

4.12 Transportation

This section analyzes potential impacts to the existing and planned transportation and circulation system and vehicle miles traveled (VMT). The analysis contained in this section is based on the *Revised Traffic Assessment: The Cove at El Niguel Project, Laguna Niguel, Orange County, California* (Traffic Impact Analysis) prepared by Linscott Law & Greenspan, Engineers (LLG) in June 2021 (Appendix L).

4.12.1 Setting

Regional circulation facilities that connect the City to surrounding areas of Orange County and Southern California include Interstate 5 (I-5) and State Route 73 (SR-73), which are located at the City's eastern boundary. A road network comprising arterial roads and local and collector streets makes up the local circulation in the City. These roadways are classified in the Laguna Niguel General Plan (LNGP) and are described in detail below.

Regional Roads

I-5 – The I-5 freeway is a north-south facility spanning over 1,300 miles through the states of California, Oregon, and Washington. The freeway begins south of San Diego, California, and ends north of Bellingham, Washington. Near the study area, I-5 has ten lanes with a posted speed limit of 65 miles per hour.

SR-73 – The SR-73 freeway is a north-south facility, beginning in Laguna Niguel and terminating in Costa Mesa. The freeway spans the Cities of Laguna Niguel, Aliso Viejo, Irvine, and Costa Mesa. SR-73 has six lanes with a posted speed limit of 65 miles per hour.

Local Roads

Crown Valley Parkway. Crown Valley Parkway is a six-lane, divided roadway oriented in the north-south direction that borders the Project site to the east. On-street parking is not permitted on either side of this roadway. The posted speed limit on Crown Valley Parkway is 50 miles per hour (mph). Daily traffic volumes on the section of Crown Valley Parkway adjacent to the Project site total approximately 23,000 vehicles per day based on traffic volumes collected on Thursday, December 3, 2020.

Paseo Del Niguel. Paseo Del Niguel is a two-lane 25 mph residential street across from the Project entrance at Playa Blanca. Access is from Crown Valley Parkway, with ingress only to the residential community (i.e., southbound left turns and northbound right turns). Outlet can only be made using northbound Paseo Del Valle to Hillhurst Drive, then to Crown Valley Parkway. This one-way access on to Paseo Del Niguel from Crown Valley Parkway can be made southbound turning left by use of a left-hand turn lane and northbound turning right using the far right third lane. Based on the traffic volumes collected for the Project Traffic Impact Analysis in 2020, Paseo Del Niguel carries approximately 3,000 vehicles per day.

Playa Blanca. Playa Blanca is the Project’s only ingress and egress point utilizing Crown Valley Parkway either traveling north or south. It forms the fourth leg of the Crown Parkway/Paseo Del Niguel/Playa Blanca intersection. It is currently a paved unmarked two-lane residential roadway with no posted signage. Because the Project site is currently vacant, the road currently has no traffic volume. Historically, Playa Blanca served as the residential roadway for the 41 homes that existed at the Project site prior to the Via Estoril landslide.

4.12.2 Existing Site Conditions

Existing Traffic Volumes

The COVID-19 virus state-wide “stay at home” resulted in a decrease in traffic volume. For the Project traffic study, the ability to collect traffic counts to establish baseline conditions that would be reflective of traffic conditions without “stay at home” orders in effect was not possible. As such, the Project traffic engineer researched historical data and obtained Year 2019 Average Daily Traffic (ADT) counts on Crown Valley Parkway, between Hillhurst Drive and Clubhouse Drive. Baseline traffic volumes were developed using the 2019 ADT counts, 2020 traffic counts to establish turning movements, and a growth factor as detailed in the Traffic Impact Analysis (Appendix L).

Transit Facilities

Public transportation is provided by the Orange County Transportation Authority (OCTA). Several routes pass by the Project site including two local fixed routes, one community and shuttle route, two intra-county express routes, and one Metrolink rail feeder route.

The local fixed routes include Route 85 (Laguna Niguel to Mission Viejo to Rancho Santa Margarita) and Route 87 (Laguna Niguel to Laguna Hills to Rancho Santa Margarita). Route 85 travels north/south via Marguerite Parkway and Crown Valley Parkway. Near the Project site, Route 85 runs along Crown Valley Parkway to Alicia Parkway. The route operates on 60-minute headways during weekdays with no weekend service. Route 87 travels north/south via Alicia Parkway. Near the Project site, Route 87 makes its southernmost stop at Crown Valley Parkway. The route operates with approximately hour headways on weekdays with no weekend service.

Rail Network

Northeast of the Project site is the Metrolink Laguna Niguel/Mission Viejo station. The Metrolink trains serve the Orange County, Inland Empire, and Los Angeles areas, traveling as far south as Oceanside and as far north as Los Angeles. The Metrolink Inland Empire line operates with 10-minute headways on weekdays and weekends and travels between Oceanside and San Bernardino. The Orange County line operates on 10-minute headways on weekdays and weekends and travels between Oceanside and Los Angeles.

Bicycle and Pedestrian Network

Along Crown Valley Parkway adjacent to the Project site the pedestrian network consists of a meandering sidewalk along the west side of the street. Additional pedestrian facilities such as crosswalks and signalized pedestrian crossings exist along Crown Valley Parkway within 1 mile of the Project, north to Alicia Parkway and south to Club House Drive. Crown Valley Parkway is a marked and signed, Class II, bikeway.

4.12.3 Related Policies and Regulations

Federal Regulations

No federal policies or regulations pertaining to transportation are applicable to the proposed Project.

State Regulations

Senate Bill 743

In January 2019, the Natural Resources Agency and the Governor’s Office of Planning and Research codified Senate Bill 743, and a new metric for determining transportation impacts, into the Public Resources Code and the State CEQA Guidelines (Pub. Resources Code, §§ 21083, 21099; CEQA Guidelines, § 15064.3.). On July 1, 2020, the new metric applied statewide, transitioning from the long-standing delay and level of service methodology (LOS) to vehicle miles traveled (VMT) (CEQA Guidelines, § 15064.3, subd. (c)). Automobile delay or traffic congestion, as described by LOS or similar measures of vehicular capacity or traffic congestion, are no longer considered a significant impact on the environment under CEQA under Public Resources Code section 21099 and related case law (Pub. Resources Code, § 21099, subd. (b)(2) [LOS and similar measures “shall not be considered a significant impact on the environment” under CEQA]; *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609). However, the City continues to require LOS analysis as part of the project review and entitlement process outside of the CEQA process. For land development projects, VMT is generally the product of the daily trips generated by a new development and the distance those trips travel to their destinations. VMT works in coordination with other measures that promote “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The VMT metric is now used as the basis for determining significant transportation impacts in the State.

Local Regulations

Laguna Niguel General Plan

Circulation Element

The Circulation Element of the Laguna Niguel General Plan (LNGP) guides development of the City’s circulation system in a manner compatible with the Land Use Element. The Circulation

Element is based on a set of circulation-related goals which reflect and are designed to support the citywide objectives of the General Plan. The goals acknowledge the changing economic, social, and environmental conditions in the City and surrounding regions, and the anticipated needs of the community.

The City's *Transportation Assessment Guidelines* state that while SB 743 requires that delay or LOS no longer be used for transportation impact assessments under CEQA, the LNGP Circulation Element has adopted vehicle LOS policies that set standards for which local roadways and intersections will strive to maintain. LOS based studies will continue to be required for certain land use projects to ensure consistency with these City standards. Outside of the scope of CEQA, this requirement for LOS assessment for qualifying projects will remain unchanged. Therefore, the information below regarding LOS goals is provided for informational purposes and is for the City's discretionary review and approval process outside of CEQA.

Goal 1: An adequate transportation/circulation system that supports regional and local land uses at adopted level of service (LOS) standards and complies with requirements of the Countywide Traffic Improvement and Growth Management Program (Measure M).

- **Policy 1.6:** Measure traffic LOS using the current guidance regarding traffic LOS policy implementation established by the Local Transportation Authority.
- **Policy 1.7:** Require necessary conditions of approval on development projects to achieve traffic LOS standards prescribed in this Element.
 - **Action 1.7.1** - Require that proposals for major new developments include a traffic impact analysis which identifies measures to mitigate any identified project impacts according to the traffic LOS standards prescribed in this Element.
- **Policy 1.8:** All new development shall be required to participate in the City's transportation fee program(s). These fee programs shall be designed to ensure that all development projects fund their prorata share of the necessary long-term transportation improvements identified in this Element or its Technical Appendix.
- **Policy 1.9:** All development projects contributing one percent or more to the critical movement at an intersection that is either projected to operate, or currently operates below the target LOS as a result of project implementation, shall fund all required feasible transportation improvements necessary to achieve the target LOS or, if the intersection exceeds the target LOS prior to project approval, mitigate the impacts of the project so that the intersection ICU is returned to its level of operation prior to project approval. Even for intersection where the target LOS is “D”, in the interim, prior to buildout, the City may require mitigation to maintain a LOS of “C”.

Necessary feasible improvements to mitigate an intersection to its level of operation prior to project approval shall be targeted for completion prior to issuance of Certificate of Use and Occupancy for the approved project. If the City determines that the cost of

improvement(s) is not feasible, the City shall require that any feasible short-term improvements be made prior to Certificates of Use and Occupancy and all permanent transportation improvements made within three years of the issuance of the first building permit, or within five years of the first grading permit.

Any project which has compiled with this policy by funding a specific transportation improvement project, which is included in the City's transportation fee program, shall be given credit for the fees required as part of the transportation fee program as established in Policy 1.8 (GME Policy 2.3).

Goal 5: An efficient bicycle, equestrian and pedestrian circulation system that encourages these alternative forms of transportation.

- **Policy 5.4:** Preserve existing pedestrian walkways, Class II bicycle lanes, and wide curb lanes by not modifying, altering, or restriping, any roadway, which currently has either a pedestrian walkway, Class II bike lane, or enough right-of-way to accommodate a pedestrian walkway or Class II bicycle lane, in a manner which would not provide for pedestrian walkways, Class II bike lanes, or a minimum curb-lane width of 17 feet, except in cases of emergency or an extraordinary case.

Goal 7: Well-designed and convenient parking facilities.

- **Policy 7.1:** Provide sufficient on- and off-street parking.

Laguna Niguel Transportation Assessment Guidelines

In order to comply with State law mandating a transition from the long-standing LOS methodology to VMT, the City developed new *Transportation Assessment Guidelines*, which align with State goals for reducing emissions, investing in multimodal transportation networks and encouraging higher density in-fill development without reliance on LOS metrics based in traffic congestion and delay. Under the City's *Transportation Assessment Guidelines*, the City evaluates whether a project meets a VMT screening criteria, and if a proposed land use project does not meet any of the screening criteria, then a VMT analysis is required. The guidelines provide as follows:

- **Section 3.2:** Small projects generating less than 500 vehicle trips per day based on the latest version of Institute of Transportation Engineers (ITE) *Trip Generation Manual* are presumed to have a less than significant CEQA transportation impact and are exempt from a detailed VMT Analysis.

Therefore, projects with less than 500 daily trips are considered small projects and screened from VMT analysis. A project with approximately 69 multifamily housing low rise units or could trigger this threshold and require further VMT analysis but could still lead to a conclusion of less than significant impacts.

4.12.4 Thresholds of Significance

Criteria for determining the significance of impacts related to transportation are based on criteria contained in Appendix G of the State CEQA Guidelines, the City's CEQA Manual, and the City's *Transportation Assessment Guidelines*. The proposed Project could have a significant impact on the environment if it would result in any of the following.

Threshold TRA-1 *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Threshold TRA-2 *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Threshold TRA-3 *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Threshold TRA-4 *Result in inadequate emergency access?*

4.12.5 Project Design Features and Standard Conditions of Approval

There are no Project Design Features or Standard Conditions of Approval required for the Project as no impact was indicated.

4.12.6 Environmental Impact Evaluation

Threshold TRA-1 *Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Less Than Significant Impact. The proposed Project would construct 22 condominium units on approximately 2.0 acres already zoned for multi-family residential use with approximately 2.2 acres of multi-family residential land use area to be used as open space. The Project site fronts Crown Valley Parkway to the east and is surrounded by local residential streets and residential properties to the north, south and west. The Project site was developed in 1979 with multi-family units that were destroyed or damaged by the 1998 Via Estoril Landslide and demolished between 1998 and 2000. The entire 4.2-acre Project site has a Residential Attached land use designation in the LNGP.

The LNGP includes a Circulation Element that describes the circulation system within the City. Most of the policies pertain to the broader circulation system that the proposed Project would not impact. However, within the Project site, the plans are consistent with the policies to accommodate

all forms for circulation. The Project provides sidewalks on all driveways, adequate parking both within private garages and for guests in designated guest parking stalls, and street sections that meet City design criteria. Therefore, impacts associated with conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities are less than significant.

Although the LNGP Circulation Element requires that development projects prepare a traffic study to determine if the project requires traffic improvements to maintain the City's LOS standard, the State-mandated a shift to VMT, and LOS, traffic congestion or automobile delay is no longer considered to be a significant environmental effect under CEQA as discussed above. The City's adopted vehicle LOS policies set standards for which local roadways and intersections will strive to maintain, and LOS based studies continue to be required for new land use projects to ensure consistency with these City standards outside of the scope of CEQA.

Per Section 4.0 of the City's *Transportation Assessment Guidelines*, projects that are expected to generate less than 50 trips during both the AM and PM peak hours based on the latest version of the ITE Trip Generation Manual are presumed to have a less than significant LOS impact on the surrounding street network and are screened out from requiring a detailed LOS analysis. A project with approximately 69 multifamily housing low rise units could trigger this threshold and require further LOS analysis outside of the CEQA process but could still lead to a conclusion of less than significant impacts.

The proposed Project trip estimate is 161 average daily trips, with 10 trips during the AM peak hour and 12 trips during the PM peak hour as shown in Table 4.12-1, which is less than the 50 peak hour trip threshold and at 22 units the project is also less than the 69 units that would trigger further analysis. Therefore, the proposed Project is considered to be consistent with the General Plan LOS policy, screened out from detailed LOS analysis, and not responsible for traffic improvements the construction of which could create an impact to the environment. Impacts are considered to be less than significant, and no mitigation is required.

Table 4.12-1. Project Trip Generation

Project Description	Daily 2-way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Trip Generation Rates Multifamily Housing Low Rise (TE/DU)*	7.32	23%	77%	0.46	63%	37%	0.56
Trip Generation Forecast The Cove at El Niguel (22 DU)	161	2	8	10	8	4	12

*Institute of Engineers Trip Generation Manual 10th Edition – Trip Ends per Dwelling Units

Threshold TRA-2 *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less Than Significant Impact. The City’s *Transportation Assessment Guidelines* also provide guidance for analysis of VMT assessments in addition to LOS assessments. The *Transportation Assessment Guidelines* provide screening thresholds to assess whether further VMT and LOS analyses are required for projects based on project location, size, or other specified criteria.

As shown in previously referenced Table 4.12-1, the proposed Project would generate 161 daily trips during the weekday.

Per section 3.2 (1) of the City’s *Transportation Assessment Guidelines*, projects generating less than 500 vehicle trips per day based on the latest version of the ITE Trip Generation Manual are presumed to have a less than significant CEQA transportation impact and are screened out from requiring a detailed VMT Analysis. Given the results of the proposed Project’s trip generation forecast as seen above in Table 4.12-1, the proposed Project would generate 161 daily trips which is less than 500 daily trips during the weekday. Therefore, the proposed Project is considered to be a small project and its CEQA transportation impacts are presumed to be less than significant, and no mitigation is required.

Threshold TRA-3 *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less Than Significant Impact with Mitigation. Construction of the Project will generate less than 50 trips during both the weekday AM and PM peak hours due to the limited amount of construction workers on site at any given time, which is estimated to be less than 20. Therefore, the added construction trips would have minimal impacts on the surrounding street network. However, there is the potential for construction-related traffic hazards and impacts upon the local circulation system in the area and during ingress/egress to the construction site, resulting in a less than significant impact requiring mitigation. Implementation of a Construction Traffic Management Plan, described in detail below in **MM TRA-1**, is recommended to minimize such hazards and impacts to less than significant.

Currently, access to the Project site is accommodated by the existing full-access driveway that currently serves the site, located along Crown Valley Parkway and Playa Blanca. However, the proposed Project would create a potentially dangerous intersection at the entrance into the Project from Crown Valley Parkway due to inadequate sight lines and high rates of speed. The Project Traffic Impact Analysis determined that motorist attempting to turn left from the driveway onto Crown Valley Parkway (i.e., the outbound left turn) would have inadequate visibility to see

oncoming southbound motorists, and the southbound motorists would have inadequate stopping distance to stop in time when outbound left turns are made. Because outbound left turns have a limited site distance to see southbound oncoming traffic traveling at a high rate of speed there is a potential of creating a safety hazard. Similarly, southbound traffic along Crown Valley Parkway traveling at the high rate of speed will not have enough site distance to brake in time to see exiting left turns and therefore potentially creating safety hazard. As a result of these potential safety hazards, a significant impact would occur and mitigation is required to render impacts to less than significant. Implementation of mitigation measure **MM TRA-2**, described below, would reduce such impacts less than significant by constructing a median that prohibits outbound left-turns from the Project site.

The existing northbound left-turn pocket at the Project Driveway along Crown Valley Parkway provides 115-feet of storage with a transition area of 60-feet. While the northbound left-turn pocket is designed appropriately per Section 400-34 of the Caltrans HDM, the transition area of the turn pocket needs to be modified to accommodate the analyzed speed of 60 mph on Crown Valley Parkway. Although the posted speed on Crown Valley Parkway is 50 mph, the analyzed 60 mph is the design speed (logical operating speed), which is consistent with Orange County Public Works Department Standard Plan 1117. This is considered a significant impact and mitigation is required. To accommodate such speeds, in conjunction with **MM TRA-2**, implementation of mitigation measure **MM TRA-3** is designed to lengthen the left-turn pocket to 100-feet with a transition area of 120-feet by restriping the area. This will provide a longer transition area for vehicles to slow (increased braking distance) prior to turning left. With the implementation of mitigation measures **MM TRA-1**, **MM TRA-2**, and **MM TRA-3**, Project specific traffic hazard impacts would be reduced to less than significant.

Threshold TRA-4 Result in inadequate emergency access?

Less Than Significant Impact. Emergency access to the Project site would be from the driveway entry at Playa Blanca off Crown Valley Parkway, which measures 22 feet curb-to-curb. Once on Playa Blanca, access to Private Drives “A” and “B” start at Private Drive “A” which is 24.5-feet wide curb to curb. This 24.5 feet wide is retained to Private Drive “B.” The proposed Project is consistent with Section 9-1-271 (2) of the Laguna Niguel Zoning Code (LNZC), which requires private streets serving 4 parcels or less to provide a minimum pavement width of 16 feet within a minimum 20-feet wide right of way. The proposed Project is also consistent with Section 8-4-12 of the LNZC, which requires easements to be a minimum of 15 feet wide. The proposed recreation trail off Private Drive “B” is 15 feet wide. In addition, each structure would meet the requirement that fire hoses of 150 feet long can reach all parts of the structure. Furthermore, the proposed Project’s fire management plan and emergency access has been reviewed and approved by the Orange County Fire Authority (OCFA) through the tentative tract map plan review process.

Because emergency vehicles can easily access and travel within the site, impacts related to emergency access on the Project site would be less than significant, and no mitigation is required.

4.12.7 Cumulative Impacts

Less than Significant Impact with Mitigation. Because the Project is small, generating less than 500 daily trips and less than 50 trips during both the AM and PM peak hours, and therefore screened out from detailed VMT and LOS analyses, the proposed Project would not contribute to a cumulative transportation impact.

The proposed Project has the potential for transportation impacts associated with potential traffic hazards in the form of traffic interference during construction and project access concerns. Implementation of **MMs TRA-1, TRA-2, and TRA-3** would reduce project specific traffic impacts to less than significant. Since traffic interference during construction and project access are impacts specific to the Project site and would not impact other cumulative projects, and since the mitigation measures would reduce the impacts to less than significant, the proposed Project would not cause a cumulative impact associated with construction traffic or site access impacts.

Project traffic impacts are not cumulatively significant, and no mitigation is required.

4.12.8 Summary of Mitigation Measures

Project-level impacts with regard to transportation would be significant. Thus, the following mitigation measures would be necessary to reduce such impacts to less than significant.

MM TRA-1 Construction Traffic Management Plan Prior to the issuance of demolition, grading, or any construction permits, the Applicant shall submit a Construction Traffic Management Plan for review and approval by the both the City Community Development Department and Traffic Engineer. The Construction Traffic Management Plan shall address the following:

- Equipment mobilization and demobilization to and from the Project site, including truck route, delivery timing, traffic control, and demobilization routes.
- Daily site circulation ingress and egress for construction personnel for the duration of construction at the Project site, including parking since all construction parking shall occur on the project site, unless otherwise approved by the City.
- Traffic control for any street closure, detour, or other disruption to traffic circulation during construction within the public right-of-way or equipment mobilization/demobilization.

- Prohibit left turns out of the Project site for all construction personnel and delivery trucks, including temporary food trucks. The Plan shall identify the physical means in which left turns will be prohibited from the Project site.
- Routes that construction vehicles will utilize for the delivery of construction materials (i.e., lumber, tiles piping, windows, etc.) to access the site, traffic controls and detours, and proposed construction phasing plan for the Project.
- Specify the hours during which transport activities can occur and methods to mitigate construction-related impacts to adjacent streets.
- Require the Applicant to keep all haul routes clean and free of debris including but not limited to gravel and dirt as a result of its operations. The Applicant shall clean adjacent streets, as directed by the City Engineer (or representative of the City Engineer) of any material which may have been spilled, tracked, or blown onto adjacent streets or areas.
- Hauling or transport of oversize loads will be coordinated with the City as to the haul route as well as the hours allowed. Hauling or transport may be permitted/required during nighttime hours, weekends, or Federal holidays, at the discretion of the City Engineer. All hauling/delivery access to and from the site will be from Crown Valley Parkway. An approved Haul Route Permit will be required from the City.
- If hauling operations cause any damage to existing pavement, street, curb and/or gutter along the haul route, the applicant will be fully responsible for repairs. The repairs shall be completed to the satisfaction of the City Engineer.
- This Plan shall meet standards established in the current *California Manual on Uniform Traffic Control Device (MUTCD)* as well as City's requirements.

MM TRA-2 Median Diverter for Left-Turn Egress at Project Driveway Prior to the issuance of a grading permit, the Applicant shall install a temporary physical median diverter on Crown Valley Parkway or the driveway entrance to prohibit outbound left-turn movements onto Crown Valley Parkway during construction activities. The design of the temporary barrier shall be approved by the City's Traffic Engineer.

Prior to the first certificate of occupancy, the installation of a permanent physical median diverter on Crown Valley Parkway is required to restrict outbound left-turn movements from the Project driveway at Playa Blanca. The median diverter along with the left-turn pocket shall be designed in a manner consistent with Figure

4.12.A. The median diverter shall be submitted for review and approved by the City Traffic Engineer prior to issuance of grading permits.

MM TRA-3 Modification of Northbound Left-Turn Pocket on Crown Valley Parkway at Project Driveway Prior to the first certificate of occupancy and in conjunction with the installation of **MM TRA-2**, the northbound left-turn pocket shall be modified to provide a 100-foot left-turn lane with a transition area of 120-feet. The modification would include restriping of the existing left-turn pocket to better accommodate queuing and high speeds along Crown Valley Parkway. The northbound left-turn pocket shall be designed in a manner consistent with Figure 4.12.A. The left-turn pocket along with the median diverter shall be submitted for review and approved by the City Traffic Engineer prior to issuance of grading permits.

4.12.9 Significant Environmental Impacts

Implementation of **MM TRA-1**, **MM TRA-2**, and **TRA-3** would reduce project specific traffic impacts to less than significant. No cumulative impacts would occur, and no cumulative mitigation is required.

4.12.10 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

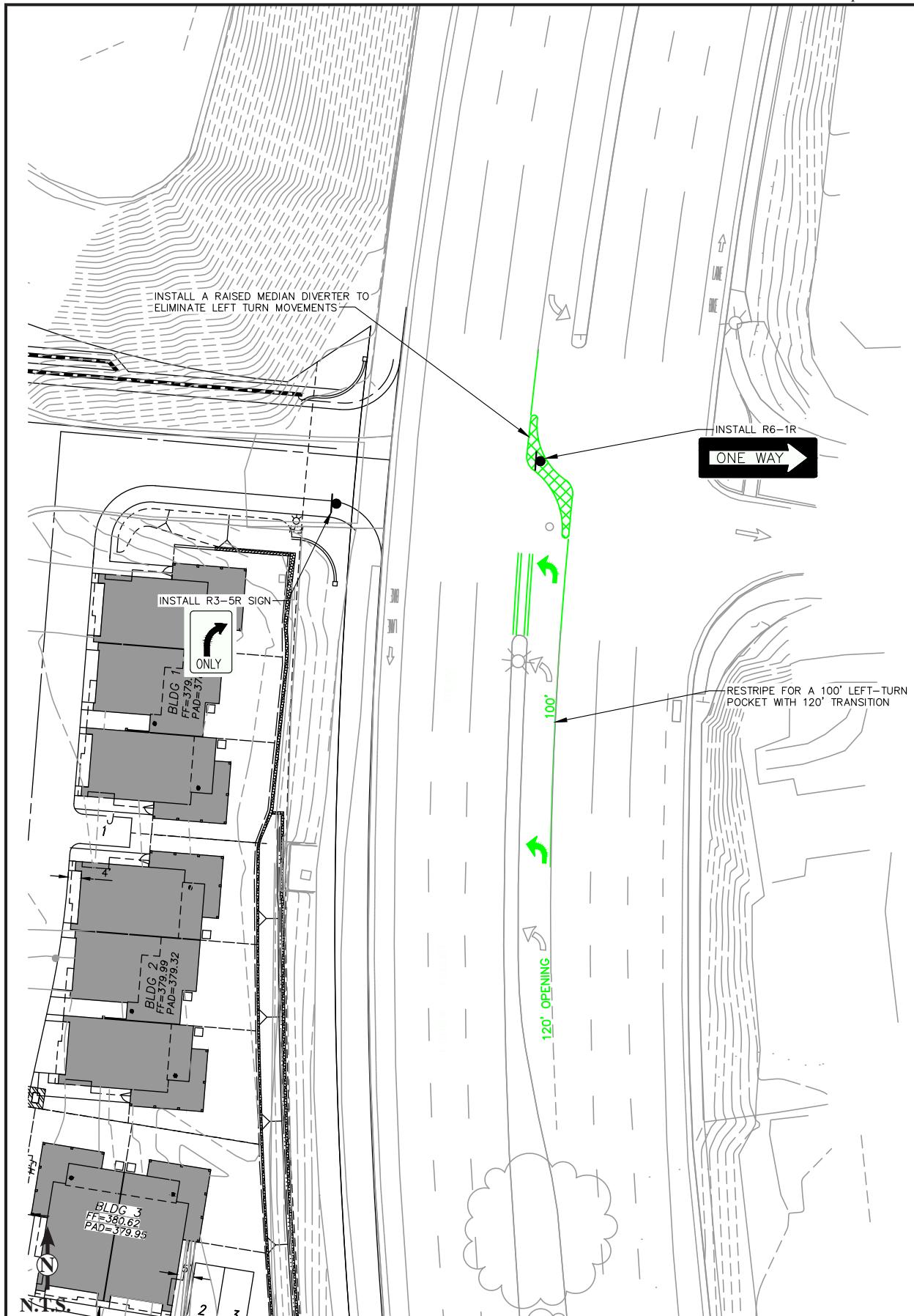
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Source: LLG (05/2021).

Figure 4.12.A Median Diverter and Northbound Left-Turn Pocket

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