CEQA Exemption 15183 – Environmental Documentation

Date:	July 3, 2024
Project:	South Coast Technology Center Project
To:	Heidi Jacinto, City of Santa Ana, Planning and Building Agency
CC:	Jeffrey Reese, C.J. Segerstrom & Sons
From:	Pei-Ming Chou, Michael Baker International Vicky Rosen, Michael Baker International John Bellas, Michael Baker International

The City of Santa Ana (City) has received a project application for the proposed South Coast Technology Center Project (Project), located at 3100, 3110, and 3120 Lake Center Drive, Santa Ana, Orange County, California (Assessor's Parcel Numbers [APN] 414-261-01, 414-272-09, 414-272-10). As documented herein, the proposed Project qualifies for a statutory exemption pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183 (California Public Resources Code 21083.3).

1. Project Background

On April 19, 2022, the Santa Ana City Council adopted the *Golden City Beyond* (General Plan Update) and certified the *Santa Ana General Plan Update Final Recirculated Program Environmental Impact Report* (GPU PEIR), dated October 2021. The General Plan Update provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the City through 2045. The General Plan Update consists of the following 12 elements: Community, Economic Prosperity, Mobility, Public Services, Conservation, Noise, Open Space, Safety, Land Use, Historic Preservation, Housing, and Urban Design. According to the GPU PEIR, the full buildout of the General Plan Update (year 2045) would result in a net increase of 96,855 persons, 36,261 housing units, 5,849,220 square footage of nonresidential building space, and 11,436 jobs as compared to existing conditions in 2019.

The GPU PEIR is a program EIR pursuant to Section 15168 of the CEQA Guidelines, providing a level of analysis consistent with the high-level nature of the General Plan Update. The programmatic environmental document may be used to eliminate or reduce the scope of future environmental review for individual projects that are consistent with the General Plan Update pursuant to CEQA Guidelines Section 21083.3 and other streamlining provisions authorized by CEQA. Later projects implemented after the General Plan Update are examined with consideration of the GPU PEIR to determine whether subsequent environmental analysis or documentation must be prepared. In addition, the CEQA Guidelines currently provide for streamlining through Section 15183, *Projects Consistent with a Community Plan or Zoning*.

CEQA Guidelines Section 15183 provides an exemption for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified. Specifically, as set forth in CEQA Guidelines Section 15183(d), the 15183 exemption applies to projects which meet the following conditions:

(1) The project is consistent with:

(A) A community plan adopted as part of a general plan,

(B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or

(C) A general plan of a local agency, and

(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

Further, as set forth in CEQA Guidelines Section 15183(e), the 15183 exemption applies when all feasible mitigation measures identified in the applicable certified EIR are implemented by the public agency with jurisdiction to require such mitigation measures.

CEQA Guidelines Sections 15183(a) through 15183(c) describe the limitations on environmental review and the examination of environmental effects for projects that qualify for an exemption pursuant to CEQA Guidelines Section 15183. These sections state:

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

(1) Are peculiar to the project or the parcel on which the project would be located,

(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,

(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or

(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

As demonstrated throughout this memorandum, the Project would qualify for an exemption from CEQA as a project consistent with a community plan or zoning under CEQA Guidelines Section 15183. In this case, the general plan is the City's General Plan Update for which the corresponding GPU PEIR was certified. This memorandum provides the limited examination of environmental effects for the Project pursuant to CEQA Guidelines Section 15183(b), evaluating whether there are impacts that are peculiar to the Project or the Project Site, impacts not analyzed as significant effects in the GPU PEIR, potentially significant off-site or cumulative impacts not

evaluated in the GPU PEIR, or previously identified significant effects that are determined to have a more severe adverse impact than discussed in the GPU PEIR.

2. Project Description

2.1 Project Location

The City of Santa Ana is located in central Orange County, generally north of the San Diego Freeway (Interstate 405 [I-405]), south of the Garden Grove Freeway (State Route 22 [SR-22]), and west of the Costa Mesa Freeway (SR-55) and Interstate 5 (I-5). The City is approximately 30 miles southeast of downtown Los Angeles; refer to Figure 1, *Regional Vicinity*. Santa Ana is surrounded by the cities of Orange and Garden Grove to the north, Tustin to the east, Costa Mesa and Irvine to the south, and Fountain Valley and Westminster to the west. The generally north-south trending Santa Ana River traverses the western portion of the City.

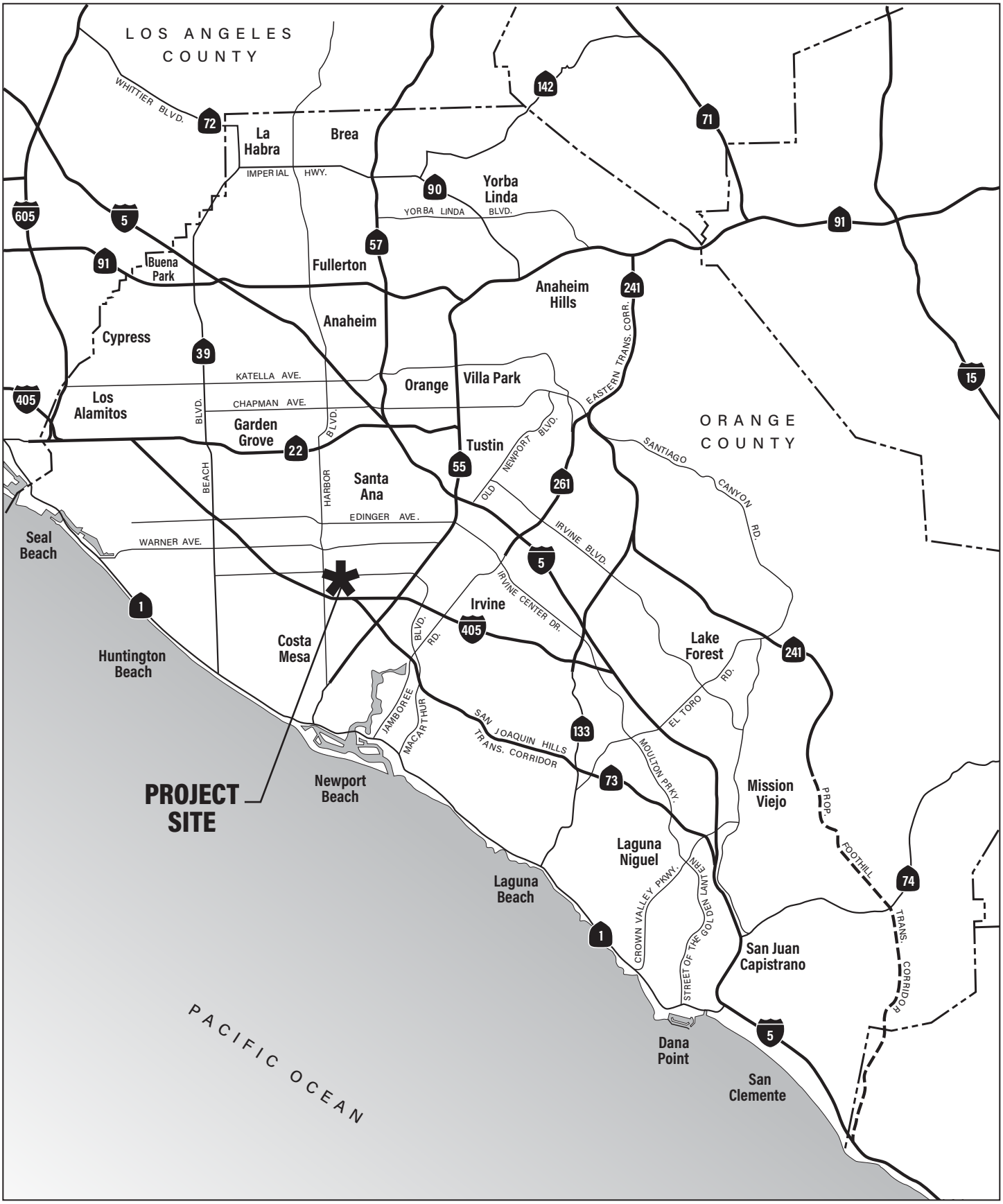
The Project is located at 3100, 3110, and 3120 Lake Center Drive within the southwestern portion of Santa Ana on three land parcels (Assessor's Parcel Numbers [APN] 414-261-01, 414-272-09, and 414-272-10) that comprise approximately 15.8 net acres (Project Site) on the south side of Lake Center Drive in both the southeast and southwest corners of the intersection with Susan Street; refer to Figure 2, *Site Vicinity*. Regional access to the Project Site is provided via I-405. Local access to the Project Site is provided via MacArthur Boulevard and Susan Street.

2.2 Existing Conditions

The Project Site is located in a highly developed and urbanized area of Santa Ana. The Project Site consists of an existing 10.2-acre office park, the Lake Center Office Park, and an approximately 5.6-acre vacant field to the west of and separated from the office park by the north-south South Susan Street. As shown in Figure 2, the Lake Center Office Park is located on the eastern portion of the Project Site and contains three existing office buildings arranged in a rough U-shape around an artificial pond with fountain features, surface parking, a parking structure, a grass lawn, and landscaping. The western three-story building is approximately 60,634 square feet and fully vacant; the central three-story building is approximately 56,930 square feet and is leased to United Health Services but has been unoccupied since the onset of the COVID-19 pandemic in 2020. The eastern six-story building is approximately 60,462 square feet, and the ground floor is leased to and occupied by OC 405 Partners Joint Venture, but will be vacant as of June 30, 2024.[1] Surface parking is located east and west of the buildings and a partially underground parking structure is located south of the buildings. The grass lawn runs south and west of the surface parking lot along Susan Street. Ornamental trees and landscaping are located throughout the office park along building perimeters and parking areas. The western portion of the Site, west of South Susan Street, is a vacant field. The field is fenced.

[1] Although the buildings are predominantly vacant at this time, this document analyzes an occupied baseline since the buildings were previously occupied and operational for the vast majority of the time. Furthermore, the property owner has the ability to lease, occupy and/or operate the currently underutilized spaces at any time under the current entitlements.

This page is intentionally left blank.



Michael Baker INTERNATIONAL

NOT TO SCALE

06/2024 • JN 199799

SOUTH COAST TECHNOLOGY CENTER PROJECT

Regional Vicinity

Figure 1

This page is intentionally left blank.

Source: Google Earth Pro, April 2024

Michael Baker INTERNATIONAL

NOT TO SCALE

06/2024 • JN 199799

SOUTH COAST TECHNOLOGY CENTER PROJECT

Site Vicinity

Figure 2

This page is intentionally left blank.

Surrounding uses adjacent to the Project Site include office, commercial, government, and recreational uses. To the north of the Project Site, across from West Lake Center Drive, is the Calvary Chapel Private School Program support facility and athletic fields. Surface parking, a parking structure, and the Greenville Banning Channel bound the Project Site to the east. To the south of the Project Site are office buildings, surface parking lots, and a U.S. Postal Service facility. Freight rail tracks bound the Project Site to the west.

2.3 General Plan Designation and Zoning

According to the General Plan Update Land Use Element Figure LU-1*, Land Use Map*, the Project Site is designated Industrial (IND).[2] The Industrial designation provides space for activities such as light and heavy manufacturing, warehousing, processing, and distribution as well as commercial uses ancillary to industrial activities. According to the General Plan Update Land Use Element Table LU-3, *Density and Intensity Standards*, the Industrial designation generally allows a maximum 0.45 floor-area-ratio (FAR) with a typical maximum building height of 35 feet. However, Table LU-3 provides a specific exception for the Lake Center Development, defined by Specific Development Plan Number 58 (SD-58), that allows intensities up to 0.72 FAR (see Footnote 4 of General Plan Update Land Use Element Table LU-3). Similarly, regarding height, Table LU-3 Footnote 2 explains that the actual maximum standard allowed on each site may be different than listed in Table LU-3 and that the allowable height of development on any parcel is subject to the zoning standards.

Based on the *City of Santa Ana Zoning Map* (Zoning Map), the Project Site is zoned SD-58. According to Ordinance No. NS-2089, permitted uses in the SD-58 District are professional and business offices providing personal and professional services including employment agencies, medical insurance, real estate, travel, trade contractors, architects, engineers, finance, research and development, and other similar use. The SD-58 District also allows commercial/retail uses, including service commercial uses such as daycare centers, banks and other financial institution, delicatessens, food stores, newsstands, automobile support facilities, health and exercise centers and other similar uses, office and computer equipment, copy centers and other similar uses, office and computer equipment, postal centers, restaurants, travel services, and other similar uses. The SD-58 District permits a maximum FAR of 0.72 and a maximum height of 200 feet for the Project Site.

2.4 Project Characteristics

The Project proposes to demolish the Lake Center Office Park, including the three existing buildings, a parking structure, and parking lots to construct three new Class A industrial buildings for office, manufacturing, and/or warehouse use. The three existing buildings within the Lake Center Office Park that would be demolished are located on the eastern portion of the Project Site and total 178,026 square feet. The total site area of 689,310 square feet (15.8 net acres) across the Project Site would be divided into two lot areas containing three buildings. Two new buildings (Buildings 2 and 3) would be constructed to replace the Lake Center Office Park and one new building (Building 1) would be constructed on the vacant field to the west of Susan Street; refer to Figure 3, *Conceptual Site Plan*. The three proposed Class A buildings would result in a total building square footage of 313,244 square feet. Each building would have a truck dock and a potential mezzanine located opposite the truck dock. A total of 497 parking stalls would be provided for the Project. The characteristics of each building are as follows:

[2] City of Santa Ana, Golden City Beyond, Santa Ana General Plan Land Use Element, Figure LU-1, Land Use Map, April 2022.

This page is intentionally left blank.

Source: DRA Architects, June 2024

Michael Baker INTERNATIONAL

NOT TO SCALE

06/2024 • JN 199799

SOUTH COAST TECHNOLOGY CENTER PROJECT

Conceptual Site Plan

Figure 3

This page is intentionally left blank.

- Centrally located on the parcel west of Susan Street, Building 1 would consist of a 58,615-square-foot tenant space and a 53,615 tenant space, for a total building square footage of 112,230 square feet on a 243,212-square-foot lot area (5.6 net acres). Building 1 would provide 164 parking spaces located around the perimeter of the building. Additionally, Building 1 would have 1,210 square feet of outdoor covered patio area and 36,832 square feet of landscaping. A loading dock with nine dock high doors and two grade doors would be located on the western side of the building, facing the existing railroad. Building 1 would have a maximum exterior height of 48 feet and 4 inches.

- Building 2 would be centrally located on the Project Site to the east of Susan Street and would consist of two 60,823-square-foot tenant spaces, for a total building square footage of 121,645 square feet on a 446,098-square-foot lot (10.2 net acres) shared with Building 3. Building 2 would provide 178 parking spaces located around the perimeter of the building. Additionally, Building 2 would have 707 square feet of outdoor covered patio area and 31,707 square feet of landscaping. A loading dock with 11 dock high doors and two grade doors would be located on the southern side of the building. Building 2 would have a maximum exterior height of 48 feet and 4 inches.

- Building 3 would be located in the eastern portion Project Site. The 79,369-square-foot building would be located on a 446,098-square-foot lot area shared with Building 2, with 155 parking spaces located on the west, south, and east sides of the building. The north side of the building would feature a prominent landscaped entrance to the South Coast Technology Center with benches and seating. Building 3 would have 895 square feet of outdoor covered patio area and 36,596 square feet of landscaping. A loading dock with seven dock high doors and one grade door would be located on the southern side of the building. Building 3 would have a maximum exterior height of 44 feet and 5 inches.

Ancillary improvements to the Project Site would include landscaping, monument signage, lighting, and fencing. The proposed Project would include 27 short term bike parking spaces and 27 long term bike parking spaces near building entrances. The Project Site would be accessible from four driveways along Lake Center Drive and three driveways along South Susan Street. Trucks would access the Project Site via the proposed driveway entrances along Lake Center Drive at the northwest corner of the Project Site and between Building 2 and Building 3, and along Susan Street near the southwest corner of Building 2. All other driveways would be used for passenger vehicles. Internal drive aisles would provide access to the proposed buildings. Additionally, the proposed Project would require connections to existing pipelines for water, sewer, and storm drains within Lake Center Drive and Susan Street.

The proposed Project would comply with the latest California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The latest California Building Energy Efficiency Standards and CALGreen became effective on January 1, 2023 (i.e., 2022 Title 24). The 2022 Title 24 provides minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. To further maximize energy efficiencies, the proposed Project would exceed the 2022 Title 24 by approximately 10 percent. The proposed Project would accomplish this through installing high efficiency HVAC units, using better building envelope insulation and glazing, installing high efficiency LED lighting, and designing lighting power density to be a minimum of 10 percent better than the baseline lighting power density of the existing buildings. The proposed Project would also install solar-ready roofs for each building.

2.4.1 Entitlements

To allow the use of the proposed buildings, the Project proposes to amend SD-58 to allow for industrial uses. Specifically, SD-58 would be amended to allow for the use of Limited Light Industrial uses, consistent with the General Plan Update. The development standards would be updated to include standards for perimeter fencing and revised parking standards to remove reference to specific numbers. Operational standards would also be included for Limited Light Industrial uses. Minor changes to SD-58 are also included to reflect emerging best practices and provide flexibility for future development projects within the district. Additionally, the proposed Project would require a lot merger and site and development plan approval.

2.4.2 Project Construction

Construction of the proposed Project is anticipated to take approximately 16 months to complete. The construction activities would include demolition, excavation, grading, building construction, paving, and architectural coating. The majority of the excavation for the proposed buildings would require over-excavation for the building pads at a depth of approximately 5 to 8 feet. The spoils from the over-excavation would be recompacted in the pad areas. Trenches for utility connections would require a maximum excavation depth of 14 feet. In total, it is anticipated that the proposed Project would excavate approximately 18,600 cubic yards of soils, of which a maximum of 7,235 cubic yards would be exported. Construction activities would comply with the City's Noise Ordinance, Santa Ana Municipal Code (SAMC) Section 18-314(e) and occur only Monday through Saturday between 7:00 a.m. and 8:00 p.m. Construction equipment and materials staging would occur within the Project Site. During construction, vehicular access would be provided via existing access points along Lake Center Drive and South Susan Street. Temporary partial lane closures of Susan Street and Lake Center Drive would be required for utilities connections to resurface the streets; during the resurfacing, access would be maintained. Full lane closures are not anticipated for the proposed Project.

3. California Environmental Quality Act Regulatory Setting

CEQA applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. CEQA applies generally to discretionary actions by agencies which may have a significant effect on the environment. However, where it can be seen with certainty that there is no possibility that an activity may have a significant effect on the environment, or if the activity meets the conditions for a CEQA exemption, it is considered exempt from the provisions of CEQA. CEQA Guidelines Section 15183 provides an exemption for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an EIR was certified. Additional environmental review of such projects shall not be required, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

Projects that are consistent with the densities and use characteristics considered by the GPU PEIR may qualify for the CEQA Guidelines Section 15183 Exemption process. In accordance with CEQA Guidelines Section 15183(b), in approving a project meeting the requirements of Section 15183, "a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

(1) Are peculiar to the project or the parcel on which the project would be located,

(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,

(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or

(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR."

The environmental review contained in Section 4 has been prepared to assess the potential for the proposed Project to result in such environmental effects and whether the proposed Project qualifies for an exemption under CEQA Guidelines Section 15183. The previously certified GPU PEIR serves as the primary environmental compliance document for the Project, and the text, standards conditions, and applicable mitigation measures are incorporated by reference. The GPU PEIR (State Clearinghouse #2020029087) is available to the public for inspection at the City of Santa Ana, City Hall, during normal business hours.

4. Environmental Review

This section includes an assessment, by issue area, of the proposed Project's potential effects on the environment.

4.1 Aesthetics

4.1.1 GPU PEIR Findings

The GPU PEIR concluded that while buildout of the General Plan Update would result in greater density and intensity in five focus areas, it would not create a substantially adverse impact on scenic vistas nor degrade the City's visual character or quality. As stated in the GPU PEIR, because the City is highly urbanized, buildout in accordance with the GPU would consist mainly of infill and redevelopment efforts. Additionally, the GPU PEIR determined that the visual character of historic districts and scenic corridors within the City would not be substantially impacted. As stated in the GPU PEIR, development would be required to comply with the design and development specifications outlined in the updated land use and urban design elements. The aesthetic quality of development within the City would be guided by the SAMC and the seven existing specific plan/special zoning areas. Further, the GPU PEIR determined that by complying with the building codes, nighttime lighting and glare impacts and potential spillover caused by the full buildout of the General Plan Update would be minimized and impacts would be less than significant. Lastly, there are no state-designated scenic highways in Santa Ana, and thus, no impact would occur related to state scenic highways. The GPU PEIR determined that aesthetics impacts would be minimized with the implementation of GPU PEIR Regulatory Requirements (RR) AE-1 through RR AE-3. RR AE-1 would require the City to enforce adherence with the California Building Code, including provisions of the Building Energy Efficiency Standards related to lighting. RR AE-2 would require the City to enforce development standards and other general provisions as detailed in the Zoning Code (SAMC Chapter 41, *Zoning*) to ensure consistency between the General Plan and proposed development projects. RR AE-3 would require the City to enforce the development standards and guidelines of adopted specific plans. Overall, impacts related to aesthetics were determined to be less than significant.

4.1.2 Project Analysis

The Project Site is located within a highly urbanized area in the southwestern portion of Santa Ana, and is not located within one of the five focus areas, a historic district, or near a scenic corridor. Additionally, no long range public views are available from or through the Project Site. The Project Site is currently developed with an existing 10.2-acre office park east of Susan Street and also consists of an approximately 5.6-acre vacant field west of Susan Street. Thus, the proposed Project would redevelop an infill site, consistent with the buildout of the General Plan Update, and would not impact a scenic vista.

The Project Site is not located within a state-designated scenic highway and there are no designated or eligible scenic highways within 5 miles of the Project Site.[3] Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista, or damage scenic resources within a state-designated scenic highway.

[3] California Department of Transportation, *California State Scenic Highway System Map*, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed April 25, 2024.

The Project would redevelop the Lake Center Office Park with two new industrial buildings and would construct a new industrial building on the vacant parcel west of Susan Street. The proposed Project would include accent walls, high quality landscaping, and monument signage at the primary entryways to the Project Site that would add visual interest to the site. Although the proposed Project would require an amendment to the SD-58 District to allow for industrial uses, the Project Site's zoning would be consistent with the General Plan Update land use designation of Industrial. The Project would be required to comply with updated development standards governing aesthetics for the SD-58 District, which include building heights, setbacks, separations, landscaping standards, and signage. Other than the addition of development standards for perimeter fencing and parking, the development standards for the SD-58 District remain essentially unchanged with the proposed SD-58 amendment. Additionally, no change in density or building height is proposed for SD-58. The proposed buildings would be consistent with or shorter than the heights of the existing buildings. Furthermore, the proposed Project would comply with RR AE-1 through RR AE-3. Therefore, the Project would not degrade the existing visual character of the Project Site or conflict with applicable zoning or other regulations governing scenic quality.

Additionally, the proposed Project would comply with existing outdoor lighting standards for nonresidential buildings in SAMC Section 8-211, *Special commercial building provisions*, which require lighting to be contained on-site. Proposed nighttime lighting on-site for the outdoor areas would be limited to security, parking, and accent lighting. Therefore, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views.

Based on the above, impacts related to aesthetics would be less than significant and similar to the impacts identified in the GPU PEIR. The Project would not result in new or substantially more severe impacts compared to the determination in the GPU PEIR, which concluded that impacts would be less than significant. As such, no new project-specific mitigation measures are required.

4.1.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR AE-1 through RR AE-3 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe aesthetic impacts than anticipated by the GPU PEIR.

4.1.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR AE-1 The City shall enforce adherence with the California Building Code, including provisions of the Building Energy Efficiency Standards related to lighting.

RR AE-2 The City shall enforce development standards and other general provisions as detailed in the Zoning Code (Chapter 41 of the Municipal Code) to ensure consistency between the City's General Plan and proposed development projects. This includes compliance with the requirements of any ordinance adopting specific development plans.

RR AE-3 The City shall enforce the development standards and design guidelines of adopted specific plans. In addition to these specific plans, the City will enforce the development standards of the Metro East Mixed-Use Overlay Zone for each district within the overlay area.

4.2 Agriculture and Forestry Resources

4.2.1 GPU PEIR Findings

As stated in the GPU PEIR, most of the City is urbanized and developed. The City does not have any land designated or zoned for agricultural use, forestland, timberland, or timberland production. Additionally, the City does not have any land subject to a Williamson Act contract. Therefore, no impact to agricultural and forestry resources would occur with buildout of the General Plan Update.

4.2.2 Project Analysis

The Project Site comprises an existing 10.2-acre office park that is fully developed with buildings, an artificial pond, and parking, and an approximately 5.6-acre vacant field. The vacant field does not contain any agricultural, forestland, or timberland uses. The Project Site is zoned SD-58, which allows for professional and business office and commercial/retail uses. The Project proposes to amend SD-58 to allow for industrial uses. The Project does not involve any land use changes related to agriculture, forest land, or timberland production. Furthermore, the Project Site and surrounding area are not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and do not include lands that qualify as forest land or timberland.[4] Therefore, similar to the GPU PEIR conclusion, no impact to agricultural and forestry resources would occur as a result of the Project. Based on the above, the Project would not result in new or substantially more severe impacts compared to the determination in the GPU PEIR, and no new project-specific mitigation measures are required.

4.2.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to agriculture and forestry resources than anticipated by the GPU PEIR.

4.2.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures

No GPU PEIR regulatory requirements or mitigation measures apply.

4.3 Air Quality

4.3.1 GPU PEIR Findings

The GPU PEIR analyzed the General Plan Update's consistency with South Coast Air Quality Management District's (SCAQMD) 2016 Air Quality Management Plan (AQMP), which was the latest AQMP when the GPU PEIR was prepared. The GPU PEIR concluded that buildout of the General Plan Update would exceed population estimates for the City, and therefore the emissions associated with the additional population are not included in the regional emissions inventory for the South Coast Air Basin (Basin). Additionally, air pollutant emissions associated with buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the Basin. Therefore, overall, the GPU would be inconsistent with the AQMP. Even with GPU PEIR Mitigation Measures (MM) AQ-1 and MM AQ-2, requiring the preparation of a project-specific technical assessment of construction and operational-related air quality impacts, and

[4] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed February 27, 2024.

policies in the General Plan Update, the GPU PEIR concluded that future development pursuant to the General Plan Update would result in significant and unavoidable impacts regarding consistency with SCAQMD's 2016 AQMP.

Regarding impacts related to a cumulatively considerable net increase of criteria pollutants, the GPU PEIR acknowledged that construction activities associated with the General Plan Update would temporarily increase particulate matter (i.e., PM_{10} and $PM_{2.5}$), volatile organic compounds (VOC), nitric oxides (NO_X), sulfur oxides (SO_X), and carbon monoxide (CO) regional emissions within the Basin. The GPU EIR also acknowledged that individual projects accommodated under the General Plan Update may not exceed the SCAQMD regional significance thresholds, but because site-specific development project information was not available at the time of the preparation of the GPU PEIR, and projects under the GPU PEIR could be constructed at the same time, impacts related to construction-related emissions that would cumulatively contribute to nonattainment designations of the Basin would be significant even with the implementation of GPU PEIR MM AQ-1. Similarly, the GPU PEIR concluded that buildout in accordance with the General Plan Update would generate long-term emissions that would exceed SCAQMD's regional significance thresholds for VOC, NO_X, and CO, which would cumulatively contribute to the nonattainment designations of the Basin. GPU PEIR MM AQ-2, in addition to the goals and policies of the General Plan Update, would reduce air pollutant emissions to the extent feasible, but impacts would remain significant and unavoidable due to the magnitude of the overall land use development associated with the General Plan Update.

Regarding sensitive receptors, the GPU PEIR concluded that buildout of the General Plan Update, including industrial and warehousing land uses, could expose sensitive receptors to substantial concentrations of toxic air contaminants (TACs). While individual projects could result in TAC emissions under the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of risk in the Basin. GPU PEIR MM AQ-3, requiring a project-specific health risk assessment (HRA) for new industrial or warehousing developments, would be required to ensure mobile sources of TACs not covered under SCAQMD permits are considered during subsequent project-level environmental review by the City. Additionally, GPU PEIR MM AQ-1 and MM AQ-2 would reduce the regional construction and operation emissions associated with buildout of the General Plan Update, and therefore also result in a reduction of localized construction- and operation-related criteria air pollutant emissions to the extent feasible. However, implementation of the General Plan Update would generate TACs that could contribute to elevated levels in the Basin, and because existing sensitive receptors may be close to project-related construction activities and large emitters of on-site operation-related criteria air pollutant emissions, construction and operation emissions generated by individual development projects have the potential to exceed SCAQMD's Localized Significance Thresholds (LSTs). Thus, the GPU PEIR concluded that the General Plan Update's cumulative contribution to health risk and localized impact would remain significant and unavoidable. However, because buildout of the General Plan Update would not result in the increase in traffic volume required to generate a CO hotspot, impacts related to CO hotspots would be less than significant.

Regarding odors, the GPU PEIR determined that industrial land uses have the potential to generate objectionable odors, and that GPU PEIR MM AQ-4 would ensure that odor impacts are minimized, and that facilities would comply with SCAQMD Rule 402. The GPU PEIR stated that the Industrial and Industrial Flex land uses proposed under the General Plan Update are not anticipated to produce odors since the General Plan Update assumes that the odor-producing industrial land uses such as wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing, facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch manufacturing plants, chemical

manufacturing, and food manufacturing facilities would not be permitted. Therefore, the GPU PEIR concluded that odor impacts would be less than significant.

4.3.2 Project Analysis

The following section evaluates potential short- and long-term air quality impacts that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment A, *Air Quality Assessment*, and Attachment B, *Health Risk Assessment*. The *Air Quality Assessment* and *Health Risk Assessment* were prepared to fulfill the requirements of GPU PEIR MM AQ-1, MM AQ-2, and MM AQ-3.

CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN

On December 2, 2022, the SCAQMD Governing Board adopted the 2022 AQMP. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, updated emission inventory methodologies for various source categories. Additionally, the 2022 AQMP utilized information and data from the South Coast Association of Governments (SCAG) and its *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). While SCAG has recently adopted *Connect SoCal 2024* (i.e., the 2024-2050 RTP/SCS), SCAQMD has not released an updated AQMP based off of the 2024-2050 RTP/SCS growth projections. As such, this consistency analysis is based off the 2022 AQMP and the RTP/SCS that was adopted at the time, the 2020-2045 RTP/SCS.

According to the SCAQMD's *CEQA Air Quality Handbook*, projects must be analyzed for consistency with two main criteria, as discussed below.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

i) Would the project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations associated with the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) is used as the basis for evaluating project consistency. As detailed below under the Criteria Air Pollutants subsection, localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during Project construction and operations. Therefore, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations.

ii) Would the project cause or contribute to new air quality violations?

As discussed below under the Criteria Air Pollutants subsection, the proposed Project would result in emissions that are below the SCAQMD thresholds. Therefore, the Project would not have the potential to cause or affect a violation of the ambient air quality standards.

iii) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

The proposed Project would result in less than significant impacts regarding localized concentrations during Project construction and operations; refer to the Localized Pollutants and Sensitive Receptors subsection below. As such, the Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the proposed Project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

i) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

A project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2022 AQMP. In the case of the 2022 AQMP, three sources of data form the basis for the projections of air pollutant emissions: general plans, SCAG's regional growth forecast, and SCAG's 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The Project Site is designated Industrial and zoned SD-58. The Industrial land use designation provides space for activities such as light and heavy manufacturing, warehousing, processing, and distribution as well as commercial uses ancillary to industrial activities; permitted uses in the SD-58 zoning district include professional and business offices providing personal and professional services including employment agencies, medical insurance, real estate, travel, trade contractors, architects, engineers, finance, research and development, and other similar uses. The Project proposes the construction of three new Class A industrial buildings for office, manufacturing, and/or warehouse use. As such, the Project would be consistent with the land use projections previously envisioned for this site. Furthermore, the Project is anticipated to generate approximately 425 employees, which would be a nominal amount of employment increase compared to the growth identified in the GPU PEIR, which is an increase of 13,418 jobs between 2019 and 2045.[5] As such, the proposed Project is considered consistent with the General Plan Update, and is consistent with the types, intensity, and patterns of land use previously envisioned for the site. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the SCAQMD has incorporated these same projections into the

[5] City of Santa Ana, General Plan Update Program Environmental Impact Report, Table 5.13-7, Population and Employment Projections for Santa Ana and Orange County, October 2021.

2022 AQMP, it can be concluded that the proposed Project would be consistent with the 2022 AQMP.

ii) Would the project implement all feasible air quality mitigation measures?

The proposed Project would be required to comply with GPU PEIR RR AQ-1 through RR AQ-3, which include applicable emission reduction measures identified by the SCAQMD such as Rule 403 that requires control of excessive fugitive dust emissions by regular watering or other dust prevention measures, and Rule 1113 that regulates the reactive organic gas (ROG) content of paint. In addition, the Project would implement GPU PEIR MM AQ-1 and MM AQ-2, which require the preparation and submittal of a technical assessment that evaluates the project's potential construction and operational-related air quality impacts. The *Air Quality Assessment* (refer to Attachment A) was prepared to fulfill the requirements of GPU PEIR MM AQ-1 and MM AQ-2. As such, the proposed Project meets this AQMP consistency criterion.

iii) Would the project be consistent with the land use planning strategies set forth in the AQMP?

Land use planning strategies set forth in the 2022 AQMP are primarily based on the 2020-2045 RTP/SCS. Overall, it is anticipated that the proposed Project would be consistent with SCAG's 2020-2045 RTP/SCS in that it would be located in a highly developed and urbanized area of Santa Ana with multiple bus stops within a quarter mile and would provide short- and long-term bike parking, both of which would incentivize employees to take alternative modes of travel, thereby reducing criteria pollutant emissions. Therefore, the Project would be consistent with the land use planning strategies and would be consistent with this criterion.

Impact Summary

In conclusion, the determination of 2022 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. Further, the proposed Project's long-term influence on air quality in the Basin would also be consistent with the SCAQMD and SCAG's goals and policies and is considered consistent with the 2022 AQMP. As such, impacts resulting from the proposed Project would be less than significant and less than the impacts disclosed in the GPU PEIR, which were determined to be significant and unavoidable despite inclusion of mitigation. As such, no new project-specific mitigation measures are required.

CRITERIA AIR POLLUTANTS

Construction Impacts

The Project proposes to demolish the Lake Center Office Park, including the three existing buildings, a parking structure, and parking lots to construct three new Class A industrial buildings for office, manufacturing, and/or warehouse use. Construction would result in fugitive dust emissions, exhaust emissions from construction equipment and worker vehicles, emissions from the application of coatings (i.e., ROG emissions). Construction activities would comply with SCAQMD Rule 402, which prohibits fugitive dust from creating a nuisance off-site, Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures, and Rule 1113, which provides specifications on painting practices as well as regulates the ROG content of paint (refer to RR AQ-3). Additionally, the proposed Project

would comply with RR AQ-2 to limit idling of construction equipment to less than five minutes. The analysis of construction criteria pollutant emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod) version 2022.1.[6] Table 4.3-1, *Construction Criteria Pollutant Emissions*, summarizes the estimated maximum daily emissions of VOC (ROG), NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$. As shown in Table 4.3-1, the daily total construction emissions would not exceed established SCAQMD thresholds. Therefore, impacts would be less than significant.

Table 4.3-1
Construction Criteria Pollutant Emissions

Construction Phase (Year)	Pollutant (pounds/day)[1,2]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition (2024)	2.75	29.21	24.39	0.05	4.71	1.7
Grading (2024)	3.63	36.89	32.3	0.07	4.63	2.5
Building Construction (2024)	1.75	13.71	21.12	0.03	2.76	1.02
Building Construction (2025)	1.66	12.77	21.52	0.03	2.68	0.96
Paving (2025)	2.85	7.51	10.71	0.01	0.55	0.37
Architectural Coating (2025)	71.03	0.99	2.46	< 0.01	0.39	0.11
Maximum Daily Emissions[3]	**71.03**	**50.6**	**53.42**	**0.10**	**7.39**	**3.52**
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
1. Emissions were calculated using CalEEMod version 2022.1. Higher emissions between summer and winter are presented as a conservative analysis.
2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
3. Grading and building construction phases would overlap in 2024. As such, maximum daily emissions for all pollutants except for ROG are the total of grading phase and building construction phase emissions in 2024. Totals may be slightly off due to rounding.

Source: Refer to Appendix A of Attachment A, Air Quality Assessment, for CalEEMod outputs and assumptions used in this analysis.

With respect to the proposed Project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2022 AQMP. The proposed Project would comply with SCAQMD Rule 403 requirements and implement all feasible SCAQMD rules to reduce construction air emissions to the extent feasible. In addition, the proposed Project would comply with adopted 2022 AQMP emissions control measures. Pursuant to SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

[6] Modeling was performed for a project with three industrial buildings totaling 325,044 square feet. However, since the completion of the modeling, the total building square footage has been reduced to 313,244 square feet. Therefore, Project emissions are conservative.

The Project's construction emissions would be below the established thresholds and would result in less than significant air quality impacts. Thus, it can be reasonably inferred that the Project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants in the Basin, and impacts would be less than significant.

Operational Impacts

Long-term air quality impacts typically consist of mobile source emissions generated from traffic associated with on-site uses (i.e., motor vehicle use by employees, deliveries travelling to and from the site), and emissions from area and energy sources. Operational emissions associated with the existing and proposed uses of the Project Site were estimated in CalEEMod. Existing uses of the Project Site generate 1,930 daily trips while the Project would generate 1,544 daily trips[7]. This analysis utilized trip lengths of 39.9 miles per trip for 4-axle trucks and 14.2 miles per trip for 2-axle and 3-axle trucks based on SCAQMD guidance; trip lengths for passenger cars remain as CalEEMod defaults (5.3 to 13.4 miles per trip). At the time of this analysis, it has not been determined if the ultimate tenants for the proposed buildings would operate their own fleet; most warehouse operators have no control over the trucks entering and exiting their facilities. Consequently, it is infeasible to require trucks with particular emission profiles (e.g., zero-emission [ZE], near-zero-emission [NZE], or 2010 or beyond model year trucks) for Project operations. If ZE or NZE fleets are utilized during Project operations, the Project's emissions would be less than those identified in this analysis. Area source emissions would be generated from consumer products, architectural coatings, and landscaping. Regarding energy emissions, the primary use of electricity by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, landscaping equipment, and electronics. The proposed Project would not consume natural gas according to the Project applicant. However, criteria air pollutant emissions from electricity use are not quantified since criteria pollutants emissions occur at the site of the power plant, which is off-site. Emissions associated with each of these sources were calculated and are discussed below in Table 4.3-2, *Operational Criteria Pollutant Emissions*. As shown in Table 4.3-2, the daily total operational emissions would not exceed established SCAQMD thresholds. Therefore, impacts would be less than significant.

As shown in Table 4.3-2, the Project would result in reduced ROG and CO emissions during both summer and winter conditions compared to existing conditions primarily due to the proposed Project generating less mobile source emissions than the existing office uses. In addition, the Project would not consume natural gas, which would also partially contribute to the reductions of ROG and CO emissions. Overall, the daily total operational emissions would not exceed established SCAQMD thresholds.

As discussed, the proposed Project would not result in long-term operational air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, no cumulative operational impacts associated with implementation of the proposed Project would result.

[7] Linscott, Law & Greenspan, Engineers, Trip Generation Assessment for the Proposed South Coast Technology Center Project, January 2, 2024.

Table 4.3-2
Operational Criteria Pollutant Emissions

Emissions Source	Pollutant (pounds/day)[1]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Summer Emissions						
Mobile[2]	6.41	4.59	50.50	0.12	10.90	2.82
Area	6.65	0.12	14.50	< 0.005	0.03	0.02
Energy[3]	0.07	1.21	1.02	0.01	0.09	0.09
Total Existing Summer Emissions[4]	**13.10**	**5.92**	**66.00**	**0.13**	**11.00**	**2.93**
Project Summer Emissions						
Mobile[2]	2.85	26.30	33.90	0.28	14.70	4.11
Area	9.73	0.12	14.10	< 0.005	0.03	0.02
Energy[3]	0.00	0.00	0.00	0.00	0.00	0.00
Total Project Summer Emissions[4]	**12.60**	**26.40**	**48.00**	**0.28**	**14.70**	**4.13**
Net Increase From Existing Conditions	***-0.50***	***20.48***	***-18.00***	***0.15***	***3.70***	***1.20***
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Existing Winter Emissions						
Mobile[2]	6.34	4.99	47.30	0.11	10.90	2.82
Area	4.28	0.00	0.00	0.00	0.00	0.00
Energy	0.07	1.21	1.02	0.01	0.09	0.09
Total Existing Winter Emissions[4]	**10.70**	**6.20**	**48.30**	**0.12**	**11.00**	**2.91**
Project Winter Emissions						
Mobile[2]	2.82	27.40	32.00	0.28	14.70	4.11
Area	7.41	0.00	0.00	0.00	0.00	0.00
Energy[3]	0.00	0.00	0.00	0.00	0.00	0.00
Total Project Winter Emissions[4]	**10.20**	**27.40**	**32.00**	**0.28**	**14.70**	**4.11**
Net Increase From Existing Conditions	***-0.50***	***21.20***	***-16.30***	***0.16***	***3.70***	***1.20***
SCAQMD Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:

1. Emissions calculated using CalEEMod Version 2022.1.
2. Operational trips based on the *Trip Generation Assessment* prepared by Linscott, Law & Greenspan Engineers (dated January 2, 2024).
3. According to the Project applicant, the Project would not consume natural gas.
4. Totals may not add precisely due to rounding.

Source: Refer to Appendix A of Attachment A, *Air Quality Assessment*, for CalEEMod outputs and assumptions used in this analysis.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, ozone (O_3) precursors, VOCs and NO_X, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants during construction would have negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form.[8] Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD), SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.[9]

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD further states that based on their own modeling in the SCAQMD's 2012 Air Quality Management Plan, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Project would have a less than significant impact for air quality health impacts.

Impact Summary

In conclusion, construction and operational impacts resulting from the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment. Project impacts would be less than significant and less than the impacts disclosed in the GPU PEIR, which were determined to be significant and unavoidable despite inclusion of mitigation. As such, no new project-specific mitigation measures are required.

LOCALIZED POLLUTANTS AND SENSITIVE RECEPTORS

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The California Air Resources Board (CARB) has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The nearest sensitive receptor to the Project Site is the existing Calvary Chapel High School located approximately 100 feet to the east of the Project Site.

[8] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, April 3, 2015.

[9] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, April 13, 2015.

Localized Significance Thresholds

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST screening lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The Project is located within SRA 17, Central Orange County.

Construction

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day.[10] SCAQMD provides LST screening thresholds for one-, two, and five-acre site disturbance areas; SCAQMD does not provide LST screening thresholds for projects over five acres. The Project would actively disturb approximately three acres per day during the grading phase of construction. Therefore, the construction LST screening threshold for two acres were utilized as a conservative analysis. As discussed, the nearest sensitive receptor to the Project Site is the existing Calvary Chapel High School located approximately 100 feet to the east of the Project Site. This sensitive land use may be potentially affected by air pollutant emissions generated during on-site construction activities. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. As the nearest sensitive receptor is located approximately 100 feet (30.5 meters) from the Project Site, the lowest available LST screening values for 25 meters was used.

Table 4.3-3, *Localized Significance of Construction Emissions*, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LST screening thresholds for SRA 17. It is noted that the localized emissions presented in Table 4.3-3 are less than those in Table 4.3-2 because localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As shown in Table 4.3-3, localized construction emissions would not exceed the LST screening thresholds for SRA 17. Therefore, localized significance impacts from construction would be less than significant.

Further, as discussed in the Attachment B, *Health Risk Assessment*, the highest expected average diesel particulate matter (DPM) emission concentrations resulting from construction of the Project at a sensitive receptor would be approximately 0.06955 µg/m^3. It is acknowledged that the calculations conservatively assume no cleaner technology with lower emissions would occur in future years. Cancer risk calculations are based on 16-month maximum individual cancer risk (MICR) exposure periods. As shown in the *Health Risk Assessment*, the highest calculated carcinogenic risk from Project construction activities is approximately 1.71 per million for 16-month exposure at the sensitive receptor at the school and 5.68 per million for 16-month exposure at a residential sensitive receptor location east of the Project Site. Thus, the Project would not exceed the MICR of 10 in one million and impacts related to cancer risk and DPM concentrations from heavy trucks would be less than significant for the MICR.

[10] The number of acres represent the total acres traversed by grading equipment. To properly grade a piece of land, multiple passes with equipment may be required. The disturbance acreage is based on the equipment list and days of the grading phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Table 4.3-3
Localized Significance of Construction Emissions

Emissions Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Construction Emissions[1, 2]	45.50	43.30	4.34	2.74
LST Screening Threshold[3]	115	715	6	4
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:

1. The grading phase would overlap with the building construction phase during Year 1; maximum daily construction emissions from these two phases are combined to be presented as the worst-case scenario for NO_X, CO, $PM_{10,}$ and $PM_{2.5}$ emissions.
2. Modeling assumptions include compliance with SCAQMD Rule 403 which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
3. The Localized Significance Threshold Mass Rate Screening Criteria was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately three acres; therefore, the two-acre thresholds were used) and Source Receptor Area 17, *Central Orange County*.

Source: Refer to Appendix A of Attachment A, *Air Quality Assessment*, for CalEEMod outputs and assumptions used in this analysis.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, serpentinite and ultramafic rocks are not known to occur within the Project area.[11]

According to the Attachment C, *Cultural and Paleontological Resources Identification Memorandum*, the existing buildings were built after the 1980s. Thus, the buildings are not likely to contain asbestos. However, SCAQMD Rule 1403 requires that, prior to the start of demolition activities, the existing structure shall be thoroughly surveyed for the presence of asbestos by a person that is certified by Cal/OSHA for asbestos surveys. Rule 1403 requires that the SCAQMD be notified a minimum of 10 days before any demolition activities begin with specific details of all asbestos to be removed, start and completion dates of demolition, work practices and engineering

[11] California Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed April 3, 2024.

controls to be used to contain the asbestos emissions, estimates on the amount of asbestos to be removed, the name of the waste disposal site where the asbestos will be taken, and names and addresses of all contractors and transporters that will be involved in the asbestos removal process. Therefore, through adherence to the asbestos removal requirements, detailed in SCAQMD Rule 1403, a less than significant asbestos impact would occur during construction of the proposed Project.

Operations

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the proposed Project consists of three new Class A industrial buildings for office, manufacturing, and/or warehouse use, the operational phase LST protocol was applied. If emissions exceed the applicable operational LST screening thresholds for the Project Site, then additional dispersion modeling would need to be conducted to determine if there is an actual exceedance of the ambient air quality standards. The Project Site is approximately 15.8 acres. Therefore, the LST values for five-acre at 25 meters were utilized to provide a conservative estimate of operational LST impacts. It is assumed that the maximum distance a vehicle could travel on the 15.8-acre (approximately 0.0247-square mile) site would be one mile or less. Therefore, a conservative percentage of 20 percent of the total mobile source emissions (one mile trip on-site of the shortest 5.3-mile trip) were assumed as on-site emissions. This assumption is conservative because only 45 percent of the passenger cars trips would have a trip length of 5.3 miles per trip; all other trip types and vehicle types would have much longer trip lengths.

Table 4.3-4, *Localized Significance of Operational Emissions*, shows the calculated emissions for the Project's operational activities compared to the applicable LST screening thresholds. As shown in Table 4.3-4, the Project's operational area source emissions would not exceed the LST screening thresholds for SRA 17. Therefore, localized significance impacts from operations would be less than significant.

Further, based on the *Health Risk Assessment*, the highest expected annual average DPM emission concentrations resulting from operation of the Project (332 daily truck trips) at a sensitive receptor would be 0.00456 micrograms per cubic meter (µg/m3). This level of concentration would be experienced at the institutional uses (Calvary Chapel High School) located directly east of the Project Site, where DPM emissions were modeled to include emissions from on-site and off-site heavy duty trucks movement and idling. It is acknowledged that the calculations conservatively assume no cleaner technology with lower emissions would occur in future years. Cancer risk calculations are based on four-year maximum individual cancer risk (MICR) exposure periods. As shown in the *Health Risk Assessment*, the highest calculated carcinogenic risk from Project implementation is 0.00965 per million for 4-year exposure at the sensitive receptor at the school. The highest calculated carcinogenic risk at a residential sensitive receptor location (800 feet south of the Project Site) is 1.750 per million for 30-year exposure. Thus, the Project would not exceed the MICR of 10 in one million and impacts related to cancer risk and DPM concentrations from heavy trucks would be less than significant for the MICR.

Table 4.3-4
Localized Significance of Operational Emissions

Emissions Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Area Source Emissions	0.12	14.10	0.03	0.02
Maximum Daily On-Site Mobile Emissions[1]	5.48	6.78	2.94	0.82
Maximum Daily Energy Emissions	0.00	0.00	0.00	0.00
Total Maximum Daily On-Site Operational Emissions	***5.60***	***20.88***	***2.97***	***0.84***
Localized Significance Threshold[2]	*183*	*1,253*	*3*	*2*
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Notes:

1. As it was conservatively assumed that approximately 20 percent of the project's mobile trips would occur on the 15.8-acre site, the operational LST assessment analyzed 20 percent of the maximum daily winter or summer operational mobile emissions.
2. The Localized Significance Threshold Mass Rate Screening Criteria was determined using Appendix C of the SCAQMD *Final Localized Significant Threshold Methodology* guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the site acreage (approximately 15.8 acres; therefore, the five-acre thresholds were used as a conservative analysis) and Source Receptor Area 17, *Central Orange County*.

Source: Refer to Appendix A of Attachment A, *Air Quality Assessment*, for CalEEMod outputs and assumptions used in this analysis.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels (i.e., adversely affect residents, school children, hospital patients, the elderly, etc.). To identify CO hotspots, the SCAQMD requires a CO microscale hotspot analysis when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (two percent) for any intersection with an existing level of service (LOS) D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersection locations.

The Basin is designated as an attainment area for state and federal CO standards. There has been a decline in CO emissions even though vehicle miles traveled (VMT) on U.S. urban and rural roads have increased. On-road mobile source CO emissions have declined 24 percent between 1989 and 1998, despite a 23 percent rise in motor VMT over the same 10 years. California trends have been consistent with national trends; CO emissions declined 20 percent in California from 1985 through 1997, while VMT increased 18 percent in the 1990s. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*. The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Of these locations, the Wilshire Boulevard/Veteran Avenue intersection experienced the highest CO concentration (4.6 parts per million (ppm)), which is well below the 35-ppm 1-hr CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection (100,000 ADT), it

can be reasonably inferred that CO hotspots would not be experienced at any locations near the Project Site as the Project would not result in increase in daily trips compared to existing conditions. Therefore, similar to the analysis in GPU PEIR, impacts related to CO hotspots would be less than significant.

Impact Summary

In conclusion, both construction and operational localized air quality impacts resulting from the proposed Project would be less than significant and would be less than the impacts disclosed in the GPU PEIR, which were determined to be significant and unavoidable despite inclusion of mitigation. As such, no new project-specific mitigation measures are required.

OBJECTIONABLE ODORS

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes (RR AQ-2). This would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also comply with the SCAQMD Rule 1113, which would minimize odor impacts from ROG emissions during architectural coating (RR AQ-3). Any impacts to existing adjacent land uses would be short-term.

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project involves the construction of three new Class A industrial buildings for office, manufacturing, and/or warehouse use. As such, the operation of the Project would not involve land uses typically associated with odor complaints. In relation to truck operations, the proposed Project would be required to comply with the California Code of Regulations, Title 13, Sections 2485(C)(1) which limits the idling time of trucks to no more than five minutes and would further minimize emissions and possible odors. As discussed above, Project adherence with SCAQMD Rule 402 would minimize any discharge of contaminants that could be detrimental or would cause a nuisance.

In conclusion, project-related construction and operational impacts pertaining to other air emissions (such as those leading to odors) would be less than significant, and would be the same as impacts disclosed in the GPU PEIR, which were also determined to be less than significant. As such, no new project-specific mitigation measures are required.

4.3.3 Conclusion

Overall, the Project is consistent with the General Plan Update. With implementation of RR AQ-1 though RR AQ-3 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe air quality impacts than anticipated by the GPU PEIR.

4.3.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR AQ-1 New buildings are required to achieve the current California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2019 Building Energy Efficiency Standards became effective January 1, 2020. The Building and Energy Efficiency Standards and CALGreen are updated tri-annually with a goal to achieve net zero buildings energy for 2030.

RR AQ-2 Construction activities will be conducted in compliance with California Code of Regulations, Title 13, Section 2449, which requires that nonessential idling of construction equipment is restricted to five minutes or less.

RR AQ-3 Construction activities will be conducted in compliance with any applicable South Coast Air Quality Management District rules and regulations, including but not limited to:

- Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
- Rule 402, Nuisance, which states that a project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."
- Rule 1113, which limits the volatile organic compound content of architectural coatings.
- Rule 1466, Soil Disturbance. Projects that involve earth-moving activities of more than 50 cubic yards of soil with applicable toxic air contaminants are subject to this rule.

MM AQ-1[12] Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

[12] The Air Quality Assessment (Attachment A) was prepared to fulfill the requirements of GPU PEIR MM AQ-1 and MM AQ-2.

- Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as:
  - Use of nontoxic soil stabilizers to reduce wind erosion.
  - Apply water every four hours to active soil-disturbing activities.
  - Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast AQMD's website.

MM AQ-2[13] Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.

[13] The Air Quality Assessment (Attachment A) was prepared to fulfill the requirements of GPU PEIR MM AQ-1 and MM AQ-2.

- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code and Sec. 41-1307.1 of the Santa Ana Municipal Code.
- Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code.
- Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate.

MM AQ-3[14] Prior to discretionary approval by the City of Santa Ana, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Santa Ana for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District and shall include all applicable stationary and mobile/area source emissions generated by the proposed project at the project site. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceed the respective thresholds, as established by the South Coast AQMD at the time a project is considered (i.e., 10 in one million cancer risk and 1 hazard index), the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may

[14] The Health Risk Assessment (Attachment B) was prepared to fulfill the requirements of GPU PEIR MM AQ-3.

include, but are not limited to, restricting idling on-site, electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

4.4 Biological Resources

4.4.1 GPU PEIR Findings

According to the GPU PEIR, the City is built out with primarily industrial, commercial, and residential uses. Within the City, wildlife habitats are generally limited to open space/vacant parcels, the Santa Ana River, and the Santiago Creek. A total of 499 parcels are designated as Open Space land use within the City boundaries. An additional 135 parcels within the City boundaries were identified as vacant or containing natural resources but are not designated Open Space. The General Plan Update proposes no change in General Plan land use designation for the parcels identified as open space or vacant parcels within the City limits. The inventory of existing conditions conducted for the GPU PEIR determined that no parcels with a proposed land use designation that allows for development (i.e., not an open space designation) currently has sensitive vegetation. All parcels currently have ruderal vegetation and little to no biological value. Nevertheless, while no development or land use changes are proposed in the City's open space areas, and the GPU PEIR reported no indication that development in accordance with the General Plan Update would have significant biological impacts, the GPU PEIR concluded that there is potential for implementation of the General Plan Update to impact candidate, sensitive, or special status species, particularly if future development includes stream crossings. In addition, the GPU PEIR determined that development under the General Plan Update could result in vegetation removal, intrusion by humans and pets, and increase noise and air pollution, which could adversely affect wildlife movement, nesting sites, and migratory birds. Thus, the GPU PEIR concluded that impacts to candidate, sensitive, or special status species; wildlife movement; nesting sites; and migratory birds would be potentially significant even with implementation of RR B-1 through RR B-5. However, with incorporation of GPU PEIR MM BIO-1, which would require screening by a qualified biologist to determine if a site-specific biological resources report is required for projects that disturb vegetated land or major streams, impacts would be reduced to less than significant.

No land use changes were proposed on parcels identified as riparian habitat, sensitive natural communities, or wetlands and jurisdictional waterways by the General Plan Update. Additionally, the City is not within a Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) area. Thus, the GPU PEIR concluded that the General Plan Update would have a less than significant impact related to riparian habitat, sensitive natural communities, wetlands and jurisdictional waterways, and adopted NCCP/HCP.

4.4.2 Project Analysis

The Project Site comprises an existing 10.2-acre office park that is fully developed with buildings, an artificial pond, and parking, and an approximately 5.6-acre vacant field. The proposed Project would demolish three buildings and a parking structure to construct three new industrial buildings for office, manufacturing, and/or warehouse use. The vacant field is disturbed, surrounded by urban uses, and does not contain any critical habitat for threatened and endangered species as

delineated by the U.S. Fish and Wildlife Service.[15] The Project Site also does not contain nor is it adjacent to any wetland or riparian habitat as identified by the National Wetlands Inventory.[16] As stated in the GPU PEIR, parcels with a proposed land use designation that allows for development, such as the Project Site, currently do not contain sensitive vegetation with any biological value. Thus, although the Project Site contains limited ornamental vegetation, the site does not include attributes that would be capable of supporting special status or sensitive plant species, or native resident or migratory species. Additionally, the Project would comply with RR B-2, which would ensure any potential direct or indirect impacts to bird species that may nest in the on-site trees comply with California Fish and Game Code Section 3503, which prohibits the take, possession, or needless destruction of any bird's nest or eggs. Therefore, Project impacts related to candidate, sensitive, or special status species; riparian habitat; wetlands; native resident or migratory species would be less than significant.

A total of 201 trees would be removed to construct the proposed Project, all of which are located on the Project Site. SAMC Chapter 33, Article VII regulates the planting, maintenance, and removal of public trees. Since all trees removed would be on-site trees, the regulations contained in SAMC Chapter 33, Article VII would not apply to the Project. Thus, the Project would not conflict with the City's tree ordinance and impacts would be less than significant. In addition, as stated in the GPU PEIR, the City is not within an NCCP/HCP area. Therefore, the proposed Project would not conflict with an NCCP/HCP or other approved local, regional, or state habitat conservation plan and no impacts would occur.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determination in the GPU PEIR, which concluded that impacts related to riparian habitat, sensitive natural communities, wetlands and jurisdictional waterways, and adopted NCCP/HCP would be less than significant and that impacts to candidate, sensitive, or special status species; wildlife movement; nesting sites; and migratory birds would be less than significant with mitigation. As such, no new project-specific mitigation measures are required.

4.4.3 Conclusion

The Project is consistent with the General Plan Update. With compliance with RR B-2 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe biological resource impacts than anticipated by the GPU PEIR.

4.4.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR B-2 Regulatory requirement for potential direct/indirect impacts to common and sensitive bird and raptor species will require compliance with the California Fish and Game Code Section 3503.

[15] U.S. Fish and Wildlife Service. *Critical Habitat for Threatened and Endangered Species Online Mapper*, https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77, accessed April 25, 2024.

[16] U.S. Fish and Wildlife Service. *National Wetlands Inventory Wetlands Mapper.* https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed April 25, 2024.

4.5 Cultural Resources

4.5.1 GPU PEIR Findings

The GPU PEIR concluded that future development under the General Plan Update could adversely impact the City's numerous historical properties listed in national, state, and local registers. Implementation of RR CUL-2 through RR CUL-6 and GPU PEIR MM CUL-1 through MM CUL-3 would be required. Specifically, GPU PEIR MM CUL-1 would require a historical resources assessment (HRA) for structures 45 years or older. GPU PEIR MM CUL-2 would require the maximum use of the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* to ensure that projects involving relocation, conversion, rehabilitation, or alteration of a historic resources would not impair any historical significance. In the event that impacts to historical resources cannot be avoided, GPU PEIR MM CUL-3 would require the affected historical resources to be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. However, impacts to historical resources would still be significant and unavoidable.

The GPU PEIR stated that development involving ground disturbance within the plan area has the potential to impact known and unknown archaeological resources. To reduce impacts to archaeological resources and prior to ground-disturbing activities, GPU PEIR MM CUL-4 requires an Archaeological Resources Assessment be conducted under the supervision of a qualitied archaeologist. If potentially significant archaeological resources are identified and impacts cannot be avoided, GPU PEIR MM CUL-5 requires a Phase II Testing and Evaluation investigation be performed by a qualified archaeologist. If the Archaeological Resources Assessment required by GPU PEIR MM CUL-4 does not identify archaeological resources but indicates the project area to be highly sensitive for archeological resources, then GPU PEIR MM CUL-6 requires a qualified archaeologist and a Native American monitor culturally affiliated with the project area to monitor all ground-disturbing activities in the areas of high archaeological sensitivity. However, if the Archaeological Resources Assessment does not identify potentially significant archaeological resources but indicates that the site has moderate sensitivity for archaeological resources, then GPU PEIR MM CUL-7 requires that a qualified archaeologist be retained on-call. With implementation of GPU PEIR MM CUL-4 through MM CUL-7, impacts to archaeological resources would be less than significant.

As stated in the GPU PEIR, the potential for disturbance of human remains is low since development in accordance with the General Plan Update would be largely limited to infill sites and previously disturbed land in an urban environment. The GPU PEIR determined that compliance with California Health and Safety Code Section 7050.5 (RR CUL-1) and Public Resources Code Section 5097.98 would ensure that impacts to human remains would be less than significant.

4.5.2 Project Analysis

The following section evaluates potential impacts to cultural resources that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment C, *Cultural and Paleontological Resources Identification Memorandum* (Cultural Memorandum). The *Cultural Memorandum* was prepared to fulfill the requirements of GPU PEIR MM CUL-4.

Based on the *Cultural Memorandum*, the Project Site does not contain any historical resources as defined by CEQA Guidelines Section 15064.5(a). Three buildings would be demolished as part of the proposed Project, but they are not historic in age (i.e., 50 years old). As discussed in the *Cultural Memorandum*, aerial photographs indicate that the two buildings on the Project Site east of Susan Street were constructed between 1980 and 1987. The third building was constructed between 1987 and 1992. Thus, no impacts would occur with regards to historical resources.

A records search of the Project Site and a half-mile search radius identified five resources within the Project area, none of which are located within or adjacent to the Project Site. An archaeological field survey conducted in February 2024 identified two marine shell scatters along the northeast of the Project Site's vacant parcel; none of the shell observed on-site showed any sign of burning or other cultural modification. No prehistoric artifacts were observed, either within or outside the shell scatters anywhere on the Project Site. Based on the results of the field survey, a follow-up visit occurred to conduct limited subsurface testing to understand the origin of the shell scatters and determine whether the shell is an archaeological resource. Based on the collective evidence from the geotechnical trenching and the archaeological shovel test pits, it was concluded that the shell scatters do not constitute an archaeological site. All the observed shell and shell fragments are unmodified. All the documented shell and shell fragments were located at or within 10 cm of the surface, within artificial fill. No prehistoric artifacts were observed anywhere in the Project Site. The collective evidence is that the shells and shell fragments were brought in with imported fill and dumped at the site relatively recently. Thus, the shell scatters are not part of a prehistoric deposit and are not historical resources as defined by CEQA Section 15064.5(a).

The Project would redevelop a 10.2-acre office park and develop an approximately 5.6-acre vacant field. Construction activities would include excavation and grading, which could disturb unknown archaeological resources. The majority of the excavation for the proposed buildings would require over-excavation for the building pads at a depth of approximately 5 to 8 feet. Trenches for utility connections would require a maximum excavation depth of 14 feet. Based on the *Cultural Memorandum*, sensitivity for cultural resources consisting of archaeological sites is considered low at and near the surface, but increases to moderate with depth. Geologic and soils maps indicate that the Project area contains surficial deposits of younger Quaternary alluvial sediments. These sediments have the potential to contain buried archaeological deposits. The late nineteenth to early twentieth century bed of the Santa Ana River was located approximately 0.6 miles to the northwest and would have provided abundant resources to area inhabitants. As the river meandered and changed its course, it or its tributaries may have been located closer to the Project area at times. These conditions heighten the sensitivity of the Project area for buried cultural resources.

However, the Project area has an extensive history of recent disturbances. East of Susan Street, the Project Site is entirely developed by the construction of multi-storied office buildings, a pond, and parking lots. Building methods at the time, and the installation of associated utilities, would have resulted in the disturbance of archaeological sites buried at shallow depths. West of Susan Street, geotechnical testing indicates that a layer of imported fill, ranging from 3 to 4.5 feet thick, covers the entire Project Site. Nevertheless, buried resources may remain in areas where developments such as parking lots or structures with shallow foundations have required only minimal ground disturbance, or below the existing imported fill. Therefore, the sensitivity of the Project area at the surface and near surface is low due to past disturbances. However, excavations for the Project are anticipated to disturb a large part of the Project Site to points below the level of existing artificial fill and other disturbances and the sensitivity for potential buried prehistoric archaeological sites is moderate in these undisturbed soils. Therefore, consistent with the GPU PEIR, the proposed Project would implement GPU PEIR MM CUL-7 which would require

a qualified archaeologist be retained on-call. Upon implementation of GPU PEIR MM CUL-7, impacts related to archaeological resources would be less than significant.

As discussed above, the Project Site is located in an urbanized area and most of the site has been previously graded and developed. Therefore, the potential for uncovering human remains on the Project Site is low. Therefore, similar to the conclusion in the GPU PEIR, compliance with California Health and Safety Code Section 7050.5 (RR CUL-1) and Public Resources Code Section 5097.98 would ensure that Project impacts to human remains would be less than significant.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts to historical resources would be significant and unavoidable and impacts to archaeological resources and human remains would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.5.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR CUL-1 and Mitigation Measure CUL-7, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe cultural resource impacts than anticipated by the GPU PEIR.

4.5.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR CUL-1 California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the proposed project site, disturbance of the site shall halt and remain halted until the coroner has investigated the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

MM CUL-4[17] For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards in either prehistoric or historic archaeology.

Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed

[17] The Cultural and Paleontological Resources Identification Memorandum (Attachment C) was prepared to fulfill the requirements of GPU PEIR MM CUL-4.

for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.

MM CUL-7[18] If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.

4.6 Energy

4.6.1 GPU PEIR Findings

The GPU PEIR determined that implementation of the General Plan Update would result in temporary demands for electricity, diesel fuel, and gasoline due to the development of projects under the General Plan Update. Due to the temporary nature of construction, energy uses from construction equipment, haul trucks, and construction employee vehicles would cease upon the completion of a project. The GPU PEIR also states that compliance with Section 2449 of 13 California Code of Regulations (CCR) Article 4.8, Chapter 9 would minimize nonessential idling of construction equipment, minimizing excessive energy consumption. Additionally, construction activities and development proposed due to the General Plan Update would be similar in nature to existing projects within the City. The GPU PEIR also determined that the operation of new developments due to the implementation of the General Plan Update would result in additional demands for electricity and natural gas compared to existing conditions. Nevertheless, future developments would be required to comply with the most recent Building Energy Efficiency Standards and CALGreen, which would reduce the overall energy demands. In addition to the Building Energy Efficiency Standards and CALGreen, the GPU PEIR also determined that compliance with goals and policies within the General Plan Update would increase energy efficiency and reduce wasteful use of energy resources. In addition, implementation of the General Plan Update would result in an overall decrease in VMT and fuel usage for gasoline-powered vehicles but would result in an increase of diesel-powered, natural gas-powered, and electric-powered vehicles. Overall, the GPU PEIR determined that the implementation of the General Plan Update would not result in excessive and inefficient energy use upon

[18] The Cultural and Paleontological Resources Identification Memorandum (Attachment C) did not identify any potentially significant archaeological resources, and determined that sensitivity for buried archaeological resources is low at the surface but increases to moderate in undisturbed deposits.

implementation of General Plan Update goals and policies and compliance with applicable regulations (i.e., Building Energy Efficiency Standards, CALGreen, and California's Renewable Portfolio Standards [RPS]). Moreover, the GPU PEIR determined that the implementation of the General Plan Update would comply with the California RPS program and the City's Climate Action Plan (CAP). Compliance with these regulatory documents ensure that the General Plan Update would not conflict or obstruct a state or local plan for renewable energy or energy efficiency. Thus, the GPU PEIR determined that impacts of energy use would be less than significant.

4.6.2 Project Analysis

The following section evaluates potential impacts on energy that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment D, *Energy Assessment*. The analysis focuses on the two sources of energy that are relevant to the proposed Project: electricity and transportation fuel for vehicle trips associated with Project operations as well as the fuel necessary for Project construction.

CONSUMPTION OF ENERGY

Project construction would require temporary energy consumption primarily using fuel for construction equipment, construction worker vehicle trips to and from the Project Site, and the import and export of earth materials to and from the Project Site by heavy trucks. For operation, the proposed Project would require energy use in the form of electricity and fuel consumption; the proposed Project would not utilize natural gas. For the purposes of this analysis, the proposed Project's electricity consumption is compared against existing conditions and the net change is compared to the total consumption in Orange County (County) in 2022, the latest year consumption data is available.

Based on the *Trip Generation Assessment for the Proposed South Coast Technology Center Project* (Trip Generation Assessment; *Attachment K*), the proposed Project would result in an operational trip generation that would be less than the existing conditions. However, the Project's estimated trip generation would result in a fleet mix that utilizes more 2-, 3-, and 4-axle trucks than the existing conditions. These trucks use diesel with a lower miles per gallon efficiency rate and longer trip lengths, resulting in higher diesel fuel consumption. Table 4.6-1, *Net Change in Energy Consumption*, shows the net change of the Project's energy consumption compared to existing conditions. As shown in Table 4.6-1, due to the different fleet mix (more medium- and heavy-duty trucks) compared to existing conditions, the Project would result in higher fuel consumption.

Table 4.6-1
Net Change in Energy Consumption

Energy Type[1]	Existing Energy Consumption	Project Energy Consumption	Project Net Change[2]
Electricity	3,691 MWh	5,703 MWh	2,012 MWh
Natural Gas[3]	45,123 therms	0 therms	-45,123 therms
Fuel			
Operational Fuel Consumption (Gasoline)	154,292 gallons	132,393 gallons	-21,900 gallons
Operational Fuel Consumption (Diesel)	11,624 gallons	392,103 gallons	380,479 gallons

Notes:
1. Construction was not analyzed in this table as the existing conditions does not include construction energy consumption.
2. Numbers my be slightly off due to rounding.
3. The Project would not utilize natural gas, and as such, the net change is negative.

Source: Refer to Appendix A of Attachment D, *Energy Assessment*, for CalEEMod outputs and assumptions used in this analysis.

Table 4.6-2, *Project and Countywide Energy Consumption*, compares the Project's net change in estimated energy consumption with the County's annual energy consumption.

Table 4.6-2
Project and Countywide Energy Consumption

Energy Type	Project Net Change Energy Consumption[1]	Orange County Annual Energy Consumption[2]	Percentage Increase Countywide
Electricity Consumption[3]	2,012 MWh	20,243,721 MWh	0.0099%
Fuel Consumption			
Construction Off-Road Fuel Consumption (Diesel)[4]	34,671 gallons	14,182,623 gallons	0.2445%
Construction On-Road Fuel Consumption (Gasoline)	91,239 gallons	1,142,034,463 gallons	0.0080%
Construction On-Road Fuel Consumption (Diesel)	14,159 gallons	135,727,658 gallons	0.0104%
Operational Fuel Consumption (Gasoline)	-21,900 gallons	1,088,796,204 gallons (Gasoline)	-0.0020%
Operational Fuel Consumption (Diesel)	380,479 gallons	136,337,459 gallons	0.2791%

Notes:

1. Project electricity consumptions as modeled in California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model. Project fuel consumption calculated based on CalEEMod results. Countywide operational fuel consumption, off-road construction equipment diesel fuel consumption, and on-road fuel consumption are from CARB EMFAC2021.
2. The Project's increase in electricity consumption is compared to the total consumption in Orange County in 2022, the latest year with data available. The Project increases in construction off-road and on-road fuel consumption are compared with the projected Orange County off-road fuel consumption and Orange County on-road fuel consumption in 2024, respectively. The Project's operational automotive fuel consumption is compared with the projected countywide on-road fuel consumption in 2026.
3. Orange County electricity consumption data source: California Energy Commission, Electricity Consumption by County, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed March 1, 2024.
4. Construction Off-Road Diesel Fuel Consumption is based on the County's Mining/Construction Sector's fuel consumption in 2024 from CARB EMFAC Off-Road.

Source: Refer to Appendix A of Attachment D, *Energy Assessment*, for CalEEMod outputs and assumptions used in this analysis.

As shown in Table 4.6-2, the Project's net change of operational electricity usage would constitute an approximate 0.0099 percent increase over the County's typical annual electricity consumption. The Project would not involve natural gas consumption, and therefore would result in a net decrease of natural gas consumption. The Project would consume nominal electricity and natural gas would not be consumed during construction. The Project's off-road construction equipment would use diesel and would increase the County's mining/constructions sector's diesel fuel consumption by approximately 0.2445 percent. The Project's on-road gasoline and diesel consumption during construction (hauling trips, vendor trips, and worker trips) would increase the County's gasoline and diesel consumption by approximately 0.0080 percent and 0.0104 percent, respectively. Based on the *Trip Generation Assessment*, the Project operations would generate approximately 386 fewer average daily trips compared to the existing conditions. However, as discussed, the Project would generate more trips from medium- and heavy-duty trucks than existing conditions, which use diesel with a lower mile per gallon efficiency rate and longer trip lengths, resulting in higher diesel fuel consumption. The Project's net change operational diesel fuel consumption would increase the County's diesel consumption by 0.2791 percent, and the Project's net change in operational gasoline would reduce the County's gasoline consumption by 0.0020 percent. Therefore, Project operation would not substantially increase Orange County's annual fuel consumption. As such, the Project's construction and operational energy consumption would be nominal compared to the County's consumption.

Construction

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Construction of the Project would not consume natural gas.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coating. As shown in Table 4.6-2, the proposed Project's off-road fuel consumption (diesel) and on-road fuel consumption (diesel and gasoline) from construction would be approximately 34,671 gallons, 14,149 gallons, and 91,239 gallons, respectively. Consequently, the Project's off-road construction equipment diesel fuel consumption and on-road construction fuel consumption (diesel and gasoline) would increase Orange County's consumption by 0.2445 percent, 0.0104 percent, and 0.008 percent, respectively (when compared to the total consumption in 2022).

During construction, the proposed Project would demolish the existing structures on-site and construct a temporary staging ground for equipment and resources. The temporary staging ground may include mobile office trailers and equipment (computers, lighting, electrical outlets, etc.) that may consume electricity. However, the electricity consumption during construction would be nominal and temporary. As such, Project construction would have a minimal effect on the local and regional energy supplies (fuel and electricity) and would not require additional capacity. Additionally, the proposed Project would comply with RR E-1, requiring that heavy-duty diesel equipment not in use for more than five minutes be turned off, as well as the latest U.S. Environmental Protection Agency (USEPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Thus, additional energy conservation would occur during construction. Moreover, due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Substantial reductions in energy inputs for construction materials can be achieved by selecting green building materials composed of recycled materials that require less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. Further, it is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources. Overall, consistent with the GPU PEIR, construction of the proposed Project would result in a less than significant impact related to wasteful, inefficient, and unnecessary consumption of energy.

Operation

Transportation Energy Demand

According to the *Trip Generation Assessment*, the proposed Project would generate approximately 1,544 total gross daily trips, and would result in approximately 386 fewer average daily trips compared to the existing conditions. However, as discussed above, the Project would result in a fleet mix that would include more medium- and heavy-duty trucks that use diesel with a lower mile per gallon efficiency rate and longer trip lengths, which would result in higher diesel fuel consumption. As indicated in Table 4.6-2, the Project would increase operational diesel fuel consumption by 380,479 gallons, but would result in a net reduction in gasoline consumption of approximately 21,900 gallons compared to existing conditions. The Project's net change in operational diesel fuel consumption would increase the County's diesel consumption by 0.2791 percent. The Project's net change in operational gasoline consumption would reduce the County's gasoline consumption by 0.0020 percent. The Project would not substantially increase the County's existing diesel and gasoline consumption. Furthermore, the Project does not propose any unusual features that would result in excessive long-term operational fuel consumption.

The key drivers of transportation-related fuel consumption for the proposed Project would be heavy-duty trucks traveling to and from the Project Site and passenger vehicle and light- and medium-duty trucks trips. At the time of this analysis, it has not been determined if the ultimate tenants for the proposed buildings would operate their own fleet; most warehouse operators have no control over the trucks entering and exiting their facilities. Consequently, it is infeasible to require trucks with particular emission profiles (e.g., zero-emission [ZE], near-zero-emission [NZE], or 2010 or beyond model year trucks) for Project operations. However, the Project would be required to comply with SCAQMD Rule 2305 for warehouse uses.

The Project would also consume fuel in the form of employees driving to and from the Project Site. Employee commuting factors are outside of the scope of the design of the proposed Project. Notwithstanding, the Project would include approximately 39 electric vehicle (EV) parking spaces with electrical charging stations installed; the Project would also include 27 short- and long-term bicycle parking spaces, all of which would be in compliance with the CALGreen Code. This requirement would encourage and support alternative modes of travel and thus reduce the petroleum fuel consumption. Therefore, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Overall, fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Consistent with the GPU PEIR, impacts would be less than significant.

Building Energy Demand

The proposed buildings would be fully powered by electricity and no natural gas would be consumed. As shown in Table 4.6-2, operational energy (electricity) consumption from the proposed Project would represent an approximately 0.0099 percent increase over the 2022 countywide electricity consumption, which would be significantly below California Energy Commission's energy consumption forecast. Therefore, the proposed Project would not require additional energy capacity or supplies beyond what was analyzed for the GPU PEIR. Additionally, the proposed Project would consume energy during the same time periods as other commercial and light industrial developments and would consume energy evenly throughout the day. Thus,

the proposed Project would not result in unique or more intensive peak or base period electricity demand.

The proposed Project would comply with RR E-3, requiring new buildings to achieve the current California Building Energy and Efficiency Standards and comply with the CALGreen Code. Moreover, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent. Title 24 Building Energy Efficiency Standards are updated every 3-year and become more stringent between each update, as such, complying with the most current Title 24 standards would make the proposed Project more energy efficient than the existing buildings built under the earlier versions of the Title 24 standards. Additionally, the proposed Project would comply with RR E-4 and install high efficiency appliances.

The electricity provider for the City, Southern California Edison, is subject to California's RPS reflected in Senate Bill (SB) 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 44 percent by the end of 2024, 52 percent by the end of 2027, 60 percent of total procurement by 2030, and 100 percent of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources. Therefore, by using electricity from SCE, the Project would be in compliance with RR E-5. As a result, the Project would ensure that energy consumption would be kept to a minimum through high efficiency lighting, energy efficient appliances, and potential on-site renewable energy production (i.e., solar-ready roofs).

Therefore, consistent with the GPU PEIR, the Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or conservation. A less than significant impact would occur in this regard.

Impact Summary

Based on the above, the Project's impact related to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation would be less than significant. Project construction and operation would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to energy consumption would be less than significant. Therefore, no new project-specific mitigation measures are required.

CONSISTENCY WITH APPLICABLE ENERGY PLANS

State and regional plans for renewable energy and energy efficiency include the California Energy Commission's Integrated Energy Policy Report (IEPR), Title 24 standards and CALGreen Code, California's RPS, and the City's CAP. As discussed above, the net change in operational electricity consumption from the proposed Project would represent an approximately 0.0099 percent increase in electricity consumption over the current countywide usage, which would be significantly below California Energy Commission's forecasts in the 2023 IEPR (i.e., forecasted baseline electricity consumption grows at a rate of about 1.7 percent annually through 2040); refer to *Table 4.6-2*. Therefore, the Project would be consistent with the California Energy Commission's 2023 IEPR. Further, the proposed Project would exceed the most current Title 24 (2022 Title 24) by approximately 10 percent. The Project would also comply with the CALGreen Code which requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, HVAC, and plumbing fixtures), divert construction

waste from landfills, and incorporate electric vehicles charging infrastructure. Specifically, the Project would install energy efficient appliances and high efficiency appliances. Implementation of the most current Title 24 standards would substantially reduce energy usage. Additionally, per the RPS, the Project would utilize electricity that would achieve 60 percent of total procurement by 2030, and 100 percent renewable energy by 2045. As such, the Project would comply with state energy plans including the 2023 IEPR, the most current Title 24, as well as the CALGreen Code, and California's RPS. In addition, the Project's proposed industrial use is consistent with the Project Site's Industrial land use designation in the City's General Plan. Therefore, the proposed Project would be consistent with the City's General Plan Update, including the goals and policies related to energy and energy efficiency. As discussed above, the GPU PEIR determined that the City's General Plan Update is consistent with California's RPS and the City's CAP for reducing energy usage and implementing energy efficiency, and impacts would be less than significant. Moreover, the Project would be required to comply with RR E-1 through RR E-1 identified in the GPU PEIR. Therefore, since the proposed Project is consistent with the General Plan Update, the Project would also be consistent with California's RPS and the City's CAP.

Therefore, consistent with the GPU PEIR, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant. Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to the conflict or obstruction of a state or local plan for renewable energy or energy efficiency would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.6.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR E-1 through RR E-5 and RR E-7, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe energy impacts than anticipated by the GPU PEIR.

4.6.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR E-1 Construction activities will be conducted in compliance with California Code of Regulations Section 2485, which requires that nonessential idling of construction equipment be restricted to five minutes or less.

RR E-2 At least 65 percent of all nonhazardous construction and demolition waste from nonresidential construction associated with future development in the plan area shall be recycled and/or salvaged for reuse in line with the 2016 California Green Building Standards Code Section 5.408 (California Code of Regulations, Title 24, Part 11).

RR E-3 New buildings implemented as part of the General Plan Update are required to achieve the current California Building Energy and Efficiency Standards (California Code of Regulations, Title 24, Part 6) and California Green Building Standards Code (California Code of Regulations, Title 24, Part 11).

RR E-4 Any appliances associated with development in the Plan Area shall meet the requirements of the 2012 Appliance Efficiency Regulations.

RR E-5 Development under the General Plan Update shall support the goals of the renewables portfolio standard, SB 350, and SB 100 to achieve a tiered increase in the use of renewable energy to 60 percent by 2030, and 100 percent by 2045.

RR E-7 Development under the General Plan Update shall be in compliance with state and local solid waste regulations including AB 939, AB 341, AB 1327, AB 1826, and Section 5.408 of 2016 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11).

4.7 Geology and Soils

4.7.1 GPU PEIR Findings

The GPU PEIR concluded that future development under the General Plan Update would be subject to potential seismic-related hazards including strong seismic ground shaking, seismic-related ground failure (including liquefaction), and landslides. Further, development associated with the General Plan Update could result in unstable geologic unit or soil conditions, including soil erosion, expansive soils, settlement and collapse, and subsidence. However, implementation of RR G-1, through RR G-3 would reduce impacts to less than significant levels. Specifically, RR G-1 and RR G-2 require development to comply with the most recent version of the California Building Code and SAMC Chapter 8, *Buildings and Structures*, and RR G-3 requires all buildings or structures within the City that require plumbing fixtures to be connected to a public sewer per SAMC Section 39-51, *Mandatory Connections*. The GPU PEIR also concluded that development under the General Plan Update could impact known and unknown paleontological resources through grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past. Therefore, GPU PEIR MM GEO-1 through MM GEO-3 require monitoring based on the sensitivity level of sites for paleontological resources. Overall, the GPU PEIR concluded that implementation of regulatory requirements and MM GEO-1 through MM GEO-3 would reduce geology and soil impacts to less than significant levels.

4.7.2 Project Analysis

The following section evaluates potential impacts to geology and soils that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment E-1, *Geotechnical Design Report*, Attachment E-2, *Geotechnical Review of Shallow Groundwater and Potential Dewatering during Grading and Construction* (Groundwater Memorandum), and Attachment C, *Cultural and Paleontological Resources Identification Memorandum* (Cultural Memorandum).

The Project Site is located in a seismically active area, as is most of southern California. However, the Project Site is not located within a state-designated Alquist-Priolo Fault Hazard Zone. No active faults are known to cross the Project Site. The nearest fault to the Project Site is the San Joaquin Hills Blind Thrust Fault, located approximately 2.6 miles south of the site. The potential for ground rupture due to an earthquake is considered very low. However, the site is located in a seismic hazard zone for liquefaction potential. According to the *Groundwater Memorandum*, although the design high groundwater in the area is 5 feet deep based on historic levels in the area, the existing shallow groundwater at the Project Site is currently 10 to 15 feet deep based on borings, trenches and other data. Thus, groundwater is not expected to be encountered during excavation activities for the proposed buildings. Wet soil and some groundwater are generally anticipated only for the sewer connection excavation in the street. Based on the subsurface investigation performed as part of the *Geotechnical Design Report*, types of soils that underlie the site (clayey, silty, sandy alluvium) and the depth of groundwater, the risk for liquefaction at the

Project Site was deemed low to moderate and the risk for lateral spread was determined to be low. Additionally, based on the laboratory test results and a visual classification of the on-site soils, the expansion potential of the soils vary from very low to medium; however, clayey soils onsite may have a high expansion potential. Consistent with the GPU PEIR, implementation of RR G-1 and RR G-2 would reduce impacts related to liquefaction, soil expansion, collapse, and subsidence to less than significant levels. Moreover, the proposed Project would be constructed based on the recommendations of the ***Geotechnical Design Report***. Based on the above analysis, and consistent with the GPU PEIR, with compliance with existing regulations, the Project's impacts related to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, lateral spreading, subsidence, and collapse would be less than significant. As such, no new project-specific mitigation measures are required.

Construction of the proposed Project would involve ground-disturbing activities that could result in erosion. As further discussed in Section 4.10, ***Hydrology and Water Quality***, the proposed Project would comply with regulatory requirements, such as the Construction General Permit and implementation of a Water Quality Management Plan, during construction and operation, which would reduce the potential for erosion to occur. Consistent with the General Plan, compliance with existing regulations including implementation of regulatory requirements would ensure the proposed Project would not result in a significant impact related to erosion. No new or substantially more severe impacts would occur compared to the determinations of the GPU PEIR, and no new project-specific mitigation measures are required.

In compliance with RR G-3, construction and operation of the proposed Project would not involve the use of septic tanks or alternative wastewater disposal systems. As such, compliance with existing regulatory requirements would ensure no impact related to the use of such systems would occur.

With regards to paleontological resources, in compliance GPU PEIR MM GEO-2, consultation with a paleontologist confirmed that project-related grading could occur at depths that could encounter highly sensitive sediments for paleontological resources. Based on the ***Cultural Memorandum***, geologic units underlying the Project area have been mapped as Holocene alluvial deposits (Qal), late Holocene to late Pleistocene-age young Quaternary deposits (Qya), Holocene to late Pleistocene-age young axial-channel deposits (Qya_s), and Holocene to late Pleistocene-age young alluvial deposits (Qya). Deposits from the Holocene epoch (less than 11,700 years ago) can contain remains of animals and plants; however, only those from the middle to early Holocene (older than about 5,000 radiocarbon years) are considered scientifically important or significant. Holocene-age deposits may overlie older alluvium of Pleistocene age at unknown but potentially shallow depths. Pleistocene-age alluvial deposits are also potentially present in the Project area and have yielded scientifically important fossils elsewhere in the region, including horses, camels, reptiles, birds, marine mammals, and fish at various depths below current ground surface. Moreover, based on a records search of the Natural History Museum of Los Angeles County and a supplemental investigation of online sources, 13 fossil localities were identified within five miles of the Project Site. Thus, while the Holocene-age deposits in the Project area have low sensitivity, Pleistocene-age alluvial sediments may underlie these younger sediments at a relatively shallow depth. The records search results indicate that potentially fossil-baring units may underlie the Project area, since Pleistocene-age deposits outside of the Project area have contained fossils. Therefore, sediments in the Project area are considered to have paleontological sensitivity increasing with depth, or low-to-high sensitivity, suggesting that project-related ground-disturbing activities have the potential to destroy or otherwise adversely impact significant paleontological resources below young Holocene-age soils at unknown depths within the Project

area. Therefore, in compliance GPU PEIR MM GEO-2, the proposed Project would conduct spot-check monitoring during construction to identify potential fossils and the lithological transition to Pleistocene sediments. If Pleistocene-aged sediments are discovered at depth, monitoring shall transition to full-time as ground-disturbing activities occur at or below this identified depth because these Pleistocene units have been identified as high sensitivity for paleontological resources. Additionally, the proposed Project would comply with GPU PEIR MM GEO-3, which requires work be halted within a 50-foot radius in case of a fossil discovery. Consistent with the GPU PEIR, less than significant impacts related to paleontological resources would occur after the implementation of GPU PEIR mitigation measures.

4.7.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR G-1 and RR G-2, MM GEO-2, and MM GEO-3 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to geology and soils than anticipated by the GPU PEIR.

4.7.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR G-1 Every public agency enforcing building regulations must adopt the provisions of the California Building Code (CBC), which is Title 24, Part 2 of the California Code of Regulations. The most recent version is the 2019 CBC (effective January 1, 2020). The CBC is updated every three years and provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC also contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with specified probability of occurring at a site.

RR G-2 Santa Ana Municipal Code, Chapter 8, Buildings and Structures. These codes address grading standards, excavation, and fills. This also includes compliance with regulations for unreinforced masonry structures in accordance with "Unreinforced Masonry Law," found in California Government Code §§ 8875 et seq. The City of Santa Ana Building Official may place additional requirements upon the construction of infrastructure, buildings, and other improvements based on the findings from plan check, soils testing, and geotechnical investigations.

RR G-3 Santa Ana Municipal Code Section 39-51 requires that all buildings or structures within the city that require plumbing fixtures must be connected to a public sewer.

MM GEO-2[19] Low-to-High Sensitivity. Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity (see Figure 5.6-3), the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity,

[19] The Cultural and Paleontological Resources Identification Memorandum (Attachment C) was prepared in part to fulfill the requirements of GPU PEIR MM GEO-2.

construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.

MM GEO-3 All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.

4.8 Greenhouse Gas Emissions

4.8.1 GPU PEIR Findings

According to the analysis the GPU PEIR, if project greenhouse gas (GHG) emissions are below the annual 3,000 metric tons of carbon dioxide equivalents ($MTCO_2e$) bright-line screening threshold, GHG emissions impacts would be considered less than significant. The GPU PEIR determined that buildout of the General Plan Update would result in a net decrease of 255,878 $MTCO_2e$ of GHG emissions (12 percent decrease in GHG emissions) from existing conditions and would not exceed the annual 3,000-$MTCO_2e$ SCAQMD bright-line screening threshold. In addition, the GPU PEIR determined that buildout of the General Plan Update would decrease GHG emissions per service population from 4.8 $MTCO_2e$ per capita for the existing baseline year to 3.5 $MTCO_2e$ per capita in horizon year 2045, despite an increase in population and employment in the City; this reduction in GHG emissions is attributed to regulations adopted to reduce GHG emissions and turnover of California's on-road vehicle fleets. However, the GPU PEIR also analyzed the potential for conflict with the GHG reduction goals established under Executive Order S-03-05, which required a statewide GHG emissions reduction from existing conditions to achieve a 40-percent reduction by 2030 and an 80-percent reduction by 2050. For the buildout year of the General Plan Update of 2045, the goal would be a 70-percent reduction compared to 2020 levels. Accordingly, the GPU PEIR determined that, even though implementation of the General Plan Update would result in a decrease in GHG emissions in 2045 from existing baseline year, the reduction would only be 12 percent and would not meet the long-term GHG reduction goal of 70 percent under Executive Order S-03-05. The GPU PEIR included a mitigation measure to require the City to update the CAP every 5 years to ensure that the City is tracking and monitoring its GHG emissions to chart a trajectory to achieve the long-term year 2050 GHG reduction goal set by Executive Order S-03-05. Nonetheless, because the City has not established a plan past 2030 that identifies major advancement in technology to allow the City to meet the goal of the executive order, the GPU PEIR concluded that impacts would be significant and unavoidable. The GPU PEIR also acknowledged that the mitigation measure (GPU PEIR MM GHG-1) is not a project-specific mitigation measure or directly related to development projects.

Related to consistency with applicable GHG plans, the GPU PEIR acknowledged that the General Plan includes goals and policies that were adopted for the purpose of reducing GHG emissions, including those that (1) would help reduce GHG emissions and achieve GHG reduction goals, (2) target transportation management and land use planning that would result in VMT reduction throughout the City, and (3) support sustainable practices that would encourage the use of renewable energy sources and reduction in energy consumption. Accordingly, the GPU PEIR concluded that the General Plan Update would not obstruct implementation of the CARB Scoping

Plan, SCAG 2020-2045 RTP/SCS, the City's CAP, and, as such, impacts related to consistency with plans, policies, and regulations adopted for the purpose of reducing GHG emissions would be less than significant.

4.8.2 Project Analysis

The following section evaluates the potential GHG impacts that would result from implementation of the proposed Project. This analysis is primarily based upon Attachment F, *Greenhouse Gas Emissions Assessment*.

SIGNIFICANCE CRITERIA AND METHODOLOGY

The significance determination for Impact 5.7-1 of the GPU PEIR focused on whether programmatic buildout of the General Plan Update would meet the long-term GHG reduction goal under Executive Order S-03-05, which does not fully align with the project-specific analysis presented below. However, as mentioned in the GPU PEIR, if specific project developments would result in emissions below the 3,000 $MTCO_2e$ bright-line threshold, impacts would be considered less than significant.

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions, whether a project's emissions exceeds an applicable significance threshold, and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

However, CEQA Guidelines Section 15064.4 does not establish a threshold of significance. CEQA Guidelines Section 15064.7 provides lead agencies the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, if any threshold chosen is supported by substantial evidence. The City has adopted a CAP; however, the CAP does not contain a numerical significance threshold for assessing impacts related to GHG emissions. Similarly, the SCAQMD, the Governor's Office of Planning and Research, CARB, California Air Pollution Control Officers Association (CAPCOA), or any other state or applicable regional agency has yet to adopt a numerical significance threshold for assessing GHG emissions that is applicable to the Project. The SCAQMD formed a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents and was proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is the lead agency as of the last Working Group meeting (Meeting No.15) held in September 2010; the Working Group identified a "bright-line" screening-level threshold of 3,000 $MTCO_2e$ annually for new development projects in the residential/commercial sectors and a threshold of 10,000 $MTCO_2e$ annually for industrial projects, which includes construction emissions amortized over 30 years and added to operational GHG emissions. However, the proposed thresholds were based on the State's GHG emissions reduction goal identified in Assembly Bill (AB) 32 for the year 2020, which is outdated, and SCAQMD never formally adopted the 3,000 $MTCO_2e$ threshold for new residential and commercial projects. The 10,000 $MTCO_2e$ threshold was adopted for industrial projects where SCAQMD is the lead agency.

Impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources, and therefore, a numerical significance threshold for individual development projects is speculative. Throughout the State, air districts are moving from numerical significance

thresholds to qualitative significance thresholds that focus on project features to reduce GHG emissions or consistency with GHG reduction plans. For example, in the Bay Area Air Quality Management District (BAAQMD) 2022 CEQA Guidelines, the GHG thresholds of significance are either whether land use projects include certain project design elements related to buildings and transportation or whether the project is consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). This is a major update to BAAQMD's 2017 CEQA Guidelines, where a numerical significance threshold was required. To reduce GHG emissions impact, it is more effective for development projects to include project features that directly or indirectly reduce GHG emissions, than relying on a numerical significance threshold, which is highly dependent on the type and size of the development.

Therefore, the significance of the Project's potential impacts regarding GHG emissions and climate change is assessed solely on its consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change and the Project's ability to incorporate sustainable features and strategies from such plans and policies in its design to reduce GHG emissions. The analysis has also quantified the Project's GHG emissions and compared them to the SCAQMD bright-line screening thresholds for informational purposes.

It should be noted that individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. As a result, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. According to CEQA Guidelines Section 15064(h)(1), "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, and plans or regulations for the reduction of GHG emissions. Therefore, a lead agency can make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

PROJECT-RELATED GHG EMISSIONS

As discussed above, the Project's GHG emissions are quantified for informational purposes only as neither the City, nor any other public agency, has an applicable numeric significance threshold for GHG emissions. CalEEMod was used to model the GHG emissions from existing buildings and to calculate project-related GHG emissions, including direct and indirect GHG emissions. Table 4.8-1, *Existing Greenhouse Gas Emissions*, presents the current GHG emission from the existing buildings.

Table 4.8-1
Existing Greenhouse Gas Emissions

Source	CO_2	CH_4	N_2O	Refrigerants	CO_2e
	Metric Tons/Year[1]				
Direct Emissions					
Mobile Source	1,401.00	0.07	0.06	2.54	1,423.00
Area Source	6.76	< 0.005	< 0.005	0.00	6.79
Refrigerants	0.00	0.00	0.00	0.07	0.07
Total Direct Emissions	***1,407.76***	***0.07***	***0.06***	***2.61***	***1,429.86***
Indirect Emissions					
Energy	1,130.00	0.08	0.01	0.00	1,134.00
Water	63.30	1.03	0.02	0.00	96.60
Solid Waste	14.80	1.48	0.00	0.00	51.70
Total Indirect Emissions	***1,208.10***	***2.59***	***0.03***	***0.00***	***1,282.30***
Total Existing Emissions	***2,712.16 $MTCO_2e$***				

Notes:

1. Emissions calculated using CalEEMod Version 2022.1; totals may be slightly off due to rounding.

Source: Refer to Appendix A of Attachment F, *Greenhouse Gas Emissions Assessment*, for assumptions used in this analysis

The proposed Project would result in GHG emissions during both construction and operation. Construction of the proposed Project is anticipated to take approximately 16 months to complete. The construction activities would include demolition, grading, building construction, paving, and architectural coating. Table 4.8-2, *Project's Greenhouse Gas Emissions*, presents the estimated GHG emissions associated with the proposed Project.[20]

Table 4.8-2
Project's Greenhouse Gas Emissions

Source	CO_2	CH_4	N_2O	Refrigerants	CO_2e
	Metric Tons/year[1]				
Direct Emissions					
Construction (amortized over 30 years)[2]	32.83	<0.01	<0.01	0.02	33.43
Mobile Source[3]	5,022.00	0.27	0.63	6.29	5,223.00
Area Source	6.59	<0.01	<0.01	0.00	6.62
Refrigerants	0.00	0.00	0.00	14.00	14.00
Total Direct Emissions	**5,060.46**	**0.27**	**0.63**	**20.31**	**5,277.05**
Indirect Emissions					
Energy	1,376.00	0.09	0.01	0.00	1,381.00
Water	134.00	2.21	0.05	0.00	205.00
Solid Waste	8.99	0.90	0.00	0.00	31.50
Total Indirect Emissions	**1,518.99**	**3.20**	**0.06**	**0.00**	**1,617.50**
Total Project-Related Emissions	***6,894.55 $MTCO_2e$***				

Notes:

1. Emissions calculated using CalEEMod Version 2022.1; totals may be slightly off due to rounding.
2. Total Project construction GHG emissions equate to 1,003 $MTCO_2e$. Value shown is amortized over the lifetime of the proposed Project (assumed to be 30 years).
3. Based on the *Trip Generation Assessment* prepared by Linscott, Law & Greenspan Engineers (dated January 2, 2024), the Project would result in a net decrease of 386 gross daily trips compared to existing conditions; refer to Attachment K. Nonetheless, zero additional trips are inputted for a conservative analysis.

Source: Refer to Appendix A of Attachment F, *Greenhouse Gas Emissions Assessment*, for assumptions used in this analysis

[20] Modeling was performed for a project with three industrial buildings totaling 325,044 square feet. However, since the completion of the modeling, the total building square footage has been reduced to 313,244 square feet. Therefore, the Project's GHG emissions inventory is conservative.

The Project's GHG emissions are compared to the current GHG emissions from the existing buildings. Table 4.8-3, *Net Change In Greenhouse Gas Emissions*, presents the estimated net change in GHG emissions from the proposed Project compared to the existing conditions.

Table 4.8-3
Net Change in Greenhouse Gas Emissions

Source	Metric Tons/Year
Total Existing Emissions[1]	2,712.16 $MTCO_2e$
Total Project-Related Emissions[2]	6,894.55 $MTCO_2e$
Net Change in Emissions[3]	4,182.39 $MTCO_2e$ per year

Notes:

1. Based on numbers presented in Table 4.8-1, *Existing Greenhouse Gas Emissions*.
2. Based on numbers presented in Table 4.8-2, *Project's Greenhouse Gas Emissions*.
3. To determine the net emissions resulting from the proposed Project, emissions from the existing conditions was deducted from emissions from the proposed Project (which includes construction emissions as shown in Table 4.8-2).

Source: Refer to Appendix A of Attachment F, *Greenhouse Gas Emissions Assessment*, for assumptions used in this analysis

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. The proposed Project would result in a total of 1,003 $MTCO_2e$ of emissions during construction. The analysis considers the net change in GHG emissions (proposed Project minus existing conditions). However, the existing conditions does not include any construction activities. Construction GHG emissions are amortized over 30 years (i.e., total construction emissions divided by the lifetime of the Project, assumed to be 30 years), then added to the operational emissions, as recommended by SCAQMD.[21] The amortization takes into consideration the temporary nature of construction activities. As shown in Table 4.8-2, construction of the proposed Project would generate approximately 33.43 $MTCO_2e$ of emissions per year when amortized over 30 years.

Mobile Source. Based on the Attachment K, *Trip Generation Assessment*, the Project would result in a net decrease of 386 gross daily trips compared to existing conditions. The existing buildings currently generate approximately 1,423 $MTCO_2e$ of mobile source emissions per year while the proposed Project would generate approximately 5,223 $MTCO_2e$ of mobile source emissions per year; refer to Table 4.8-1 and Table 4.8-2. Additionally, as a conservative analysis, daily trips on weekends were assumed to be zero under the existing conditions, as the existing uses on-site are commercial offices and are assumed not to operate on weekends. As such, the net increase in GHG emissions from mobile emissions would be approximately 3,800 $MTCO_2e$ of emissions per year.

Area Source. Area source emissions would be generated due to an increased demand for consumer products, architectural coating, and landscaping associated with the development of the proposed Project. The existing buildings currently generate approximately 6.79 $MTCO_2e$ of area source emissions per year while the proposed Project would generate approximately 6.62 $MTCO_2e$ of area source emissions per year; refer to Table 4.8-1 and Table 4.8-2. As such, the net change in GHG emissions from area sources would result in a net decrease of 0.17 $MTCO_2e$ of emissions per year (i.e., the proposed Project would result in less area source emissions than the existing conditions).

[21] The Project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008).

Refrigerants. Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are hydrofluorocarbons or blends thereof, which can have high global warming potential values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a global warming potential that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimate. The use of refrigerants in the existing buildings currently generates approximately 0.07 $MTCO_2e$ of emissions per year while the proposed Project would generate approximately 14.00 $MTCO_2e$ of emissions per year; refer to Table 4.8-1 and Table 4.8-2. As such, the net increase in GHG emissions from refrigerants would be approximately 13.93 $MTCO_2e$ of emissions per year.

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. The proposed Project would construct and operate three new Class A industrial buildings for office, manufacturing, and/or warehouse use. According to the Project applicant, the proposed buildings would not consume natural gas during operation. Additionally, according to the Project applicant, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent; however, as a conservative analysis, this project design feature was not incorporated in the modeling. The 2022 Title 24 provides minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Additionally, the Project would also include solar-ready roofs for all buildings. The energy consumption of the existing buildings currently generates approximately 1,134.00 $MTCO_2e$ of emissions per year while the energy consumption of the proposed Project would generate approximately 1,381.00 $MTCO_2e$ of emissions per year; refer to Table 4.8-1 and Table 4.8-2. As such, the net increase in GHG emissions from energy consumption would be approximately 247.00 $MTCO_2e$ of emissions per year.

Water Demand. According to CalEEMod, the existing buildings consume approximately 31,641,228 gallons of indoor water per year, and 1,040,873 gallons of outdoor water per year (i.e., for landscaping). The Project would consume approximately 67,762,532 gallons of indoor water per year, and 593,833 gallons of outdoor water per year (i.e., for landscaping). The Project would install water-efficient irrigation systems and drought-tolerant landscaping, as accounted for in CalEEMod. The existing water demand currently generates approximately 96.60 $MTCO_2e$ of emissions per year while the water demand for the proposed Project would generate approximately 205.00 $MTCO_2e$ of emissions per year; refer to Table 4.8-1 and Table 4.8-2. As such, the net increase in GHG emissions from water demand would be approximately 108.40 $MTCO_2e$ of emissions per year.

Solid Waste. The existing buildings currently generate approximately 51.70 $MTCO_2e$ of emissions per year from solid waste while the proposed Project would generate approximately 31.50 $MTCO_2e$ of emissions per year; refer to Table 4.8-1 and Table 4.8-2. As such, the net change in GHG emissions from solid waste would result in a net decrease of 20.20 $MTCO_2e$ of emissions per year (i.e., the proposed project would result in less emissions from solid waste than the existing conditions).

Total Net Change in Greenhouse Gases

As shown in Table 4.8-3, the total net change in GHG emissions for the proposed Project and existing conditions from direct and indirect sources combined would be approximately 4,182.39 $MTCO_2e$ per year. This net change in GHG emissions would exceed the SCAQMD 3,000 $MTCO_2e$ per year screening threshold previously postulated, but not adopted, for residential or commercial development and would not exceed the SCAQMD 10,000 $MTCO_2e$ per year threshold for stationary sources and industrial developments. However, the 3,000 $MTCO_2e$ threshold was never formally adopted by SCAQMD and is not applicable to the Project since it is not a new development in the residential or commercial sector. Further, although adopted by SCAQMD, the 10,000 $MTCO_2e$ threshold is also not directly applicable to the Project since SCAQMD is not the lead agency. As such, these thresholds are discussed in this analysis for informational purposes. Moreover, the significance of the Project's potential impacts regarding GHG emissions and climate change is not determined by the SCAQMD bright-line screening thresholds, but by the Project's consistency with applicable plans, which is discussed in more detail below.

CONSISTENCY WITH APPLICABLE PLANS

Since the certification of the GPU Final PEIR, CARB has adopted the 2022 Scoping Plan. As discussed above, although SCAG has approved the Connect SoCal 2024, CARB has not certified it and the GPU PEIR analyzed consistency with SCAG's 2020-2045 RTP/SCS. Furthermore, the GPU PEIR analyzed consistency with the 2020-2045 RTP/SCS. As such, to be consistent with the GPU PEIR, this assessment analyzes the Project's consistency with the 2020-2045 RTP/SCS. Accordingly, the proposed Project is evaluated for consistency with the CARB 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's GPU and CAP, as presented below.

Consistency with the 2022 Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Provided in Table 4.8-4, *Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors*, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.[22] As shown therein, the proposed Project would be consistent with the applicable GHG emission reduction strategies contained in the 2022 Scoping Plan.

[22] Not all actions contained in the 2022 Scoping Plan are included in the analysis as they are not applicable to the Project. The Project is not an aviation, port, rail, oil and gas, petroleum refining, energy generating, food producing, industrial, agricultural, or retrofit project.

Table 4.8-4
Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent**. Based on the *Trip Generation Assessment* provided as Attachment K, the proposed Project would result in less operational trips than those from existing land uses. In particular, the proposed Project would result in 1,212 passenger vehicle trips (employee commuting) compared to the existing 1,930 average daily trips. The proposed Project would also include 27 short-term and 27 long-term bike parking spaces as well as electric vehicle (EV) charging stations in accordance with Title 24 standards. Additionally, the Project would include vanpool/carpool parking spaces in accordance with a CALGreen voluntary measure (Appendix A5, Nonresidential Voluntary Measures). As such, the proposed Project would encourage alternative modes of transportation and would include land uses that would reduce total VMT. Thus, the Project would be consistent with the action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent.** The Project would be all electric and would not consume natural gas. Furthermore, the Project would exceed Title 24 standards by 10 percent which would reduce energy consumption. As such, the proposed Project would be consistent with this action.
Construction Equipment	
Achieve 25% of energy demand electrified by 2030 and 75% electrified by 2045	**Not Applicable.** The City of Santa Ana has not adopted an ordinance or program requiring electricity-powered construction equipment. However, if adopted, the proposed Project would be required to comply with such regulation. As such, the proposed Project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent**. SB 1383 establishes targets to achieve a 50 percent reduction in the level of Statewide organic waste disposal from 2014 levels by 2020 and a 75 percent reduction by 2025. The law establishes an additional target that no less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The Project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383. As such, the Project would be consistent with this action.
Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.	

Consistency with the 2020-2045 RTP/SCS

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional VMT and GHG reduction goals, as required by the State. Table 4.8-5, *Consistency with the 2020-2045 RTP/SCS*, provides a consistency analysis of the Project with these five 2020-2045 RTP/SCS strategies. As shown therein, the proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS. As mentioned above, the latest 2024-2050 RTP/SCS was adopted on April 4, 2024. However, CARB concluded that the technical methodology SCAG used to quantify the GHG emission reductions for the Connect 2024-2050 RTP/SCS does not operate

accurately. SCAG is currently working on updating the technical methodology and resubmitting for CARB's review. Until CARB approves the methodology, the 2024-2050 RTP/SCS is not a fully adopted document, especially from the GHG reduction perspective of the proposed strategies. As such, the consistency analysis relies upon the 2020-2045 RTP/SCS. Nevertheless, the Project is located in a HQTA and supports alternative transportation methods and electric vehicles by providing supporting infrastructure and facilities on-site, which would ensure the Project's consistency with the strategies in the 2024-2050 RTP/SCS.

Table 4.8-5
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** Transit Priority Areas (TPAs) are defined in the 0.5-mile radius around an existing or planned major transit stop or an existing stop along a HQTA. A HQTA is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours. As stated above, the Project is located within an HQTA.[1] The Project Site is located in a highly developed and urbanized area of Santa Ana, and within walking and biking distance of existing residential and commercial uses that would contribute to reduction in VMT and associated GHG emissions. Specifically, the Project Site is located within walking distance (approximately 300 feet) to the nearest bus stops along West MacArthur Boulevard. In addition, the Project would provide bicycle parking spaces and electric vehicle (EV) charging stations in accordance with CALGreen Code. The Project would also revitalize the Project Site by removing the underutilized office park and developing industrial/warehousing uses on-site. Therefore, the Project would focus growth near destinations and mobility options. Thus, the Project would be consistent with this reduction strategy.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.**	**Not Applicable.** The Project Site does not include existing residential development; existing uses on-site include an approximately 10.2-acre office park, Lake Center Office Park, and an approximately 5.6-acre vacant field west of the existing buildings.

Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**HQTA, TPAs, NMA, Livable Corridors.**	**Consistent.** As detailed above, the Project would install EV charging stations and bicycle parking spaces in accordance with the most current and applicable Title 24 standards and CALGreen Code. Additionally, the Project would include vanpool/carpool parking spaces in accordance with a CALGreen voluntary measure (Appendix A5, *Nonresidential Voluntary Measures*). Further, the Project would also include solar-ready roofs for all buildings. Therefore, the proposed Project would leverage technology innovations to promote alternative modes of transportation and help the City, County, and State meet their GHG reduction goals. The Project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** As previously discussed, the proposed Project is located within an HQTA. The Project would support sustainable development implementation that would reduce GHGs by installing EV charging stations and providing bicycle parking spaces to promote alternative modes of transportation. Further, the Project would comply with sustainable practices included in the most current and applicable Title 24 standards and CALGreen, including the installation of high efficiency lighting, water efficient landscaping, low-flow water fixtures, among others. Thus, the Project would be consistent with this reduction strategy.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape	**Green Region, Urban Greening, Greenbelts and Community Separators.**	**Consistent.** The proposed Project is located in an urbanized area and would not interfere with regional wildlife connectivity or convert agricultural land. According to the Project applicant, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent, which would help reduce energy consumption and reduce GHG emissions. Additionally, the Project would include solar-ready roofs for all buildings. Thus, the Project would

• Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space		support resource efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.

Note:

1. Southern California Association of Governments, *High Quality Transit Areas (HQTA) 2045 – SCAG Region*, https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areas-hqta-2045-scag-region/explore?location=34.058231%2C-118.364678%2C13.71, accessed April 8, 2024.

Source: Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.

Consistency with the City of Santa Ana General Plan

The Conservation Element of the General Plan Update contains various goals and policies aimed at reducing the health hazards from air pollution, reducing overall GHG emissions in the City, and minimizing the impacts of climate change. Table 4.8-6, *Consistency with the Santa Ana General Plan Update*, provides a consistency analysis of the Project with applicable goals and policies. As shown therein, the proposed Project would be consistent with the GHG emission reduction goals and policies contained in the City's General Plan Update.

Table 4.8-6
Consistency with City of Santa Ana General Plan Update

Goals and Policies	Project Consistency Analysis
Goal CN-1: Air Quality and Climate. Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.	
Policy CN 1.2 Climate Action Plan. Consistency with emission reduction goals highlighted in the Climate Action Plan shall be considered in all major decisions on land use and investments in public infrastructure.	**Consistent**. The Project would be consistent with the goals listed in the Climate Action Plan; refer to the discussion below. As such, the Project is consistent with this policy.
Policy CN 1.4 Development Standards. Support new development that meets or exceeds standards for energy-efficient building design and site planning.	**Consistent.** According to the Project plans, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent, which would help reduce energy consumption and reduce GHG emissions. Additionally, the Project would also include solar-ready roofs for all buildings. Upon conformance with applicable regulations, the Project would be consistent with this policy.
Policy CN 1.7 Housing and Employment Opportunities. Improve the City's jobs/housing balance ratio by supporting development that provides housing and employment opportunities to enable people to live and work in Santa Ana.	**Consistent.** The proposed Project would involve the construction of three new Class A industrial buildings for office, manufacturing, and/or warehouse uses that would introduce employment opportunities in the City. As such, the Project is consistent with this policy.

Goals and Policies	Project Consistency Analysis
Policy CN 1.8 Promote Alternative Transportation. Promote use of alternate modes of transportation in the City of Santa Ana, including pedestrian, bicycling, public transportation, car sharing programs and emerging technologies.	**Consistent.** The proposed Project is located in an urbanized environment and would include short- and long-term bicycle parking and would construct EV charging stations in accordance with the most current and applicable Title 24 standards and CALGreen, as well as provide vanpool/carpool parking spaces. Additionally, the Project Site would be served by existing bus stops along West Macarthur Boulevard, which could encourage the use of public transportation. As such, the Project is consistent with this policy.
Policy CN 1.12 Sustainable Infrastructure. Encourage the use of low or zero emission vehicles, bicycles, non-motorized vehicles, and car-sharing programs by supporting new and existing development that includes sustainable infrastructure and strategies such as vehicle charging stations, drop-off areas for ridesharing services, secure bicycle parking, and transportation demand management programs.	**Consistent.** The Project would incorporate features that would encourage the use of sustainable forms of transportation. As previously discussed, the Project would construct short- and long-term bicycle parking spaces, EV charging stations, and vanpool/carpool parking spaces. Additionally, the Project Site would be served by existing bus stops along West Macarthur Boulevard, which could encourage the use of public transportation. As such, the Project is consistent with this policy.
Goal CN-3: Energy Resources. Reduce consumption of and reliance on nonrenewable energy, and support the development and use of renewable energy sources.	
Policy CN-3.5 Site Design. Encourage site planning and subdivision design that incorporates the use of renewable energy systems.	**Consistent.** According to the Project applicant, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent, which would help reduce energy consumption and reduce GHG emissions. Additionally, the Project would also include solar-ready roofs for all buildings. As such, the Project would be consistent with this policy.
Policy CN 3.5 Landscaping. Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.	**Consistent.** The proposed Project would incorporate landscaping throughout the site, primarily along the perimeter of the site and parking lot. The Project would also provide a small, publicly accessible pocket park along West Lake Center Drive. Outdoor patios have also been proposed for each building. As such, the Project would be consistent with this policy.
Policy CN-3.7 Energy Conservation Design and Construction. Incorporate energy conservation features in the design of new construction and rehabilitation projects.	**Consistent.** According to the Project plans, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent, which would help reduce energy consumption and reduce GHG emissions. Additionally, the Project would include solar-ready roofs for all buildings. As such, the Project would be consistent with this policy.
Goal CN-4: Water Resources. Conserve and replenish existing and future water resources.	
Policy CN 4.1 Water Use. Encourage and educate residents, business owners, and operators of public facilities to use water wisely and efficiently.	**Consistent.** The proposed Project would incorporate features that would reduce water usage. Specifically, the Project would include low-flow fixtures that would reduce excessive use of water throughout the Project Site, water efficient irrigation, and incorporate drought-tolerant plants. As such, the Project would be consistent with these policies.
Policy CN 4.2 Landscaping. Encourage public and private property owners to plant native or drought-tolerant vegetation.	
Policy CN 4.4 Irrigation Systems. Promote irrigation and rainwater capture systems that conserve water to support a sustainable community.	

Goals and Policies	Project Consistency Analysis
Goal M-5 Sustainable Transportation Design. A transportation system that is attractive, safe, state-of-the-art, and supports community, environmental, and conservation goals.	
Policy M-5.6 Clean Fuels and Vehicles. Encourage the use of alternative fuel vehicles and mobility technologies through the installation of supporting infrastructure.	**Consistent.** The Project would construct short- and long-term bicycle parking spaces and EV charging stations to encourage the use of alternative fuel vehicles. As such, the Project is consistent with this policy
Source: City of Santa Ana, *Golden City Beyond, Santa Ana General Plan*, May 26, 2022.	

Consistency with the City of Santa Ana Climate Action Plan

The City's CAP recommends measures that would achieve GHG reductions including installation of solar photovoltaic systems and compliance with Title 24 energy efficiency standards. The Project proposes to revitalize the SD-58 by constructing three new Class A industrial buildings for office, manufacturing, and/or warehouse uses. The proposed Project would be consistent with the applicable measures listed in the CAP by incorporating energy efficient features (i.e., energy efficient lighting, energy efficient appliances, and on-site renewable energy production capabilities) and water efficient features (i.e., low-flow fixtures, drought-tolerant landscaping, and water efficient irrigation). The proposed Project would also comply with SB 1383 for waste reduction. According to the Project plans, the proposed Project would exceed the most current Title 24 (i.e., 2022 Title 24) by approximately 10 percent, which would help reduce energy consumption and reduce GHG emissions. Additionally, the Project would include solar-ready roofs for all buildings. As further described in Table 4.8-7, *Consistency with the Santa Ana Climate Action Plan*, the Project would be consistent with the City's CAP.

Table 4.8-7
Consistency with the Santa Ana Climate Action Plan

Goals	Project Consistency Analysis
Transportation and Land Use Measures	
Measure: Local Employment Nodes near Residential and Retail Areas.	**Consistent.** The proposed Project would replace an existing office complex with three new Class A industrial buildings for office, manufacturing, and/or warehouse use. The Project Site is located within a portion of the City designated for Industrial (IND) use in the City's General Plan. However, residential uses exist approximately 800 feet to the south of the site and 850 feet to the east of the site, providing for both proximity of residents to the Project's employment opportunities and a buffer between the proposed industrial use and existing residential uses. Therefore, the proposed Project is consistent with this measure.
Measure: End-of-trip Facilities in New Projects.	**Consistent.** According to the City's CAP, end-of-trip facilities include bike lockers, showers and changing rooms that would be used by cyclists. Installation of these end-of-trip facilities would encourage the use of bicycles as a form of transportation. The proposed Project is located in an urbanized environment and would include short- and long-term bicycle parking and would construct EV charging stations in accordance with the most current and applicable Title 24 standards and CALGreen, as well as provide vanpool/carpool parking spaces. As such, the proposed Project would be consistent with this measure.
Measure: Design Guidelines for External Bike/Pedestrian/Transit Connectivity.	**Consistent.** As previously discussed, the proposed Project is located in an urbanized environment and would include short- and long-term bicycle parking. The proposed Project includes internal walkways that would connect to existing sidewalks on West Lake Center Drive and South Susan Street. Such public sidewalks provide access to existing bus stations along West MacArthur Boulevard. As such, the proposed Project would be consistent with these measures.
Measure: Design Guidelines for Internal Bike/Pedestrian/Transit Connectivity.	

Goals	Project Consistency Analysis
Community-wide Energy Measures	
Measure: Property Assessed Clean Energy (PACE) Financing for Commercial Properties.	**Consistent.** As discussed in the City's CAP, PACE is an energy efficiency financing program that promotes the implementation of energy efficient features and renewable energy generation by providing financing opportunities for commercial property owners. The proposed Project would exceed the requirements of the most current and applicable Title 24 standards, which include energy efficiency standards. As such, development of the proposed Project could utilize PACE financing to help implement the energy efficiency standards as required in the most current and applicable Title 24 standards. Therefore, the proposed Project would be consistent with the CAP's measures related to PACE financing.
Measure: Solar Photovoltaic Systems – New Private Installs.	**Consistent.** As discussed above, the proposed Project would include solar-ready roofs for all buildings and would exceed Title 24 standards by 10 percent. As such, the proposed Project would be consistent with this goal.
Measure: Benchmarking and Retro-commissioning.	**Consistent**. This measure directs the City to develop an ordinance requiring that all nonresidential buildings larger than 10,000 square feet report their Energy Star Portfolio Manager results every seven years, and that buildings with a score of less than 75 must complete retro-commissioning. When this measure becomes applicable, the Project buildings would be required to comply with it. As such, the proposed Project would be consistent with this measure.
Measure: Title 24 Energy Efficiency Standards – Commercial.	**Consistent.** As previously discussed, the proposed Project would exceed Title 24 requirements by 10 percent. As such, the proposed Project would be consistent with this measure.
Solid Waste, Water, and Wastewater Measures	
Measure: AB 341 Commercial and Multifamily Recycling.	**Consistent.** The proposed Project would implement a recycling system in accordance with state and local regulations, including the mandatory commercial recycling under AB 341. Additionally, the proposed Project would comply with SB 1383, which aims to recycle or compost 75 percent of waste by 2025. As such, the proposed Project would be consistent with this measure.
Measure: Food Waste Digestion.	**Consistent.** SB 1383 establishes targets to achieve a 50-percent reduction in the level of Statewide organic waste disposal from 2014 levels by 2020 and a 75-percent reduction by 2025. The law establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The proposed Project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383. As such, the proposed Project would be consistent with this measure.
Measure: Rainwater Harvesting.	**Consistent.** As discussed, the proposed Project includes water efficient irrigation and drought-tolerant plants in the landscaping plans. The proposed Project would also reduce the amount of turf currently on the Project Site. As such, the proposed Project would be consistent with this measure.
Measure: Turf Removal.	**Consistent.** As discussed in the City's CAP, natural turf is one of the most water-intensive features of landscaping. The removal of natural turf would help reduce overall water consumption in the City. As discussed, the proposed Project includes water efficient irrigation and drought-tolerant plants in the landscaping plans. The proposed Project would also reduce the amount of turf currently on the Project Site. As such, the proposed Project would be consistent with this measure.
Source: City of Santa Ana, *Santa Ana Climate Action Plan*, adopted December 2015.	

Consistency Conclusion

As discussed, the significance determination for GHG emissions is based solely on consistency with applicable statewide, regional, and local climate change mandates, plans, policies, and regulations. As demonstrated in the above analysis, the Project's characteristics render it consistent with statewide, regional, and local climate change mandates, plans, policies, and regulations. More specifically, the GHG plan consistency analyses provided above demonstrates that the proposed Project would comply with the regulations and GHG reduction goals, policies, actions, measures, and strategies outlined in the 2022 Scoping Plan, Connect SoCal, the City's General Plan, and the City's CAP. Consistency with these plans would reduce the impact of the Project's incremental contribution to GHG emissions. Accordingly, the Project would not conflict with any applicable plan, policy, regulation, or recommendation adopted for the purpose of reducing GHG emissions. As the proposed Project is consistent with statewide, regional, and local GHG reduction plans, the proposed Project would also be consistent with the State's long-term goal to achieve statewide carbon neutrality (zero-net emissions). Accordingly, impacts related to GHG emissions resulting from the proposed Project would be less than significant and would be less when compared to the impacts disclosed in the GPU PEIR, which were determined to be significant and unavoidable even with implementation of mitigation for GPU PEIR Impact 5.7-1 and less than significant for GPU PEIR Impact 5.7-2. Therefore, no new project-specific mitigation measures are required.

4.8.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR GHG-1, RR GHG-2, RR GHG-3, and RR GHG-7, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe GHG impacts than anticipated by the GPU PEIR.

4.8.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR GHG-1 New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11). The 2019 Building and Energy Efficiency Standards were effective on January 1, 2020. The Building Energy and Efficiency Standards and CALGreen are updated tri-annually.

RR GHG-2 Construction activities are required to adhere to California Code of Regulations, Title 13, Section 2499, which restricts nonessential idling of construction equipment to five minutes or less.

RR GHG-3 New buildings are required to adhere to the California Green Building Standards Code and Water Efficient Landscape Ordinance requirements to increase water efficiency and reduce urban per capita water demand.

RR GHG-7 California's Green Building Standards Code (CALGreen) requires the recycling and/or salvaging for reuse at minimum of 65 percent of the nonhazardous construction and demolition waste generated during most "new construction" projects (CALGreen §§ 4.408 and 5.408). Construction contractors are required to submit a construction waste management plan that identifies the construction and

demolition waste materials to be diverted from disposal by recycling, reuse on the project, or salvaged for future use or sale and the amount (by weight or volume).

4.9 Hazards and Hazardous Materials

4.9.1 GPU PEIR Findings

As stated in the GPU PEIR, the General Plan Update does not introduce any general or heavy industrial uses anywhere in the City in comparison to existing conditions. The GPU PEIR concluded that buildout of the proposed General Plan Update would include construction activities and operations that would transport, use, or dispose of hazardous materials in proximity to existing environmental justice (EJ) communities (i.e., disadvantaged communities), existing sensitive receptors, and proposed new sensitive receptors. Such activities could create a significant hazard to the public or the environment given the proximity of hazardous materials sites which are considered open cases, existing lead-contaminated soils, existing buildings containing asbestos-containing materials (ACM) and/or lead-based paint (LBP), and existing and planned industrial uses throughout the City. The GPU PEIR also determined that buildout of the General Plan Update would increase the number of hazardous waste generators as there would be an increase in industrial uses. However, impacts related to the use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the USEPA, US Department of Transportation, California Division of Occupational Safety and Health, and the Orange County Health Care Agency (OCHCA), Environmental Health Division. Policies and implementation actions in the General Plan Update specifically target existing land use compatibility issues and aim to prevent any future impacts to new sensitive receptors within EJ communities. Additionally, buildout under the General Plan Update would be required to implement RRs HAZ-1 through RR HAZ-5. Thus, the GPU PEIR determined that impacts related to the routine use, storage, transport, and disposal of hazardous materials, and the accidental release of hazardous materials, would be less than significant.

The GPU PEIR also concluded that development on or adjacent to any sites listed on hazardous materials databases would require an environmental site assessment to ensure that projects would not disturb hazardous materials on any of the hazardous materials sites or plumes of hazardous materials diffusing from one of the hazardous materials sites, and that any proposed development, redevelopment, or reuse would not create a substantial hazard to the public or the environment. With the preparation of an environmental site assessment, impacts related to development on an existing hazardous materials site would be less than significant.

Further, there are parts of the City that are within the vicinity of the *John Wayne Airport Compatibility Land Use Plan* and have height limits due to regulations pertaining to navigable airspace. The GPU PEIR concluded that projects approved under the General Plan Update would be required to comply with existing regulations to ensure consistency with the *John Wayne Airport Compatibility Land Use Plan* and protect navigable airspace. Impacts would be less than significant.

The GPU PEIR concluded that buildout of the General Plan Update would increase square footage, dwelling units, population, and traffic congestion in the City, which could adversely impact evacuation plans. However, as the General Plan Update would not result in substantial changes to circulation patterns and emergency access routes, or interfere with the City's operations for emergency response, impacts related to emergency response would be less than significant.

The GPU PEIR also concluded that no impact would occur related to wildland fire as the City is not within a fire hazard severity zone.

4.9.2 Project Analysis

The proposed Project would develop three new Class A industrial buildings for office, manufacturing, and/or warehouse use on a site that is currently developed with commercial office buildings east of Susan Street and is vacant west of Susan Street. While the proposed Project would introduce new industrial uses to the Project Site, according to GPU PEIR Figure 2-1, *EJ Communities, Neighborhoods, and Focus Areas*, the Project Site is not located within an environmental justice (EJ) community. As such, the proposed Project would not expose EJ communities to hazardous materials and waste. Moreover, although the proposed Project would require an amendment to the SD-58 District to allow for industrial uses, the Project Site's land use designation is already Industrial. Thus, the proposed Project would not introduce any general or heavy industrial uses in the City in comparison to existing conditions.

Construction of the proposed Project would involve demolition, grading, and construction of new buildings. Construction activities would use limited amounts of hazardous materials in the form of paints, solvents, glues, and other common construction materials for the proposed buildings. Construction activities may include the use of machinery and other equipment that require fueling or maintenance/servicing. These types of materials are not acutely hazardous, and all storage, handling, use, transport, and disposal of these would be required to conform to existing laws and regulations of the California Department of Toxic Substances Control (DTSC), USEPA, Occupational Safety & Health Administration (OSHA), and OCHCA, which would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Additionally, the storage, handling, use, transport, and disposal of these hazardous materials would cease once construction is complete. Project compliance with RR HAZ-1 would ensure hazardous materials and hazardous wastes are transported in compliance with any applicable state and federal requirements; RR HAZ-2 would ensure hazardous waste generation, transportation, treatment, storage, and disposal would be conducted in compliance with Subtitle C of the Resource Conservation and Recovery Act (Code of Federal Regulations [CFR], Title 40, Part 263). According to the ***Cultural Memorandum***, the existing buildings were built after the 1980s; refer to Attachment C. Thus, the buildings are not likely to contain ACM and LBP. Nonetheless, demolition of the existing buildings would comply with RR HAZ-4, which would ensure demolition activities that could expose workers or the public to ACMs or LBPs would be conducted in accordance with any applicable state and federal requirements, and RR HAZ-5, which would ensure removal of hazardous materials be conducted as outlined in 29 CFR 1910.120 and 8 CCR 5192. Moreover, based on Attachment G, ***Phase I Environmental Site Assessment***,[23] the vacant parcel to the west of Susan Street does not have any recognized environmental conditions.[24] Therefore, with adherence to existing regulations construction of the proposed Project would result in less than significant impacts related to the use, storage, transport, and disposal of hazardous wastes, as well as related to the accidental release of hazardous materials.

During operation, there is potential for future tenants of the proposed buildings to use hazardous materials and generate hazardous waste. The nearest sensitive receptor is Calvary High School, located to the east of the Project Site. However, any future hazardous materials use, storage,

[23] Attachment G, ***Phase I Environmental Site Assessment*** is comprised of two Phase I reports – one for the vacant parcel and one for the Lake Center Office Park. For the purposes of this document, references to the Phase I Environmental Site Assessment includes both reports.

[24] As defined by ASTM E1527-21, a REC is: "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

transport, or disposal would be required to comply with existing regulations of the USEPA, US Department of Transportation, CalRecycle, and other agencies, consistent with the industrial uses analyzed in the GPU PEIR. Therefore, operation of the proposed Project would result in less than significant impacts related to the use, storage, transport, and disposal of hazardous wastes, as well as related to the accidental release of hazardous materials.

The Project Site is not listed in the State Water Resources Control Board (SWRCB) GeoTracker system which includes leaking underground fuel tank sites and spills, leaks, investigations, and cleanups sites; or the DTSC EnviroStor Data Management System which includes Cortese sites; or the USEPA's database of regulated facilities.[25, 26] As such, consistent with the GPU PEIR, impacts related to hazardous materials sites would be less than significant.

According to Figure 5.8-5, *John Wayne Airport Safety Compatibility Zones*, and Figure 5.8-6, *Height Restrictions per Federal Air Regulations Part 77*, of the GPU PEIR, the Project Site is located outside of the John Wayne Airport's safety compatibility zone and height restriction areas. As such, the proposed Project would not result in a safety hazard or excessive noise for people residing and working in the Project area. No impact would occur.

Construction equipment and materials staging would occur within the Project Site. During construction, vehicular access would be provided via existing access points along Lake Center Drive and South Susan Street. Temporary partial lane closures of Susan Street and Lake Center Drive would be required to resurface the streets; during the resurfacing, access would be maintained. Full lane closures are not anticipated for the proposed Project. Operation of the proposed Project would not result in population growth or changes to the existing circulation system. All driveways would provide adequate space for emergency vehicle access. As such, the proposed Project would not interfere with operations of the City's Emergency Operations Center and would not interfere with operations of emergency response agencies or with coordination and cooperation between such agencies; thus, consistent with the GPU PEIR, impacts to emergency response planning would be less than significant.

The City of Santa Ana is not in a designated fire hazard zone. As such, consistent with the GPU PEIR, no impact related to the risk of wildland fires would occur.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to the transport, use, disposal, and release of hazardous materials; hazardous materials sites; sites located within the vicinity of an airport or in an airport land use plan; and impairment of an emergency response or evacuation plan would be less than significant; and that no impacts would occur related to the risk of wildland fires. Therefore, no new project-specific mitigation measures are required.

[25] California State Water Resources Control Board, GeoTracker, https://geotracker.waterboards.ca.gov/map/, accessed April 25, 2024.
[26] California Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/, accessed April 25, 2024.

4.9.3 Conclusion

The Project is consistent with buildout of the General Plan Update. With implementation of RR HAZ-1, RR HAZ-2, RR HAZ-4, and RR HAZ-5 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to hazards and hazardous materials than anticipated by the GPU PEIR.

4.9.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR HAZ-1 Hazardous materials and hazardous wastes will be transported to and/or from projects developed under the General Plan Update in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.

RR HAZ-2 Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with Subtitle C of the Resource Conservation and Recovery Act (Code of Federal Regulations, Title 40, Part 263), including the management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The projects developed under the General Plan Update will be designed and constructed in accordance with the regulations of the Orange County Health Care Agency, Environmental Health Division, which serves as the designated Certified Unified Program Agency.

RR HAZ-4 Demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials or lead-based paint will be conducted in accordance with applicable regulations, including, but not limited to:

- South Coast Air Quality Management District's Rule 1403
- California Health and Safety Code (Section 39650 et seq.)
- California Code of Regulations (Title 8, Section 1529)
- California Occupational Safety and Health Administration regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])
- Code of Federal Regulations (Title 40, Part 61 [asbestos], Title 40, Part 763 [asbestos], and Title 29, Part 1926 [asbestos and lead]).

RR HAZ-5 The removal of hazardous materials, such as polychlorinated biphenyls (PCBs), mercury-containing light ballast, and mold, will be completed in accordance with applicable regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.

4.10 Hydrology and Water Quality

4.10.1 GPU PEIR Findings

The GPU PEIR concluded that compliance with local, state, and federal regulations and the policies of the proposed General Plan Update would reduce buildout impacts related to groundwater, drainage, hydrology, and water quality. Individual projects would be required to incorporate project-specific source control and treatment Best Management Practices (BMPs), incorporate low impact design (LID)/site design, and comply with applicable regulatory requirements to ensure compliance with regulations governing water quality, including the following:

- Santa Ana Local Implementation Plan [LIP]
- Orange County Drainage Area Management Plan
- Construction General Permit (CGP) Water Quality Order 2009-0009-DWQ for preparation of a Stormwater Pollution Prevention Plan (SWPPP) (RR HYD-1)
- National Pollutant Discharge Elimination System [NPDES] Municipal Separate Storm Sewer System [MS4] Permit from the Santa Ana Regional Water Quality Control Board (RR HYD-4)
- Santa Ana Model Water Quality Management Plan [WQMP]
- Santa Ana Municipal Code (RR HYD-5)
- General Industrial Permit (Order No. CAS000001) for industrial activity (RR HYD-2) preparation of a Water Quality Management Plan).

Additionally, the GPU PEIR determined that projected water demand from the proposed GPU at buildout is well within the projected total water demand for 2040 in the 2015 urban water management plan for normal, dry year, and multiple dry year scenarios. Related to pervious surfaces and runoff, the GPU PEIR also determined peak flows would be decreased overall but an increase of stormwater runoff peak flow rates could result from the introduction of new impervious surfaces. As stated in the GPU PEIR, the City and County have policies in place for reviewing and permitting new developments including requiring detailed hydrology studies. Related to flood hazards, tsunami, and seiche zones, the GPU PEIR determined that impacts would be less than significant due to the low potential for such conditions to occur and the regulations in place to manage flood hazards and minimize flood risks. In summary, the GPU PEIR determined that all impacts related hydrology and water quality would be less than significant and that no mitigation measures were required.

4.10.2 Project Analysis

The Project would redevelop a 10.2-acre office park and develop an approximately 5.6-acre vacant field. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris at the Project Site as well as increase erosion and/or siltation. The proposed Project would be required to comply with various applicable regulatory requirements governing water quality, including the requirements to incorporate project-specific source control and treatment BMPs and the requirements to incorporate low impact design (LID)/site design. For construction, the proposed Project would

comply with the latest CGP (Order No. 2022-057-DWQ) and RR HYD-1, which requires filing a Notice of Intent, a Risk Assessment, a Site Map, a Storm Water Pollution Prevention Plan (the Project Site is larger than one acre) and associated best management practices, an annual fee, and a signed certification statement.

As the Project would introduce a new use to the Project Site (i.e., industrial/warehousing), the proposed Project would be required to comply with the requirements of the General Industrial Permit and RR HYD-2. A preliminary WQMP has been prepared for the proposed Project to comply with the requirements of the County's NPDES Stormwater Program (RR HYD-4) and be consistent with the Orange County Drainage Area Management Plan; refer to Attachment H, *Preliminary Water Quality Management Plan*. The WQMP describes site design and drainage, and structural and non-structural source control BMPs for the proposed Project to ensure water quality standards or waste discharge requirements are not violated, and to prevent substantial erosion or siltation on- or offsite. The proposed Project would also be required to comply with the SAMC regarding prohibitions on illicit connections and discharges, urban runoff control measures, and permit requirements. As a result, consistent with the GPU PEIR, water quality impacts associated with construction and operational activities would be less than significant.

Regarding water demand, the proposed Project is anticipated to require less water than the existing office building use due to a reduction in fixtures; refer to Section 4.19, *Utilities and Service Systems*, for additional details. Thus, the proposed Project would be consistent with the General Plan Update. Regarding pervious surfaces and runoff, according to the Attachment I, *Preliminary Drainage and Hydrological Study* (Drainage Study), prepared by Incledon Consulting Group, dated June 2024, the proposed Project would increase imperviousness but due to modifications in stormwater flow paths within the Project Site, peak runoff produced from the site is expected to decrease or remain the same as existing conditions; refer to *Preliminary Drainage and Hydrological Study*. Additionally, the *Drainage Study* determined that the proposed Project has been designed to effectively capture and convey the Project's storm water to the existing/public systems during a 10-year storm, utilizing a new on-site storm drain system that would collect surface water from the on-site BMP catch basins. The system would continue the flow patterns of the existing conditions by utilizing the street's infrastructure and an on-site storm drain system. Therefore, consistent with the GPU PEIR, impacts would be less than significant.

According to Figure 5.9-4, *City of Santa Ana Flood Zones*, of the GPU PEIR, the Project Site is not within a 100-year flood hazard area as designated by the Federal Emergency Management Agency (FEMA). According to Figure 5.9-5, *Dam Inundation Areas*, of the GPU PEIR, the Project Site is within both the Santiago Creek Dam and Prado Dam inundation areas. However, the Santiago Creek Dam has been assessed by the California Division of Safety of Dams (DSOD) to have no existing or potential dam safety deficiencies and the U.S. Army Corps of Engineers' Dam Safety Program is actively implementing risk-reduction measures to remediate the Prado Dam, including routine inspections and ongoing monitoring, spillway modifications to improve downstream flow, and public outreach, to ensure potential inundation hazards are minimized or eliminated.[27] The GPU PEIR determined that, while seiche theoretically could occur with these reservoirs, the flooding impacts would be less than the inundation zones. The GPU PEIR also determined that the City is too far inland to be at risk of a tsunamis. As such, implementation of

[27] U.S. Army Corps of Engineers, *Corps reclassifies Prado Damn, implements risk-reduction measures*, https://www.spl.usace.army.mil/Media/News-Releases/Article/1849301/corps-reclassifies-prado-dam-implements-risk-reduction-measures/, May 15, 2019.

the proposed Project would result in less than significant impacts related to flood hazard, tsunami, and seiche zones.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to violation of water quality standards or waste discharge requirements; decrease in groundwater supplies or interference with groundwater recharge; alteration of existing drainage patters; flood, tsunami, or seiche risks; and conflicts with or obstruction of a water quality control plan or sustainable groundwater management plan would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.10.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR HYD-1, RR HYD-2, RR HYD-4, and RR HYD-5 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to hydrology and water quality than anticipated by the GPU PEIR.

4.10.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR-HYD-1 All development pursuant to the General Plan Update shall comply with the requirements of the Construction General Permit (Order No. 2012-0006-DWQ)[28] for stormwater discharges associated with construction activity. Compliance requires filing a Notice of Intent, a Risk Assessment, a Site Map, a Storm Water Pollution Prevention Plan and associated best management practices, an annual fee, and a signed certification statement.

RR-HYD-2 All industrial development pursuant to the General Plan Update shall comply with the requirements of the General Industrial Permit (Order No. CAS000001). The General Industrial Permit regulates operators of facilities subject to stormwater permitting, that discharge stormwater associated with industrial activity.

RR HYD-4 All development pursuant to the General Plan Update shall comply with the requirements of the Orange County MS4 Permit (Order R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010 0062). The MS4 Permit requires new development and redevelopment projects to:

- Control contaminants into storm drain systems
- Educate the public about stormwater impacts
- Detect and eliminate illicit discharges
- Control runoff from construction sites
- Implement best management practices and site-specific runoff controls and treatments for new development and redevelopment.

[28] The proposed Project would be subject to the most recent Construction General Permit (Order No. 2022-057-DWQ), which was adopted on September 8. 2022.

RR HYD-5 All development pursuant to the General Plan Update shall comply with the requirements detailed in Chapter 18 Article IV of the Santa Ana Municipal Code.

4.11 Land Use and Planning

4.11.1 GPU PEIR Findings

The GPU PEIR concluded that the General Plan Update's policies would encourage the preservation or enhancement of the existing residential communities through infill development, open space opportunities, and development of compatible uses that would enhance the existing character of the City. A primary goal of the General Plan Update is to preserve and improve the character and integrity of existing neighborhoods and districts; specific policies would reduce the conflict between contrasting land uses and enhance neighborhoods by responsibly integrating new development into existing communities. The General Plan Update would not divide established communities; rather, implementation of the policies in the General Plan Update would ensure the development of cohesive communities. As such, the GPU PEIR concluded that impacts would be less than significant.

Additionally, none of the changes in the General Plan Update would affect plans, policies, or regulations of other agencies that have jurisdiction within the City, including the *Airport Environs Land Use Plan for the John Wayne Airport*, the *Orange County Transportation Authority (OCTA) Congestion Management Plan*, and the *Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). As individual projects are considered by the City, each would be subject to a variety of federal, state, and locally adopted plans designed to mitigate environmental impacts or to preserve important resources. As such, the GPU PEIR concluded that the General Plan Update would not conflict with any applicable land use plan, policy, or regulation and impacts would be less than significant.

4.11.2 Project Analysis

The proposed Project would demolish three buildings and a parking structure to construct three new industrial buildings for office, manufacturing, and/or warehouse use entirely within SD-58. Similar to existing conditions, the Project Site would remain accessible from driveways along Lake Center Drive and South Susan Street. Per RR LU-1, the Project must comply with the applicable provisions of SAMC Chapter 41 (Zoning). Permitted uses in the SD-58 District are professional and business offices and commercial/retail uses. To allow the development of the proposed buildings for industrial use, an amendment to the SD-58 District would be required to allow for industrial uses. In addition, the development standards would be updated to include standards for perimeter fencing and revise parking standards to remove reference to specific numbers. Operational standards would also be included for Limited Light Industrial uses. Additionally, the proposed Project would require a lot merger and site and development plan approval. Although the proposed Project would amend SD-58 to allow for industrial uses, the Project Site's zoning would be consistent with the General Plan land use designation of Industrial. Additionally, the infill development of the portion of the Project Site west of Susan Street would enhance SD-58 by making it more cohesive. The three buildings would be designed in accordance with the updated development standards governing the SD-58 District. Upon approval of the above entitlements, the proposed Project would be consistent with the requirements of the General Plan Update and Project Site's zoning. Furthermore, the Project Site is not within a residential community; it is surrounded by office, commercial, and recreational uses. Therefore, the Project would not divide an established community and impacts would be less than significant, consistent with the conclusion in the GPU PEIR.

As detailed in Table 4.11-1, *General Plan Update Land Use Element Project Consistency Analysis*, the proposed Project would be consistent with the applicable General Plan Update Land Use Element goals and policies.

Table 4.11-1
General Plan Update Land Use Element Project Consistency Analysis

Applicable General Plan Land Use Policies	Project Consistency Analysis
Goal LU-1: Provide a land use plan that improves quality of life and respects our existing community.	
Policy LU-1.1: Foster compatibility between land uses to enhance livability and promote healthy lifestyles.	Consistent. Surrounding uses adjacent to the Project Site include office, commercial, and recreational uses. The Greenville Banning Channel bounds the Project Site to the east and freight rail tracks bound the Project Site to the west. The Project proposes to redevelop the Lake Center Office Park with two new industrial buildings and construct a new industrial building on the vacant parcel west of Susan Street. As discussed previously, the proposed industrial use is consistent with the General Plan Update. The SD-58 District currently includes design standards such as building heights, setbacks, separations, landscaping standards, and signage; and would be amended to include design standards for perimeter fencing and operational standards for the Limited Light Industrial Use to ensure that the Project would be compatible with adjacent and surrounding uses. In addition, the Project would include bicycle parking spaces and EV charging stations, which would promote healthy lifestyles and reduce GHG emissions.
Policy LU-1.8: Ensure that new development projects provide a net community benefit.	Consistent. The Project proposes to redevelop the Lake Center Office Park with two new industrial buildings and construct a new industrial building on the vacant parcel west of Susan Street. The infill development of the western portion of the Project Site would enhance SD-58 by making it more cohesive. As discussed in Section 4.14, *Population and Housing*, the proposed Project would generate 425 employees that would be drawn from the City or region. As the proposed Project would provide additional jobs in the City, it would improve the jobs-housing ratio determined in the GPU PEIR and help offset residential population growth impacts resulting from implementation of the General Plan Update. In addition, the Project would include bicycle parking spaces and EV charging stations to encourage alternative modes of transportation and reduce VMT and GHG emissions. Overall, the proposed Project would provide a net community benefit.
Policy LU-1.9: Evaluate individual new development proposals to determine if the proposals are consistent with the General Plan and to ensure that they do not compound existing public facility and service deficiencies.	Consistent. As discussed throughout this document, the proposed Project would be consistent with the General Plan Update. Additionally, as discussed in Section 4.15, *Public Services*, and Section 4.19, *Utilities and Service Systems*, the proposed Project would result in less than significant impacts to public utilities and infrastructure.
Goal LU-2: Provide a balance of land uses that meet Santa Ana's diverse needs.	
Policy LU-2.1: Provide a broad spectrum of land uses and development that offer employment opportunities for current and future Santa Ana residents.	Consistent. Refer to the response to Policy LU-1.8 above. Overall, the proposed Project would offer employment opportunities for current and future Santa Ana residents.

Table 4.11-1
General Plan Update Land Use Element Project Consistency Analysis

Applicable General Plan Land Use Policies	Project Consistency Analysis
Policy LU-2.7: Support land use decisions that encourage the creation, development, and retention of businesses in Santa Ana.	Consistent. To allow the use of the proposed buildings for industrial use, an amendment to the SD-58 District would be required. As previously discussed, the proposed industrial uses would generate approximately 425 employment opportunities. Thus, approval of the proposed Project would support land use decisions that encourage the creation, development, and retention of new businesses in in the City.
Policy LU-2.8: Encourage land uses, development projects, and public art installations that promote the city's image as a cultural, governmental, and business-friendly regional center	Consistent. Refer to the response to Policy LU-2.7 above. Approval of the proposed Project would support land uses and development projects that promote the City's image as a business-friendly regional center.
Goal LU-3: Preserve and improve the character and integrity of existing neighborhoods and districts.	
Policy LU-3.1: Support new development which provides a net community benefit and contributes to neighborhood character and identity.	Consistent. Refer to response to Policy LU-1.8 above. Overall, the proposed Project would provide a net community benefit.
Policy LU-3.4: Ensure that the scale and massing of new development is compatible and harmonious with the surrounding built environment.	Consistent. The proposed Project would be required to comply with updated development standards governing aesthetics for the SD-58 District, which include building heights, setbacks, separations, landscaping standards, and signage. Other than the addition of development standards for perimeter fencing, the development standards for the SD-58 District remain unchanged with proposed the SD-58 amendment. Additionally, no change in density or building height is proposed for SD-58. The proposed buildings would be consistent with or shorter than the heights of the existing buildings. Overall, the scale and massing of the new development would be compatible with the surrounding built environment.
Policy LU-3.8: Avoid the development of industry and sensitive receptors in close proximity to each other that could pose a hazard to human health and safety due to the quantity, concentration, or physical or chemical characteristics of the hazardous materials utilized, or the hazardous waste an operation may generate or emit.	Consistent. The proposed Project would develop industrial uses at the Project Site. The closest sensitive receptors to the Project Site are the institutional use located approximately 100 feet east of the Project Site and residential uses located approximately 800 feet south of the Project Site. However, as discussed above in Section 4.9, *Hazards and Hazardous Materials*, Project impacts related to the use or, generation, or emission of hazardous waste would be less than significant.
Policy LU-3.9: Improve the health of residents, students, and workers by limiting the impacts of construction activities and operation of noxious, hazardous, dangerous, and polluting uses that are in close proximity to sensitive receptors, with priority given to discontinuing such uses within environmental justice area boundaries.	Consistent. Refer to the response to Policy LU-3.8 above. As discussed in Section 4.9, *Hazards and Hazardous Materials*, the Project Site is not located in an EJ area and impacts related to the use of hazardous materials in close proximity to sensitive receptors would be less than significant. In addition, as discussed in Section 4.3, *Air Quality*, Project impacts related to air pollutant emissions would also be less than significant. In addition, the Project would include bicycle parking spaces and EV charging stations to encourage alternative modes of transportation and reduce GHG emissions.
Goal LU-4: Support a sustainable Santa Ana through improvements to the built environment and a culture of collaboration.	
Policy LU-4.3: Encourage land uses and strategies that reduce energy and water consumption, waste and noise generation, soil contamination, air quality impacts, and light pollution.	Consistent. As discussed throughout this document, the proposed Project would reduce energy and water consumption. Impacts related to waste and noise generation, soil contamination, air quality impacts, and light pollution would be less than significant.
Source: City of Santa Ana, *Golden City Beyond, Santa Ana General Plan Land Use Element*, April 2022.	

In addition, according to Figure 5.8-5, *John Wayne Airport Safety Compatibility Zones*, of the GPU PEIR, the Project Site is not within an airport safety zone. Similarly, according to Figure 5.12-6, *John Wayne Airport Noise Contours*, of the GPU PEIR, the Project Site is not within the 60 dBA CNEL aircraft operation noise contours. Thus, the Project would not conflict with the *Airport Environs Land Use Plan for the John Wayne Airport*. Moreover, as the Project Site is not located near the study intersections for the OCTA Congestion Management Program (i.e., Harbor Boulevard and 1st Street and Harbor Boulevard and Warner Avenue) the proposed Project would not impair implementation of the OCTA Congestion Management Program. As such, the Project would not conflict with any applicable land use plan, policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Based on the above, the proposed Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to physically dividing an established community, and conflicting with applicable land use plan, policy, or regulation would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.11.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR LU-1 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to land use and planning than anticipated by the GPU PEIR.

4.11.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR LU-1 Development associated with the General Plan Update would be designed and constructed in accordance with the applicable provisions of Chapter 41 (Zoning) of the City of Santa Ana Municipal Code. Development within specific plan areas, overlay areas, and specific development districts would implement zoning and development standards that are applicable within these subareas in addition to those in the underlying zoning district.

4.12 Mineral Resources

4.12.1 GPU PEIR Findings

According to the GPU PEIR, the City is mostly mapped as Mineral Resource Zone (MRZ) 3, which is an area where the significance of mineral deposits cannot be determined from available data. The area in the southeast portion of the City is mapped as MRZ-1, which means an area where no significant mineral resources are present or there is little likelihood that significant mineral resources are present. A small area in the northeast corner of the City is mapped as MRZ-2, which means significant mineral resources are known or very likely. However, the City does not have mineral resource sectors or active or inactive mines. Thus, implementation of the General Plan Update would not cause a loss of availability of known mineral resources, and impacts would be less than significant.

4.12.2 Project Analysis

The Project Site is located in the southwestern portion of the City, and is mapped MRZ-3, like most of the City. While the significance of mineral deposits cannot be determined from available data in areas mapped as MRZ-3, the City does not have mineral resource sectors. The Project Site is not used as a mineral extraction operation, has not historically been used for mineral resource extraction, and the proposed Project would not include any mineral extraction. Therefore, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State and would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, specific plan, or other land use plan. Therefore, consistent with the General Plan Update, impacts to mineral resources would be less than significant.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts to mineral resources would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.12.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to mineral resources than anticipated by the GPU PEIR.

4.12.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures

No GPU PEIR regulatory requirements or mitigation measures apply.

4.13 Noise

4.13.1 GPU PEIR Findings

The GPU PEIR concluded that implementation of the General Plan Update has the potential to result in significant temporary and permanent increases of noise levels throughout the City from construction activities and land use development projects. The General Plan Update included regulations designed to protect new sensitive land uses from excessive noise levels, including GPU PEIR MM N-1, which prescribes measures for construction activities. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, the GPU PEIR concluded that construction activities could result in a temporary substantial increase in noise levels above ambient conditions and impacts would remain significant and unavoidable even with mitigation.

The GPU PEIR also identified that buildout of the General Plan Update would result in an increase in traffic along local roadways proximate to existing sensitive receptors and could exceed noise standards on several roadway segments. Although policies identified in the General Plan Update Noise Element and Mobility Element would help to minimize and mitigate traffic noise impacts along several roadway segments, the GPU PEIR conservatively concluded that traffic noise increase on the roadway segments would be significant and unavoidable. However, the GPU PEIR also noted that the identification of program-level impacts does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

The GPU PEIR determined that construction activity would generate varying degrees of ground vibration. GPU PEIR MM N-2, which requires preparation of a noise and vibration analysis for projects requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster), or use of a vibratory roller within 25 feet of any structure, and adherence to associated performance standards, would reduce impacts to a less-than-significant level. The GPU PEIR determined that implementation of GPU PEIR MM N-3, which applies to new residential projects located within 200 feet of existing railroad lines and GPU PEIR MM N-4, which applies to industrial developments, would reduce potential vibration impacts during operation to less than significant levels.

The GPU PEIR determined that future development of noise-sensitive land uses could be located within areas where airport noise exceeds 60 dBA CNEL, but with implementation of the policies in the Noise Element, impacts would be less than significant.

4.13.2 Project Analysis

The following section evaluates potential impacts related to noise and vibration that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment J, *Noise and Vibration Assessment*. The *Noise and Vibration Assessment* was prepared to fulfill the requirements of GPU PEIR MM N-4.

EXISTING CONDITIONS

The Project Site is surrounded by existing commercial and institutional uses to the north, south, and west. The primary sources of stationary noise in the Project vicinity are from urban-related activities (i.e., mechanical equipment and parking areas). Commercial and industrial operations in the Project vicinity can also generate varying degrees of ground vibration, depending on the operational procedures and equipment, which can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Such equipment-generated vibrations spread through the ground and diminish with distance from the source.

The existing noise in the Project vicinity is generated predominately by traffic along surrounding roadways including MacArthur Boulevard, South Susan Street, and Lake Center Drive. These roadways also have the potential to generate vibrations. However, according to the Federal Transit Administration (FTA), it is unusual for vibration from sources, such as buses and trucks, to be perceptible, even in locations close to major roads.[29]

Existing Ambient Noise Levels

Three short-term noise measurements were taken in the Project vicinity on March 12, 2024 to quantify existing ambient noise levels in the Project area. The noise measurement locations are described in Table 4.13-1, *Noise Measurements* and are representative of typical existing noise exposure at the nearest sensitive receptors. The 10-minute measurements were taken between 11:00 a.m. and 12:30 p.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day. The noise measurements were taken during “off-peak” (9:00 a.m. through 3:00 p.m.) traffic noise hours as this provides a more conservative baseline. During rush

[29] Federal Transit Administration, *Noise and Vibration Impact Assessment Manual, Section 5.2, Sources of Transit Ground-borne Vibration and Noise*, September 2018.

hour traffic, vehicle speeds and heavy truck volumes are often low and free-flowing traffic conditions just before or after rush hour often yield higher noise levels.

Table 4.13-1
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	In front of 3626 South Marine Street multifamily residential use	72.6	51.2	87.0	11:07 a.m.
2	Near 3388 Corte Cassis residential use, approximately 200 feet west of the Fairview Road and Sunflower Avenue intersection	68.2	48.5	86.6	11:39 a.m.
3	In front of Calvary Chapel bookstore, approximately 200 feet east from the Lake Center Drive and Susan Street intersection	60.3	52.3	81.0	12:07 p.m.

Notes:

dBA = A-weighted decibels, L_{eq} = Equivalent Sound Level; L_{min} = Minimum Sound Level; L_{max} = Maximum Sound Level, Peak = Highest Instantaneous Sound Level

Source: Michael Baker International, May 18, 2023.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest sensitive receptor to the Project Site is an existing institutional use (Calvary Chapel High School) located approximately 100 feet to the east of the Project Site. The nearest existing residential uses are located approximately 800 feet to the south in the City of Costa Mesa and 850 feet to the east within the City of Santa Ana.

SIGNFICANCE CRITERIA AND METHODOLOGY

Construction and Operational Noise Standards

Neither the City of Santa Ana nor the City of Costa Mesa have a quantitative threshold that applies to noise levels at active construction sites. To evaluate whether the Project would generate potentially significant temporary construction noise levels at off-site sensitive receiver locations, a construction-related noise level threshold from the from the FTA *Transit Noise and Vibration Impact Assessment* criteria will be used. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For residential uses, the daytime noise threshold is 80 dBA L_{eq} averaged over an 8-hour period (L_{eq} (8-hr)) and the nighttime noise threshold is 70 dBA L_{eq} (8-hr). In compliance with the SAMC, construction would not occur during the noise-sensitive nighttime hours. For the purposes of this analysis, the lowest, most conservative construction noise level threshold of 80 dBA L_{eq} is used as an acceptable threshold for construction noise at the nearby sensitive receptor locations. Since this construction-related noise level threshold represents the energy average of the noise source over

a given time, they are expressed as L_{eq} noise levels. Therefore, the noise level threshold of 80 dBA L_{eq} over a period of eight hours or more is used to evaluate the potential project-related construction noise level impacts at the nearby sensitive receptor locations. Noise levels from construction equipment and activities were modeled using the Federal Highway Administration's Roadway Construction Noise Model (RCNM).

Related to operational noise from a stationary source for the City of Santa Ana, a project would result in a significant impact if project-related operational noise levels exceed the daytime exterior 55 dBA L_{eq} and nighttime exterior 50 dBA L_{eq} noise level standard at nearby sensitive receiver locations (based on the exterior noise level standards in SAMC Section 18.312).

The nearest residential uses to the Project Site are located within the City of Costa Mesa. The City of Costa Mesa's residential exterior noise standards are effectively the same as the exterior noise level standards in SAMC Section 18.312,[30] which would be applied when analyzing noise impacts for residential uses. A project would result in a significant impact if project-related operational (stationary-source) noise levels exceed the daytime exterior 55 dBA L_{eq} and nighttime exterior 50 dBA L_{eq} noise level standard at the nearest residential uses.

Construction and Operational Vibration Standards

The FTA *Transit Noise and Vibration Impact Assessment Manual* provides criteria for acceptable levels of groundborne vibration for various types of buildings, which are shown in Table 4.13-2, *Structural Vibration Damage Criteria*. As the nearest sensitive receptor structures to Project Site are institutional uses, the architectural damage criterion for continuous vibrations of 0.3 inch-per-second PPV for engineered concrete and masonry is applied for this Project.

Table 4.13-2
Structural Vibration Damage Criteria

Building Category	Peak Particle Velocity for Continuous Sources (PPV) (inches/second [in/sec])
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineering concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.	

Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. The vibration level at which human annoyance is perceived is 0.2 inch per second peak particle velocity (PPV).[31]

Mobile Noise Threshold

An off-site traffic noise impact typically occurs when there is a discernable increase in traffic and the resulting noise level exceeds an established noise standard. In community noise considerations, changes in noise levels greater than 3 dB are often identified as discernible, while changes less than 1 dB would not be discernible to local residents. A 5-dB change is generally

[30] The residential exterior noise standards in SAMC Section 18.312 are 55 dBA for daytime (7 am – 10 pm) and 50 dBA for nighttime (10 am – 7 pm). The residential exterior noise standards in Costa Mesa Municipal Code Chapter 8 are also 55 dBA for daytime (7 am – 11 pm) and 50 dBA for nighttime (11 am – 7 pm).
[31] California Department of Transportation, *Transportation Related Earthborne Vibrations,* 2002.

recognized as a clearly discernable difference. Thus, the Project would result in a significant noise impact if a permanent increase in ambient traffic noise levels of 3.0 dB occurs upon Project implementation and the resulting noise level at the receiving sensitive receptor exceeds the applicable exterior standard at a noise sensitive use.

PROJECT-GENERATED NOISE IMPACTS

Short-Term Construction Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. The Project involves construction activities associated with demolition, grading, building construction, paving, and architectural coating applications. The Project would be constructed over a duration of approximately 16 months. Ground-borne noise and other types of construction-related noise impacts typically occur during the initial grading phase, which has the potential to create the highest levels of noise. Construction equipment produces maximum noise levels when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, at partial power.

Table 4.13-3, *Noise Levels Generated During Construction Phases* displays the estimated construction noise levels at the nearest sensitive receptors. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment were assumed to operate simultaneously. Results from RCNM also assumes a clear line-of-sight and no other machinery or equipment noise that would mask project-related construction noise. The shielding of buildings and other barriers that interrupt line-of-sight conditions would help further reduce noise levels than what is shown in Table 4.13-3. According to the General Noise Assessment methodology prescribed in the FTA *Transit Noise and Vibration Impact Assessment Manual*, noise can be considered as concentrated at the center of the site. In addition, construction activities would occur across the entire Project Site and therefore the estimated noise levels were calculated from the center of the Project Site. The geographic center of the Project Site is approximately 625 feet from the closest sensitive receptor (institutional use) to the east and approximately 1,000 feet from the nearest residential uses to the south.

Table 4.13-3
Noise Levels Generated During Construction Phases

Phase	Estimated Exterior Construction Noise Level at 625 feet (Center of Project Site) (dba L_{eq})[1]	Estimated Exterior Construction Noise Level at 1,000 feet (Center of Project Site) (dba L_{eq})[1]
Demolition	64.5	60.4
Grading	66.3	62.2
Building Construction	64.3	60.3
Paving	59.7	55.6
Architectural Coating	51.8	47.7

Notes:

1. These noise levels conservatively assume the simultaneous operation of all heavy construction equipment at the same precise location. Modeled heavy construction equipment includes concrete saws, excavators, and dozers during demolition phase, grader, dozers, and backhoes during the grading phase, forklifts, generator, crane, welders, and backhoes during the building construction phase, pavers, paving equipment, rollers, and backhoes during the paving phase, and air compressor during the architectural coating phase.

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006.

As shown in Table 4.13-3 above, the nearest receptors to the Project Site could be exposed to temporary and intermittent construction noise levels ranging from approximately 51.8 to 66.3 dBA L_{eq} at the nearest institutional use to the east and approximately 47.7 to 62.2 dBA L_{eq} at the nearest residential uses to the south. As such, construction noise would not have the potential to exceed the FTA significance of threshold of 80 dBA L_{eq}. In addition, according to SAMC Section 18-314(e), construction activities are exempt from the residential exterior noise control standards upon compliance with the permitted construction hours. As such, construction activities would be required to comply with the construction timings specified in SAMC Section 18-314(e), which restricts construction activities to the daytime hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday.

Compliance with the SAMC construction hours (RR NOI-2) would minimize impacts from construction noise. In addition, the Project is required to comply with the allowable interior noise levels specified in the California Building Code and the CALGreen noise standards pursuant to the requirements of RR NOI-1 and implement GPU PEIR MM N-1, which enforce measures for construction activities such as requiring the use of best-available noise control techniques, the use of hydraulic or electrical impact tools whenever possible, locating stationary equipment and stockpiling as far as feasible from sensitive receptors, limiting construction traffic to approved haul routes, and the use of temporary construction noise barriers.

Therefore, construction impacts resulting from the proposed Project would be less than significant and would be less than the impacts disclosed in the GPU PEIR, which were determined to be significant and unavoidable despite inclusion of mitigation.

Long-term Operational Impacts

Mobile Noise

Operation of the Project would generate vehicle trips on adjacent roadways, thereby potentially increasing vehicular noise in the vicinity of existing and proposed land uses. The most prominent source of mobile traffic noise in the Project vicinity is along Susan Street, Lake Center Drive, and MacArthur Boulevard. According to the California Department of Transportation, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA).[32] As discussed above the Project would generate approximately 386 net fewer total daily trips compared to the existing conditions.[33] As such, as the Project generated traffic volumes would not exceed the traffic volumes of the existing condition, and would not generate additional vehicular noise along adjacent roadways. Project-related traffic noise impacts would be less than significant.

On-Site Noise

The operations of the proposed Project would be typical of a warehousing facility. Stationary noise sources associated with the Project would include noise generated from mechanical equipment, loading dock activities, and slow-moving trucks. Although the nearest noise sensitive use is the institutional use located approximately 100 feet to the east when measured from the property line, the distances to the nearest sensitive receptors would be greater when measured from the

[32] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

[33] Note that the *Trip Generation Assessment* analyzed a project with three industrial buildings totaling 325,044 square feet. However, the total building square footage for the proposed project has been reduced to 313,244 square feet.

proposed on-site stationary sources. Operational noise levels are analyzed at the surrounding nearest sensitive receptors to the east and south.

The Project would install 14 rooftop HVAC units on each warehouse building. Typically, mechanical equipment, such as HVAC units, generate noise levels of 60 dBA (or 84 dBA in sound power level (L_w))[34] at 20 feet from the source.[35] Typical noise associated with loading dock activities would include noise from lift gate operation, backup alarms, load drops, forklifts/pallet jacks, and personnel. Loading dock activity would occur at the western side of Building 1 and the southern side of Building 2 and Building 3. Loading dock activities can typically generate a maximum noise level of approximately 80 dBA in L_w per meter. Another major noise source from a warehousing facility is from slow-moving trucks. According to the proposed truck routes, slow-moving truck activities would occur at the western side of Building 1 and the southern side of Building 2 and Building 3. Slow-moving trucks can typically generate a maximum noise level of approximately 62 dBA in L_w per square meter.

Table 4.13-4, *Operational Noise Levels*, shows the combined long-term operational noise levels from all noise sources occurring simultaneously at the surrounding sensitive receptors.

Table 4.13-4
Operational Noise Levels

Receptor Land Use	Estimated Project Generated Operational Noise Level (dba L_{eq})[1]	Noise Level Criteria (dba L_{eq})[2] (Daytime/Nighttime)	Noise Levels Exceeds Standards?
Residential Uses to the East	35.2	55/50	No
Residential Uses to the South	38.8	55/50	No
Institutional Building to the East	40.7	55/50	No
School Playground to the Southeast	39.5	55/50	No

Notes:
1. Operational noise levels conservatively assume the simultaneous operation of all operational activities at the same time.
2. Noise level criteria are based on the SAMC Section 18.312. For informational purposes, noise level criteria for residential uses in the Costa Mesa Municipal Code Chapter 8 are also 55 dBA for daytime (7 am – 11 pm) and 50 dBA for nighttime (11 am – 7 pm).

Source: SoundPLAN Version 5.1.

As shown in Table 4.13-4, the nearest sensitive receptors surrounding the Project Site would experience noise levels ranging from 35.2 to 40.7 dBA L_{eq} from the Project's operational activities. The Project's operational noise levels would not exceed noise level standards in the SAMC. Furthermore, the existing ambient noise level at the institutional and residential uses to the east is approximately 72.6 dBA L_{eq} and the existing ambient noise level at the residential use to the south is approximately 68.2 dBA L_{eq}, which are higher than the projected operational noise levels at these sensitive receptors. As such, the Project's operational noise levels would not be audible above existing ambient noise levels and would not increase the ambient noise levels experienced by these sensitive uses. Therefore, the nearest sensitive receptors would not be directly exposed to substantial noise from on-site operational activities, and impacts would be less than significant.

[34] Sound power level is used in SoundPlan modeling. The SoundPlan noise model was utilized to predict the anticipated operational noise levels and impacts associated with a worst-case scenario, where all operational activities are assumed to occur simultaneously. SoundPLAN is a three-dimensional noise model that allows computer simulations of noise situations, and creates noise contour maps using reference noise levels, topography, point and area noise sources, mobile noise sources, and intervening structures.

[35] Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 26, 2015.

Based on the above, the Project's operational mobile and stationary source impacts would be less than significant and would be less than the impacts disclosed in the GPU PEIR, which concluded that traffic noise impacts during operation would be significant and unavoidable, and no feasible or practical mitigation are available to reduce traffic noise impacts.

Summary of Project-Generated Noise Impacts

Based on the above, the Project's construction and operational noise impacts would be less than significant. The Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that the Project's construction and operational noise impacts would be significant and unavoidable. Therefore, no new project-specific mitigation measures are required.

PROJECT-GENERATED VIBRATION IMPACTS

Short-Term Construction Vibration Impacts

Project construction activities have the potential to generate ground-borne vibration and result in construction vibration impacts that include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. The vibration level at which human annoyance is perceived is 0.2 inch per second PPV. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 25 feet from most construction vibration sources. This distance can vary substantially depending on the soil composition and underground geological layer between the vibration source and the receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The FTA architectural damage criterion for continuous vibrations of 0.3 in/sec PPV for engineered concrete and masonry (refer to Table 4.13-2) is used because the closest structures to the Project Site are institutional use buildings. The nearest sensitive receptor building is located approximately 225 feet to the east of the Project construction activities. As such, vibration impacts are analyzed at 225 feet to evaluate the architectural building damage criterion. Groundborne vibration decreases rapidly with distance. As a result, vibration velocities from the construction equipment would be barely perceptible at this distance. Typical vibration produced by construction equipment is illustrated in Table 4.13-5, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-5
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 225 feet (inch/sec)[1]
Large bulldozer	0.089	0.0033
Loaded trucks	0.076	0.0028
Small bulldozer	0.003	0.0001

Notes:

1. Calculated using the following formula:
   $PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$
   where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
   PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
   D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Guidelines*, September 2018.

As shown in Table 4.13-5, vibration velocities from typical heavy construction equipment operation would range from 0.003 to 0.089 inch/second PPV at 25 feet from the source of activity. The nearest structure to the Project Site is the existing institutional use building located approximately 225 feet to the east of the Project Site. Table 4.13-5 shows that the vibration level during the operation of construction equipment would be approximately less than 0.0001 inch/second PPV to 0.0033 inch/second PPV at 225 feet. As a result, construction groundborne vibration would not exceed the 0.2 inch per second PPV significance threshold for human annoyance or 0.3 inch/second PPV significance threshold for building damage at the nearest structures. It should be noted that GPU PEIR MM N-2, which applies to projects utilizing pile driving during construction, and GPU PEIR MM N-3, which applies to residential projects located within 200 feet of existing railroad lines, are not applicable to the Project since the Project would not include pile driving and is not a residential project. In addition, the *Noise and Vibration Assessment* prepared for the Project (Attachment J) satisfies the requirements of GPU PEIR MM N-4, which requires industrial projects subject to CEQA to conduct a noise and vibration analysis. Therefore, vibration impacts would be less than significant impact during construction.

Long-Term Operational Vibration Impacts

The proposed industrial uses on the Project Site would not generate groundborne vibration that could be felt by the nearest sensitive receptors. However, heavy duty trucks associated with operation of the proposed Project would occasionally travel through the surrounding roadways. According to the FTA, it is unusual for vibration from sources, such as buses and trucks, to be perceptible, even in locations close to major roads.[36] As such, it can be reasonably inferred that operation of the proposed Project would not create perceptible vibration impacts to the nearest sensitive receptors. Therefore, vibration impacts related to human annoyance and building damage during operation would be less than significant.

Summary of Project-Generated Vibration Impacts

Based on the above, the Project's construction and operational vibration impacts would be less than significant. The Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that the Project's construction and operational vibration impacts would be less than significant with mitigation incorporated. Therefore, no new project-specific mitigation measures are required.

EXCESSIVE NOISE NEAR AIRPORTS

The nearest airport to the Project Site is the John Wayne Airport located approximately 2.9 miles to the southeast. The Project Site is not located within two miles of the airport. Additionally, the Project Site is not located within the vicinity of a private airstrip or related facilities. Therefore, Project implementation would not expose people residing or working in the Project area to excessive noise levels associated with aircraft. As such, the impacts would be less than significant.

Based on the above, impacts related to airport noise would be less than significant. The Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that the airport noise impacts would be less than significant. Therefore, no new project-specific mitigation measures are required.

[36] Federal Transit Administration, *Noise and Vibration Impact Assessment Manual, Section 5.2, Sources of Transit Ground-borne Vibration and Noise*, September 2018.

4.13.3 Conclusion

The Project is consistent with buildout of the General Plan Update. Upon implementation of RR NOI-1 through RR NOI-3 and GPU EIR MM N-1 and MM N-4, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to noise and vibration than anticipated by the GPU PEIR.

4.13.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR NOI-1: California Building Code: The California Building Code (CBC), Title 24, Part 2, Volume 1, Chapter 12, Interior Environment, Section 1207.11.2, Allowable Interior Noise Levels, requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric is evaluated as either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan.

The State of California's noise insulation standards for non-residential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA Leq(1hr).

RR NOI-2: Construction Noise Sources: Section 18-314(e) of the Santa Ana Municipal Code prohibits construction activities to the hours of 7:00 AM to 8:00 PM Monday through Saturday.

RR NOI-3: Stationary Noise Sources: Section 18.312 of the Santa Ana Municipal Code establishes standards for stationary noise sources.

MM N-1: Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.

- Construction activity is limited to the hours: Between 7 AM to 8 PM Monday through Saturday, as prescribed in Municipal Code Section 18-314(e). Construction is prohibited on Sundays.

- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment, such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning and Building Agency.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.
- Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.

MM N-4: During the project-level California Environmental Quality Act (CEQA) process for industrial developments under the General Plan Update or other projects that could generate substantial vibration levels near sensitive uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.

4.14 Population and Housing

4.14.1 GPU PEIR Findings

The GPU PEIR concluded that full buildout of the General Plan Update would result in a population of 431,629 and the City's 2045 population growth would be approximately 20 percent greater than the Orange County Council of Government (COG) 2045 population projections for the City. Furthermore, it is anticipated that General Plan Update buildout would result in 115,053 dwelling units, which exceeds the Orange County COG's housing projections for the City by 38 percent. The GPU PEIR stated that development based on the General Plan Update's land use designations would result in a jobs-housing ratio of 1.5, which is lower than the City's existing ratio (2.0) and the ratio projected by Orange County COG (2.1). A ratio of 1.5 would bring the City closer to a more equal distribution of employment and housing. Thus, the GPU PEIR determined the population growth resulting directly from the proposed GPU would be offset by the increase of employment opportunities provided to the City's residents and workers commuting into Santa Ana. The GPU PEIR concluded that impacts related to unplanned population growth are considered potentially significant. However, there are no feasible mitigation measures to mitigate the population and housing growth anticipated for the buildout of the General Plan Update. Thus, impacts related to a substantial increase in unplanned population growth were determined to be significant and unavoidable.

According to the GPU PEIR, the General Plan Update would change the land use designations of 839.7 acres of existing nonresidential land uses to residential uses. Thus, the General Plan Update would provide for additional residential opportunities in areas that currently do not allow residential uses. As such, the General Plan Update would not displace people and/or housing and no impacts would occur.

4.14.2 Project Analysis

The Project proposes to demolish three office buildings to construct three new industrial buildings for office, manufacturing, and/or warehouse use. Once constructed, the three new industrial buildings would total 313,244 square feet and would generate 425 employees based on estimates provided by the Project applicant. It is anticipated that some of the workforce would be filled by individuals who live in the City, as 20 percent of residents who live in Santa Ana also work in the City,[37] or nearby, as 65 percent of residents work in Orange County,[38] thus not inducing substantial population growth. A portion of the workforce could also be drawn from individuals who relocate closer to the Project Site. However, even assuming that all 425 individuals would relocate to the City or neighboring cities, the potential growth associated with operation of the proposed Project in the opening year of 2026 would only constitute 0.005 percent of employment growth when compared to the SCAG region, which has a projected employment of 9,373,688 for 2026.[39] Therefore, the Project would not directly or indirectly result in substantial unplanned population growth. Moreover, as the proposed Project would provide additional jobs in the City, it would improve the jobs-housing ratio determined in the GPU PEIR and help offset residential

[37] Southern California Association of Governments (SCAG), Local Profiles Report, Profile of the City of Santa Ana, May 2019, https://scag.ca.gov/sites/main/files/file-attachments/santaana_localprofile.pdf?1606012682, accessed June 5, 2024.

[38] SCAG, Local Profiles Report, Profile of Orange County, May 2019, https://scag.ca.gov/sites/main/files/file-attachments/orangecountylp.pdf?1606012194, accessed June 5, 2024

[39] According to Table 3.1, Comparing 30 Years of Growth: Past and Future, of Connect SoCal 2024, the SCAG region has a projected employment of 9,855,000 in 2035. The employment growth projection for 2026 is based on a straight line interpolation from 2019 to 2035.

population growth impacts resulting from implementation of the General Plan Update. Thus, the Project impacts related to substantial unplanned population growth would be less than significant.

Additionally, the Project Site does not currently contain any residential uses and the proposed Project would not displace existing people or housing. Therefore, consistent with the GPU PEIR, no impacts would occur.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to substantial unplanned population growth would be significant and unavoidable and displacement of people and housing would not occur. Therefore, no new project-specific mitigation measures are required.

4.14.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to population and housing than anticipated by the GPU PEIR.

4.14.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures

No GPU PEIR regulatory requirements or mitigation measures apply.

4.15 Public Services

4.15.1 GPU PEIR Findings

The GPU PEIR concluded that introduction of new structures and additional residents and workers to the City would increase the demand for fire and police protection services. However, funding for additional staff, equipment, and facilities would come from property taxes, grants, special revenue funds, and the City's general fund as future development accommodated by the General Plan Update occurs. The additional demand for fire and police protection services due to population growth generated within the City would be satisfied through these sources. Additionally, development under the General Plan Update would comply with the California Fire and Building Codes, California Health and Safety Code, City ordinances, and applicable national standards and would require approval of Building Plan Check for Site Plan and Emergency Access as well as approval of a Fire Master Plan. Moreover, as part of the project review process, the Santa Ana Police Department may require project design features to improve security on-site. Additionally, the GPU PEIR determined that some school districts within the City would have the capacity to accommodate future students generated as a result of the proposed General Plan Update. Should there be a need to expand or construct new facilities, funding for new schools would be obtained from the mitigation fee program pursuant to SB 50, and state and federal funding programs. Pursuant to Section 65996 of the Government Code, payment of school fees is deemed to provide full and complete school facilities mitigation (RR SS-1). Further, while library services would also experience an increase in demand, property taxes and library fines and fees are expected to offset this increased demand. Overall, impacts related to public services would be less than significant.

4.15.2 Project Analysis

As discussed in Section 4.14, *Population and Housing*, the Project is not a residential project that would generate population growth. However, the Project would generate 425 employees, which would increase the daytime population on the Project Site and the corresponding demand for fire and police protection services. The proposed Project would comply with the California Fire and Building Codes, California Health and Safety Code, City ordinances, and applicable national standards and would require approval of Building Plan Check for Site Plan and Emergency Access as well as approval of a Fire Master Plan. The proposed Project would include gated driveways and security cameras, which would provide site security and minimize the demand for police services. Additionally, the proposed Project would comply with RR FP-1, which would ensure that the proposed Project would meet the fire regulations outlined in California Health and Safety Code. The Project would also generate property tax which further fund fire and police protection services. Therefore, consistent with the General Plan Update, impacts related to fire and police protection services would be less than significant.

As the Project is not a residential project and it is anticipated that workers for the Project would be drawn from the existing City and regional workforce, the proposed Project would not generate school-aged children or a population that would increase demand for library services. As stated in the GPU PEIR, funding for school services would be obtained from the fee program pursuant to SB 50 and state and federal funding programs; funding for library services comes primarily from property taxes and library fines and fees collected from patrons, and state, federal, or government aid. The Project would pay fees pursuant to SB 50 (RR SS-1) and property taxes, which would offset any nominal demand for school or library services create by the Project. Therefore, consistent with the General Plan Update, impacts related to school and library services would be less than significant.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to public services would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.15.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR FP-1 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to public services than anticipated by the GPU PEIR.

4.15.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR FP-1 New buildings are required to meet the fire regulations outlined in California Health and Safety Code (Sections 13000 et seq.).

RR SS-1 New residential and commercial development shall pay development fees authorized by Section 65996 of the California Government Code to be “full and complete school facilities mitigation.”

4.16 Recreation

4.16.1 GPU PEIR Findings

The GPU PEIR states that the City has existing park deficiencies and concluded that buildout of the General Plan Update would exacerbate the existing shortage based on the projected population growth and scale of development in park deficient areas. The GPU PEIR determined that buildout of the General Plan would generate the demand for approximately 564 acres of parkland and recreational facilities. Without acquisition of new parkland, population growth related to buildout of the General Plan Update would equate to 1.20 acres per 1,000 residents, which is 0.80 acres below the City's parkland standard. The deficiency would be reduced by park and recreational amenities developed and maintained by the City in addition to private parks and recreational facilities owned and maintained by homeowner associations. Future development in accordance with the General Plan Update would be required to dedicate land or pay in-lieu impact fees per SAMC Chapter 34, Article VIII, and SAMC Chapter 35, Article IV, as well as the Quimby Act. The collected park development impact fees would fund future park acquisition and development and assist the City in achieving the parkland standard of two acres per 1,000 residents. The lack of existing parks is particularly apparent for the 55 Fwy/Dyer Road focus area. To address potential impacts to existing parks within 0.5-mile of the focus area, GPU PEIR MM REC-1 is included, which would require preparation of a public park utilization study for new residential development within the 55 Fwy/Dyer Road focus area, followed by further mitigation for incremental cumulative impacts. However, impacts would remain significant and avoidable even with mitigation.

The City is essentially built-out and very limited vacant land is available to be developed with new recreational opportunities, new or expanded facilities would need to occur outside of park-designated parcels which may have an adverse physical effect on the environment, including impacts relating to air quality, biological resources, lighting, noise, and traffic. Although construction and/or expansion of new parks and recreation facilities would be subject to General Plan Update policies and implementation actions, regulatory requirements, and future, project-specific environmental review under CEQA, the GPU PEIR concluded that development of such facilities could result in significant and unavoidable impacts. The GPU PEIR determined that development of such facilities could result in significant and unavoidable impacts.

4.16.2 Project Analysis

As discussed in Section 4.14, *Population and Housing*, the Project is not a residential project that would generate population growth. The Project would generate 425 employees and it is anticipated that these employees would be drawn from the existing City or region workforce. The Project's employees would not be expected to utilize existing parks or recreational facilities during work hours. Moreover, the proposed Project would provide 2,812 square feet of outdoor patio area for employee use during breaks. As such, the Project would not cause or accelerate substantial physical deterioration of existing parks or other recreational facilities nor include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment and no impacts would occur.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to parks and recreational facilities would be significant and unavoidable. Therefore, no new project-specific mitigation measures are required.

4.16.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to recreation than anticipated by the GPU PEIR.

4.16.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

No GPU PEIR regulatory requirements or mitigation measures apply.

4.17 Transportation

4.17.1 GPU PEIR Findings

The GPU PEIR determined that buildout of the General Plan Update would not conflict with a program, plan, ordinance, or policy addressing the circulation system with implementation of RR T-1. RR T-1 requires the City to design and operate a balanced multimodal circulation system network with all users in mind including bicyclists, public transportation vehicles and riders, and pedestrians of all ages and abilities. The General Plan Update incorporates future networks and policies related to supporting transit, bicycles, and pedestrians in the City, which are consistent with regional and local planning efforts supporting these modes of travel. The GPU PEIR also determined that implementation of the General Plan Update would result in a reduction of VMT per service population in comparison to existing conditions at the time the GPU PEIR was prepared and would achieve a VMT per service population of at least 15 percent lower than the County VMT per service population. In addition, the GPU PEIR also determined that buildout of the General Plan Update would not substantially increase hazards due to a geometric design feature or result in inadequate emergency access with compliance with the City's circulation plan and roadway design guidelines, the California Manual of Uniform Traffic Control Devices design guidelines, the policies in the City's Mobility Element, and with implementation of RR T-2. RR T-2 requires projects pursuant to the General Plan Update to implement fire protection requirements as detailed in the Orange County Fire Authority's (OCFA) Fire Prevention Guidelines and the California Fire Code. Overall, impacts related to transportation were determined to be less than significant.

4.17.2 Project Analysis

CONSISTENCY WITH APPLICABLE PROGRAM, PLAN, ORDINANCE, OR POLICY

The Project does not propose changes to the existing circulation system in the Project area. Pedestrian circulation for the proposed Project would continue to be provided via existing public sidewalks along Lake Center Drive and Susan Street within the vicinity of the Project Site. There are no bike paths, bike lanes, or bus routes along Lake Center Drive and South Susan Street adjacent to the Project Site. Additionally, based on the existing traffic and pedestrian volumes, current intersection geometrics, and review of the accident data, the installation of a traffic signal at the intersection of Alpine Street/Lake Center Drive at MacArthur Boulevard would not be warranted.[40,41] Moreover, according to SAMC Chapter 36, Article XIII, *Transportation*

[40] Linscott, Law & Greenspan, Engineers, *Traffic Signal Warrant Analysis for Alpine Street/Lake Center Drive at MacArthur Boulevard*, January 19, 2024.

[41] The *Traffic Signal Warrant Analysis* was conducted for a project with three industrial buildings totaling 325,044 square feet. However, since the completion of the analysis, the total building square footage has been reduced to 313,244 square feet. Therefore, the Project's analysis is conservative.

Management, any developments with more than 250 employees would be required to prepare a Transportation Demand Management (TDM) plan. The proposed Project would result in approximately 425 employees and would be required to prepare a TDM plan to reduce demand on the circulation system by promoting alternative modes of transportation, reducing or limiting the number of vehicle trips, and implementing other strategies to reduce the demand on the circulation system. The TDM plan for the proposed Project would be required to comply with standards and regulations listed within the SAMC. Thus, the proposed Project would not conflict with any program, plan, ordinance, or policy addressing the circulation system and impacts would be less than significant.

VMT ASSESSMENT

According to the *City of Santa Ana Traffic Impact Study Guidelines* (City Traffic Guidelines), a project can be presumed to have a less-than-significant VMT impact if the project satisfies one of the following screening criteria: [42]

- Projects which serve the local community and have the potential to reduce VMT, such as neighborhood K-12 schools and local-serving retail less than 50,000 sq. ft. (Charter schools are excluded from this criteria).

- Projects that generate less than 110 net daily trips.

- Projects located within Transit Priority Areas (TPAs); refer to City Traffic Guidelines Appendix A, *Santa Ana Transit Priority Areas*.

- Projects located in a low-VMT generating Traffic Analysis Zone (TAZ). City Traffic Guidelines Appendix B, *VMT/SP in Santa Ana as Compared to Orange County Average*, shows VMT per service population in Santa Ana as compared to the County average. Low-VMT TAZs per Santa Ana's threshold of significance are any TAZs generating VMT 15 percent below the County average.

The Project proposes to demolish three buildings and a parking structure to construct three new industrial buildings for office, manufacturing, and/or warehouse use. According to the Attachment K, *Trip Generation Assessment*, the trip generation potential for the existing land use totals 1,930 daily trips, with 271 trips (238 inbound, 33 outbound) during the AM peak hour and 256 trips (44 inbound, 212 outbound) during the PM peak hour. The proposed Project would generate approximately 1,544 gross daily trips with 222 gross trips (169 inbound, 53 outbound) during the AM peak hour and 242 gross trips (76 inbound, 166 outbound) during the PM peak hour. Thus, the proposed Project would generate 386 fewer gross daily trips, 49 fewer gross AM peak hour trips and 14 fewer gross PM peak hour trips than existing uses. Therefore, the proposed Project would meet the screening criteria for projects that generate less than 110 net daily trips.

Additionally, according to the Attachment L, *Vehicle Miles Traveled (VMT) Screening Assessment for the Proposed South Coast Technology Center* (VMT Assessment),[43] prepared by Linscott, Law & Greenspan, Engineers (LLG) dated February 29, 2024, the Project Site is located within a TPA, which is defined as a 0.5-mile radius around an existing or planned major transit stop (e.g., Metrolink Station, Streetcar Station, etc.) or an existing stop along a high-quality transit corridor.

[42] City of Santa Ana, *City of Santa Ana Traffic Impact Study Guidelines*, September 2019.

[43] The *VMT Assessment* was conducted for a project with three industrial buildings totaling 325,044 square feet. However, since the completion of the analysis, the total building square footage has been reduced to 313,244 square feet. Therefore, the VMT assessment is conservative.

Further, the Project is consistent with the land uses in the 2020-2024 RTP/SCS, which assumed the Project Site would be built out with an industrial use. Thus, the Project also meets the screening criteria related to projects located within TPAs. Overall, the Project meets two of the VMT screening requirements and thus, no VMT analysis would be required. Accordingly, the Project's VMT impact is presumed to be less than significant.

HAZARDS AND EMERGENCY ACCESS

The Project would not introduce incompatible uses to area roadways. Site access would not change as part of the proposed Project. Similar to existing conditions, the Project Site would be accessible from driveways along Lake Center Drive and South Susan Street. Project driveways and internal roadways would be designed to meet City standards. Additionally, the proposed Project would not require any full road closures during Project construction. Emergency access to the Project Site and within the surrounding area would be maintained during construction and operation of the Project. Furthermore, pursuant to RR T-2, the Project would be required to implement OCFA's fire protection requirements to ensure that the Project would not adversely affect emergency vehicle access. Therefore, impacts related to hazards and emergency access would be less than significant.

Based on the above, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to consistency with a circulation plan, program, ordinance, or policy; VMT; hazards; and emergency access would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.17.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe transportation impacts than anticipated by the GPU PEIR.

4.17.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

RR T-2 Projects pursuant to the General Plan Update will implement fire protection requirements as detailed in the Orange County Fire Authority's Fire Prevention Guidelines and in the California Fire Code.

4.18 Tribal Cultural Resources

4.18.1 GPU PEIR Findings

As discussed in the GPU PEIR, the City consulted with applicable Native American tribes in accordance with SB 18 and AB 52 and determined that future development allowed under the General Plan Update could potentially impact and cause significant adverse impacts to portions of the City with sensitivity to tribal cultural resources. The GPU PEIR MM CUL-4 through MM CUL-7 were included to reduce such impacts. Specifically, GPU PEIR MM CUL-4 requires an Archaeological Resources Assessment for projects with ground disturbance to be conducted under the supervision of an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards in either prehistoric or historic archaeology. Further, if unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey is required. If potentially significant

archaeological resources are identified and impacts cannot be avoided, GPU PEIR MM CUL-5 requires a Phase II Testing and Evaluation investigation to be performed by an archaeologist meeting the Secretary of the Interior's Standards to determine the significance of the resource(s), and site-specific mitigation measures to be developed for significant resources. Per GPU PEIR MM CUL-6, if the Archaeological Resources Assessment does not identify archaeological resources but indicates the project area is highly sensitive for archeological resources, a qualified archaeologist and a Native American monitor culturally affiliated with the project area must monitor all ground-disturbing activities in the areas of high archaeological sensitivity. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery must halt while the resources are evaluated for significance by a qualified archaeologist. Pursuant to GPU PEIR MM CUL-7, if the Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources, an archaeologist meeting the Secretary's Standards must be retained on-call. The archaeologist must inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. According to the GPU PEIR, impacts related to tribal cultural resources would be reduced to less-than-significant levels with implementation of GPU PEIR MM CUL-4 through MM CUL-7.

4.18.2 Project Analysis

The following section evaluates potential impacts to tribal cultural resources that would result from the construction and operation of the proposed Project. The analysis is primarily based upon Attachment M, *Tribal Cultural Resources Identification Memorandum* (Tribal Cultural Resources Memorandum). Additionally, as discussed above in Section 3, California Environmental Quality Act Regulatory Setting, the proposed Project qualifies for an exemption under CEQA Guidelines Section 15183. Therefore, no formal government-to-government consultation pursuant to AB 52 is required for the proposed Project.

Based on the *Tribal Cultural Resources Memorandum*, the Project Site is located in a region traditionally important to multiple Native American groups. In particular, these include the Gabrielino (including the Tongva and Kizh), the Juaneño or Acjachemen, and the Luiseño. In March 2024, a Native American Heritage Commission search of the Sacred Lands File for any Native American cultural resources that might be affected by the Project yielded negative results.

Moreover, as discussed in Section 4.5, *Cultural Resources*, a records search of the Project Site and a half-mile search radius identified five resources within the Project area, none of which are located within or adjacent to the Project Site. An archaeological field survey conducted in February 2024 identified two marine shell scatters along the northeast portion of the Project Site's vacant parcel; none of the shell observed on-site showed any sign of burning or other cultural modification. No prehistoric artifacts were observed, either within or outside the shell scatters anywhere on the Project Site. Based on the results of the field survey, a follow-up visit occurred to conduct limited subsurface testing to understand the origin of the shell scatters and determine whether the shell is an archaeological resource. Based on the collective evidence from the geotechnical trenching and the archaeological shovel test pits, it was concluded that the shell scatters do not constitute an archaeological site. All the observed shell and shell fragments are unmodified. All the documented shell and shell fragments were located at or within 10 cm of the surface, within artificial fill. No prehistoric artifacts were observed anywhere in the Project Site. The collective evidence is that the shells and shell fragments were brought in with imported fill and dumped at the site relatively recently. Thus, the shell scatters are not part of a prehistoric deposit and are not historical resources as defined by CEQA Section 15064.5(a).

The Project would redevelop a 10.2-acre office park and develop an approximately 5.6-acre vacant field. The majority of the excavation for the proposed buildings would require over-excavation for the building pads at a depth of approximately 5 to 8 feet. Trenches for utility connections would require a maximum excavation depth of 14 feet. Based on the *Tribal Cultural Resources Memorandum*, sensitivity for cultural resources consisting of archaeological sites is considered low at and near the surface but increases to moderate with depth. The late nineteenth to early twentieth century bed of the Santa Ana River was located approximately 0.6 miles to the northwest and would have provided abundant resources to area inhabitants. As the river meandered and changed its course, it or its tributaries may have been located closer to the Project area at times. These conditions heighten the sensitivity of the Project area for buried cultural resources.

However, the Project area has an extensive history of recent disturbances. East of Susan Street, the Project Site is entirely developed by the construction of multi-storied office buildings, a pond, and parking lots. Building methods at the time, and the installation of associated utilities, would have resulted in the disturbance of archaeological sites buried at shallow depths. West of Susan Street, geotechnical testing indicates that a layer of imported fill, ranging from 3 to 4.5 feet thick, covers the entire Project Site. However, buried resources may remain in areas where developments such as parking lots or structures with shallow foundations have required only minimal ground disturbance, or below the existing imported fill. Therefore, the sensitivity of the Project area at the surface and near surface is low due to past disturbances. However, excavations for the Project are anticipated to disturb a large part of the Project Site to points below the level of existing fill and other disturbances. The sensitivity for potential buried prehistoric archaeological sites is moderate in these undisturbed soils.

Therefore, consistent with the GPU PEIR, the proposed Project would implement GPU PEIR MM CUL-7 since the *Cultural Memorandum* did not identify potentially significant resources but portions of the Project Site with undisturbed soils has been determined to be moderately sensitive for buried resources. With implementation of GPU PEIR MM CUL-7, impacts would be reduced to less-than-significant levels. Additionally, in the event that human remains are uncovered during ground disturbing activities, the Project would be required to comply with California Health and Safety Code Section 7050.5 (RR CUL-1) and Public Resources Code Section 5097.98 to ensure that Project impacts to human remains would be less than significant.

Based on the above, the Project would not result in new or substantially more severe impacts would occur compared to the determinations of the GPU PEIR, which concluded that impacts to tribal cultural resources would be less than significant with mitigation incorporated. Therefore, no new project-specific mitigation measures are required.

4.18.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR CUL-1 and GPU PEIR MM CUL-7 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no project-specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe tribal cultural resources impacts than anticipated by the GPU PEIR.

4.18.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

Refer to Section 4.5, *Cultural Resources*, for RR CUL-1 and MM CUL-7.

4.19 Utilities and Service Systems

4.19.1 GPU PEIR Findings

The GPU PEIR concluded that buildout of the General Plan Update would increase sewer flows and sewer upgrades may be needed to achieve optimal hydraulic capacity. However, the City's Sewer Master Plan and Capital Improvement Program process would adequately prioritize necessary projects as developments under the General Plan Update occur. Additionally, as described in the GPU EIR any project within the City and under the GPU that goes through the entitlement process would be required to perform a sewer monitoring study with submittal and review of the study by City staff. If the sewer system is found to be deficient, the developer would be required to upsize the portion of the sewer pipe within the frontage of their property in accordance with City standards and could pay for the upsize through agreements with the Orange County Sanitary District (OCSD).

The GPU PEIR also concluded that OCSD wastewater treatment plants would have the capacity to accommodate the increased flows generated by the buildout of the General Plan Update. Additionally, the GPU PEIR states that that any sewer utility infrastructure improvement would be designed, constructed, and operated in accordance with the City's Design Guidelines for Water and Sewer Facilities, and development would be required to abide by the requirements of OCSD's ordinances and wastewater discharge requirements of the NPDES permit. Overall, with compliance with General Plan Update policies related to wastewater and implementation of RR U-1 through RR U-3, impacts related to wastewater infrastructure and wastewater treatment facilities were determined to be less than significant.

The GPU PEIR concluded that buildout of the General Plan Update would increase water demand, but the City would have adequate capacity for the proposed increases in water demand across the City and adequate supplies from the City, Orange County Water District, and Metropolitan Water District of Southern California to meet the increased demand. Furthermore, policies in the General Plan Update encourage business and industry to improve their performance in water conservation, promote the implementation of cost-effective conservation strategies and programs that increase water-use efficiency, and encourage and educate residents, business owners, and operators of public facilities to use water wisely and efficiently. Policies also promote the maintenance and upgrade of water infrastructure through impact fees from new development and use of drought-tolerant landscape. Overall, with compliance with General Plan Update policies related to water and implementation of RR U-5 through RR U-7, impacts related to water infrastructure and supply were determined to be less than significant.

The GPU PEIR concluded that, while the City is largely developed, buildout of the General Plan Update would result in vacant lots being developed into higher-intensity uses that could increase peak-flow runoff. However, the City has policies in place for reviewing and permitting new developments, which includes review of potential increases in runoff. Policies in the General Plan Update also encourage site drainage features that reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events on private and public developments. Overall, with compliance with General Plan Update policies related to drainage and stormwater and implementation of RR U-8.1, RR HYD-1, and RR HYD-4, impacts related to stormwater drainage were determined to be less than significant.

The GPU PEIR concluded that waste generated by buildout of the General Plan Update could be accommodated by existing facilities. Additionally, all development pursuant to the General Plan Update would comply with the CALGreen Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Policies in the General Plan Update also encourage land uses and strategies that reduce waste generation and support infill development projects that provide adequate and creative solutions for waste and recycling collection activities. Overall, with compliance with General Plan Update policies related to solid waste and implementation of RR U-7 and RR U-8.2, impacts related to solid waste were determined to be less than significant.

As stated in the GPU PEIR, the forecasted increase in electricity and natural gas demand for the plan area is well within the forecasted demand in Southern California Edison's and Southern California Gas Company's service area, respectively. Furthermore, development pursuant to the General Plan Update would be required to comply with energy efficiency standards, appliance efficiency regulations, CALGreen, and policies of the General Plan Update for energy-efficient building design and maintenance practices. Therefore, the GPU EIR concluded that impacts related to other utilities, including electric power, natural gas, and telecommunications facilities would be less than significant.

4.19.2 Project Analysis

The Project proposes to demolish three buildings and a parking structure to construct three new industrial buildings for office, manufacturing, and/or warehouse use. According to the Attachment N, *Water Supply & Sewer Demand Assessment*, prepared by Incledon Consulting Group, dated January 10, 2024, the proposed fixture units (i.e., drinking fountains, toilets, sinks) associated with the three new industrial buildings would result in a nearly 40 percent reduction in demand for water due to the change in building usage from office to industrial use. Thus, there would also be large reduction in wastewater. The proposed Project would connect to existing wastewater distribution and treatment infrastructure, which would have the capacity to serve the Project's reduced demand in addition to existing service commitments and would not require the expansion of existing facilities. Compliance with RR U-2 would ensure that OCSD connection fees are paid in accordance with Ordinance No. OCSD-40. Thus, Project impacts related to wastewater infrastructure and treatment would be less than significant and less than the impacts disclosed in the GPU PEIR.

As stated above, the proposed Project would result in a nearly 40 percent reduction in water use due to the change in building usage from office to industrial use. The proposed Project would also require water for landscaping; however, water use for landscaping would be minimal as the proposed Project would use drought-tolerant landscape. Additionally, the proposed Project would comply with RR U-5, which requires the Project to be designed pursuant to the water conservation and efficiency requirements of the SAMC, and RR U-6, which requires payment of water connection fees. Since the Project Site's water demand would be significantly reduced compared to existing conditions, the City's existing water infrastructure and supplies would be sufficient to serve the Project. As such, the Project impacts related to water infrastructure and supply would be less than significant and less than the impacts discussed in the GPU PEIR.

As discussed in Section 4.10, *Hydrology and Water Quality*, the Project would introduce a new use to the Project Site (i.e., industrial/warehousing), and thus, would be required to comply with the requirements of the General Industrial Permit and RR HYD-2. A preliminary WQMP has been prepared for the proposed Project to comply with the requirements of the County's NPDES Stormwater Program (RR HYD-4) and to be consistent with the Orange County Drainage Area

Management Plan. The WQMP describes site design and drainage. Moreover, according to Attachment I, *Preliminary Drainage and Hydrological Study*, the proposed Project would increase imperviousness but due to modifications in stormwater flow paths within the Project Site, peak runoff produced from the site is expected to decrease or remain the same as existing conditions. The *Drainage Study* determined that the proposed Project has been designed to effectively capture and convey the Project's storm water to the existing/public systems during a 10-year storm, utilizing a new on-site storm drain system that would collect surface water from the on-site BMP catch basins. The system would continue the flow patterns of the existing conditions by utilizing the street's infrastructure and an on-site storm drain system. Therefore, consistent with the General Plan Update, impacts related to stormwater drainage would be less than significant.

Regarding solid waste, the proposed Project would include the demolition of existing buildings and pavement on-site, which would generate 8,400 tons of crushed concrete and 2,100 tons of crushed a/c paving during construction. The proposed Project would minimize construction waste by complying with the CALGreen Code, which requires new development projects to submit and implement a construction waste management plan in order to reduce the amount of construction waste transported to landfills (RR U-7). During operation, the proposed Project would also generate waste typical of industrial and warehouse uses. Any recyclable or green waste would be diverted from landfills, in compliance with RR U-8 and AB 341. As discussed in the GPU PEIR, existing landfills have adequate capacity to serve the City, including the proposed Project. Therefore, consistent with the General Plan Update, impacts related to solid waste would be less than significant.

The proposed Project would require electricity for construction and operation of the Project. The proposed Project would not use natural gas during operation and natural gas is generally not required to power construction equipment. As summarized under Section 4.6, *Energy*, the Project would not result in substantial energy consumption. The proposed Project would also comply with existing regulatory requirements, including the 2022 Title 24 Building Energy Efficiency Standards. The 2022 Title 24 provides minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Specifically, the Project would install energy efficient appliances (RR U-11), and high efficiency lighting that would exceed the 2022 Title 24 standards by 10 percent (RR U-10). Additionally, the Project would be required to pay connection and ongoing user fees to SCE and SoCalGas to offset Project impacts on existing dry utility services and resources. Thus, impacts with regards to other utilities would be less than significant.

Therefore, the Project would not result in new or substantially more severe impacts compared to the determinations of the GPU PEIR, which concluded that impacts related to water supply, wastewater treatment, storm water drainage, solid waste, and other utilities would be less than significant. Therefore, no new project-specific mitigation measures are required.

4.19.3 Conclusion

The Project is consistent with the General Plan Update. With implementation of RR U-2, RR U-5, RR U-6, RR U-7, RR U-8.1, U-8.2, RR U-10, RR U-11, RR E-1 through RR E-5, RR E-7, RR HYD-1, RR HYD-2, RR HYD-4, and RR HYD-5 identified in the GPU PEIR, the proposed Project would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts the GPU PEIR failed to analyze, and there are no new significant or substantially more severe impacts to utilities and service systems than anticipated by the GPU PEIR.

4.19.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

Refer to Section 4.6, *Energy*, for RR E-1 through RR E-5 and RR E-7, and Section 4.10, *Hydrology and Water Quality*, for RR HYD-1, RR HYD-2, RR HYD-4, and RR HYD-5.

RR U-2 Any new connections to the Orange County Sanitation District system or expansion of a previous connection shall pay a capital facilities charge in accordance with Ordinance No. OCSD-40.

RR U-5 Any development implemented under the General Plan Update shall abide by the water conservation and efficiency requirements detailed in Chapter 8, Article XVI, Chapter 39, Article VI and Chapter 41, Article XVI of the Santa Ana Municipal Code.

RR U-6 Water connection fees shall be paid in accordance with Chapter 39, Article II of the City's Municipal Code and plumbing shall be installed in compliance with Chapter 8, Article III.

RR U-7 All development pursuant to the General Plan Update shall comply with Section 4.408 of the 2019 California Green Building Code Standards, which requires new development projects to submit and implement a construction waste management plan in order to reduce the amount of construction waste transported to landfills.

RR U-8.1[44] Storm drain shall be installed in compliance with Chapter 8, Article III, of the Santa Ana Municipal Code.

RR U-8.2[34] All development pursuant to the General Plan Update shall store and collect recyclable materials in compliance with Assembly Bill 341. Green waste will be handled in accordance with Assembly Bill 1826.

RR U-10 New buildings are required to achieve the current California Building Energy and Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11).

RR U-11 All new appliances would comply with the 2012 Appliance Efficiency Regulations (Title 20, California Code of Regulations, Sections 1601 through 1608)

4.20 Wildfire

4.20.1 GPU PEIR Findings

As stated in the GPU PEIR, the City does not contain any very high fire hazard severity zones (VHFHSZ). The CEQA Guidelines require analysis of wildfire risk in state responsibility areas (SRAs) and/or lands classified as VHFHSZs. According to the GPU PEIR, the nearest fire hazard severity zone (FHSZ) in an SRA to the City of Santa Ana is a high FHSZ about four miles east along the western edge of Loma Ridge. The nearest FHSZ in a local responsibility area (LRA) is about 3.8 miles at the southern tip of the Peters Canyon Regional Park. Thus, buildout of the General Plan Update would not substantially impair an adopted emergency response plan or emergency evacuation plan, exacerbate wildfire risks thereby creating elevated particulate

[44] Please note that there was an error in the numbering of RRs in the GPU EIR and two RR U-8 requirements are listed. In order to avoid confusion for the purposes of this document, we have renumbered them as RR U-8.1 and RR U-8.2.

concentration exposure to people, or expose people or structures to significant risks. While buildout of the General Plan Update would require the installation and maintenance of associated infrastructure in areas that are undeveloped or vacant, which could exacerbate fire risk, no impact would occur related to VHFHSZs.

4.20.2 Project Analysis

As stated in the GPU PEIR, the City does not contain any VHFHSZ and is not in or adjacent to an SRA. Therefore, the Project Site is not in or near SRAs or lands classified as VHFHSZs. As such, consistent with the GPU PEIR, no impact related to wildfire would occur as a result of the proposed Project.

4.20.3 Conclusion

The Project is consistent with the General Plan Update and would not have any specific effects which are peculiar to the Project or the Project Site. There are no Project specific impacts or potentially significant off-site or cumulative impacts that the GPU PEIR did not analyze, and there are no new significant or substantially more severe impacts to wildfire than anticipated by the GPU PEIR.

4.20.4 Applicable GPU PEIR Regulatory Requirements/Mitigation Measures:

No GPU PEIR regulatory requirements or mitigation measures apply.

5. Findings

As discussed in Section 3.0, the proposed Project qualifies for a CEQA exemption under CEQA Guidelines Section 15183. The General Plan Update and GPU PEIR were adopted and certified by the Santa Ana City Council in 2022. The Project Site is located within the southwestern portion of the City on three parcels on the south side of Lake Center Drive in both the southeast and southwest corners of the intersection with Susan Street. The Project Site is designated Industrial (IND), which provides space for activities such as light and heavy manufacturing, warehousing, processing, and distribution as well as commercial uses ancillary to industrial activities. The Project Site is zoned SD-58. According to Ordinance No. NS-2089, permitted uses in the SD-58 District are professional and business offices providing personal and professional services including employment agencies, medical insurance, real estate, travel, trade contractors, architects, engineers, finance, research and development, and other similar use. The SD-58 District also allows commercial/retail uses, including service commercial uses such as daycare centers, banks and other financial institution, delicatessens, food stores, newsstands, automobile support facilities, health and exercise centers and other similar uses, office and computer equipment, copy centers and other similar uses, office and computer equipment, postal centers, restaurants, travel services, and other similar uses.

The proposed Project would demolish the Lake Center Office Park, including the three existing buildings, a parking structure, and parking lots to construct three new Class A industrial buildings for office, manufacturing, and/or warehouse use. To allow the use of the proposed buildings, the Project proposes to amend SD-58 to allow for industrial uses. Specifically, SD-58 would be amended to allow for the use of Limited Light Industrial uses, consistent with the General Plan Update. The Project qualifies for an exemption from additional environmental review as set forth in CEQA Guidelines Section 15183 based on the following findings:

(1) *The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.*

Based on General Plan Update Land Use Element Figure LU-1*, Land Use Map*, the Project Site is designated Industrial (IND). According to the General Plan Update Land Use Element Table LU-3, *Density and Intensity Standards*, the Industrial designation generally allows a maximum 0.45 floor-area-ratio (FAR) with a typical maximum building height of 35 feet. However, Table LU-3 provides a specific exception for the Lake Center Development, defined by Specific Development Plan Number 58 (SD-58), that allows intensities up to 0.72 FAR (see Footnote 4 of General Plan Update Land Use Element Table LU-3). Similarly, regarding height, Table LU-3 Footnote 2 explains that the actual maximum standard allowed on each site may be different than listed in Table LU-3 and that the allowable height of development on any parcel is subject to the zoning standards. SD-58 District permits a maximum FAR of 0.72 and a maximum height of 200 feet for the Project Site.

The proposed Project would demolish the Lake Center Office Park and construct three new buildings totaling 313,244 square feet. The Project Site is approximately 15.8-acres. Thus, the Project would result in a 0.46 FAR. Additionally, the maximum height of the proposed buildings would be 48 feet and 4 inches. Although the Project proposes to amend SD-58 to allow for industrial uses, the Project would not change the FAR or maximum height allowed in SD-58. Thus, the proposed Project would be consistent with the development density established by the General Plan Update for SD-58. Additionally, the Project would be consistent with applicable General Plan Update Land Use Element policies as detailed in Table 4.11-1. Overall, the Project would be consistent with Criterion (1).

(2) *There are no project specific effects which are peculiar to the project or its site.*

The Project Site is located in a highly developed and urbanized area of Santa Ana. The Project Site consists of an existing 10.2-acre office park, the Lake Center Office Park, and an approximately 5.6-acre vacant field to the west of and separated from the office park by the north-south South Susan Street. The Project Site is designated Industrial (IND) and zoned SD-58. Surrounding uses adjacent to the Project Site include office, commercial, government, and recreational uses, and are designated Industrial (IND) and Professional & Administrative Office (PAO). The proposed Project would be consistent with the land use designation of the Project Site. Additionally, operation of the proposed Project as industrial buildings for office, manufacturing, and/or warehouse use would be consistent with the surrounding uses of the Project Site. As evaluated in Section 4.0, there are no Project specific effects which are peculiar to the Project or its site. Therefore, the proposed Project is consistent with Criterion (2).

(3) *There are no project specific impacts that were not analyzed as significant effects in the prior EIR.*

The GPU PEIR concluded that buildout of the General Plan Update would result in a total of 115,053 residential units and 72,967,816 square feet of non-residential development by 2045. The proposed Project, which is consistent with the General Plan Update, involves the demolition of the Lake Center Office Park and construction of three new buildings. The proposed Project would result in an increase of 135,218 square feet of non-residential uses. The Project would be consistent with the development density requirement for the IND designation and thus, was considered in the planned development of the General Plan Update and would have similar or lesser significant impacts than analyzed in the GPU PEIR. As evaluated in Section 4.0, there are no Project specific impacts which the GPU PEIR did not analyze as significant effects. Therefore, the proposed Project is consistent with Criterion (3).

(4) *There are no potentially significant off-site and/or cumulative impacts that were not discussed in the prior EIR*.

As stated, buildout of the proposed Project is consistent with the General Plan Update and, thus, was considered in the GPU PEIR analysis. No off-site improvements are proposed in the Project area and the size and nature of the Project would not result in cumulatively considerable environmental impacts. As evaluated in Section 4.0, there are no potentially significant off-site and/or cumulative impacts from the Project which the GPU PEIR did not discuss. Therefore, the Project is consistent with Criterion (4).

(5) *There is no substantial new information which results in more severe impacts than anticipated by the prior EIR.*

As evaluated in Section 4.0, the proposed Project would result in similar and/or lesser impacts than the GPU PEIR. There is no substantial new information which results in more severe impacts than anticipated by the GPU PEIR. Therefore, the Project is consistent with Criterion (5).

As shown, the proposed Project is consistent with the criteria in CEQA Guidelines Section 15183. As such, the proposed Project qualifies for the CEQA exemption.

REFERENCES

Berger, Elliott H., et al., *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, June 26, 2015.

California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.

California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed February 27, 2024.

California Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed April 3, 2024.

California State Water Resources Control Board, GeoTracker, https://geotracker.waterboards.ca.gov/map/, accessed April 25, 2024.

California Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/, accessed April 25, 2024.

California Department of Transportation, *California State Scenic Highway System Map*, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed April 25, 2024.

California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.

California Department of Transportation, *Transportation Related Earthborne Vibrations*, 2002.

City of Santa Ana, *City of Santa Ana Climate Action Plan*, December 2015.

City of Santa Ana, *City of Santa Ana Traffic Impact Study Guidelines*, September 2019.

City of Santa Ana, *City of Santa Ana Zoning Map*, March 4, 2021.

City of Santa Ana, *General Plan Update Program Environmental Impact Report, Table 5.13-7, Population and Employment Projections for Santa Ana and Orange County*, October 2021.

City of Santa Ana, *Golden City Beyond, Santa Ana General Plan Land Use Element*, Figure LU-1, Land Use Map, April 2022.

City of Santa Ana, *Golden City Beyond, Santa Ana General Plan Mobility Element*, accessed on April 2022.

City of Santa Ana, *Santa Ana Municipal Code*, codified through Ordinance No. NS-3049, adopted July 18, 2023.

Environmental Health Perspectives, *Vehicle Motion Alarms: Necessity, Noise Pollution, or Both?* https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/, accessed March 20, 2024.

Federal Highway Administration, *Roadway Construction Noise Model User's Guide Appendix A,* January 2006.

Federal Transit Administration, *Noise and Vibration Impact Assessment Manual, Section 5.2, Sources of Transit Ground-borne Vibration and Noise*, September 2018.

Geosyntec Consultants, *Draft Phase I Environmental Site Assessment for 3100, 3110, and 3120 Lake Center Drive, Santa Ana 92704,* April 2024.

Geosyntec Consultants, *Phase I Environmental Site Assessment for Undeveloped Parcel, West Lake Center Drive, Santa Ana 92704,* April 2024.

Incledon Consulting Group, *DP 2023-37 (3100 W Lake Center Dr. – South Coast Technology Center) Water Supply & Sewer Demand Assessment,* January 10, 2024.

Incledon Consulting Group, *Preliminary Water Quality Management Plan (WQMP) – South Coast Technology Center Development,* June 6, 2024.

Incledon Consulting Group, *South Coast Technology Center Development Preliminary Drainage and Hydrological Study,* June 2024.

International Code Council, *2022 California Building Code, Title 24, Part 2,* https://codes.iccsafe.org/content/CABC2022P1/chapter-18-soils-and-foundations, accessed July 26, 2023.

Linscott, Law & Greenspan, Engineers, *Traffic Signal Warrant Analysis for Alpine Street/Lake Center Drive at MacArthur Boulevard,* January 19, 2024.

Linscott, Law & Greenspan, Engineers, *Trip Generation Assessment for the Proposed South Coast Technology Center Project,* January 2, 2024.

Linscott, Law & Greenspan, Engineers, *Vehicle Miles Traveled (VMT) Screening Assessment for the Proposed South Coast Technology Center - Santa Ana, CA,* February 29, 2024.

Michael Baker International, *Air Quality Technical Memorandum – South Coast Technology Center Project,* June 14, 2024.

Michael Baker International, *Cultural and Paleontological Resources Identification Memorandum for the South Coast Technology Center, City of Santa Ana, Orange County, California,* April 10, 2024.

Michael Baker International, *Energy Assessment Memorandum – South Coast Technology Center Project,* June 13, 2024.

Michael Baker International, *Greenhouse Gas Technical Memorandum – South Coast Technology Center Project,* June 14, 2024.

Michael Baker International, *Health Risk Assessment Technical Memorandum – South Coast Technology Center Project,* June 19, 2024.

Michael Baker International, *Noise and Vibration Assessment Memorandum – South Coast Technology Center Project,* June 14, 2024.

Michael Baker International, *Tribal Cultural Resources Identification Memorandum for the South Coast Technology Center, City of Santa Ana, Orange County, California,* April 10, 2024.

NMG Geotechnical, Inc., *Geotechnical Design Report for Lake Center Office Park Redevelopment, South Coast Technology Center, 3100 Lake Center Drive, City of Santa Ana, California,* April 18, 2024.

NMG Geotechnical, Inc., *Geotechnical Review of Shallow Groundwater and Potential Dewatering during Grading and Construction, Lake Center Office Park Redevelopment Project, City of Santa Ana, California,* June 12, 2024.

San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, April 13, 2015.

South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, April 3, 2015.

South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008

South Coast Air Quality Management District, *Rule 1113 Architectural Coatings*, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf, accessed June 15, 2023.

Southern California Association of Governments, *2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.

Southern California Association of Governments, *Local Profiles Report, Profile of the City of Santa Ana, May 2019*, https://scag.ca.gov/sites/main/files/file-attachments/santaana_localprofile.pdf?1606012682, accessed June 5, 2024.

Southern California Association of Governments, *Local Profiles Report, Profile of Orange County, May 2019*, https://scag.ca.gov/sites/main/files/file-attachments/orangecountylp.pdf?1606012194, accessed June 5, 2024U.S. Army Corps of Engineers, *Corps reclassifies Prado Damn, implements risk-reduction measures*, https://www.spl.usace.army.mil/Media/News-Releases/Article/1849301/corps-reclassifies-prado-dam-implements-risk-reduction-measures/, May 15, 2019.

U.S. Fish and Wildlife Service. *Critical Habitat for Threatened and Endangered Species Online Mapper*, https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77, accessed April 25, 2024.

U.S. Fish and Wildlife Service. *National Wetlands Inventory Wetlands Mapper.* https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed April 25, 2024.

This page is intentionally left blank.