

# 1. Executive Summary

This Draft Supplemental Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the proposed Related Bristol Specific Plan Project (proposed Project). This Supplemental EIR has been prepared in conformance with State and City of Santa Ana environmental policy guidelines for implementation of the California Environmental Quality Act (CEQA).

The Supplemental EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft Supplemental EIR will be available for public review at the City's website: ([https://www.santa-ana.org/related-california-bristol-specific-plan/#:~:text=The%20applicant%20proposes%20a%20specific,acres%20of%20onsite%20open%20space.](https://www.santa-ana.org/related-california-bristol-specific-plan/#:~:text=The%20applicant%20proposes%20a%20specific,acres%20of%20onsite%20open%20space.))) or physically at the following locations:

City of Santa Ana, Planning Division Counter  
20 Civic Center Plaza, M-20  
Santa Ana, CA 92701

City of Santa Ana Public Library  
26 Civic Center Plaza  
Santa Ana, CA 92701

Written comments related to environmental issues in the Draft Supplemental EIR should be addressed to:

Ali Pezeshkpour, AICP, Planning Manager  
City of Santa Ana Planning and Building Agency  
PO BOX 1988 (M-20)  
Santa Ana, CA 92702  
Email: [APezeshkpour@santa-ana.org](mailto:APezeshkpour@santa-ana.org)

A Notice of Availability of the Draft Supplemental EIR was published concurrently with distribution of this document.

## 1.1 PROJECT LOCATION

The 41.13-gross-acre Project site is located within the southern portion of the City of Santa Ana at 3600, 3606, 3732, 3701, 3719, 3810, 3814, 3820, and 3900 South Bristol Street. The Project site includes the following nine parcels: (Assessor Parcel Numbers [APNs]) 412-131-12, 412-131-13, 412-131-14, 412-131-16, 412-131-17, 412-131-22, 412-131-24, 412-131-25, and 412-131-26. The Project site is bordered by MacArthur Boulevard to the north, Sunflower Avenue to the south, and Bristol Street to the east. The west side of the site is bordered by South Plaza Drive between MacArthur Boulevard and Callen's Common and by existing development between Callen's Common and Sunflower Avenue to the south. Regional access to the Project site is provided from Interstate 405 (I-405) from the Bristol Street exit, and from State Route 55 (SR-55) from the MacArthur Boulevard exit. Access to the Project site is provided from Bristol Street, Callen's Common, MacArthur Boulevard, Sunflower Avenue, and South Plaza Drive.

## 1.2 PROJECT BACKGROUND

The City of Santa Ana (City) General Plan Update (GPU) was adopted, and the GPU FEIR was certified, in April 2022 (State Clearinghouse Number 2020029087); the GPU went into effect on May 26, 2022. The GPU provides long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045. The GPU Land Use Element guides development (e.g., infill development, redevelopment, use and revitalization/restoration) by designating land uses. The GPU FEIR evaluated the potential environmental effects associated with implementation of the

GPU and addresses appropriate and feasible mitigation measures that would minimize or eliminate these impacts.

The Project site is located within the GPU South Bristol Street Focus Area, which is designated to create opportunities to transform auto-oriented shopping plazas to walkable, bike-friendly, and transit-friendly urban villages that incorporate a mix of high intensity office and residential living with experiential commercial uses.

### 1.3 BASIS FOR A SUPPLEMENTAL EIR

The GPU FEIR is a Program EIR that examined the existing environment and the total scope of environmental effects that would occur as a result of buildout of the GPU land uses. Once a Program EIR has been prepared, subsequent activities within the program or changes to the program must be evaluated to determine whether additional CEQA documentation needs to be prepared.

The key considerations in determining the need for additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines Section 15162, which states that no subsequent EIR shall be prepared unless one or more of the following conditions is present:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Also, CEQA Guidelines Section 15163 states that the Lead Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
- (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

As detailed in Chapter 3.0, *Project Description*, the proposed Project includes a phased redevelopment of the Project site, consistent with the General Plan District Center-High (DC-5) land use designation and the South Bristol Street Focus Area that may involve new significant environmental effects or a substantial increase in the previously identified effects. Thus, the City of Santa Ana has prepared this Supplemental EIR that evaluates the potential of the proposed Project to result in new or substantially greater impacts than previously identified in the GPU FEIR; and include Project specific mitigation measures to make the GPU FEIR adequate for the proposed Project, pursuant to CEQA.

## 1.4 PROJECT DESCRIPTION SUMMARY

The proposed Project would demolish the 16 existing buildings and remove all existing improvements, landscaping, and pavement. The proposed Project would then construct a 3-phase mixed-use development that would include up to 3,750 multi-family residential units, up to 200 units of senior living/continuum of care use, a 250-room hotel, and up to 350,000 square feet (SF) of commercial uses. The proposed development within each phase is listed in Table 1-1.

**Table 1-1: Project Summary**

Use	Phase 1	Phase 2	Phase 3	Total
Residential (units)	1,375	856	1,519	<b>3,750</b>
Commercial (SF)	250,000	65,000	35,000	<b>350,000</b>
Hospitality (rooms)	250	--	--	<b>250</b>
Senior/Continuum of Care (units)	200	--	--	<b>200</b>

The proposed multi-family residential units would be provided as for-rent multi-family uses. Residences would be in vertical mixed-use structures which could include residential on top of commercial uses and would include recreation areas, leasing offices, fitness rooms, pools/spas, business centers, etc.

### Open Space, Recreation, and Amenities

The proposed Project would provide open space and recreation amenities for residents that would include approximately 13.1 acres of open space plazas, pedestrian paseos, and parks. Pursuant to the proposed Specific Plan, private and common open space would be provided at a ratio of 200 SF per unit.<sup>1</sup> These spaces would allow for seating areas, walkways, outdoor dining, open play areas, and a private recreation facility for residents.

### Site Access

Vehicular access to the Project site would be provided via ingress/egress to and from Bristol Street, South Plaza Drive, MacArthur Boulevard, and Sunflower Avenue. The proposed Project would also include the construction of Bristol Paseo, the primary north/south street through the site. Access to the Bristol Paseo would be provided through the construction of a new intersection on MacArthur Boulevard, as well as the construction of a new driveway that would be realigned approximately 110 feet to the east of the existing driveway. The construction of the new driveway on Sunflower Avenue would include restriping and modification of the existing median to provide an eastbound left-turn lane. The proposed Project would install a five-phase traffic signal, subject to the improvements/realignment of the South Coast Plaza driveway. In addition, the

<sup>1</sup> Private and Common Open Space amounts may vary; however, a total of 200 SF of combined private/common open space per unit shall be provided, measured across the overall Specific Plan area. This private and common open space may be a combination of passive and active open space. Common open space may include backbone parks, parkways, programmable roads, greenways, courtyards, pool/spa decks, roof decks, dog parks, fitness rooms, business centers, parkways, landscaped yards. Private open space of a minimum of 50 SF, which may include patios or balconies of any orientation.

proposed Project would install a three-phase traffic signal on South Plaza Drive at Callen's Common. The proposed Project would install a signalized driveway on Bristol Street between Callen's Common and Sunflower Avenue. The proposed Project would modify the northbound approach on Bristol Street to provide a second left turn lane and remove the existing median. The proposed Project would remove the existing median on the southbound approach and install a five-phase traffic signal. Drop-off and loading areas would be provided on Callen's Common and Sunflower Avenue.

Parking spaces would be provided through subterranean and above-grade structures. The proposed Project also includes limited on-street parking. The site design would include pedestrian/bicycle paths to provide for non-vehicular onsite circulation and connection to existing sidewalks and bike lanes adjacent to the Project site.

### **Water Infrastructure**

The proposed Project would redevelop the onsite infrastructure to serve the proposed multi-family residential and commercial uses. The proposed Project would install new onsite water infrastructure that would connect to water pipelines that are adjacent to the site. The onsite improvements include construction of a 12-inch water main in Bristol Paseo and replacement of the existing 12-inch water line in Callen's Common with a new 12-inch main and connection of the new onsite infrastructure to the replacement line. The proposed Project also includes offsite infrastructure improvements that would replace a portion of the existing 12-inch water main in South Plaza Drive from MacArthur Boulevard to Sunflower Avenue with a 12-inch water main. The 12-inch water mains in Sunflower Avenue from South Plaza Drive to Bristol Street and Bristol Street from MacArthur Boulevard to Sunflower Avenue would be replaced "in-kind" with new 12-inch water mains.

### **Wastewater Infrastructure**

Wastewater from the Project site currently discharges into an existing City-owned 8-inch sewer line at Sunflower Avenue and Bristol Street, which drains directly into the 78-inch Orange County Sanitation District (OCSD) sewer line in Sunflower Avenue. The proposed Project would install a new onsite sewer system that would connect directly to the 78-inch OCSD sewer line in Sunflower Avenue.

### **Drainage Infrastructure**

The existing topography of the Project site is relatively flat, gently sloping towards the west. Currently, the site is 90 percent impervious. A storm drain system would be installed within the onsite roadways to convey the stormwater to proposed biotreatment infrastructure (Modular Wetlands) on the site and then to the existing City storm drain systems in MacArthur Boulevard, South Plaza Drive, Sunflower Avenue, and Bristol Street. In addition, the proposed Project would upgrade the existing 54-inch reinforced concrete pipe (RCP) in Sunflower Avenue to a 72-inch RCP for 2,230 linear feet and the existing 42-inch RCP in South Plaza Drive to a 60-inch RCP for 320 linear feet.

### **General Plan Land Use and Zoning**

The Project site has an existing General Plan land use designation of District Center-High (DC-5) and a zoning designation of General Commercial (C-2) and Commercial Residential (CR). The proposed Project is requesting the approval of the Related Bristol Specific Plan to replace the existing zoning, which would define the allowable uses and development standards within its boundaries.

## **1.5 PROJECT OBJECTIVES**

The Project objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

The proposed Related Bristol Specific Plan Project objectives include the following:

- Implement the vision and objectives established in the City of Santa Ana General Plan for the South Bristol Street Focus Area to create a southern gateway to the City. The South Bristol Street Focus Area objectives:
  - Capitalize on the success of the South Coast Metro area;
  - Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented;
  - Realize an intense, multi-story presence along the Bristol Street corridor; and
  - Provide for mixed-use opportunities while protecting adjacent, established low density neighborhoods.
- Allow for the flexible redevelopment of the underutilized Project site to provide a balanced mix of residential, retail, and hospitality uses in the South Bristol Street Focus Area that integrate into the existing urban systems and provide a safe and attractive environment for living and working, as encouraged by the GPU.
- Transform an auto-oriented shopping plaza with large surface parking areas to a community which maximizes opportunities for onsite open space which can be accomplished through the provision of subsurface shared parking and intensity of land use permitted by the General Plan.
- Develop high quality residential spaces that reflect modern lifestyles, while responding to the need for additional housing at a higher density in an area of the City planned for growth.
- Develop a project with a mix of land uses that stimulate economic activity, commerce, and new housing opportunities in the South Bristol Street Focus Area.
- Have a positive contribution to the local economy through new capital investment, the creation of new jobs, and the expansion of the tax base.
- Create a walkable mixed-use development to encourage and enhance pedestrian activity within the Specific Plan area and the local community.
- Enhance non-vehicular activity by providing onsite and offsite pedestrian and bicycle facilities that link with existing facilities and transit services.
- Improve existing infrastructure to support the Related Bristol Specific Plan consistent with the General Plan conditions.
- Provide a project that contributes to the creation of a vibrant urban core for the City and takes advantage of the site's location within the South Coast Metro area. Provide a project that contains vibrant and attractive community amenities, recreational and open space areas, and gathering spaces that are directly accessible to residents and the community.
- Provide community benefits commensurate with the Specific Plan development proposal including public open space onsite and locations for public community events, as well as streetscape improvements along the Project site frontages of MacArthur Boulevard, Bristol Street, Sunflower Avenue and South Plaza Drive.

## 1.6 SUPPLEMENTAL EIR LEVEL OF ANALYSIS

The GPU FEIR (State Clearinghouse Number 2020029087) evaluated the update to the City's GPU, including the Project site within the South Bristol Street Focus Area at a DC-5 land use designation at a programmatic

level. Project-specific developments were not evaluated within the GPU FEIR. This Supplemental EIR analyzes development of the Project site at a project-specific level pursuant to the development application that has been received to make the GPU FEIR adequate for the proposed Project.

## 1.7 SUMMARY OF ALTERNATIVES

Chapter 6.0, *Alternatives*, of this Supplemental EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Chapter 6.0 are summarized below.

**Alternative 1: No Project/No Build Alternative.** Under this alternative, the proposed Project would not be developed, and no development would occur. The existing 16 commercial buildings would remain. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the proposed Project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the proposed Project in contrast to the result from not approving, or denying, the proposed Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

As detailed in Chapter 6.0, *Alternatives*, the No Project/No Build Alternative would avoid the significant and unavoidable air quality and parks and recreation impacts that would occur from the proposed Project. Additionally, operational impacts would be reduced and the mitigation measures that are detailed in Chapter 5.0, which include measures related to air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources would not be required. However, the benefits of the proposed Project would also not be realized, such as implementation of the General Plan DC-5 land use and South Bristol Street Focus Area objectives, improvements to offsite bicycle lanes, sidewalks, and stormwater infrastructure, CALGreen infrastructure improvements to storm water quality, and a reduction of drainage from the area, removal of potentially contaminated soils, provision of housing within TPAs and High Quality Transit Areas, improvements to the jobs/housing balance, and the potential to reduce vehicle miles traveled. Overall, the No Project/No Build Alternative would not generate the significant impacts of the proposed Project and would not require implementation of mitigation measures; however, this alternative would not realize the benefits of the proposed Project. In addition, the No Project/No Build Alternative would not meet any of the Project Objectives.

**Alternative 2: Reduced Project Alternative.** Under this alternative, a reduction in commercial square footage would be built. Specifically, this alternative would consist of a reduction of 100,000 SF of commercial retail and elimination of the 250-room hotel. This alternative would develop and operate 3,750 multi-family residential units, a 200-room senior housing facility, and 250,000 SF of retail and restaurant commercial uses.

The reduction would result in the construction of 1,375 units, 200 senior housing units, and 150,000 SF of commercial uses in Phase 1; including an administrative Police Department substation to be located within the commercial use area. Approximately 856 units and 65,000 SF of commercial uses would be constructed in Phase 2; and 1,519 units and 35,000 SF of commercial uses would be constructed in Phase 3.

To support the reduced Project under this alternative, the same ratio of parking spaces would be provided as proposed under the proposed Project. Under the Reduced Project Alternative, certain offsite improvements (including storm drain upgrades, restriping, and signal installation) are assumed, consistent with the proposed Project. In addition, the same amount of recreational facilities and common open space would be provided as the proposed Project.

Like the proposed Project, this alternative would require a Zoning Map Amendment to amend the existing zoning of General Commercial (C-2) and Commercial Residential (CR) to Related Bristol Specific Plan District.

As detailed in Chapter 6.0, *Alternatives*, the Reduced Project Alternative would reduce operational air quality impacts at Project buildout to a less than significant level. However, significant and unavoidable impacts related to construction air quality emissions and the proposed Project's contribution to cumulative parkland deficiencies would continue to occur from implementation of this alternative. Additionally, the mitigation required for implementation of the proposed Project would continue to be required for the Reduced Project Alternative to reduce impacts related to construction air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources to a less than significant level. Overall, although the Reduced Project Alternative's impacts would be less than the impacts of the proposed Project, the Reduced Project Alternative would not eliminate all of the significant and unavoidable impacts of the proposed Project or eliminate the need for mitigation. The Reduced Project Alternative would also result in a reduced beneficial impact, providing less commercial space on the Project site, which would in turn provide fewer employment opportunities. Furthermore, the Reduced Project Alternative would meet the Project Objectives, but not to the same extent as the proposed Project.

**Alternative 3: Buildout of the Existing Zoning Alternative.** Under this alternative, no Zoning Map Amendment would occur, and the Project site would be built out according to the existing zoning designations, as shown on Figure 3-5 in Chapter 3.0, *Project Description*. Therefore, this alternative would include development of the 23.96-acre area north of Callen's Common with only commercial uses pursuant to the C-2 zoning designation, which would result in approximately 782,774 SF at the maximum FAR of 0.75 with a building height of 35 feet. This alternative would provide surface parking and would not develop Bristol Central Park in the northern portion of the site.

Also, the 17.17-acre area south of Callen's Common would be redeveloped with commercial uses and mixed-uses pursuant to the CR zoning designation, which would result in approximately 250,000 SF of ground-floor commercial uses and office space, approximately 250 hotel rooms, approximately 200 senior care units, and 1,375 multi-family units would be developed to a maximum FAR of 5.0. Buildings at the northwestern corner of the CR zoned area would be a maximum of 50 feet, buildings at 200 feet from adjacent residential uses would be a maximum height of 100 feet. The buildings toward the southeast corner of the site would be a maximum of 25 stories. Parking within areas south of Callen's Common would be underground and open space within this area would be consistent with the proposed Project.

Overall, Buildout of the Existing Zoning Alternative would develop the site with 682,774 SF more commercial space than proposed by the Project, totaling 1,032,774 SF of commercial uses (including an administrative Police Department substation), the same amount of hotel rooms and senior care units as the proposed Project, and 2,375 fewer residential units for a total of 1,375 multi-family units.

The Buildout of the Existing Zoning Alternative would increase the proposed Project's significant and unavoidable operational air quality impact. As such, significant and unavoidable impacts related to air quality and parks and recreation would continue to occur from implementation of this alternative. Additionally, the mitigation required air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and tribal cultural resources would continue to be required for the Buildout of the Existing Zoning Alternative.

The Buildout of the Existing Zoning Alternative would also result in a reduced beneficial impact, as it would not provide as many multi-family units on the Project site; and therefore, would not improve the jobs-housing balance. Further, the Buildout of the Existing Zoning Alternative would meet the majority of the Project objectives, but not to the same extent as the proposed Project.

## 1.8 SUMMARY OF IMPACTS

Table 1-2 summarizes the conclusions of the environmental analysis contained in this Supplemental EIR. The level of significance of impacts after the proposed mitigation measures are applied are identified as significant and unavoidable, less than significant, and no impact. Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts.



**Table 1-2: Summary of Impacts, Mitigation Measures, and Level of Significance**

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>5.1 Air Quality</b>				
<b>Impact AQ-1:</b> The Project would result in a conflict with or obstruct implementation of the applicable air quality plan.	<b>PPP AQ-1: Rule 403.</b> The following measures shall be incorporated into construction plans and specifications as implementation of Rule 403:	Potentially significant	<b>GPU FEIR Mitigation Measures</b> <b>MM AQ-1</b> Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:	Significant and unavoidable
<b>Impact AQ-2:</b> The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	<ul style="list-style-type: none"> <li>All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.</li> <li>The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.</li> <li>The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.</li> </ul>	Potentially significant	<ul style="list-style-type: none"> <li>Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as:</li> </ul>	Significant and unavoidable

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p><b>PPP AQ-2: Rule 1113.</b> The following measure shall be incorporated into construction plans and specifications as implementation of Rule 1113. The Project shall only use “Low-Volatile Organic Compounds (VOC)” paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113.</p> <p><b>PPP AQ-3: Rule 445.</b> The following measure shall be incorporated into construction plans and specifications as implementation of Rule 445. Wood burning stoves and fireplaces shall not be included or used in the new development.</p> <p><b>PPP AQ-4: CALGreen Building Standards MERV 13 Filters.</b> Indoor air quality within mechanically ventilated buildings shall comply with Section 5.504.5.3 (Filters) of the California Green Building Standards Code Part 11 that requires utilization of at least a Minimum Efficiency Reporting Value (MERV) of 13 air filtration systems. The Code requires MERV 13 filters to be installed prior to occupancy and replaced and/or maintained as directed by the manufacturer.</p>		<ul style="list-style-type: none"> <li>o Use of nontoxic soil stabilizers to reduce wind erosion.</li> <li>o Apply water every four hours to active soil-disturbing activities.</li> <li>o Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> <li>• Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.</li> <li>• Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.</li> <li>• Limit nonessential idling of construction equipment to no more than five consecutive minutes.</li> <li>• Limit onsite vehicle travel speeds on unpaved roads to 15 miles per hour.</li> <li>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super- Compliant architectural coating manufactures can be found on the South Coast AQMD's website.</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p><b>MM AQ-2:</b> Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>• For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.</li> <li>• Applicants for manufacturing and light industrial uses shall consider</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.</p> <ul style="list-style-type: none"> <li>• Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).</li> <li>• Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures).</li> <li>• Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code and Sec. 41-1307.1 of the Santa Ana Municipal Code.</li> <li>• Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures).</li> <li>• Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code.</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> <li>Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star-certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star-certified or equivalent appliances shall be verified by Building &amp; Safety during plan check.</li> <li>Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate.</li> </ul> <p><b>Project Specific Mitigation Measures</b></p> <p><b>MM AQ-1: Construction Exhaust and Dust Control.</b> Prior to issuance of Phase 1, Phase 2, and Phase 3 grading permits, the Project Applicant shall prepare and submit documentation to the City of Santa Ana Building and Safety Division that demonstrates the following:</p> <ul style="list-style-type: none"> <li>Require fugitive-dust control measures that exceed SCAQMD Rule 403 requirements: <ul style="list-style-type: none"> <li>Apply water at least three times daily to active soil-disturbing activities.</li> <li>Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling</li> </ul> </li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>dirt, sand, soil, or other loose materials.</p> <ul style="list-style-type: none"> <li>○ Limit onsite vehicle travel speeds on unpaved roads to 15 miles per hour.</li> <li>○ Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.</li> <li>• All off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each equipment's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) shall be provided to the City at the time of mobilization of each applicable unit of equipment.</li> <li>• Construction equipment shall be properly maintained according to manufacturer specifications. All equipment maintenance records and data sheets, including design specifications and emission control tier classifications shall be kept onsite and furnished to the lead agency or other regulators upon request.</li> <li>• All construction equipment and delivery vehicles shall be turned off when not in use, or limit onsite idling</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>for no more than 5 minutes in any 1 hour.</p> <ul style="list-style-type: none"> <li>Onsite electrical hook ups to a power grid shall be provided for electric construction tools including saws, drills, and compressors, where feasible, to reduce the need for diesel powered electric generators. Construction contracts shall require all off-road equipment with a power rating below 19 kilowatts (25 horsepower) (e.g., plate compactors, pressure washers, etc.) used during project construction be battery powered.</li> <li>Prepare a construction traffic control plan detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.</li> <li>Provide information on transit and ridesharing programs and services to construction employees.</li> </ul> <p><b>MM AQ-2: Low VOC Paint (Construction).</b> Construction plans, specifications, and permitting shall require that during construction, the Project shall use "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits (i.e., have a lower VOC content than what is required) put forth by SCAQMD's Rule 1113 for all architectural coatings. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Prior to issuance</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>of building permits, the City of Santa Ana shall confirm that plans include the following specifications:</p> <ul style="list-style-type: none"> <li>• All architectural coatings will be Super-Compliant low VOC paints.</li> <li>• Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.</li> <li>• Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.</li> <li>• For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain. Set aside the can of cleanup water and take it to the hazardous waste center (<a href="http://www.cleanup.org">www.cleanup.org</a>).</li> <li>• Use compliant low-VOC cleaning solvents to clean paint application equipment.</li> <li>• Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.</li> <li>• Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.</li> <li>• Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.</li> </ul>	



Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p><b>MM AQ-3: Vehicle Trip Reduction.</b> Develop a qualifying Commute Trip Reduction (CTR)/ Transportation Demand Management (TDM) plan to reduce mobile GHG emissions for all uses. The TDM plan shall be approved by the City of Santa Ana prior to the issuance of building permits. The TDM plan shall discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The following measures shall be incorporated into the TDM plan.</p> <p>TDM Requirements for Non-Residential Uses:</p> <ul style="list-style-type: none"> <li>• The Project Applicant shall consult with the local transit service provider to maintain and identify opportunities to maximize transit. Evidence of compliance with this requirement may include correspondence from the local transit provider(s) regarding the potential need for installing bus shelters or bus stops at the site.</li> <li>• The portion of the TDM plan for non-residential uses shall include, but not be limited to the following potential measures: ride-matching assistance, preferential carpool parking, flexible work schedules for carpools, half-time transportation coordinators, providing a web site or message board for coordinating rides, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and including bicycle end of trip facilities (such as bicycle parking and changing/shower facilities). This list</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>may be updated as new methods become available. Verification of this measure shall occur prior to building permit issuance for the commercial uses.</p> <p>TDM Requirements for Residential Units:</p> <ul style="list-style-type: none"> <li>Rental Units. Upon a residential dwelling being rented or offered for rent, the Project Applicant shall notify and offer to the tenant or prospective tenant, materials describing public transit, ridesharing, and nonmotorized commuting opportunities in the vicinity of the development. The materials shall be approved by the City of Santa Ana. The materials shall be provided no later than the time the rental agreement is executed. This information shall be submitted to the City of Santa Ana Planning Division for review and approval, prior to the issuance of the first certificate of occupancy.</li> </ul> <p><b>MM AQ-4: Prohibition of Fireplaces.</b> The installation of wood-burning and natural gas devices shall be prohibited inside residential dwelling units. The purpose of this measure is to limit emissions of ROG, NO<sub>x</sub>, and particulate matter emissions from wood-burning and natural gas devices used for primary heat, supplemental heat, or ambiance. This prohibition shall be noted on the deed and/or lease agreements for tenants to obey.</p> <p><b>MM AQ-5: Electric Landscape Equipment.</b> Prior to the issuance of occupancy permits, the Planning Division shall confirm that the</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>Project's Codes Covenants and Restrictions (CC&amp;Rs) and/or tenant lease agreements include contractual language that all landscaping equipment used on site shall be 100 percent electrically powered. All residential and non-residential properties shall be equipped with exterior electrical outlets to accommodate this requirement. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable.</p> <p><b>MM AQ-6: Low VOC Paint (Operations).</b> The Project Applicant shall require by contract specifications for commercial development to use interior and exterior architectural coatings (paint and primer including parking lot paint) products that have a volatile organic compound rating of 10 grams per liter or less. Contract specifications shall be reviewed and approved by the City of Santa Ana prior to the issuance of occupancy permits. This measure shall be made a condition of approval for continued upkeep of the property.</p>	
<b>Impact AQ-3:</b> The Project would not result in exposure of sensitive receptors to substantial pollutant concentrations.		Potentially significant	<p><b>GPU FEIR Mitigation Measures</b> <b>MM AQ-1</b>, listed previously</p> <p><b>Project Specific Mitigation Measures</b> <b>MM AQ-1</b>, listed previously</p>	Less than significant
<b>Impact AQ-4:</b> The Project would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people.		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Cumulative</b>		Potentially significant	GPU FEIR Mitigation Measures: MM AQ-1 through MM AQ-2, listed previously  Project Specific Mitigation Measures: MM AQ-1 through MM AQ-6, listed previously	Significant and unavoidable
<b>5.2 Cultural Resources</b>				
<b>Impact CUL-1:</b> The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.		No impact	None required	No impact
<b>Impact CUL-2:</b> The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.		Potentially Significant	<p><b>GPU FEIR Mitigation Measures</b></p> <p><b>MM CUL-4:</b> For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior's Professionally Qualified Standards in either prehistoric or historic archaeology.</p> <p>Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.</p> <p><b>MM CUL-6:</b> If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the project area shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil of high sensitivity. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial onsite safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. The Native American monitor shall be invited to participate in this training. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards and this will include tribal consultation and coordination with the Native American monitor in the case of a prehistoric archaeological resource or tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> <p><b>Project Specific Mitigation Measures</b></p> <p><b>MM CR-1:</b> If a resource is determined significant, the Project Applicant, qualified archaeologist, and tribal monitors (as included in MM TCR-1) Native American tribal representative shall meet and confer regarding the treatment measures and mitigation for such resources. Pursuant to PRC Section 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and may include deeding archaeological resources into permanent conservation easements or planning parks, greenspace, or other open space to incorporate archaeological resources. If preservation in place or avoidance is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis of the artifacts that are recovered. The methods and results of the data recovery excavations shall be included in the monitoring report that is described in MM CR-2. The report shall include a description of resources recovered, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Construction activities in the immediate vicinity of the discovery can resume once the fieldwork component of the treatment measures has been implemented. These treatment measures and mitigation shall reduce any significant impacts by</p>	

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			ensuring that either the resource is preserved in place or is removed prior to its destruction by construction activities.  <b>MM CR-2:</b> After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring activities, which shall be submitted to the City and to the SCCIC at the University California, Fullerton.	
<b>Impact CUL-3:</b> The Project would not disturb any human remains, including those interred outside of formal cemeteries.		Less than significant	None required	Less than significant
<b>Cumulative</b>		Potentially significant	GPU FEIR Mitigation Measures: CUL-4, and CUL-6, listed previously  Project Specific Mitigation Measures: CR-1 and CR-2, listed previously	Less than significant
<b>5.3 Energy</b>				
<b>Impact E-1:</b> The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.		Less than significant	None required	Less than significant
<b>Impact E-2:</b> The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.		No impact	None required	No impact
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.4 Geology and Soils</b>				
<b>Impact GEO-1i:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving		No impact	None required	No impact

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.				
<b>Impact GEO-1ii:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	<b>PPP GEO-1: CBC Compliance.</b> The Project is required to comply with the California Building Standards Code (CBC) as included in the City's Municipal Code as Chapter 8, Article 2, Division 1, to preclude significant adverse effects associated with seismic and soils hazards. As part of CBC compliance, CBC related and geologist and/or civil engineer specifications for the proposed Project shall be incorporated into grading plans and building specifications as a condition of construction permit approval.	Less than significant	None required	Less than significant
<b>Impact GEO-1iii:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	<b>PPP GEO-1</b> , listed previously	Less than significant	None required	Less than significant
<b>Impact GEO-1iv:</b> The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.		No impact	None required	No impact
<b>Impact GEO-2:</b> The Project would not result in substantial soil erosion or the loss of topsoil.		Less than significant	None required	Less than significant
<b>Impact GEO-3:</b> The Project would not be located on a geologic unit or soil that	<b>PPP GEO-1</b> , listed previously	Potentially significant	<b>Project Specific Mitigation Measures</b>	Less than significant



Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
is unstable, or that would become unstable as a result of the Project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.			<p><b>MM GEO-1 Incorporation of and Compliance with a Design Level Geotechnical Report.</b> A final design level geotechnical report that complies with all applicable state and local code requirements shall be prepared for each Project structure by a California licensed qualified geotechnical engineer consistent with the California Building Code and City of Santa Ana requirements applicable at the time of grading/construction and shall include recommendations related to site grading and earthwork, fill materials, compaction, foundations, and other structural elements. The report recommendations shall be included in construction specifications and permits; and confirmed through onsite inspections.</p> <p><b>MM GEO-2 Implementation of Geotechnical Recommendations for Groundwater and Expansive Soils.</b> Project plans, grading specifications, and construction permitting shall incorporate site specific earthwork and ground improvement requirements related to groundwater saturated soils and expansive soils consistent with the California Building Code and City of Santa Ana requirements applicable at the time of grading/construction as stated in a design level geotechnical report and approved by the City's Building and Safety Division. This shall include recommendations related to discovery of groundwater, wet soils, or unstable soils during grading, stabilization, dewatering, fill materials, and foundations.</p>	
<b>Impact GEO-4:</b> The Project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building	<b>PPP GEO-1</b> , listed previously	Potentially significant	<b>Project Specific Mitigation Measures</b> <b>MM GEO-1</b> , listed previously	Less than significant

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Code (1994), but would not create substantial risks to life or property.			<b>MM GEO-2</b> , listed previously	
<b>Impact GEO-5:</b> The Project would not result in soils incapable of adequately supporting the use of wastewater disposal systems where sewers are not available for disposal of wastewater.		No impact	None required	No impact
<b>Impact GEO-6:</b> The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.		Potentially significant	<p><b>GPU FEIR Mitigation Measures</b></p> <p><b>MM GEO-2 Low-to-High Sensitivity.</b> Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with “low- to-high” paleontological sensitivity (see Figure 5.6-3), the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.</p> <p><b>MM GEO-3 All Projects.</b> In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a Qualified Paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County (NHMLA). The repository shall be identified, and a</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>curatorial arrangement shall be signed, prior to collection of the fossils.</p> <p><b>Project Specific Mitigation Measures</b></p> <p><b>MM PALEO-1: Retention of a Qualified Paleontologist.</b> Project plans, grading specifications, and construction permitting shall ensure that prior to the start of excavation, the client shall retain a Qualified Paleontologist who meets the professional criteria established by the Society of Vertebrate Paleontology (SVP 2010) to oversee the implementation of all paleontological resources mitigation requirements for the proposed Project.</p> <p><b>MM PALEO-2: Paleontological Resources Sensitivity Training.</b> Project plans, grading specifications, and construction permitting shall ensure that prior to the start of excavations, the Qualified Paleontologist, or their designee, shall conduct paleontological resources awareness training for onsite personnel. The training session shall focus on how to identify paleontological resources that may be encountered during excavations and the procedures to be followed in the event of their discovery. The City shall ensure onsite personnel are made available for and attend the training and retain documentation demonstrating attendance.</p> <p><b>MM PALEO-3: Paleontological Monitoring.</b> Project plans, grading specifications, and construction permitting shall detail that paleontological resources monitoring shall be required for excavations below 20 feet below ground surface (bgs). Paleontological monitoring shall be conducted by a monitor who meets the professional criteria established by the Society of Vertebrate Paleontology working under the direct</p>	

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			<p>supervision of the Qualified Paleontologist. Monitoring can be reduced, or ceased entirely, if determined adequate by the Qualified Paleontologist. Recommendations for reduction or cessation of monitoring will be based on a more accurate understanding of the lithologic character and age of the sediments exposed during excavation. If deeper excavations continue to encounter younger, Holocene alluvium, monitoring shall be reduced from full-time to part-time monitoring or weekly inspections. If the Qualified Paleontologist determines, based on the lithologic character of the sediments, that there is very little likelihood of impacting Pleistocene marine sediments, paleontological monitoring shall cease entirely. The paleontological monitor shall collect any identifiable fossils encountered during the excavations. If onsite personnel discover potential fossils during excavations when a paleontological monitor is not present, they shall cease excavation within 50 feet of the discovery and contact the Qualified Paleontologist. Construction activities may resume after the discovery is assessed by the Qualified Paleontologist and appropriate treatment measures have been implemented.</p> <p><b>MM PALEO-4: Paleontological Resources Treatment and Disposition.</b> Project plans, grading specifications, and construction permitting shall require that significant fossils be prepared to the point of identification and cataloged. Significant fossils shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, then the fossils may be donated to a local</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>museum, historical society, school, or other institution for educational purposes. Accompanying notes, reports, maps, and photographs shall also be filed with the final repository.</p> <p><b>MM PALEO-5: Paleontological Resources Monitoring Report.</b> Project plans, grading specifications, and construction permitting shall ensure that upon completion of the excavation phase of the Project, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring efforts. The report shall be submitted to the City to signify the satisfactory completion of required paleontological mitigation measures. If significant fossils are discovered, the report shall also be submitted to the appropriate repositories.</p>	
<b>Cumulative</b>	<b>PPP GEO-1</b> , listed previously	Less than significant	<p>GPU FEIR Mitigation Measures: MM GEO-1 through MM GEO-3, listed previously</p> <p>Project Specific Mitigation Measures: MM PAELO-1 through MM PALEO-5, listed previously</p>	Less than significant
<b>5.5 Greenhouse Gas Emissions</b>				
<b>Impact GHG-1:</b> The Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.		Potentially significant	<p><b>GPU FEIR Mitigation Measures</b> <b>MM AQ-1</b>, listed previously</p>	Less than significant
<b>Impact GHG-2:</b> The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.		Potentially significant	<p><b>Project Specific Mitigation Measures</b> <b>MM AQ-3</b>, listed previously <b>MM AQ-4</b>, listed previously <b>MM AQ-5</b>, listed previously <b>MM AQ-6</b>, listed previously</p>	Less than significant
<b>Cumulative</b>		Potentially significant	<b>MM GHG-1: Solar Panels.</b> The Project shall be required to install solar photovoltaic (PV)	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>panels or other source of renewable electricity generation onsite, based on the maximum roof area available for solar (i.e., solar-ready zone). The solar-ready zone shall comply with Section 110.10 of the 2022 California Energy Code and shall comply with access, pathway, ventilation, and spacing requirements, and exclude skylight area.</p> <p>The final PV generation facility size requires approval by Southern California Edison (SCE). SCE's Rule 21 governs operating and metering requirements for any facility connected to SCE's distribution system. Should SCE limit the offsite export, the proposed Project may utilize a battery energy storage system (BESS) to lower offsite export while maintaining onsite renewable generation to off-set consumption. The electrical system and infrastructure must be clearly labeled with noticeable and permanent signage. The schedule of photovoltaic system locations may be updated as needed.</p> <p><b>MM GHG-2: LEED, Charging Stations, and Bus Stops.</b> Prior to the issuance of a Phase 1, Phase 2, or Phase 3 building permits, the Project Applicant or successor in interest shall provide documentation to the City of Santa Ana demonstrating the following:</p> <ul style="list-style-type: none"> <li>The Project shall be designed to achieve Leadership in Energy and Environmental Design (LEED) certification to meet or exceed CALGreen Tier 2 standards in effect at the time of building permit application in order to exceed 2022 Title 24 energy efficiency standards.</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<ul style="list-style-type: none"> <li>The Project shall provide facilities to support electric charging stations per the Tier 2 standards in Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the 2022 CALGreen Code.</li> <li>The Applicant shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate.</li> </ul> <p><b>MM GHG-3: Landfill Waste.</b> The development (Phase 1, Phase 2, and Phase 3) shall divert a minimum of 75 percent of landfill waste. Prior to issuance of certificate of occupancy, a recyclables collection and load area shall be constructed in compliance with the City standards for Recyclable Collection and Loading Areas.</p> <p><b>MM GHG-4: Electrical Landscape Equipment.</b> Prior to the issuance of Phase 1, Phase 2, or Phase 3 occupancy permits, the City Planning and Building and Safety Divisions shall confirm that tenant lease agreements include contractual language that all landscaping equipment used on site shall be 100 percent electrically powered. This requirement shall be included in the third-party vendor agreements for landscape services for the building owner and tenants, as applicable.</p> <p><b>MM GHG-5: Energy Efficient Appliances.</b> All major applicant provided in-unit</p>	

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			residential appliances (e.g., dishwashers, refrigerators, clothes washers and dryers, water heaters, and for space heating) provided/installed shall be electric (i.e., appliances that do not use natural gas, propane, or other fossil fuels) and Energy Star certified or of equivalent energy efficiency where applicable. Prior to the issuance of the certificate of occupancy, the City of Santa Ana shall verify implementation of this requirement. Installation of electric Energy Star-certified or equivalent appliances shall be verified by the Planning and Building Department during plan check.	
<b>5.6 Hazards and Hazardous Materials</b>				
<b>Impact HAZ-1:</b> The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.	<b>PPP HAZ-1: SCAQMD Rule 1403.</b> Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted at all existing buildings located on the Project site. If asbestos or asbestos containing material is found, the Project applicant shall follow all procedural requirements and regulations of the South Coast Air Quality Management District (SCAQMD) Rule 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.	Potentially significant	<b>Project Specific Mitigation Measures</b>  <b>Mitigation Measure HAZ-1:</b> Prior to issuance of a grading permit, a Soil Management Plan (SMP) shall be prepared by a qualified hazardous materials consultant and shall detail procedures and protocols for excavation and disposal of onsite hazardous materials, including: <ul style="list-style-type: none"> <li>Any subsurface materials exposed during construction activities that appear potentially contaminated, based on either visual observation or suspect odors, shall be segregated, stockpiled, and tested for potential contamination. If contamination is found to be present per the California Department of Toxic Substances Control (DTSC) Environmental Screening Levels (ESLs) for the applicable use, and cannot be</li> </ul>	Less than significant



Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p><b>PPP HAZ-2: Lead.</b> Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. CalOSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.</p>		<p>reused on the Project site, it shall be transported by a certified hazardous waste hauler to a landfill permitted by the state to accept hazardous materials and disposed of per California Hazardous Waste Regulations.</p> <ul style="list-style-type: none"> <li>A Health and Safety Plan (HASP) shall be prepared for each contractor that addresses potential safety and health hazards and includes the requirements and procedures for employee protection. The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.</li> <li>All SMP measures shall be printed on the construction documents, contracts, and project plans prior to issuance of grading permits.</li> </ul>	
<p><b>Impact HAZ-2:</b> The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.</p>	<p><b>PPP HAZ-1</b>, listed previously</p> <p><b>PPP HAZ-2</b>, listed previously</p> <p><b>PPP WQ-1: NPDES/SWPPP.</b> Prior to issuance of any grading or demolition permits, the applicant shall provide the City Building and Safety Division evidence of compliance with the National Pollutant Discharge Elimination System (NPDES) requirement to</p>	Potentially significant	<p><b>Project Specific Mitigation Measures</b></p> <p><b>Mitigation Measure HAZ-1</b>, listed previously</p> <p><b>Mitigation Measure HAZ-2:</b> Prior to issuance of a building permit for a future building within the Specific Plan area, the Project applicant shall, at its election, undertake one of the following three activities: (1) perform a subsurface soil vapor assessment demonstrating that vapor concentrations are within established limits for vapor intrusion into future buildings; (2) prepare a human health risk assessment (HHRA) demonstrating that documented levels of soil vapor do not represent a significant health risk to</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p>obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.</p> <p><b>PPP WQ-3: WQMP.</b> Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City Building and Safety Division. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development project in order to minimize the adverse effects on receiving waters.</p>		occupants of the future buildings; or (3) submit plans for a vapor intrusion mitigation system (VIMS) to be installed beneath the foundation of the future buildings. The Project applicant may rely on different measures of the foregoing options in different parts of the Specific Plan area.	
<b>Impact HAZ-3:</b> The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school.	<p><b>PPP HAZ-1</b>, listed previously</p> <p><b>PPP HAZ-2</b>, listed previously</p>	Less than significant	None required	Less than significant
<b>Impact HAZ-4:</b> The Project would not be located on a site that is included on		No impact	None required	No impact

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.				
<b>Impact HAZ-5:</b> The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport.		Less than significant	None required	Less than significant
<b>Impact HAZ-6:</b> The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.		Less than significant	None required	Less than significant
<b>Impact HAZ-7:</b> The Project would not expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires.		No impact	None required	No impact
<b>Cumulative</b>	PPP HAZ-1, PPP HAZ-2, PPP WQ-1, PPP WQ-3	Potentially significant	MM HAZ-1 and MM HAZ-2, listed previously	Less than significant
<b>5.7 Hydrology and Water Quality</b>				
<b>Impact WQ-1:</b> The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	<b>PPP WQ-1: NPDES/SWPPP</b> , listed previously.  <b>PPP WQ-2: Groundwater Dewatering Permits.</b> Prior to initiation of excavation activities, the Project applicant shall obtain coverage under the Santa Ana RWQCB General Waste Discharge Requirements for Discharges to Surface Waters Resulting from De Minimis Discharges or Groundwater	Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p>Dewatering Operations, and/or Groundwater Cleanup / Remediation Operations at Sites within the Newport Bay Watershed Permit (Order No. R8-2019-0061, NPDES No. CAG918002), or any other subsequent permit for dewatering activities, and provide evidence of coverage to the City of Santa Ana Building and Safety Division designee. This shall include submission of a Notice of Intent (NOI) for coverage under the permit to the Santa Ana Regional Water Quality Control Board (RWQCB) at least 60 days prior to the start of excavation activities and anticipated discharge of dewatered groundwater to surface waters. Groundwater dewatering activities shall comply with all applicable provisions in the permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination shall be submitted to the Santa Ana RWQCB.</p> <p><b>PPP WQ-3: WQMP,</b> listed previously.</p>			
<p><b>Impact WQ-2:</b> The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.</p>	<p><b>PPP WQ-2,</b> listed previously.</p>	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>
<p><b>Impact WQ-3:</b> The Project would not substantially alter the existing drainage</p>	<p><b>PPP WQ-1,</b> listed previously.</p>	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or offsite.	PPP WQ-3, listed previously.			
<b>Impact WQ-4:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.	PPP WQ-1, listed previously.	Less than significant	None required	Less than significant
<b>Impact WQ-5:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	PPP WQ-1, listed previously. PPP WQ-2, listed previously.	Less than significant	None required	Less than significant
<b>Impact WQ-6:</b> The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.		Less than significant	None required	Less than significant
<b>Impact WQ-7:</b> The Project would not risk release of pollutants due to Project inundation in a flood hazard, tsunami, or seiche zone.		No impact	None required	No impact

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact WQ-8:</b> The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	PPP WQ-1, listed previously. PPP WQ-2, listed previously. PPP WQ-3, listed previously.	Less than significant	None required	Less than significant
<b>Cumulative</b>	PPP WQ-1 and PPP WQ-3, listed previously.	Less than significant	None required	Less than significant
<b>5.8 Land Use and Planning</b>				
<b>Impact LU-1:</b> The Project would not physically divide an established community.		No impact	None required	No impact
<b>Impact LU-2:</b> The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.		Less than significant	None required	Less than significant
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.9 Noise</b>				
<b>Impact NOI-1:</b> The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	<b>Conditions of Approval</b> <b>COA N-1: Onsite Traffic Noise.</b> Prior to issuance of building permits for Phase 1, Phase 2, and Phase 3, a detailed acoustical study based on architectural plans shall be prepared by a qualified acoustical consultant to demonstrate compliance with General Plan Noise Element Standards. The acoustical study shall be submitted to the City's Planning and Building Agency to demonstrate that all residential units would meet the City's 65 dBA exterior noise standard and 45 dBA interior noise standard to the satisfaction of the Planning and	Potentially significant	<b>GPU FEIR Mitigation Measures</b> <b>MM N-1:</b> Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits. <ul style="list-style-type: none"><li>Construction activity is limited to the hours: Between 7:00 a.m. to 8:00 p.m. Monday through Saturday, as prescribed in</li></ul>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
	<p>Building Agency Executive Director. This complies with the applicable sections of the California Building Code (Title 24 of the California Code of Regulations). The necessary noise reductions may be achieved by implementing noise control measures at the receiver locations. The required noise attenuation measures shall be incorporated into the applicable building plans and specifications.</p>		<p>Municipal Code Section 18-314(e). Construction is prohibited on Sundays.</p> <ul style="list-style-type: none"> <li>• During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.</li> <li>• Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.</li> <li>• Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.</li> <li>• Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.</li> <li>• Construction traffic shall be limited to approved haul routes established by the City Public Works Agency. Exceptions to approved routes must be granted by the Public Works Agency before any modification to approved haul routes.</li> <li>• At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone</li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.</p> <ul style="list-style-type: none"> <li>• Signs shall be posted at the job site entrance(s), within the onsite construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.</li> <li>• During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.</li> <li>• Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.</li> </ul>	



Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p><b>Project Specific Mitigation Measures</b></p> <p><b>Mitigation Measure NOI-1:</b> Prior to the issuance of construction/grading permits, the Project Applicant shall obtain a permit from the City's Building and Safety Division to complete work outside the standard construction hours outlined in Santa Ana Municipal Code Section 18-314(e). In addition, the Project Applicant and/or contractor(s) shall develop a nighttime construction noise control plan that requires the following:</p> <p>Stationary equipment such as generators and air compressors shall adhere to the following:</p> <ul style="list-style-type: none"> <li>• Stationary equipment (e.g., generators, air compressors, etc.) shall be located 300 feet or more away from residences.</li> <li>• Stationary equipment shall be surrounded with noise barriers to achieve a minimum 10 dBA reduction. Alternatively, a temporary noise barrier may be used along the property line.</li> </ul> <p>Mobile equipment such as concrete mixer trucks, pump trucks shall adhere to the following:</p> <ul style="list-style-type: none"> <li>• The nighttime noise control plan shall prohibit mobile equipment and trucks from operating within the following distances to offsite sensitive receptors: <ul style="list-style-type: none"> <li>▪ <b>Phase 1:</b> Trucks and equipment shall be 140 feet or more away from the Versailles residences along Plaza Drive.</li> <li>▪ <b>Phase 2:</b> No minimum distance required (Phase 2 is 410 feet</li> </ul> </li> </ul>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>from sensitive receptors and would not exceed thresholds).</p> <ul style="list-style-type: none"> <li>▪ <b>Phase 3:</b> Trucks and equipment shall be 150 feet or more away from the Versailles residences along Plaza Drive.</li> <li>• The nighttime noise control plan shall prohibit mobile equipment and trucks from operating within the following distances to onsite sensitive receptors: <ul style="list-style-type: none"> <li>▪ <b>Phase 1:</b> No minimum distance is required because no onsite receptors would be constructed prior to Phase 1.</li> <li>▪ <b>Phase 2:</b> Trucks and equipment shall be 150 feet or more away from Phase 1 onsite residences.</li> <li>▪ <b>Phase 3:</b> Trucks and equipment shall be 170 feet or more away from Phase 1 and Phase 2 onsite residences.</li> </ul> </li> </ul>	
<b>Impact NOI-2:</b> The Project would not generate excessive groundborne vibration or groundborne noise levels.		Less than significant	None required	Less than significant
<b>Impact NOI-3:</b> The Project would not expose people residing and working in the Project area to excessive noise levels related to a public airport.		Less than significant	None required	Less than significant
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.10 Population and Housing</b>				
<b>Impact POP-1:</b> The Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
<b>Impact POP-2:</b> The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.		No Impact	None required	No impact
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.11 Public Services</b>				
<b>Impact PS-1:</b> The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.		Less than significant	None required	Less than significant
<b>Impact PS-2:</b> The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services.		Less than significant	None required	Less than significant
<b>Impact PS-3:</b> The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts.		Less than significant	None required	Less than significant
<b>Impact PS-4:</b> The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
facilities, the construction of which could cause significant environmental impacts.				
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.12 Parks and Recreation</b>				
<b>Impact PR-1:</b> The Project would result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts.		Potentially significant	There are no feasible mitigation measures to reduce the citywide parkland deficiency	Significant and unavoidable
<b>Impact PR-2:</b> The Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.		Potentially significant	There are no feasible mitigation measures to reduce the citywide parkland deficiency	Significant and unavoidable
<b>Impact PR-3:</b> The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.		Potentially significant	There are no feasible mitigation measures to reduce the citywide parkland deficiency	Significant and unavoidable
<b>Cumulative</b>		Potentially significant	There are no feasible mitigation measures to reduce parkland deficiency	Significant and unavoidable
<b>5.13 Transportation</b>				
<b>Impact TR-1:</b> The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.		Less than significant	None required	Less than significant
<b>Impact TR-2:</b> The Project would not conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).		Less than significant	None required	Less than significant
<b>Impact TR-3:</b> The Project would not substantially increase hazards due to a		Less than significant	None required	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).				
<b>Impact TR-4:</b> The Project would not result in inadequate emergency access.		Less than significant	None required	Less than significant
<b>Cumulative</b>		Less than significant	None required	Less than significant
<b>5.14 Tribal Cultural Resources</b>				
<b>Impact TCR-1:</b> The Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).		Potentially significant	<p><b>GPU FEIR Mitigation Measures</b>  <b>MM CUL-4</b>, listed previously.  <b>MM CUL-6</b>, listed previously.</p> <p><b>Project Specific Mitigation Measures</b>  <b>Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</b></p> <p>A. The Project Applicant shall retain a Native American monitor from or approved by the Gabrieleño Band of Mission Indians-Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject Project at any Project locations (i.e., both onsite and any offsite locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the Lead Agency prior to the earlier of the</p>	Less than significant

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant upon written request to the Tribe.</p> <p>D. Onsite tribal monitoring shall conclude upon the earlier of the following (1) written confirmation to the Kizh from a designated point of contact for the Project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh to the Project Applicant or Lead Agency that no future, planned construction activity and/or development/construction</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			<p>phase at the Project site possesses the potential to impact Kizh TCRs.</p> <p><b>MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)</b></p> <p>A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor in consultation with a qualified archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</p> <p><b>MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects</b></p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p>	

Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
			C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	
<b>Impact TCR-2:</b> The Project would not cause a substantial adverse change in the significance of a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, that considers the significance of the resource to a California Native American tribe.		Potentially significant	<b>Project Specific Mitigation Measures</b> <b>MM TCR-1</b> , listed previously. <b>MM TCR-2</b> , listed previously. <b>MM TCR-3</b> , listed previously.	Less than significant
<b>Cumulative</b>		Potentially significant	GPU FEIR Mitigation Measures CUL-4 and CUL-6, listed previously.  Project Specific Mitigation Measure TCR-1 through TCR-3, listed previously.	Less than significant
<b>5.15 Utilities and Service Systems</b>				
<b>Impact UT-1:</b> The Project would require or result in the relocation or construction of new water facilities or expansion of existing facilities; however, the construction of these facilities would not cause significant environmental effects.		Less than significant	None required	Less than significant
<b>Impact UT-2:</b> The City would have sufficient water supplies available to serve the Project and reasonably		Less than significant	None required	Less than significant



Impact	Applicable Standard Conditions or Plan, Program, Policy	Level of Significance before Mitigation	Mitigation Measures	Significance after Mitigation
foreseeable development during normal, dry, and multiple dry years.				
<b>Impact UT-3:</b> The Project would not require or result in the relocation or construction of new or expanded wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects.		Less than significant	None required	Less than significant
<b>Impact UT-4:</b> The Project would result in a determination by the wastewater treatment provider that would serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.		Less than significant	None required	Less than significant
<b>Impact UT-5:</b> The Project would not require or result in the relocation or construction of new drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.		Less than significant	None required	Less than significant
<b>Impact UT-6:</b> The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.		Less than significant	None required	Less than significant
<b>Impact UT-7:</b> The Project would comply with federal, state, and local statutes and regulations related to solid waste.		No impact	None required	No impact
<b>Cumulative</b>		Less than significant	None required	Less than significant

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