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MEMORANDUM

DATE: November 6, 2025

TO: Danny Morris, Development Director, Extra Space Storage

FROM: Ryan Bensley, Principal, LSA

SUBJECT: Class 32 Categorical Exemption for the Proposed Extra Space Storage Sullivan Street Project in Santa Ana, California

LSA is pleased to submit this memorandum in support of a Class 32 Categorical Exemption (CE) under the California Environmental Quality Act (CEQA) for the proposed Extra Space Storage Sullivan Street Project (project) in Santa Ana, California. This memorandum includes an introduction, project description, and evaluation of the project's consistency with the requirements of a Class 32 CE.

As discussed in this memorandum, the project would be exempt from detailed CEQA review under *State CEQA Guidelines* Section 15332. Under Section 15332, a project characterized as infill development qualifies for a Class 32 CE if the project (1) is consistent with the general plan and zoning ordinance; (2) occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses; (3) is located on a site that does not have value as habitat for endangered, rare, or threatened species; (4) would not result in any significant impacts relating to traffic, noise, air quality, or water quality; and (5) is adequately served by all required utilities and services. Additionally, *State CEQA Guidelines* Section 15300.2 lists six exceptions to a categorical exemption related to location, cumulative impact, significant effect, scenic highways, hazardous waste sites, and historical resources.

PROJECT DESCRIPTION

Project Site Location

As shown in **Figure 1**, Regional Location (all figures provided in **Attachment A**), the overall project parcel encompasses 212 and 280 North Sullivan Street in Santa Ana. The 5.72-acre, 249,152 square-foot (sf) overall project parcel[1] is located west of Sullivan Street between First and Fifth streets in the western part of the city. The overall project parcel consists of Assessor's Parcel Numbers 007-141-11, 007-141-78, and 007-141-79. The project-specific construction site is located within a 2.45-acre portion located on the southeast corner of the overall 5.72-acre project parcel. The overall project

[1] Although PRC §15332 states that Class 32 Categorical Exemptions may only be used for projects on sites 5 acres or less, the improvements of this proposed project would only occur within 2.45 acres of the overall 5.72-acre property on which the project would be located. Therefore, consistent with the findings in *Protect Tustin Ranch v. City of Tustin* (2021) 70 Cal.App.5th 951, the project qualifies for a Class 32 Categorical Exemption because only 2.45 acres of the larger 5.72-acre property would be altered by the project.

parcel is currently developed with 67,899 sf of self-storage uses (13 one-story buildings), including one rental office and a manager apartment, a recreational vehicle (RV) parking lot, an Extra Space Storage facility sign, and perimeter landscaping. The overall project parcel is generally flat in elevation. Vehicular access to the project site is currently provided via one driveway along Sullivan Street. Additionally, three emergency only access points are located on the frontage along Sullivan and Fifth Street (the southernmost driveway on Sullivan Street and two driveways along Fifth Street.

The overall project parcel footprint is L-shaped, and is generally surrounded by a mixture of industrial and commercial uses. The overall project parcel is bounded to the north by Fifth Street, a single-family residential structure off Sullivan Street, and industrial uses, to the east by Sullivan Street and industrial uses, and to the south and west by commercial and industrial uses. Regional access to the project site is provided by Fairview Street and First Street, which are to the west and south of the project site, respectively. State Route 22 is 1.6 miles northwest of the project site and Interstate 5 is 2.5 miles northeast of the project site. Local access to the project site is provided via Sullivan Street and Fifth Street.

Proposed Project

The project-specific construction site is located within a 2.45-acre portion located on the southeast corner of the overall 5.72-acre project parcel. The improvements proposed within this 2.45-acre project site would include all areas to be disturbed during construction; and would include areas for all construction staging and access roads. The proposed project would demolish an existing rental office and manager apartment (a total of 1,214 sf) in the southeastern portion of the project site and replace it with a three-story, 84,197 sf, self-storage building. The proposed project would provide an additional 18 parking stalls, including 5 Americans with Disabilities Act (ADA) compliant stalls and 4 electric vehicle (EV) capable stalls. The proposed project would also provide 2 bike parking spaces on-site and would restripe the existing RV parking area to provide 57 RV spaces. All other existing uses on site, including the other self-storage buildings (66,685 sf in total) and 3 parallel parking stalls, would remain. Under post-development conditions, the total self-storage square footage on site (including the existing 66,685 sf of self-storage uses to remain) would be 150,882 sf and include 21 total parking stalls. The net increase in building area under post-development conditions would be 82,983 sf.

Figure 2, Conceptual Site Plan, provides an overview of the proposed site plan, including the locations of the existing buildings to remain, the proposed building, vehicular access, the RV parking lot, the trash enclosure, and landscaping. The trash enclosure would be on the northeast corner of the RV parking lot, west of the proposed building. No changes to the office hours of operation or storage gate hours are proposed. Office hours are currently Monday through Saturday, from 9:30 a.m. to 6:00 p.m. (closed on Sundays). Customer access hours are currently Monday through Sunday, from 6:00 a.m. to 8:00 p.m.

Zoning and General Plan Land Use Designations

According to the City of Santa Ana's (City) Zoning map, the project site is currently zoned for Light Industrial (M1). Per City Municipal Code Section 41-472.5, with approval of a Conditional Use Permit (CUP), operation of commercial storage facilities is permitted on parcels zoned M1. The proposed project requires a lot merger and Planning Commission approval for modification of the 1976 CUP

for the mini-warehouse use expansion. However, with approval of the CUP, the proposed project would be consistent with the City zoning code and the M1 zoning designation.

According to the City's General Plan, the project site is designated for Industrial Flex-1.5 (West Santa Ana Boulevard Focus Area) uses which allows for clean industrial uses that do not produce significant air pollutants, noise, or other nuisances typically associated with industrial uses, including commercial retail, such as self-storage facilities.

For a detailed discussion regarding the proposed project's consistency with the General Plan and Zoning Code, refer to Criteria 1 for the Class 32 CE, below.

Site Access and Parking

Vehicular access to the project site would continue to be provided via the northernmost driveway along Sullivan Street; however, the project would remove the southernmost driveway along Sullivan Street, which is currently used for emergency access only. The two existing emergency access only gates along 5th Street would remain as is. Further, the City of Santa Ana's Planning Department and the Orange County Fire Authority (OCFA) have reviewed and provided their concurrence on the proposed project's current design plans, which includes the circulation plans for emergency access vehicles.

The existing RV parking lot would remain; however, it would be restriped. The project site currently provides 3 parallel parking stalls that would remain. The proposed project would provide an additional 15 parking stalls, including 4 ADA-compliant stalls and 2 EV capable stalls. In accordance with Section 41-1394 of the City's Municipal Code, the proposed 15 parking space supply, in addition to the existing 3 parallel parking stalls that would remain, would provide adequate parking to accommodate the proposed project's parking demand.

Building Design

The proposed project would also develop an 84,197 sf self-storage building. Under post-development conditions, the total new building square footage on site (including the existing 66,685 sf of self-storage uses) would be 150,882 sf. The proposed building would consist of three stories above ground level, reaching a maximum height of 35 ft 0 inches (in). The maximum Floor Area Ratio (FAR) allowed for the overall project parcel is 1.5. Under existing uses, the FAR is a total of 0.27, and with the implementation of the proposed project, the FAR would continue to remain under the maximum allowance with a 0.61 total.

The on-site rental office would be on the northeastern corner of the proposed building, adjacent to Sullivan Street. As noted above, the office hours would remain the same as existing conditions. The manager's apartment would be on the second floor on the northeastern corner of the proposed building. The proposed project would not require any additional employees on site compared to existing operations.

Infrastructure Improvements

As part of the project, new electricity, water, telephone, fire, and sewer infrastructure would be constructed to connect the proposed building to the existing main lines in the right of way. A new storm drain line would be constructed around the proposed building to specifically capture water

from the roof of the proposed building, proposed sidewalks, driveways, and parking, and connect to the underground retention basins. Infrastructure improvements would include construction of a sewer lateral; a new water service and a new fire service line to connect the building to the existing city water line along Sullivan Street; an on-site fire water line and fire hydrants; a concrete swale located to the southeast of the building; and an underground retention basin located southwest of the building.

Construction and Grading

Development of the proposed project would require demolition of the existing rental office and manager apartment (a total of 1,214 sf) in the southeastern portion of the project site, excavation and grading of the site, delivery of materials, restriping of the RV parking lot, construction of the underground retention basin, and construction of the new building. Construction of the proposed project is anticipated to commence around July to September 2026 and extend over a period of approximately 12 months.[2] Construction would include demolition of the existing rental office and manager apartment and construction of a new building along Sullivan Street. It is anticipated that construction workers would make a total of 8 trips per day during construction activities.[3]

Based on the preliminary grading plans, the proposed project would require 250 cubic yards (cy) of cut and 1,115 cy of fill, resulting in a total of 865 cy to be imported to the site. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.

Construction of the proposed project would require a maximum excavation depth of 8.5 ft.

Discretionary Actions, Permits, and Other Approvals

In accordance with Sections 15050 and 15367 of the *State CEQA Guidelines*, the City is the designated Lead Agency for the proposed project and has principal authority and jurisdiction for CEQA actions and project approval. Responsible agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee agencies are State agencies that have jurisdiction by law over natural resources affected by a proposed project.

The discretionary actions to be considered by the City as a part of the proposed project include:

- Approval of the use of a Class 32 CE
- Development Plan Approval

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2 The air quality emissions modeling completed for the project assumes that project construction would commence in May 2025 and extend over a period of 18 months. Although the project schedule has since been adjusted to start in May 2026 and occur over a shorter time period of 12 months, the analysis remains conservative in that an earlier start date represents a worst-case scenario for air pollutant emissions because it assumes the greater use of older equipment that does not incorporate cleaner technologies.

3 This trip generation estimate assumes that there would be 95,639 sf of building construction and 8,094 sf of demolition. The project's site plan has since been modified and now includes 84,197 sf of building construction and 1,214 sf of demolition. As the construction trip generation assumptions prepared for the project reflect a greater amount of building demolition and construction than is currently proposed, the project would likely generate fewer daily construction worker trips than stated here.

- Modification of the existing 1976 CUP.

CALIFORNIA ENVIRONMENTAL QUALITY ACT, SECTION 15332, CLASS 32 INFILL DEVELOPMENT EXEMPTION

Under *State CEQA Guidelines* Section 15332, a project characterized as infill development qualifies for a Class 32 CE under CEQA if the project (1) is consistent with the general plan and zoning ordinance; (2) occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses; (3) is located on a site that does not have value as habitat for endangered, rare, or threatened species; (4) would not result in any significant impacts relating to traffic, noise, air quality, or water quality; and (5) is adequately served by all required utilities and services.

(1) The proposed project is consistent with the General Plan and Zoning Ordinance.

No amendments to an adopted planning document would be required for implementation of the proposed project. The City's General Plan land use designation for the project site is Industrial Flex-1.5 (West Santa Ana Boulevard Focus Area) which allows for clean industrial uses that do not produce significant air pollutants, noise, or other nuisances typically associated with industrial uses, including commercial retail, such as self-storage facilities. Additionally, the proposed project is consistent with one of the objectives of the West Santa Ana Boulevard Focus Area, to promote infill development. Table A shows the proposed project's consistency with the applicable City's General Plan policies.

Table A: General Plan Consistency Analysis

Policies	Consistency Analysis
Land Use Element	
Goal 1: Promote a balance of land uses to address basic community needs.	
Policy 1.8: Encourage the development of commercial and nonprofit recreational facilities and services.	**Consistent.** The project site is currently developed with a commercial self-storage facility. The proposed project would develop one self-storage building, thereby expanding the existing commercial facility on the project site and providing additional storage space to meet the demand for those facilities generated by local residents and businesses. Therefore, the proposed project would be consistent with **General Plan Policy 1.8.**
Goal 2: Promote land uses which enhance the City's economic and fiscal viability.	
Policy 2.8: Promote rehabilitation of commercial properties and encourage increased levels of capital investment.	**Consistent.** The proposed project would demolish one, nearly 50-year-old, existing, self-storage building on-site. A new self-storage building would be constructed in place of the demolished building and would provide an upgraded building and amenities. Additionally, the existing RV parking lot would be restriped. Therefore, the proposed project would contribute to the rehabilitation of the project site and would be consistent with **General Plan Policy 2.8.**
Policy 2.10: Support new development which is harmonious in scale and character with existing development in the area.	**Consistent.** Land uses surrounding the project site include a mixture of industrial and commercial uses and one single-family residential home. The proposed project would develop a self-storage building on a site that currently is developed with self-storage uses, which would be consistent with the character of the surrounding area. Although the proposed 84,197 sf self-storage building

Table A: General Plan Consistency Analysis

	would be taller than the other self-storage buildings on site, it would be consistent with the scale of other buildings in the surrounding area, which are also 2-3 stories. Therefore, the proposed project would be consistent with **General Plan Policy 2.10.**
Goal 3: Preserve and improve the character and integrity of existing neighborhoods.	
Policy 3.5: Encourage new development and/or additions to existing development that are compatible in scale, and consistent with the architectural style and character of the neighborhood.	**Consistent.** The proposed project would develop a self-storage building on a site that currently is developed with self-storage uses and also matches with the mix of industrial and commercial land uses surrounding the project site, along with one single-family residential home. Although the proposed 84,197 sf self-storage building would be taller than the other self-storage buildings on site, it would be consistent with the scale of other buildings in the surrounding area, which are also 2-3 stories. Therefore, the proposed project would be consistent with the character of the surrounding neighborhood site and would be consistent with **General Plan Policy 3.5.**
Goal 5: Ensure that the impacts of development are mitigated.	
Policy 5.2: Protect the community from incompatible land uses.	Land uses surrounding the project site include a mixture of industrial and commercial uses and one single-family residential home. The proposed project would develop a self-storage building on a site that currently is developed with self-storage uses, which would be consistent with the character of the surrounding area and would not propose any incompatible land uses to the surrounding area. In addition, the properties adjacent to the project site are zoned M-1 Light Industrial and are designated for Industrial/Flex (FLEX 1.5) land uses, which are generally compatible with self-storage uses. Therefore, the proposed project would be consistent with **General Plan Policy 5.2.**
Policy 5.5: Encourage development which is compatible with, and supportive of surrounding land uses.	**Consistent.** Land uses surrounding the project site include a mixture of industrial and commercial uses and one single-family residential home. The proposed project would develop a self-storage building on a site that currently is developed with self-storage uses, which would be consistent with the character of the surrounding area. In addition, the properties adjacent to the project site are zoned M-1 Light Industrial and are designated for Industrial/Flex (FLEX 1.5) land uses, which are generally compatible with self-storage uses. Therefore, the proposed project would be consistent with **General Plan Policy 5.5.**
Policy 5.11: Encourage development which does not generate obnoxious fumes, toxins, or hazardous materials.	**Consistent.** As discussed in the Air Quality section of this CE, construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. However, these effects would be temporary in nature and would cease upon the completion of project construction. Analysis conducted for this CE also showed that construction emissions associated with the project would not exceed the daily SCAQMD thresholds for VOCs, NOx, CO, SO_X, $PM_{2.5}$, or PM_{10} emissions. It was also found that long-term operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which

Table A: General Plan Consistency Analysis

	the project region is in nonattainment under an applicable federal or State ambient air quality standard (NAAQS or CAAQS) and would not result in a locally significant air quality impact. Further, the Phase 1 Environmental Site Assessment that was prepared found that the proposed project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not potentially result in any exposure to hazardous materials. Therefore, the proposed project would be consistent with **General Plan Policy 5.11.**
Policy 5.12: Provide appropriate permanent measures to reduce storm water pollutant loads in storm water from a development site.	**Consistent.** As discussed in the Water Quality section of this CE, the proposed project would comply with the Construction General Permit, which requires implementation of a Stormwater Pollution Prevention Plan and best management practices, and the NPDES Permit. Compliance with these permits would ensure that permanent measures are implemented to reduce pollutant loads in stormwater. Therefore, the proposed project would be consistent with **General Plan Policy 5.12.**

Source: Santa Ana General Plan (City of Santa Ana, 1998).
City = City of Santa Ana
NPDES = National Pollutant Discharge Elimination System
RV = recreational vehicle
sf = square foot/feet

The project site is zoned for Light Industrial (M1). Per City Municipal Code Section 41-472.5, with approval of a CUP, operation of commercial storage facilities is permitted on parcels zoned M1. For example, Section 41-1394 of the City's Municipal Code requires that, for the first 900 storage units, 1 parking space be provided for each 150 units, and for storage units in excess of 900, 1 parking space be provided for each 300 units. Additionally, two spaces are required for any on-site management unit. Further, Section 41-1342 requires three spaces be provided for each 1,000 square feet of gross floor area of office use. The proposed project would provide approximately 724 storage units, an on-site management unit, and a 1,246 sf office. Pursuant to the City's Municipal Code, the proposed project would be required to provide 7 parking spaces and the proposed project would provide 18 new parking spaces. Therefore, the proposed 21-parking-space supply, including the 3 existing parking spaces, would provide adequate parking to accommodate the proposed project's parking demand and the proposed project would be consistent with Section 41-1394 of the City Municipal Code. Further, the City of Santa Ana's Planning Department and the OCFA have reviewed and provided their concurrence on the proposed project's current design plans, which includes the circulation plans for emergency access vehicles. With approval of the CUP, the proposed project would be consistent with the M1 zoning designation.

(2) The proposed project would occur within city limits on a project site of no more than 5 acres and would be substantially surrounded by urban uses.

Although the proposed project is located on a 5.72-acre project parcel, project construction is set to take place only within a 2.45-acre portion of the southeast corner of the overall project

parcel.[4] In its existing condition, the overall project parcel contains self-storage facilities, paved parking areas, and perimeter landscaping. The project site is surrounded by existing urban uses, including industrial, commercial, and residential uses. The project site is immediately bounded to the north by Fifth Street, a single-family residential structure along Sullivan Street, and industrial uses, to the east by Sullivan Street and industrial uses, and to the south and west by commercial and industrial uses. Therefore, the proposed project would be within City limits on a project site of no more than 5 acres and is substantially surrounded by urban uses.

(3) The proposed project would be located on a site that does not have value as habitat for endangered, rare, or threatened species.

As shown on **Figure 2**, the overall project parcel includes 67,899 sf of existing self-storage uses (13 one-story buildings), which includes one rental office and manager apartment, an RV parking lot, perimeter landscaping, and an Extra Space Storage facility sign. The existing landscaped areas consisting of ornamental shrubs are generally along the eastern perimeter of the project site along Sullivan Street. The site is surrounded on all sides by urban development.

The project site is currently developed; therefore, no special-status species are expected to occur on the project site in the existing condition because of the lack of suitable habitat. Similarly, the proposed project would not substantially reduce locally common wildlife populations, because no suitable habitat exists on site. The proposed project would not significantly affect sensitive biological resources given the amount of previous development that has taken place on the project site and in the vicinity. Project construction and operation would have no impacts either directly or through habitat modification to any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. Therefore, the project site does not have value as habitat for endangered, rare, or threatened species.

The proposed project, like all projects, would be subject to the provisions of the Migratory Bird Treaty Act (MBTA), which prohibits disturbing or destroying active nests, and California Fish and Game Code Section 3503, which protects nests and eggs. Additionally, the proposed project would include the removal and replacement of on-site trees. Therefore, the proposed project would be required to comply with the City's Municipal Code, including Article VII, Regulation for the Planting Maintenance, and Removal of Trees.[5] With compliance with existing regulations, potential impacts to nesting birds and trees would be avoided.

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4 Although PRC §15332 states that Class 32 Categorical Exemptions may only be used for projects on sites 5 acres or less, the improvements of this proposed project would only occur within 2.45 acres of the overall 5.72-acre property on which the project would be located. Therefore, consistent with the findings in *Protect Tustin Ranch v. City of Tustin* (2021) 70 Cal.App.5th 951, the project qualifies for a Class 32 Categorical Exemption because only 2.45 acres of the larger 5.72-acre property would be altered by the project.

5 City of Santa Ana. n.d.-a. Municipal Code. Article VII, Regulation for the Planting Maintenance, and Removal of Trees. Website: https://library.municode.com/ca/santa_ana/codes/code_of_ordinances?nodeId=PTIITHCO_CH33STSIPUWO_ARTVIIREPLMARETR_S33-188SIPLAP#:~:text=%2D20%2D99)-,Sec.,of%20Arboricultural%20Tree%20Pruning%20Standards. (accessed April 15, 2024).

(4) The proposed project would not result in any significant impacts relating to traffic, noise, air quality, or water quality.

Traffic. A Trip Generation and Vehicle Miles Traveled (VMT) Memorandum[6] (**Attachment B**) was prepared to identify the transportation impacts associated with the proposed project. The trip generation of the proposed project was calculated using trip rates from the Institute of Transportation Engineers' Trip Generation Manual, 11th Edition (2021) for Land Use Code 151 (Mini-Warehouse)[7] and site-specific trips surveyed for similar existing RV storage facilities in Chino and Ontario. Table B, below, summarizes the proposed project trip generation.

Table B: Project Trip Generation Summary

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Mini-Warehouse (Self-Storage)[1]		tsf	1.45	0.05	0.04	0.09	0.07	0.08	0.15
RV Storage[2]		space	0.48	50%	50%	0.03	50%	50%	0.04
Existing Trip Generation									
Self Storage	67.899	tsf	98	3	3	6	5	5	10
RV Storage	127	space	61	2	2	4	3	2	5
Subtotal:			**159**	**5**	**5**	**10**	**8**	**7**	**15**
Project Trip Generation									
Self-Storage	152.748	tsf	221	8	6	14	11	12	23
RV Storage	54	space	26	1	1	2	1	1	2
Subtotal:			**247**	**9**	**7**	**16**	**12**	**13**	**25**
Net Trip Generation (Project - Existing)			**88**	**4**	**2**	**6**	**4**	**6**	**10**

[1] Trip rates referenced from the Institute of Transportation Engineers (ITE) *Trip Generation* Manual, 11th Edition (2021).

[2] The daily, total a.m., and p.m. peak hour trips are based on survey data collected at the existing similar facilities in Chino and Ontario (2021).

50 percent inbound and 50 percent outbound is assumed for the peak hours of RV storage.

ADT = average daily trips

RV = recreational vehicle

tsf = thousand square feet

As shown in Table B, the proposed project would generate a total of 247 daily trips, including 16 trips in the a.m. peak hour and 25 trips in the p.m. peak hour. After taking into account the daily trips generated by the self-storage uses on the portion of the project parcels that would not be affected by the proposed project, the proposed project's net trip generation would be 88 daily trips, including 6 trips in the a.m. peak hour and 10 trips in the p.m. peak hour.[8]

[6] LSA Associates, Inc. 2024a. *Trip Generation and Vehicle Miles Traveled (VMT) Memorandum*, Extra Space Storage Sullivan Street Project. July.

[7] Institute of Transportation Engineers (ITE). 2021. Trip Generation Manual, 11th Edition. September.

[8] This analysis evaluated the project trip generation associated with 152,748 sf of self-storage uses and 54 RV storage spaces. The project's site plan has since been modified to include 150,882 sf of self-storage uses and 57 RV storage spaces. LSA reviewed this modification to the project site plan and determined that the modified square footage would not result in more severe transportation impacts than what is described in the Trip Generation and VMT Memorandum provided in Attachment B as the trip generation would be slightly reduced from 88 to 86 net new ADT.

The City of Santa Ana Traffic Impact Study Guidelines[9] (City TIS Guidelines) provide VMT screening criteria for projects that are presumed to have less than significant impacts to the local transportation system and would therefore not be required to conduct a VMT analysis. Pursuant to Section 2.1 (Project Screening) of the City TIS Guidelines, projects that generate fewer than 110 net daily trips are presumed to not substantially increase VMT. This is consistent with the screening threshold for small projects identified in the Office of Planning and Research (OPR)[10] Technical Advisory on Evaluating Transportation Impacts in CEQA.[11] As shown in Table B, the proposed project is anticipated to generate a total net difference of 88 daily trips, which is below the 110 net daily trip threshold established in the City TIS Guidelines and the screening criteria for small projects from the OPR Technical Advisory. Therefore, the proposed project is presumed to result in a less than significant impact, and a project-level VMT quantified analysis is not required under the City's TIS Guidelines.

Pedestrian facilities run along Sullivan Street and Fifth Street; however, no bicycle lanes exist along these streets. The proposed project would not result in a significant increase in daily vehicle trips and would not alter existing pedestrian facilities during construction or operation. Additionally, the proposed project would not result in any physical changes to the surrounding roadway network and therefore would not preclude the implementation of future bicycle and transit facilities. Therefore, the proposed project would be consistent with the current use of the project site and would not conflict with a plan, ordinance, or policy addressing the circulation system.

Vehicular access to the project site would continue to be provided via two existing driveways along Fifth Street for emergency access and one driveway along Sullivan Street. The proposed project would close off the existing southernmost driveway along Sullivan Street, which is currently used for emergency access; however, emergency access would continue to be provided via the two existing driveways along Fifth Street. Additionally, the proposed project would provide a minimum 20-foot-wide, paved, "fire lane" access roadway through the project site. Vehicular traffic to and from the project site would use the existing network of regional and local roadways that currently serve the area surrounding the project site. Additionally, design of the proposed project would be subject to the standards set forth in the City's Municipal Code and review and approval by the City. Construction of the proposed project would not result in temporary lane closures on surrounding roadways. Based on the temporary nature of the construction activities and trips, and the low trip generation for daily operations, project vehicles would not create operational deficiencies or related hazards to the public roadways when accessing the project site.

Because the proposed project would generate fewer than 110 net daily trips and a nominal number of new peak hour trips, it would not require a traffic study and is screened out from a

9 City of Santa Ana. 2019. City of Santa Ana Traffic Impact Study Guidelines. Website: https://www.santa-ana.org/documents/traffic-vmt-impact-study-guidelines/ (accessed April 19, 2024).

10 On July 1, 2024, the Office of Planning and Research (OPR) was renamed the Office of Land Use and Climate Innovation (LCI).

11 OPR. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Website: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf (accessed June 3, 2025).

VMT analysis per the City TIS Guidelines. Therefore, the proposed project would have a less than significant impact on transportation.

Noise. The *Noise and Vibration Impact Analysis Memorandum*[12] prepared for the proposed project is provided in **Attachment C**.

***Existing Noise Environment*.** The primary existing noise sources in the vicinity of the project site are transportation facilities. Traffic on Sullivan Street, First Street, Fifth Street, and other roadways in the surrounding area contribute to the ambient noise levels in the vicinity of the project site. Also, commercial and industrial activities contribute to the noise environment in and around the project site.

Ambient Noise Level Measurements. Two long-term (24-hour) noise level measurements (LT-1 and LT-2) were conducted on September 3, 2025, using Larson Davis Spark 706RC dosimeters to document the existing noise environment within the vicinity of the project site. Table C summarizes the results of the long-term noise level measurements along with a description of the measurement locations and noise sources that occurred during the measurements. As shown in Table C, the calculated CNEL levels at LT-1 and LT-2 were 60.9 and 67.3 dBA, respectively. In addition, the daytime noise levels ranged from 57.4 to 66.2 dBA L_{eq} and nighttime average noise levels ranged from 48.1 to 63.0 dBA L_{eq}. Also, the daytime maximum instantaneous noise levels ranged from 75.3 to 91.2 dBA L_{max} and the nighttime maximum instantaneous noise levels ranged from 66.2 to 90.0 dBA L_{max}. The long-term noise level measurement survey sheets along with the hourly L_{eq} and L_{max} results are provided in Attachment C. Figure 3 shows the long-term monitoring locations.

Table C: Long-Term Ambient Noise Monitoring Results

Monitoring No.	Location	Noise Level (dBA)					Noise Source
		L_{eq}		L_{max}			
		Daytime[1]	Nighttime[2]	Daytime	Nighttime	CNEL	
LT-1	280 North Sullivan Street, Santa Ana, CA. On security camera pole near the entrance. Approximately 70 ft from Sullivan Street centerline.	57.4-63.2 (61.2)[3]	48.1-62.2 (56.7)[4]	75.3-90.2	66.2-86.7	60.9	Light traffic on Sullivan Street and noise from occasional vehicles entering the storage facility.
LT-2	402 North Sullivan St, Santa Ana, CA. Near the sidewalk, in a tree. Approximately 24 ft from Sullivan Street centerline.	60.0-66.2 (64.1)[3]	51.7-63.0 (59.4)[4]	78.0-91.2	72.4-90.0	67.3	Traffic on 5th Street and light traffic on Sullivan Street.

Source: Compiled by LSA (2025).
Note: The long-term (24-hour) noise level measurements were conducted on September 3, 2025.
[1] Daytime hours are from 7:00 a.m. to 10:00 p.m.
[2] Nighttime hours are from 10:00 p.m. to 7:00 a.m.
[3] Average of daytime noise level.
[4] Average nighttime noise level.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet
L_{eq} = equivalent continuous sound level
L_{max} = maximum instantaneous noise level

[12] LSA Associates, Inc. 2025. *Noise and Vibration Impact Analysis for the Extra Space Storage Sullivan Street Project*. September 10.

Construction Noise. Two types of short-term noise impacts would occur during project construction. The first type would be from construction crew commutes and the transport of construction equipment and materials to the project site, and would incrementally raise noise levels on roadways leading to the site. The pieces of construction equipment for construction activities would move on site, would remain for the duration of each construction phase, and would not add to the daily traffic volume in the project site vicinity. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 ft would generate up to a maximum of 84 dBA (as shown in Table D), the effect on longer-term (daily) ambient noise levels would be small because the daily construction-related vehicle trips would be relatively small compared to the existing daily traffic volumes on Sullivan Street, First Street, and Fifth Street, which would be used to access the project site. The results of the California Emissions Estimator Model (CalEEMod) (version 2022.1) contained in Attachment D indicate that the grading phase would generate the most trips out of all of the construction phases and have an acoustical equivalent traffic volume of 579 passenger car equivalent vehicles. The existing average daily traffic (ADT) volumes on Sullivan Street, First Street, and Fifth Street in the vicinity of the project site are 5,934, 29,230, and 9,822, respectively, based on the 2015 ADT volumes obtained from the City's GIS Open Data (City of Santa Ana 2018). Based on the information above and the calculations provided in Attachment D of the *Noise and Vibration Impact Analysis Memorandum,* which evaluates construction-related traffic noise from the different construction phases related to demolition, site preparation, grading, building construction, paving, and architectural coating; construction-related traffic would increase noise levels by up to 0.4 dBA based on the slight increase of vehicles that would travel along Sullivan Street during these phases of construction. A noise level increase of less than 1 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related noise impacts associated with worker commutes and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related noise generated from construction activities. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. The proposed project anticipates demolition, site preparation, grading, building construction, paving, and architectural coating phases of construction. These various sequential phases change the character of the noise generated on a project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table D lists the L_{max} recommended for noise impact assessments for typical construction equipment included in the *Federal Highway Administration (FHWA) Highway Construction Noise Handbook (FHWA 2006)*, based on a distance of 50 ft between the equipment and a noise receptor.

Table D: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)[1]	Maximum Noise Level (L_{max}) at 50 ft[2]
Backhoes	40	80
Compactor (ground)	20	80
Compressor (air)	40	80
Concrete Mixer Truck	40	85
Concrete Saw	20	90
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Manlift (Forklift)	20	85
Front-end Loaders	40	80
Generator	50	82
Graders	40	85
Jackhammers	20	85
Pavement Scarifier	20	85
Paver	50	85
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Welder/Torch	40	73

Source: Table 1, *FHWA Roadway Construction Noise Model User's Guide* (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.
[2] Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration L_{max} = maximum instantaneous sound level
ft = foot/feet

Table E lists the anticipated construction equipment for each construction phase based on the CalEEMod (Version 2022.1) results contained in Attachment D. Table E shows the combined noise level at 50 ft from all of the equipment in each phase and the L_{eq} noise level for each equipment type at 50 ft based on the quantity, reference instantaneous maximum (L_{max}) noise level at 50 ft, and acoustical use factor. As shown in Table E, construction noise levels would reach up to 87.1 L_{eq} at a distance of 50 ft.

Table E: Summary of Construction Phase, Equipment, and Noise Levels

Construction Phase	Construction Equipment	Quantity	Reference Noise Level at 50 ft (dBA L_{max})	Acoustical Use Factor[1] (%)	Noise Level at 50 ft (dBA L_{eq})	Combined Noise Level at 50 ft[2] (dBA L_{eq})
Demolition	Concrete Saw	1	90	20	83.0	86.5
	Front End Loader	3	80	40	80.8	
	Dozer	1	85	40	81.0	
Site Preparation	Grader	1	85	40	81.0	84.7
	Scraper	1	85	40	81.0	
	Front End Loader	1	80	40	76.0	
Grading	Grader	1	85	40	81.0	85.2
	Dozer	1	85	40	81.0	
	Front End Loader	2	80	40	79.0	
Building Construction	Crane	1	85	16	77.0	85.1
	Man Lift	2	85	20	81.0	
	Generator	1	82	50	79.0	
	Front End Loader	1	80	40	76.0	
	Welder / Torch	3	73	40	73.8	
Paving	Concrete Mixer Truck	1	85	40	81.0	87.1
	Paver	1	85	50	82.0	
	Pavement Scarafier	1	85	20	78.0	
	Roller	2	85	20	81.0	
	Front End Loader	1	80	40	76.0	
Architectural Coating	Compressor (air)	1	80	40	76.0	76.0

Source: Compiled by LSA (2025).

Note: The hourly L_{eq} noise level is equivalent to the 8-hour L_{eq} noise level when project construction of the same phase lasts for an 8-hour day

[1] The acoustical use factor is the percentage of time during a construction noise operation that a piece of construction equipment operates at full power.

[2] The formula for calculating the noise level for each construction equipment based on the quantity and acoustical use factor is provided in the FHWA *Roadway Construction Noise Model User's Guide* (2006).

[3] The combined noise level is calculated using the following formula: SPL = 10*log(10^(L_1/10) + 10^(L_2/10) … + 10^(L_n/10)). L_1, L_2,…L_n are the individual noise levels.

dBA = A-weighted decibel(s)
L_{eq} = equivalent continuous sound level
ft = foot/feet
L_{max} = maximum instantaneous noise level

The closest residential property line is approximately 160 ft from the center of the proposed building. At a distance of 160 ft, noise would be attenuated by 10.1 dBA compared to the distance of 50 ft. Based on the above, the closest residential property line may be subject to short-term construction noise reaching 77.0 dBA L_{eq}[13] generated by construction activities on the project site. Construction noise is temporary and would stop once project construction is completed. Project construction activities would be limited to between the hours of 7:00 a.m. and 8:00 p.m., pursuant to Section 18-314(e) of the City's Municipal Code, and would ensure construction-related noise would not be generated during the more sensitive nighttime hours. Furthermore, construction-related noise levels would be below the FTA noise level standard of 80 dBA L_{eq} for residential uses. Therefore, noise levels generated from project construction would be less than significant. No mitigation measures are required.

Construction Vibration. This construction vibration impact analysis assesses the potential for building damage using vibration levels in PPV (in/sec). Vibration levels in PPV are best for characterizing damage potential. Table F shows the reference vibration levels at a distance of 25 ft for each type of standard construction equipment from the Transit Noise and Vibration Impact Assessment Manual (FTA 2018). Project construction is expected to require the use of bulldozers, loaded trucks, and jackhammers, which would generate ground-borne vibration levels of up to 0.089, 0.076, and 0.035 PPV (in/sec), respectively, when measured at 25 ft.

Table F: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS VdB re 1 µin/sec.
µin/sec = micro-inches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project construction boundary (assuming the construction equipment would only be used at or near the project construction boundary). The formula for vibration transmission is provided below:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$$

[13] The noise level at 160 ft is calculated using the following formula: $dBA_2 = dBA_1 - 20*\log(D_2/D_1)$. Where dBA_1 is the noise level at distance D_1 and dBA_2 is the noise level at distance D2. The calculated noise level at 160 ft is also 87.1 dBA – 10.1 dBA = 77.0 dBA.

Table G lists the projected vibration levels from various construction equipment expected to be used on the project site at the project construction boundary to the nearest buildings in the vicinity of the project site. As shown in Table G, the closest residential and industrial buildings are approximately 25 feet from the project construction boundary and would experience a vibration level of up to 0.089 PPV (in/sec). This vibration level would not have the potential to result in building damage because these neighboring buildings were conservatively assumed to be built to the same (or more stringent) building standards and materials as older residential structures, and the anticipated project-related vibration levels would not exceed the Caltrans vibration damage threshold of 0.30 PPV (in/sec). Other existing buildings that surround the project site would experience lower vibration levels because they are farther away and are also conservatively assumed to be built to the same (or more stringent) standard as older residential structures, and the anticipated project-related vibration levels would not exceed the Caltrans vibration damage threshold of 0.30 PPV (in/sec). Therefore, construction vibration impacts during project construction would be less than significant. No mitigation measures are required.

Table G: Potential Construction Vibration Damage

Land Use	Direction	Equipment/Activity	Reference Vibration Level at 25 ft	Distance to Structure (ft)[1]	Vibration Level
			PPV (in/sec)		PPV (in/sec)
Residential	North	Large Bulldozers	0.089	25	0.089
		Loaded Trucks	0.076	25	0.076
		Jackhammers	0.035	25	0.035
Industrial	East	Large Bulldozers	0.089	75	0.027
		Loaded Trucks	0.076	75	0.023
		Jackhammers	0.035	75	0.010
Industrial	South	Large Bulldozers	0.089	25	0.089
		Loaded Trucks	0.076	25	0.076
		Jackhammers	0.035	25	0.035
Industrial	West	Large Bulldozers	0.089	180	0.010
		Loaded Trucks	0.076	180	0.009
		Jackhammers	0.035	180	0.004

Source: Compiled by LSA (2025).
Note: The vibration damage threshold is 0.3 PPV (in/sec) for older residential structures.
ft = foot/feet
in/sec = inches per second
PPV = peak particle velocity

Operational Mobile Noise (Traffic Noise). The proposed project is estimated to generate a net new average of 88 daily trips[14] based on the *Trip Generation and Vehicle Miles Traveled Assessment for the Extra Space Storage Sullivan Street Project* (LSA 2024a). The existing ADT volumes on Sullivan Street, First Street, and Fifth Street in the vicinity of the project site are 5,934, 29,230, and 9,822, respectively, based on the 2015 ADT volumes obtained from the City's GIS Open Data (City of Santa Ana 2018). Based on the information above, project-related traffic on Sullivan Street and Fifth Street would increase traffic noise levels by less than 0.1 dBA. A

[14] This trip generation is based on 152,748 sq ft of self-storage uses and 54 RV storage spaces. The project's site plan has since been modified and now includes 150,882 sq ft of self-storage uses and 57 RV storage spaces, which would generate a total of 86 net new ADT. Given that the project's trip generation would be slightly reduced from 88 to 86 net new ADT, it would not result in more severe traffic noise impacts than those described here.

noise level increase of less than 1 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise impacts from project-related traffic on off-site sensitive receptors would be less than significant. No mitigation measures are required.

Operational Stationary Noise. Operation of the proposed project would include heating, ventilation, and air conditioning (HVAC) equipment and parking lot activities that have the potential to result in stationary noise impacts as described below. The following provides a detailed noise analysis and discussion of each stationary noise source.

Recreational Vehicle Parking Activities. Similar to the existing RV storage uses on the project site, the proposed project would generate noise from RV parking activities between the hours of 6:00 a.m. and 8:00 p.m. RV parking activities would include noise generated by vehicles traveling at slow speeds, engine start-up noise, car door slams, car horns, car alarms, and tire squeals. Representative parking activities would generate a noise level of 68.3 dBA L_{eq} at 50 feet based on previously conducted measurements. The proposed project would reduce the number of RV parking spaces from 127 existing spaces to 54 spaces. Based on the existing trip generation in the *Trip Generation and Vehicle Miles Traveled Assessment for the Extra Space Storage Sullivan Street Project* (LSA 2024a) there is estimated to be 61 RV-related vehicle trips daily, with 4 RV-related trips during the AM peak hour and 5 RV-related trips during the PM peak hour. Based on this information, it is estimated that there would be up to 5 RV-related trips per hour during both daytime and nighttime hours. Assuming each RV-related trip would generate noise levels for up to 5 minutes, each hour would generate noise levels for a cumulative period of 25 minutes in any hour, which would be 64.5 dBA at a distance of 50 ft. Similarly, based on the proposed project trip generation (LSA 2024b), the proposed project is estimated to generate 26 RV-related trips daily, with 2 RV-related trips during the AM peak hour and 2 RV-related trips during the PM peak hour. Based on this information, it is estimated that there would be up to 2 RV vehicles parking per hour during both daytime and nighttime hours. Assuming each RV vehicle would generate noise levels for up to 5 minutes, each hour would generate noise levels for a cumulative period of 10 minutes in any hour, which would be 60.5 dBA at a distance of 50 ft.

Heating, Ventilation, and Air Conditioning Noise. Under existing conditions, the project has one rooftop HVAC unit on the existing rental office building. By contract, the proposed project would include up to four rooftop HVAC units. The existing and proposed HVAC equipment is assumed to operate 24 hours per day. Noise generated from existing HVAC equipment is estimated to be 44.4 dBA L_{eq} at a distance of 50 ft. Noise generated from one proposed HVAC unit is estimated to be 62.4 dBA L_{eq} at a distance of 50 ft. A total of four proposed HVAC units operating simultaneously would generate a noise level of 68.4 dBA L_{eq}. The specifications of typical existing and proposed HVAC equipment, including the reference noise level, are provided in Attachment C. In addition, the proposed HVAC units would include a 5 ft high screen based on the project plans and would be shielded by the roofline, which would provide a minimum noise reduction of 8 dBA based on the noise reduction calculation provided in Attachment F of the *Noise and Vibration Impact Analysis Memorandum.*

Stationary Noise Impact Summary. Table H lists the individual stationary noise source along with the daytime and nighttime reference noise level at 50 ft, distance from the source to the residential property line, distance attenuation, attenuation from shielding, noise level of each noise source at the residential property line, and the combined noise level at the residential property line for both the existing and proposed project.

Table I shows that daytime noise levels generated from existing and proposed project operations would not exceed the City's daytime 30-minute noise standard of 55.0 dBA. Because the daytime 30-minute noise standard of 55.0 dBA would not be exceeded, the City's daytime 15-minute, 5-minute, 1-minute, and anytime noise standards of 60, 65, 70, and 75 dBA (respectively) would also not be exceeded. Although nighttime noise levels generated from existing and proposed project operations would exceed the City's nighttime 30-minute noise standard of 50 dBA, the City's nighttime 15-minute, 5-minute, 1-minute, and anytime noise standards of 55, 60, 65, and 70 dBA (respectively) would not be exceeded. In addition, although nighttime noise from the proposed project would exceed the City's 30-minute nighttime standard of 50 dBA, it is expected to be 1.8 dBA lower than noise generated from existing operations as shown in Table I**.** Therefore, noise generated from project operations would be less than significant.

Table H: Stationary Daytime and Nighttime Noise Levels

Scenario	Land Use	Direction	Noise Source	Reference Noise Level at 50 ft (dBA)		Distance (ft)	Distance Attenuation (dBA)	Shielding (dBA)	Noise Level (dBA)		Combined Noise Level (dBA)	
				L_{max}	L_{eq}				L_{max}	L_{eq}	L_{max}	L_{eq}
Existing	Residence	North	RV Parking Activity	70	66.2	188	11.5	0	58.5	54.7	58.5	55.0
			HVAC	--	44.4	60	1.6	0	--	42.8		
Proposed	Residence	North	RV Parking Activity	70	62.2	200	12.0	0	58.0	50.2	58.0	52.5
			HVAC	--	68.4	192	11.7	8[1]	--	48.7		

Source: Compiled by LSA (2025).

[1] The proposed HVAC units would include a 5 ft high screen based on the project plans and would be shielded by the roofline, which would provide a minimum noise reduction of 8 dBA based on the noise reduction calculation provided in Attachment C.

dBA = A-weighted decibels

ft = foot/feet

HVAC = heating, ventilation, and air conditioning

L_{eq} = equivalent continuous sound level

RV = recreational vehicle

Table I: Stationary Impact Summary

Scenario	Land Use	Direction	Combined Noise Level (dBA L_{eq})	Daytime/Nighttime Noise Standard (dBA)	Exceed?	Noise Level Change (dBA)	Impact?
Existing	Residence	North	55.0	55/50	No/Yes	--	--
Proposed	Residence	North	52.5	55/50	No/Yes	-1.8	No

Source: Compiled by LSA (2025).

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

Air Quality. The *Air Quality Technical Memorandum* (Air Quality Analysis)[15] prepared for the proposed project is provided in **Attachment D**.

The project site is in Orange County and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which regulates air quality in the South Coast Air Basin (Basin). LSA used the California Emissions Estimator Model (CalEEMod) to calculate emissions from construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by demolition, grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_X), volatile organic compounds (VOCs), directly emitted particulate matter less than 2.5 microns in size ($PM_{2.5}$) or particulate matter less than 10 microns in size (PM_{10}), and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_x, VOCs, and some

[15] LSA Associates, Inc. 2024b. *Air Quality Technical Memorandum*, Extra Space Storage Sullivan Street Project. July.

soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site. Table J summarizes the construction emissions estimated for the project using CalEEMod.[16]

Table J: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Demolition	0.7	20.0	15.4	<0.1	0.5	0.7	0.1	0.6
Site Preparation	0.6	20.3	15.5	<0.1	0.7	0.6	0.1	0.5
Grading	0.6	20.0	15.3	<0.1	3.2	0.6	1.4	0.5
Building Construction	0.7	17.2	15.2	<0.1	0.6	0.7	0.2	0.6
Paving	0.6	10.4	9.0	<0.1	0.2	0.5	<0.1	0.4
Architectural Coating	2.7	1.1	1.3	<0.1	0.1	0.1	<0.1	0.1
Peak Daily Emissions	**3.4**	**20.3**	**16.4**	**<0.1**	**3.8**		**1.9**	
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**		**55.0**	
Significant?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA (September 2024).
Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table J, construction emissions associated with the project would not exceed the daily SCAQMD thresholds for VOCs, NO_x, CO, SO_X, $PM_{2.5}$, or PM_{10} emissions. Therefore, construction of the proposed project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under an applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS).

Operational Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas.

Mobile-source emissions are from vehicle trips associated with operation of the project. Area-source emissions consist of direct sources of air emissions at the project site, including architectural coatings, consumer products, and use of landscape maintenance equipment.

16 This analysis was conducted assuming that there would be 95,639 sf of building construction and 8,094 sf of demolition. The project's site plan has since been modified and now includes 84,197 sf of building construction and 1,214 sf of demolition. Therefore, this analysis provides a conservative estimate of the emissions related to construction activities associated with the proposed project.

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other particulate matter emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

LSA calculated long-term operational emissions associated with the proposed project using CalEEMod. Table K provides the estimated existing emissions and the proposed project's estimated operational emissions.[17]

Table K: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	0.3	0.2	2.3	<0.1	0.6	0.1
Area Sources	2.9	<0.1	4.0	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.6	0.5	<0.1	<0.1	<0.1
Total Project Emissions	**3.2**	**0.8**	**6.8**	**<0.1**	**0.6**	**0.1**
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (September 2024).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

The results shown in Table K indicate the proposed project would not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (NAAQS or CAAQS).

Long-Term Microscale (CO Hot-Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may

[17] This analysis evaluated the project emissions associated with 152,748 sq ft of self-storage uses and 54 RV storage spaces, which would generate a total of 88 net new ADT. The project's site plan has since been modified and now includes 150,882 sq ft of self-storage uses and 57 RV storage spaces, which would generate a total of 86 net new ADT. This modification to the project site plan was reviewed by LSA and it was determined that the modified square footage would not result in more severe air quality impacts than what is described within because the trip generation would be slightly reduced from 88 to 86 net new ADT.

reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable LOS or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the 1630 West Pampas Lane station in Anaheim (the closest station to the project site), showed a highest recorded 1-hour concentration of 2.5 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 1.6 ppm (the State standard is 9 ppm) during the past 3 years[18]. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The proposed project is expected to generate 88 net new ADT, with 6 net new trips occurring in the a.m. peak hour and 10 net new trips occurring in the p.m. peak hour.[19] As the proposed project would not generate 110 or more a.m. or p.m. peak-hour trips, it did not meet the criteria for an evaluation of study area intersection or roadway segment levels of service based on the City's TIS Guidelines.[20] Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot-spots would occur, and the project would not result in any project-related impacts on CO concentrations.

Localized Impact Analysis. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units.

Localized significance thresholds (LST) are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Central Orange County area (SRA 17). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As identified above, the closest sensitive receptor to the project site is a single-family residence located immediately north of the project site at approximately 20 feet. In cases where receptors may be closer than 82 feet (25 meters), any distances within the 82-foot (25-meter)

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18 United States Environmental Protection Agency (USEPA). 2023. Outdoor Air Quality Data.

19 As described elsewhere in this memorandum, this trip generation reflects the inclusion of 152,748 sf of self-storage uses and 57 RV storage spaces. The project's site plan has since been modified to include 150,882 sf of self-storage uses and 53 RV storage spaces, which would generate a total of 86 net new ADT. Given that the project's trip generation would be slightly reduced from 88 to 86 net new ADT, it would not result in more severe air quality emissions than those described here.

20 City of Santa Ana. 2019. City of Santa Ana Traffic Impact Study Guidelines. Website: https://www.santa-ana.org/documents/traffic-vmt-impact-study-guidelines/ (accessed April 19, 2024).

buffer zone can be used. As such, the minimum distance of 25 meters was used for purposes of the LST assessment. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage for the proposed project would be 3.0 acres.[21] The proposed project would provide improvements on 2.45 acres of the 5.72-acre site; therefore, the maximum daily disturbed acreage during operation of the proposed project was estimated to be 2.45 acres. For simplicity, this analysis uses the 2.5-acre threshold for operation of the proposed project. Tables L and M show the results of the LST analysis during project construction and operation, respectively.

Table L: Project Localized Construction Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	20.3	15.0	3.3	1.8
Localized Significance Threshold	**138.0**	**894.0**	**8.3**	**5.0**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (September 2024).
Note: Source Receptor Area 17, based on a 3-acre construction disturbance daily area, at a distance of 25 meters the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Table M: Project Localized Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	0.6	4.6	<1.0	<1.0
Localized Significance Thresholds	**126.0**	**805.0**	**2.2**	**1.2**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (September2024).
Note: Source Receptor Area 17, based on a 2.5-acre operational daily area, at a distance of 25 meters the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

By design, the localized impact analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table G assume all area- and energy-source emissions would occur on site, and 5 percent of the project-related new mobile sources (which is an estimate of the amount of project-related on-site vehicle and truck travel) would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. Table G indicates the localized operational emissions would not exceed the LSTs at nearby residences. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

[21] SCAQMD. n.d. *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed May 2024).

As detailed in Tables L and M, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_X emissions are approximately less than 1 pound per day. Due to the small size of the proposed project in relation to the overall Basin, on a regional scale, the quantity of emissions from the project is incrementally minor. Based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations.

Health Risk to Nearby Sensitive Receptors. Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD rules for standard construction practices such Rule 403 for fugitive dust emissions and Rule 1113 for architectural coatings. The toxic air contaminant (TAC) of concern from construction is diesel particulate matter (DPM), which is entirely contained in the PM_{10} and $PM_{2.5}$ emissions, included in the LST analysis. As shown in Table J and Table L, the maximum emissions of PM_{10} and $PM_{2.5}$ would both be well below the SCAQMD and LST thresholds indicating that significant mass emissions of PM_{10} would not occur. As the LST and criteria pollutant thresholds are a very conservative by design, this demonstrates that there would not be a significant health risk impact from construction to any nearby sensitive receptor. Furthermore, emissions associated with construction would be temporary in nature and limited to the immediate area surrounding the construction site. The closest sensitive receptor is a single-family residence located immediately north of the project site at approximately 20 feet, this distance would be sufficient for particulate matter to settle before reaching the closest sensitive receptor. Therefore, the proposed project would not generate a substantial amount of diesel PM emissions that would result in the generation of a substantial amount of TACs and a significant health risk would not occur.

Primary sources for TAC emissions during project operation include power plants, refineries, factories, gas stations, and consumer products. In addition, CARB identifies major sources of air pollution to be associated with land uses that include high traffic freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and large dispensing facilities[22]. The proposed project would involve the construction of a three-story, 84,197 sf, self-storage building and would therefore not be considered a major source of air pollution or TACs. As identified in Table K, project operational emissions of criteria pollutants would be below SCAQMD significance thresholds; thus, they are not likely to have a significant impact on sensitive receptors. Therefore, once the project is constructed, the project would not be a source of substantial pollutant emissions and sensitive receptors would not be exposed to substantial pollutant concentrations during either project construction or operation. Therefore, implementation of the proposed project would not result in new sources of TACs and the project would not expose sensitive receptors to substantial levels of TACs. This impact would be less than significant.

[22] CARB. 2015. Air Quality And Land Use Handbook: A Community Health Perspective. April. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf (accessed September 2025)

Odors. Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project.

SCAQMD Rule 402 regarding nuisances states: "A person 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." The proposed uses are not anticipated to emit any objectionable odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SCAQMD thresholds of significance. Compliance with SCAQMD Rule 403: Fugitive Dust would further reduce construction dust impacts. The proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors. The project would also be consistent with the 2022 AQMP and would also not result in objectionable odors affecting a substantial number of people.

Water Quality

Construction Impacts. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked, and they have the potential to be transported via storm water runoff into receiving waters.

Project construction would result in a total Disturbed Soil Area of 1.2 acres. Projects that disturb greater than 1 acre of soil are subject to the regulatory requirements of the *State Water Resources Control Board (SWRCB) Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order WQ 2022-0057-DWQ NPDES No. CAS000002) (Construction General Permit). Because the proposed project would disturb more than 1 acre, the Applicant would be required to obtain coverage under the Construction General Permit, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan and best management practices (BMPs) including, but not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. Compliance with the standard requirements of the Construction General Permit would ensure that construction impacts related to surface water quality would be less than significant.

According to the *Geotechnical Site Evaluation* (**Attachment D**) prepared for the proposed project, groundwater was encountered during exploratory borings at depths at 22.5 ft below ground surface (bgs). Historic groundwater is approximated at 15 ft bgs at the project site.

Excavation during construction would be to a maximum depth of 4.5 ft bgs. Due to the depth of groundwater and the proposed depth of excavation, groundwater is not anticipated to be encountered during construction; therefore, groundwater dewatering would not be required during construction and construction-related impacts to groundwater would be less than significant.

Operational Impacts. Stormwater runoff from the project site currently flows southeast via a series of valley gutters to an existing sidewalk culvert which discharges through the curb face on Sullivan Street where it flows south and enters the City's storm drainage system (Greenville-Banning Channel), where it would then connect to an underground retention system and ultimately discharge into the Santa Ana River and the Pacific Ocean. Under the proposed conditions, Under the proposed conditions, stormwater from the portions of the property which are not being developed would continue to flow via valley gutters to the existing sidewalk culvert and discharge to Sullivan Street. Stormwater from the proposed building, driveways, and parking would be captured via a new storm drain system and conveyed to an underground retention system and infiltrated.

The proposed project would provide improvements on 2.45 acres of a 5.72-acre site with existing self-storage facilities. Under existing conditions, the project site is 93 percent impervious surface area and under post development conditions, the project site would be 90 percent impervious surface area. Therefore, the proposed project would not increase the amount of impervious surface area on-site. Pollutants of concern from long-term project operations include suspended soil/sediment, nutrients, pesticides, oil and grease, and trash and debris.

The proposed project is subject to the requirements of the California Regional Water Quality Control Board, Santa Ana Region*, Waste Discharge Requirements for The County of Orange, Orange County Flood Control District and The Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff* (Orange County MS4 Permit), Order No. R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062. The Orange County Flood Control District, the County of Orange, and incorporated cities, including the City of Santa Ana, are subject to the Orange County MS4 permit. The Orange County MS4 permit requires that a Water Quality Management Plan (WQMP) be prepared for priority new development and redevelopment projects. The proposed project is considered a priority redevelopment project because it replaces more than 5,000 sf of impervious surface on an already developed site.

In compliance with the Orange County MS4 Permit, a Preliminary WQMP (**Attachment E**) was prepared for the proposed project. WQMPs specify the Site Design, Source Control, Low Impact Development, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. According to the Preliminary WQMP, stormwater runoff from the proposed building and surrounding disturbed area would be captured via roof drains and routed to an underground retention basin for infiltration. Infiltration will be utilized for water quality treatment in compliance with the requirements of the Orange County MS4 permit. The remainder of the project parcel would continue to drain via the existing valley gutters to the southeast corner of the project site and discharge to an existing sidewalk culvert through the curb face on Sullivan Street and into the City's storm drainage

system (Greenville-Banning Channel). In addition to the Orange County MS4, the proposed project would comply with City Municipal Code Section 18-156, Control Urban Runoff, which requires all new development and significant redevelopment to comply with Orange County's Drainage Area Management Plan and "any conditions and requirements established by city agencies related to the reduction or elimination of pollutants in storm water runoff from the project site".[23] Because the proposed project would implement the requirements of the applicable NPDES permit and associated BMPs and the City's Municipal Code, impacts to surface water quality would be less than significant.

The project site is within the boundaries of the Coastal Plain of Orange County Groundwater Basin.[24] According to the Preliminary WQMP, the majority of on-site soils are in Soil Group B and characterized by a fair to moderate infiltration rate. Under existing conditions, 93 percent of the project site is impervious surface area. The proposed project would decrease the amount of impervious surface area compared to existing conditions. The proposed project would capture and infiltrate stormwater runoff from the rooftop of the new building and surrounding disturbed area. No stormwater runoff is being infiltrated in the existing condition. Therefore, the proposed project would increase groundwater recharge compared to existing conditions. The proposed project would not decrease groundwater supplies or interfere with groundwater recharge.

According to Federal Emergency Management Agency Flood Zone FIRM Panel: 06059C0257J (December 2009), the project site is in an area designated with reduced flood risk due to a levee. Specifically, the project site is within Zone X, an area of minimal flood hazard (outside the 500-year floodplain). According to the California Department of Conservation,[25] the project site is not within a tsunami hazard zone. Therefore, no project-related impacts associated with flood flows or release of pollutants from inundation would occur.

The proposed project would comply with the Construction General Permit, the City's Municipal Code, and Orange County MS4 Permit, which require the implementation of BMPs to treat pollutants of concern and control the volume and velocity of stormwater runoff. In addition, the proposed project would not require groundwater dewatering and would not interfere with groundwater recharge. The proposed project would not conflict with the Water Quality Control Plan for the Santa Ana River Basin or sustainable groundwater management plans.

Overall, the proposed project would not result in impacts associated with water quality.

(5) The project site is adequately served by all required utilities and services.

The project site is served by all utilities and public services in the existing condition. Specific utilities and public service providers serving the project site include:

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23 City of Santa Ana. 2024b. Municipal Code Section 18-156. Website: https://library.municode.com/ca/santa_ana/codes/code_of_ordinances?nodeId=PTIITHCO_CH18HESA_ARTIVWAPO_S18-161CODI (accessed April 26, 2024).

24 California Department of Water Resources. 2016. Groundwater Basin Boundary Assessment Tool. Website: https://gis.water.ca.gov/app/bbat/ (accessed April 15, 2024).

25 California Department of Conservation. 2020. Orange County Tsunami Hazard Areas. Website: https://www.conservation.ca.gov/cgs/tsunami/maps/orange (accessed April 15, 2024).

Water	City of Santa Ana Public Works Agency
Wastewater	City of Santa Ana Public Works Agency
Fire	Orange County Fire Authority
Police	Santa Ana Police Department
Schools	Santa Ana Unified School District
Landfill	Private waste haulers
Electricity	Southern California Edison
Natural Gas	Southern California Gas Company

The project site is currently developed for qualified urban uses. As defined by Public Resources Code (PRC) Section 21072, a qualified urban use is any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses. The proposed project would continue the existing self-storage use on the project site. As such, the project site is served by all utilities and service providers in the existing condition.

The City of Santa Ana Public Works Agency is the water provider for the project site. The City of Santa Ana Public Works Agency maintains and operates the sewer collection system, including storm drains, catch basins, and sewer lines. Water usage for operation of the proposed additions to the self-storage uses on site would be minimal, limited to irrigation for the existing landscaping and fire suppression systems. The new self-storage building would require similar water use as the existing buildings on site and project operation would not substantially increase water usage on the project site compared to existing conditions due the use as a storage facility. Wastewater would only be generated from the office use and manager's apartment and fire suppression systems in the unlikely event of a fire. The proposed project would construct on-site water and wastewater distribution systems to serve the new building and install new laterals to connect those lines to the existing water and sewer mains in Sullivan Street. The on-site systems would be constructed in compliance with the City's building and plumbing codes in its Municipal Code. The proposed on-site distribution systems would connect to the existing water and wastewater facilities off site. Extension of the water and wastewater infrastructure from the existing system within the project site would be a routine part of the construction process and would not result in additional environmental impacts beyond those evaluated for the construction of the project. The water and wastewater facility improvements would be generally limited to the project site, with the exception of the new water and sewer laterals that would be installed in Sullivan Street.

The City of Santa Ana contracts fire department services with the Orange County Fire Authority (OCFA) which fulfills both fire protection and emergency medical responsibilities. Santa Ana is within Operations Division 6, which includes 10 fire stations[26]. The closest fire station to the project site is OCFA–Santa Ana Fire Station number 73, located at 419 Franklin Street 0.6 mile southeast of the project site. Because the proposed project would not change the existing use on site or require additional employees beyond what is required for existing operations, the proposed project would be adequately served by the OCFA and Fire Station 73. The proposed

[26] Orange County Fire Authority. 2023. "Member Cities". Website: https://ocfa.org/AboutUs/PartnerCities.aspx#:~:text=The%20Orange%20County%20Fire%20Authority,10%20stations%20throughout%20Orange%20 County (accessed May 10, 2024).

project would provide a minimum 20-foot-wide, paved "fire lane" access roadway through the project site and fire safety equipment and design elements such as fire hydrants, sprinkler systems, emergency access/fire lanes, fire extinguishers, and Knox boxes would be incorporated into the project design. The proposed project would satisfy all fire protection standards contained in the Uniform Fire and Building Codes.

Police protection services are provided to the City including the project site by the Santa Ana Police Department (SAPD). The SAPD includes multiple departments, including the Field Operations Bureau, composed of the patrol, operations and traffic divisions. The SAPD central police station is at 60 Civic Center Plaza, and the City's Westend substation is at 3750 West McFadden Avenue.[27] In addition, the police department maintains the Santa Ana Regional Transportation Public Safety Office and Jose Vargas Community Affairs Office. The closest police station to the project site is the Santa Ana Police Department, on 60 Civic Center Plaza, 1.3 miles northeast of the project site. The proposed project would not decrease the officer-to-resident ratio in Santa Ana or trigger the need for new or physically altered police facilities. Because the proposed project would not change the existing use on site or require additional employees beyond what is required for existing operations, the SAPD would adequately serve the proposed project

CALIFORNIA ENVIRONMENTAL QUALITY ACT CATEGORICAL EXEMPTIONS—EXCEPTIONS

State CEQA Guidelines Section 15300.2 provides exceptions to categorical exemptions that apply to specific types of projects. The exceptions to the CEs pursuant to Section 15300.2 of the *State CEQA Guidelines* are:

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

The proposed project does not rely on the specific classes of exemptions (3, 4, 5, 6, and 11) specified at the beginning of exception 15300.2(a). This exception does not apply to the proposed project.

Nonetheless, if this exception were applicable to a Class 32 exemption, the proposed project would not trigger this exception to the exemption. The overall project parcel encompasses 212 and 280 North Sullivan Street and is characterized by pavement, storage facilities, and landscaping associated with the existing on-site use. The project site is surrounded on all sides by urban development and is zoned and designated for Light Industrial (M1). Therefore, the project site is not particularly sensitive in terms of environmental resources, and there are no mapped environmentally sensitive habitat areas within or close to the project site. In addition,

[27] Santa Ana Police Department. 2023. "City of Santa Ana: Police". Website. https://www.santa-ana.org/departments/police (accessed May 10, 2024).

the proposed project, like all projects, would be subject to the provisions of the MBTA, which prohibits disturbing or destroying active nests, and California Fish and Game Code Section 3503, which protects nests and eggs. Further, although the proposed project would include the removal and replacement of on-site trees, the proposed project would be required to comply with the City's Municipal Code, including Article VII, Regulation for the Planting Maintenance, and Removal of Trees. With compliance with existing regulations, potential impacts to nesting birds and trees would be avoided.

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

The proposed project is an infill development project in an urban area. According to the Governor's Office of Planning and Research, the term "infill development" refers to building within unused and underutilized lands within existing development patterns, typically, but not exclusively, in urban areas.[28] The project site and surrounding areas are currently developed for qualified urban uses as defined by PRC Section 21072.

According to the City of Santa Ana's Major Development Activity Report[29], there are several active projects within the vicinity of the project site. The following active projects are within 1 mile of the project site: Vista Heritage Development Project, Habitat for Humanity Washington Avenue Project, Arches Project, First Harbor Mixed-Use Development Project, Fifth & Harbor Mixed-Use Development Project, Illumination Foundation Renovation Project, and the Bewley Street Townhomes Project. These projects include development of residential buildings, multi-family apartments, industrial buildings, and mixed-use buildings with commercial space. There are no active projects of the same type (commercial self-storage) in the vicinity of the project site.

Due to the project site's proximity to the Vista Heritage Development Project, Habitat for Humanity Washington Avenue Project, Arches Project, First Harbor Mixed-Use Development Project, Fifth & Harbor Mixed-Use Development Project, Illumination Foundation Renovation Project, and the Bewley Street Townhomes Project, the proposed project has the potential to contribute to cumulative impacts in relation to these projects. The remaining projects listed above are farther away, and intervening land uses would prohibit the proposed project from contributing to a significant cumulative impact. Therefore, the following discussion evaluates the proposed project's potential to result in cumulative impacts in conjunction with the Vista Heritage Development Project, Habitat for Humanity Washington Avenue Project, Arches Project, First Harbor Mixed-Use Development Project, Fifth & Harbor Mixed-Use Development Project, Illumination Foundation Renovation Project, and the Bewley Street Townhomes Project.

The proposed project would be consistent with existing land use and visual patterns typical of an urban built environment. No amendments to an adopted planning document would be required for implementation of the proposed project, nor would the project divide an established

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28 Governor's Office of Planning and Research. n.d. Infill Development. Website: https://opr.ca.gov/planning/land-use/infill-development/ (accessed April 15, 2024).

29 City of Santa Ana. 2024c. City of Santa Ana – Major Development Activity Report. Website: https://www.santa-ana.org/major-planning-projects-and-monthly-development-project-reports/ (accessed April 26, 2024).

community. Therefore, the proposed project would not contribute to a significant cumulative land use impact.

Neither the project site nor any other site in Santa Ana is currently used for agricultural or farmland production. Neither the project site nor the local area is particularly sensitive in terms of biological resources, and there are no mapped environmentally sensitive habitat areas within or near the project site. The proposed project would not result in the loss of known mineral resources or a locally important mineral resource recovery site, as there are no mineral resources located at the project site. Therefore, the proposed project would not result in impacts related to agricultural, biological, or mineral resources and would not contribute to a significant cumulative impact.

The proposed project would contribute criteria pollutants to the area during project construction. Individual projects in the area may be under construction simultaneously with the proposed project. Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dust and pollutant emissions during construction could result in substantial short-term increases in air pollutants. However, each project would be required to comply with SCAQMD's standard construction measures, which aim to mitigate and minimize impacts associated with fugitive dust[30] and greenhouse gas emissions[31] from construction as much as possible. The proposed project's short-term construction CO, NO_2, PM_{10}, and $PM_{2.5}$ emissions would not exceed the LSTs. Therefore, construction of the proposed project would have a less than significant impact with regard to regional and localized emissions and would not result in cumulatively considerable impacts.

Construction of the proposed project would result in short-term noise and vibration. Individual projects in the area may be under construction simultaneously with the proposed project. Depending on construction schedules and actual implementation of projects in the area, construction could result in substantial short-term increases in noise and vibration levels. However, each project would be required to comply with the City's Noise Ordinance. Due to the proposed project's distance to these nearby projects listed above, the proposed project would not contribute to cumulatively considerable noise and vibration impacts. The proposed project's short-term construction noise and vibration levels would not exceed the vibration threshold considered safe for non-engineered timber and masonry buildings or the FTA's noise criteria. Additionally, the proposed project would be constructed in compliance with the requirements of the City's Noise Ordinance. Therefore, construction of the proposed project would have a less than significant impact with regard to noise and vibration and would not result in cumulatively considerable impacts.

Individual projects in the area may be under construction simultaneously with the proposed project. Depending on construction schedules and actual implementation of projects in the area, construction could result in substantial short-term increases in traffic but would ultimately not

[30] South Coast Air Quality Management District (SCAQMD). 2007. Fugitive Dust Mitigation Measures & Control Efficiencies. Website: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust (accessed September 10, 2025)

[31] SCAQMD. 2010. Greenhouse Gases Mitigation Measures & Control Efficiencies. Website: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/greenhouse-gases (accessed September 10, 2025)

pose significant impacts to current emergency access throughout City arterials or result in an increased VMT output due to cumulative construction traffic. Ultimately, implementation of the proposed project and projects in the area would not result in significant traffic impact during construction. The proposed project would also not contribute to the exposure of any hazardous materials during construction since the project site and overall project parcel are not located on an area that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, construction of the proposed project would have a less than significant impact with regard to traffic and would not result in cumulatively considerable impacts.

In summary, the proposed project is an infill development project in an urban area. Upon completion of construction, the project site would operate in a nearly identical manner as its current operation. The proposed project would rely on and can be accommodated by the existing road system, public services, and utilities. Impacts of the proposed project would not be cumulatively considerable in connection with the effects of past projects, the effects of other current projects, or the effects of probable future projects.

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

The proposed project would continue the existing self-storage use on-site and would operate in a nearly identical manner as its current operation. Given the urban nature of the project site and the compatibility of the proposed project with the character of the surrounding uses, there is no evidence to indicate that the proposed project would have a significant effect on the environment due to unusual circumstances.

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

The nearest eligible or State-designated scenic highway to the project site is State Route 91, which is approximately 8 miles northeast of the project site.[32] Therefore, the proposed project does not have the potential to damage resources within a State-designated scenic highway. The project site is developed with a self-storage facility; none of the existing structures on the project site are over 50 years old and, therefore, are not eligible for listing as historic resources. Additionally, the project site is not listed on the City of Santa Ana Register of Historic

[32] California Department of Transportation. 2018. California State Scenic Highway System Map. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed April 16, 2024).

Properties[33] or mapped within a historic district on the City of Santa Ana Historic Resource Map[34].

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

A Phase 1 Environmental Site Assessment (ESA)[35] (**Attachment F**) was prepared to identify the environmental conditions of the site. Pursuant to Government Code Section 65962.5, the Hazardous Waste and Substances Sites List (Cortese List) has been compiled by the California Environmental Protection Agency Hazardous Materials Data Management Program. The California Department of Toxic Substances Control (DTSC) compiles information from subsets of the following databases to make up the Cortese List:

1. The DTSC list of contaminated or potentially contaminated hazardous waste sites listed in the California Sites database (formerly known as ASPIS);
2. The California SWRCB listing of leaking underground storage tanks (LUSTs); and
3. The California Integrated Waste Management Board list of sanitary landfills that have evidence of groundwater contamination or known migration of hazardous materials (formerly WB-LF; now Assembly Bill 3750).

The proposed project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[36] The project site is within 0.25 mile of one current LUST cleanup site[37]. ARCO, 0.18 mile southwest of the project site at 2646 West First Street, has been under remediation since 2019. Due to the ARCO site's lower elevation and regulated nature, this LUST cleanup site would not represent an environmental concern to the project site.

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

The buildings on the project site were constructed in approximately 1977. The project site is developed with a self-storage facility; none of the existing structures on the project site are over 50 years old and, therefore, are not eligible for listing as historic resources. Additionally, the project site is not listed on City of Santa Ana Register of Historic Properties[38] and there are no recorded historic resources in the vicinity of the project site. According to the City of Santa Ana

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33 City of Santa Ana. n.d.-b. City of Santa Ana Register of Historic Properties. Website: https://www.santa-ana.org/historic-preservation/ (accessed April 16, 2024).

34 City of Santa Ana. 2023. City of Santa Ana Historic Resource Map. Website: https://www.santa-ana.org/historic-preservation/ (accessed April 16, 2024).

35 AES Due Diligence, Inc. 2021. P*hase I Environmental Site Assessment (ESA*) *Memorandum*, Self Storage Management Company, or their assigns.

36 Department of Toxic Substances Control. 2024. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/ (accessed April 16, 2024).

37 State Water Resources Control Board. 2024. GeoTracker Map. Website: https://geotracker.waterboards.ca.gov/ (accessed April 16, 2024).

38 City of Santa Ana. n.d.-b. City of Santa Ana Register of Historic Properties. Website: https://www.santa-ana.org/historic-preservation/ (accessed April 16, 2024).

Historic Resource Map[39] and the City's General Plan Historic Preservation Element[40], the project site is not within a historic district or near a historic district. As the existing buildings on the project site are not 50 years old, they are not old enough to be considered historical resources and are not eligible for listed at the federal, State, or local levels. Because of the age of the existing buildings, they do not need to be evaluated as historical resources pursuant to CEQA. As such, project construction and operation would have no impacts to "historical resources" pursuant to *State CEQA Guidelines* Section 5064.5.

CONCLUSION

In summary, the proposed project would not result in any specific or general exceptions to the use of a CE as detailed under *State CEQA Guidelines* Section 15332. The proposed project would not cause any significant impacts to traffic, noise, air quality, or water quality. The project site does not have value as habitat for endangered, rare, or threatened species. The proposed project would not result in damage to a scenic resource within a highway officially designated as a State Scenic Highway. The project site is not on any list compiled pursuant to Section 65962.5 of the Government Code. Furthermore, no unusual circumstances or potential cumulative impacts would occur that may reasonably create an environmental impact. Therefore, the proposed project is exempt from the provisions of CEQA as specified by the *State CEQA Guidelines* identified above.

Attachments:
A: Project Figures
B: Trip Generation and VMT Memorandum
C: Noise and Vibration Impact Analysis Memorandum
D: Air Quality Analysis Memorandum
E: Geotechnical Site Evaluation
F: Water Quality Management Plan (WQMP)
G: Phase 1 Environmental Site Assessment (ESA)
H: References

39 City of Santa Ana. 2023. City of Santa Ana Historic Resource Map. Website: https://www.santa-ana.org/historic-preservation/ (accessed April 16, 2024).

40 City of Santa Ana. 2022. Historic Preservation Element. Website: https://storage.googleapis.com/proudcity/santaanaca/uploads/2022/05/Vol.-3-Historic-Preservation-Element-April-2022.pdf (accessed April 16, 2024).

ATTACHMENT A

PROJECT FIGURES
(FIGURES 1, 2 AND 3)

ATTACHMENT B

TRIP GENERATION AND VMT MEMORANDUM

ATTACHMENT C

NOISE AND VIBRATION IMPACT ANALYSIS MEMORANDUM

ATTACHMENT D

AIR QUALITY ANALYSIS MEMORANDUM

ATTACHMENT E

GEOTECHNICAL SITE EVALUATION

ATTACHMENT F

WATER QUALITY MANAGEMENT PLAN (WQMP)

ATTACHMENT G

PHASE 1 ENVIRONMENTAL SITE ASSESSMENT (ESA)

ATTACHMENT H

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REFERENCES

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