Provide an allowable area calculation in accordance with CBC 506 and Equation 5-1 (or 5-2).
5. Provide an allowable height calculation for the building, per the 2022 California Building Code.
6. Provide information about what systems will be installed in the building: fire alarm system, fire sprinkler system, smoke control, etc.
7. Provide an easement agreement, recorded with the city, for the shared access fire lane road between the proposed building and the existing building.
8. Provide occupant load calculation for roof deck area and second exit as needed.

Serving the Cities of: Aliso Viejo • Buena Park • Cypress • Dana Point • Garden Grove • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods
Lake Forest • La Palma • Los Alamitos • Mission Viejo • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana
Seal Beach • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

9. Provide existing and proposed fire hydrant locations according to OCFA guideline B-01.
10. Per OCFA Guideline B-01 section 6.3, provide firefighter access tunnels to the courtyard that meet the requirements listed.

February 12, 2024

Larry Longenecker, AICP
Community Development Director
City of Laguna Hills
24035 El Toro Road
Laguna Hills, California 92653

Subject: Oakbrook Plaza Senior Housing Project Technical Studies and CEQA Documentation

Dear Larry Longenecker:

Dudek is pleased to submit this proposal for technical studies to support the California Environmental Quality Act (CEQA) process, as well as a scope, fee, and schedule for CEQA documentation, which is assumed to be an Initial Study/Mitigated Negative Declaration (IS/MND). The proposed project is a senior living development to be located on an existing office building site at 24422 Avenida de la Carlota in the City of Laguna Hills (City). The office building will remain, and the 240 senior dwelling units (DUs) will comprise four stories located above a three-story parking structure, all built in what is currently surface parking for the office building. There will be 218 surface stalls (including 13 Americans with Disabilities Act accessible stalls and 7 electric vehicle stalls). Bike storage will be located within the building's parking structure. Some of the office building parking will be located in the new parking structure. Amenities will include a pool and three outdoor courtyards, a clubhouse, fitness center, a dog park, a pet spa, and a mail/package room. The mix of land uses and the residential density are consistent with the current zoning/General Plan.

TASK 1 TECHNICAL STUDIES

Task 1.1 Air Quality, Construction Health Risk Assessment, Greenhouse Gas Emissions, and Energy

Dudek will assess the air quality, greenhouse gas (GHG) emissions, and energy impacts of the project utilizing the significance thresholds in Appendix G of the CEQA Guidelines and the South Coast Air Quality Management District (SCAQMD) CEQA Guidelines, which will be summarized in the body of the IS/MND. Detailed methodology and results of the air quality and GHG analyses will be summarized in a technical memorandum, which will be included as an appendix to the IS/MND. Emission calculations and other technical data will be included as technical appendices to the memorandum, as appropriate.

After reviewing all available project materials, Dudek will prepare a request for any outstanding data needed to conduct the analysis. If precise information on a particular factor is not available from the applicant, Dudek will make every effort to quantify these items using the best available information for comparable data sources, but in all cases will consult first with the applicant regarding the information needed.

Air Quality Assessment

The air quality analysis in the IS/MND will include a brief discussion of criteria air pollutants, the attainment status of the South Coast Air Basin, and applicable SCAQMD rules and regulations. Dudek will estimate criteria air pollutant emissions associated with the project using the California Emissions Estimator Model (CalEEMod). The analysis of short-term construction emissions, including demolition, will be based on scheduling information (e.g., overall construction duration, phasing and phase timing) and probable construction activities (e.g., construction equipment type and quantity, workers, and haul trucks) developed by the applicant, its representatives, and/or standardized approaches. Dudek will then evaluate the significance of the construction emissions based on the SCAQMD significance criteria.

CalEEMod will also be used to estimate project-generated operational criteria air pollutant emissions associated with mobile, energy, and area sources. Dudek will estimate mobile source emissions using the trip generation rates and additional necessary trip characteristics provided in the traffic report to be prepared for the project (see Task 1.6). Dudek assumes that no stationary sources of emissions are included in the project (emergency generators, etc.). If stationary sources are included, Dudek can estimate emissions and potential health risk in a separate scope of work. Dudek will estimate the emissions and compare the project's emissions to the SCAQMD significance thresholds.

Dudek will also assess the proposed project's potential to cause or contribute to exceedances of ambient air quality standards at sensitive receptors near the proposed project site using the SCAQMD localized significance thresholds (LSTs). For projects with a total site area of 5 acres or less, the assessment may use a simple "lookup table" approach provided by SCAQMD. For budgetary purposes, it is assumed that the maximum daily area of disturbance will not exceed 5 acres per day; therefore, the LST assessment will use the lookup table approach provided by SCAQMD and the construction emission estimates from CalEEMod. Dudek will also compare estimated on-site operational criteria air pollutant emissions to the SCAQMD operational LSTs from the look-up tables. For budgetary purposes, it is assumed that a dispersion model LST analysis is not required for construction or operational LST.

All Appendix G thresholds will be evaluated, including the potential for the project to result in other emissions, such as odors, or to impede attainment of the current SCAQMD air quality management plan. Details of the analysis (e.g., daily criteria air pollutant emission calculations) will be included in an appendix to the technical memorandum.

Construction Health Risk Assessment

During construction, the primary toxic air contaminant (TAC) of concern would be diesel particulate matter (DPM) from heavy-duty trucks and any on-site off-road equipment. Dudek will use the American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model (AERMOD), which is required by SCAQMD to conduct dispersion modeling, and the California Air Resources Board (CARB) Hotspots Analysis and Reporting Program Version 2 (HARP2) to calculate the health impacts. Notably, the health impact calculations in HARP2 are based on the Office of Environmental Health Hazard Assessment's Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments. The dispersion of DPM and associated health risk impacts on sensitive receptors will be determined using AERMOD, HARP2, local meteorological data obtained from SCAQMD, and the estimated annual average DPM emissions. The maximum cancer risks at the appropriate receptors (e.g., proximate residential receptors) will be tabulated. Cancer risk isopleths (i.e., lines of equal cancer risk) will be plotted on figures showing the project site if the maximum cancer risk exceeds the SCAQMD significance threshold of 10 in 1 million. The assessment will also include the

estimated chronic (long-term) hazard indices due to non-cancer health effects associated with DPM. The hazard indices will be tabulated at the appropriate locations and plotted on figures similar to that showing estimated cancer risks if they exceed the SCAQMD significance threshold of 1.0. If the health impacts exceed the thresholds of significance, we will suggest appropriate mitigation measures to reduce the health impacts. A summary of the methodology and results would be provided in the air quality section of the technical memorandum, and detailed results will be provided in an appendix.

Greenhouse Gas Emissions Assessment

The GHG emissions section of the IS/MND will include a setting and background discussion consisting of a summary of the GHGs and global climate change, potential effects of climate change, and emission inventories at the national, state, and local levels. It will also include a summary of the key federal, state, and local regulatory actions and programs to reduce GHG emissions relevant to the project.

Dudek will estimate the GHG emissions associated with construction of the project using CalEEMod based on the same construction scenario utilized in the air quality analysis. Project-generated operational GHG emissions that will be estimated will include those associated with mobile sources, natural gas usage, electrical generation, area sources, water supply, wastewater, solid waste disposal, and refrigerants. When proposed project details are not available, CalEEMod default values will be used to calculate direct and indirect source GHG emissions. Dudek will present the estimated annual operational GHG emissions and amortized construction GHG emissions in metric tons of carbon dioxide equivalent (CO_{2e}) per year in the analysis. A summary of the methodology and results would be provided in the GHG section of the technical memorandum, and detailed results will be provided in an appendix.

The impact analysis will reflect Appendix G of the CEQA Guidelines, specifically whether the project would (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The SCAQMD GHG CEQA Significance Threshold Working Group has proposed options lead agencies can select from to screen thresholds of significance for GHG emissions in residential and commercial projects; however, no thresholds have been formally adopted. Our budget assumes that a simple emission-based threshold can be used, such as the SCAQMD-recommended 3,000 metric tons of CO_{2e} per year for all non-industrial projects. Dudek will work with City staff to identify the preferred GHG threshold prior to initiating the analysis.

At the local level, the City does not have an adopted GHG reduction plan such as a climate action plan. Dudek will qualitatively evaluate the project's potential to conflict with other applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, such as the CARB Scoping Plans adopted to achieve state regulations (2030 and 2045 reduction goals identified in Senate Bill 32 and Assembly Bill [AB] 1279, respectively) and the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy.

Energy Assessment

Dudek will prepare an energy assessment for the project per Appendix G of the CEQA Guidelines, including if the project would (1) result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, and (2) conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The project will be assessed with regard to construction and operational energy consumption (electricity, natural gas, and petroleum consumption) using CalEEMod data from the GHG assessment. Project elements that would reduce the project's energy demand will

be identified in the analysis and quantified as available. Dudek assumes that the applicant will provide a list of the project's sustainable design and energy conservation measures prior to initiating air quality and GHG emissions modeling, as the energy analysis will be prepared consistent with the emissions modeling assumptions.

Task 1.2 Cultural Resources

The following tasks serve to provide an assessment of impacts to archaeological resources in conformance with CEQA and all applicable local municipal guidelines and regulations for the proposed project. This scope of work assumes that no federal nexus has been identified that would require compliance with Section 106 of the National Historic Preservation Act (NHPA). Dudek's cultural resources inventory will include a California Historical Resources Information System (CHRIS) records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, Native American outreach, site visit, and report preparation.

Records Search

Dudek will conduct a records search of the CHRIS database for the proposed project area and a 1-mile radius at the South Central Coastal Information Center (SCCIC), which houses cultural resource records for Orange County. The purpose of the records search is to identify any previously recorded cultural resources that may be located within the proposed project site. Dudek assumes the direct fees for the SCCIC records search will not exceed \$1,200. In addition to a review of previously prepared site records and reports, the records search will also provide information on historical maps of the project area, ethnographies, the National Register of Historic Places, the California Register of Historical Resources, the California Historic Property Data File, the lists of California State Historical Landmarks and California Points of Historical Interest, and Archaeological Determinations of Eligibility. Finally, a review of historical maps and aerials will be conducted to better determine the history of land use and disturbance within the proposed project area.

Native American Coordination: Sacred Lands File Search and Inquiry Letters

Dudek will contact the California NAHC for a review of their SLF. NAHC will determine whether any NAHC-listed Native American sacred lands are located within or adjacent to the project area. With permission from the client, Dudek will prepare and mail a letter to each of the NAHC-listed contacts, requesting that they contact us if they know of any Native American cultural resources within or immediately adjacent to the project area. We assume no more than 20 Native American contacts will be identified; however, the exact number may vary. This process is to inform the cultural resources inventory and does not constitute consultation with tribes.

The proposed project is subject to compliance with AB 52, which requires lead agencies to provide tribes (who have requested notification) with early notification of the proposed project and, if requested, consultation to inform the CEQA process with respect to Tribal Cultural Resources. Dudek assumes that AB 52 consultation will be handled by the City without Dudek assistance. No in-person meetings or follow-up phone calls with Native American groups are included in this task.

Cultural Resources Site Visit

Upon completion of background research Dudek will conduct a site visit of the proposed project area for cultural resources (including both prehistoric and historic archaeological resources). Aerial photographs show that the project area is on a developed parcel, so an intensive-level archaeological survey is not warranted. Dudek will perform a brief reconnaissance site visit to inspect the project site for potential ground exposures in case artifacts or indications of subsurface deposits may be visible.

For the purposes of this scope of work and cost estimate, Dudek assumes that the site visit will be negative for cultural resources (i.e., no newly discovered cultural resources will be encountered that will require additional efforts to record and document). Therefore, it is assumed that no cultural resource evaluations will be conducted, nor will any artifacts be collected during the site visit. Should any new resources be encountered during the site visit requiring recordation, we will work with you to augment this scope and cost as appropriate.

Cultural Resources Report

Dudek will prepare a cultural resources technical letter report that will summarize the results of the records searches, Native American coordination, background research, and cultural resources survey. The report will discuss the proposed project description, regulatory framework, all sources consulted, research and field methodology, setting, and findings. In addition, the report will discuss the proposed project's potential to impact cultural resources under CEQA and will provide mitigation measures and recommendations as appropriate.

Additional Assumptions:

- Direct and indirect costs incurred to conduct the CHRIS records search at the SCCIC will not exceed \$1,200 (this does not include labor).
- Locational data will be provided for the proposed project site, and fieldwork will be conducted according to those delineated boundaries.
- No resources will be identified that require documentation of full Department of Parks and Recreation 523 series forms. Should resources be identified that require more intensive field and documentation efforts, Dudek will provide an augment to this scope of work and associated costs as appropriate.
- No Native American monitor will be required during the survey.
- Field staff conducting the surveys will be provided full and safe access to the proposed project site. If the technicians conducting the survey are not able to access an area with exposed ground due to locked gates or unsafe conditions that are not able to be immediately remedied, another survey may be required at an additional cost.
- No federal nexus has been identified that would require compliance with Section 106 of the NHPA.
- Any changes to the scope or assumptions above may result in the need for an additional separate scope and fee estimate.

Task 1.3 Hazards and Hazardous Materials

Dudek hazardous materials specialists will evaluate potential impacts due to current and past use/storage of hazardous substances and identify potential environmental concerns related to construction and operation of the proposed project, including any potential impacts to sensitive receptors and public safety plans. The hazards and hazardous materials assessment for the IS/MND will include the following:

- Review of federal, state, and local regulatory agency records per Government Code Section 65962.5 for sites within and adjacent to the proposed project site, including the Regional Water Quality Control Board's GeoTracker website, the Department of Toxic Substances Control's EnviroStor website, and the California Environmental Protection Agency's Regulated Site Portal
- Review of the available Environmental Site Assessment/investigation/remediation reports and relevant regulatory documents for the project site and nearby sites
 - It is assumed a Phase I Environmental Site Assessment has been prepared for the project site and review will be included in the hazardous materials analysis

- Review of the National Pipeline Mapping System for hazardous material pipelines
- Review of the California Geologic Energy Management Division database
- Evaluation of local safety plans, emergency response plans, and wildland fire zones
- Evaluation of potential impacts to nearby airports
- Evaluation of potential impacts to nearby school sites

The hazards and hazardous materials section of the document will be prepared in accordance with the CEQA Appendix G checklist questions. Impacts will be evaluated with regard to the construction and operations components of the proposed project. Mitigation measures will be based on potential impacts to both construction and operations. Dudek will identify issues related to hazardous substances that would need further evaluation related to additional investigation, sampling, remediation, human health risk analyses, and/or construction and operations contingency measures.

Task 1.4 Noise

Dudek will conduct a noise study of the proposed project. The analysis will address potential noise and vibration impacts from construction and operation of the project at adjacent noise-sensitive receivers. Residential land uses are located to the west, southwest, and south of the proposed project site. These land uses could experience short-term impacts in noise and vibration from project construction, as well as long-term impacts from operational noise (from the project's heating, ventilation, and air conditioning equipment or other activities associated with the proposed housing project), as well as from potential project-related increases in traffic noise on the local arterial roadways.

A field noise study will be conducted to measure existing ambient noise conditions. Sound-level data will be collected over 10- to 15-minute periods at up to four nearby noise-sensitive land use locations. Potential impacts from excavation and grading and from construction noise and vibration at nearby noise-sensitive land uses will be evaluated based on construction equipment data to be provided by the project applicant or from typical construction activities associated with similar construction projects and noise modeling methods developed by the Federal Highway Administration. Vibration during construction will also be assessed using methodology and guidance developed by the Federal Transit Administration. Long-term (operational) noise effects from traffic on adjacent arterial roadways will be evaluated using the project's traffic study and the Federal Highway Administration's Traffic Noise Model version 2.5 or other assessment methods as appropriate. Noise from on-site operations will be assessed using project-specific information from the applicant or from similar projects as applicable.

The significance of noise impacts pursuant to CEQA Guidelines Appendix G will be assessed based on the relevant City, state, and federal thresholds. If significant noise impacts are identified, mitigation measures to reduce impacts to a less-than-significant level (where feasible) will be recommended. The regulatory background and noise environment, methodology, results of the noise analysis, findings of potential effects, and mitigation measures will be provided in the noise section of the CEQA document (anticipated to be an IS/MND). Field study results will be provided as an appendix to the IS/MND.

Task 1.5 Paleontological Resources and Geology and Soils

The majority of the approximately 2.44-acre proposed project site is underlain by Pliocene (approximately 2.58 to 5.33 million years ago) Niguel Formation (map unit Tn). As per CEQA guidelines and the Society of Vertebrate Paleontology guidelines, Dudek will complete a paleontological resources desktop review and inventory. Dudek's qualified paleontologists will complete a paleontological records search through the Cooper Center in Orange County

and/or the Natural History Museum of Los Angeles County to determine the location of any previously recorded fossil discoveries within and nearby the proposed project site. Direct costs for the records search are assumed to be no more than \$1,000. Dudek will also review geological maps and paleontological and geological literature, which, along with the records search, will provide information necessary to determine the paleontological sensitivity of proposed project. Dudek will prepare a paleontological resources analysis that will include all necessary information, including a records search and the results of a map and literature review, to provide recommendations for future management considerations or treatment. It is assumed that any existing geotechnical and paleontological resource reports will be provided to Dudek, if available.

The project site is located in southern Orange County where the geology is dominated by a complex network of seismic fault zones and drainages that have tended to cut into the bedrock, forming canyons along the fault traces. Much of the bedrock of the area consists of highly erosive sedimentary rocks. The region is seismically active with notable historic earthquakes in the general area including the 1933 Long Beach earthquake (magnitude 6.4), the 1910 Elsinore earthquake (magnitude 6), and the 1923 North San Jacinto Fault earthquake (magnitude 6.3). The site has been leveled for the completion of the existing surface parking lot, but the adjacent roadways gently slope to the south. The project site is not located within a liquefaction hazard zone according to the California Geologic Survey (CGS). Dudek will use publicly available data from CGS, the U.S. Geological Survey, and the California Emergency Management Agency as well as any available geotechnical report to provide a site setting. Impacts will be evaluated based on the most current version of Appendix G of the CEQA Guidelines, with respect to both construction and operation of the proposed improvements. Construction impacts are typically short-term, erosion related, and become less than significant with implementation of the required National Pollutant Discharge Elimination System Construction General Permit, which includes implementation of erosion control best management practices. Long-term operational impacts associated with construction of new structures would be primarily related to structural instability in relation to seismicity, liquefaction, if applicable, and associated ground failure following construction. However, impacts would only be considered significant in the event that project construction and operation would exacerbate the potential for geologic hazards to occur, which is not likely due to compliance with local and state building codes.

Task 1.6 Transportation

Per the City, the applicant has already prepared a traffic study which includes a level of service (LOS) and vehicle miles traveled (VMT) assessment. This report has been peer reviewed by the City's traffic consultant, Hatzog & Crabill, Inc. Per the City's request, Dudek's in-house transportation team will conduct a high-level review of the transportation-related information (applicant's traffic study and City consultant's peer review memorandum) to ensure there is adequate information to prepare the Transportation section of the IS/MND. Our high-level review will be conducted consistent with the City of Laguna Hills Vehicle Miles Traveled Analysis Guidelines under the California Environmental Quality Act and General Plan Development Review Traffic Study Guidelines (July 2021), as well as the current CEQA Guidelines.

The findings of our high-level review will be provided to the City via e-mail. Dudek will prepare the Transportation section of the IS/MND based on the provided traffic report and any changes required as a result of Dudek's peer review. This scope assumes that the applicant's traffic consultant will conduct and/or provide any additional transportation information needed to prepare the Transportation section of the IS/MND.

TASK 2 INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Task 2.1 Develop and Finalize the Project Description

Dudek will work with the City to develop a detailed project description for the Oakbrook Plaza project that can be used in an IS/MND. Dudek will submit a written request for additional information, if necessary. The project description will include the following and will be used in the IS/MND:

- A discussion of the requirements for and the background related to the proposed project
- A discussion of the property involved in construction of the proposed project
- A description of the construction timing and process for the project site, including any staging areas and detours
- A description of operational requirements associated with the project
- Maps of the project location and project footprint
- Diagrammatic drawing(s) of the key project components
- A list of discretionary actions and permit approvals

The draft project description will be submitted to the team for two rounds of review and revision. All submittals will be electronic submittals in Word.

Deliverables:

- Draft project description
- Revised project description
- Final project description

Task 2.2 Administrative and Screencheck Draft IS/MND

Using the project description developed under Task 2.1, as well as the results of the technical studies completed under Task 1 above, Dudek will prepare an IS/MND for the proposed project.

Concurrent with completing the technical analyses outlined above, Dudek will prepare an administrative draft IS/MND in electronic format for the project. Once a consolidated set of comments on the administrative draft IS/MND has been received from the project team, Dudek will incorporate all comments and submit (electronically only) a screencheck draft IS/MND to the project team for final review before preparing the public draft IS/MND. It is anticipated that comments received on the screencheck draft IS/MND would be minimal and mostly editorial in nature. Substantive comments requiring a second round of substantial edits would require an amendment to the proposed budget.

Deliverables:

- One electronic copy (in Word) of the administrative draft IS/MND
- One electronic copy (in Word) of the screencheck draft IS/MND

Task 2.3 Public Draft IS/MND

Upon receipt of a consolidated set of electronic comments on the screencheck draft IS/MND from the project team, Dudek will incorporate all comments and submit (electronically only) a print-ready copy of the IS/MND in electronic format to the City.

Dudek will prepare the Notice of Intent (NOI) for the public draft IS/MND and will be responsible for preparation of the Notice of Completion (NOC) filed with the California State Clearinghouse. Dudek will submit the NOC and the IS/MND to the State Clearinghouse and will file the NOI with the County Clerk. In consultation with the City, Dudek will develop a draft mailing list including property owners within a 500-foot radius for distribution of the NOI to area property owners. Dudek will be responsible for distributing the NOI to area property owners, which assumes up to 100 recipients. This scope does not include a newspaper posting, but Dudek will draft one for the City should the City choose to post in a newspaper of regional circulation. We also recommend a posting on site.

Deliverables:

- One electronic copy (PDF) of the public draft IS/MND for the City to post on the website
- Up to 100 hard copies of the NOI
- One electronic copy (PDF) of the NOC
- Five hard copies of the public draft IS/MND (with appendices on flash drive)

Task 2.4 Final IS/MND

Upon the close of the 30-day public comment period, Dudek will take the lead in compiling all comments received, preparing responses to all comments, and incorporating responses into the final IS/MND. For budget estimation purposes, Dudek assumes no more than 10 substantive comments will be received (a comment letter may contain several individual comments) requiring detailed input and analysis from the Dudek team. Dudek will also prepare the mitigation monitoring and reporting program (MMRP) to accompany the final IS/MND.

Once the final IS/MND and MMRP have been adopted, Dudek will prepare a Notice of Determination (NOD) and file it with the State Clearinghouse and the County Clerk. This scope includes the California Department of Fish and Wildlife filing fee.

Deliverables:

- One electronic copy (in Word) of draft responses to comments
- One electronic copy (in Word) of the administrative draft final IS/MND and MMRP
- One electronic copy (PDF) of the final IS/MND and MMRP
- Five hard copies of the final IS/MND and MMRP
- One electronic copy (PDF) of the NOD

TASK 3 MEETINGS, HEARINGS, AND COORDINATION

Task 3.1 Regular Calls

The Dudek project manager, Laura Masterson, will attend monthly team meetings at the request of the City. Meeting attendance will be billed on a time-and-materials basis assuming virtual 1-hour meetings once a month with the project team. For purposes of the cost estimate, an 8-month period was assumed. If additional meetings are required, a contract amendment will be requested.

Task 3.2 Public Hearings

The Dudek project manager will attend one hearing for consideration of project approval.

Task 3.3 Project Coordination

Effective collaboration between the project planning team and environmental consultants will be a key element for the success of this project. Dudek believes this is paramount to project success and understands that the City values such collaboration. For cost estimating purposes, this task assumes 2 hours for the project manager each month during the approximately 8-month schedule.

IS/MND Schedule

The schedule assumes 12 weeks for preparation of the technical studies, with an 8-month schedule for preparation and completion of an IS/MND (Table 1).

Table 1. Initial Study/Mitigated Negative Declaration Schedule

Task	Duration
Formal Notice to Proceed/kickoff meeting	Week 1
Dudek develops project description and submits to City for review; develops data needs request for any missing information that the applicant should provide (e.g., hydrology, storm drain information, geotechnical information, water quality management plan)	Week 2
City provides feedback on draft project description and confirms/approves use in technical analyses and administrative draft initial study/mitigated negative declaration (IS/MND)	Week 3
Dudek prepares technical studies	Weeks 4–12
Dudek prepares administrative draft IS/MND	Weeks 13–16
City reviews and provides comments	Weeks 17–18
Dudek prepares screencheck draft IS/MND	Week 19
City reviews and provides comments	Weeks 20–21
Public review period (30 days)	Weeks 22–25
Dudek prepares final IS/MND (includes response to comments, mitigation monitoring and reporting program, changes to draft IS/MND, if applicable)	Weeks 26–29
City reviews and provides comments	Weeks 30–32
Dudek completes final IS/MND	Week 33
Project management, meetings, and hearings	Ongoing
Dudek files Notice of Determination	Post at County Clerk's Office within 5 days of project decision

Fee Estimate

The fee estimate for an IS/MND is attached as Attachment A.

We look forward to working with the City on this important project. Please feel free to contact me with any questions at 949.373.8326 or lmasterson@dudek.com.

Sincerely,



Laura Masterson
Project Manager

Att.: A, Cost Estimate – IS/MND
cc: Rachel Struglia, PhD, AICP

Attachment A

Cost Estimate – IS/MND

2/12/2024

[illegible]