

# THE HERITAGE MIXED USE PROJECT

## Initial Study

Prepared for  
City of Santa Ana

January 2015





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626 Wilshire Boulevard  
Suite 1100  
Los Angeles, CA 90017  
213.599.4300  
[www.esassoc.com](http://www.esassoc.com)

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# ENVIRONMENTAL CHECKLIST

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## Initial Study

1. **Project Title:** The Heritage Mixed Use Project
2. **Lead Agency Name and Address:** City of Santa Ana  
20 Civic Center Plaza  
Santa Ana, California 92702
3. **Contact Person and Phone Number:** Vince Fregoso, AICP
4. **Project Location:** 2001 East Dyer Road  
Santa Ana, CA 92705  
  
The site is located near the northwest corner of East Dyer Road and Red Hill Avenue, adjacent to the Candlewood Suites Hotel.
5. **Project Sponsor's Name and Address:** Dyer 18 LLC  
1945 Port Chelsea Place  
Newport Beach, CA 92660
6. **General Plan Designation(s):** PAO (Professional and Administration Office)
7. **Zoning Designation(s):** M-1 (Light Industrial)
8. **Description of Project:** The proposed project would redevelop the 18.84 acre project site with residential and commercial uses. The project site is currently developed with a 366,000 square foot warehouse/distribution building and parking area that was developed in 1978. The building is currently occupied by several short and long-term tenants that include: a data center that occupies 10,700 square feet; office space that occupies 5,367 square feet; and warehousing storage that occupies 71,000 square feet. The remainder of the building, which is approximately 276,633 square feet, is vacant.  
  
The proposed project includes four phases. Phases one through three would develop the site with up to 1,240 multi-family residential units to be provided in three buildings with adjacent parking structures (one level of which would be subterranean) surrounding a one-acre central private park area. In addition, a total of 12,633 square feet of retail space and 5,427 square feet of restaurant space would be provided on the ground level of these residential buildings. The proposed residential units would range in size from 512 square feet to 1,201 square feet and would consist of studios, one bedroom and two bedroom units. All units would have between 41 square feet and 71 square feet of outdoor terrace area. These three phases include development of one building per phase, and the central park area would be constructed in

conjunction with the first building. The fourth phase would either develop a 66,000 square foot office building or a 161 unit residential building. The density of the proposed project would be 74 dwelling units per acre (du/ac) with 1,401 total units or 68 du/ac with 1,240 total units.

The project would provide approximately 234,000 square feet of open space in courtyards, common area amenities, roof terraces and perimeter plazas and open space areas and a Central Park area for residents within the project site. The Central Park would include an outdoor theatre, putting green, and par course/walking/running trail with seating. In addition, recreation amenities for residents that would include a pool and spa, fire pits, dog park, outdoor bbq area, fitness area, community center, tennis and basketball courts, and children's play area. Each building would have a common area rooftop deck with outdoor kitchen and seating areas.

The project includes a proposed General Plan Amendment from PAO (Professional and Administrative Office) to District Center, a Zone Change from M-1 (Light Industrial) to a Specific Development designation, a vesting map, and a development agreement.

**9. Surrounding Land Uses and Setting.** (Briefly describe the project's surroundings.)

North: Commercial office uses

South: Dyer Road followed by commercial retail, office, and light industrial uses

East: Hotel followed by Redhill Avenue. Areas across Redhill Avenue are planned for mixed uses as part of the Legacy Project.

West: Railroad tracks followed by commercial office uses

**10. Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement. Indicate whether another agency is a responsible or trustee agency.)

Department of Toxic Substances Control (DTSC): If site remediation is required

Santa Ana Regional Quality Control Board (SARQCB): Water quality permits

South Coast Air Quality Management District (SCAQMD): Permits to construct

Airport Land Use Commission (ALUC): Land use review





Source: ESRI Imagery

The Heritage Mixed Use Project . 140730

**Figure 1**  
Regional Location





Source: ESRI Imagery

The Heritage Mixed Use Project . 140730

**Figure 2**  
Site Aerial



SOURCE: Architects Orange

The Heritage Mixed Use Project . 140730

**Figure 3**  
Proposed Master Site Plan





SOURCE: AHBE Landscape Architects; Architects Orange

The Heritage Mixed Use Project . 140730  
**Figure 4**  
 Proposed Landscape Site Plan

# Environmental Factors Potentially Affected

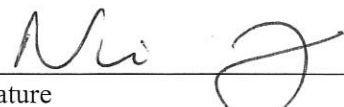

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.


- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics                     | <input type="checkbox"/> Agriculture and Forestry Resources         | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources                      | <input checked="" type="checkbox"/> Cultural Resources              | <input checked="" type="checkbox"/> Geology, Soils and Seismicity      |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions       | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology and Water Quality        |
| <input checked="" type="checkbox"/> Land Use and Land Use Planning | <input type="checkbox"/> Mineral Resources                          | <input checked="" type="checkbox"/> Noise                              |
| <input checked="" type="checkbox"/> Population and Housing         | <input checked="" type="checkbox"/> Public Services                 | <input checked="" type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Transportation and Traffic     | <input checked="" type="checkbox"/> Utilities and Service Systems   | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

  
 Signature \_\_\_\_\_  
  
 Printed Name \_\_\_\_\_

  
 Date \_\_\_\_\_  
 \_\_\_\_\_  
 For \_\_\_\_\_

# Environmental Checklist

## Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>1. AESTHETICS — Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **No impact.** The project site and surrounding areas are urbanized and do not contain any sensitive scenic vistas. The General Plan Scenic Corridors Element identifies street corridors, watercourse corridors, inter-city corridors, City entries, and selected/screened views from a highway that are considered unique visual resources within the City. The nearest feature identified by the General Plan is Edinger Avenue, a “Secondary Street Corridor”, which is approximately 1.4 miles (google earth, 2014) north of the site. Because of the flat topography it is not visible from the project site. Because there are no scenic vistas in the project area, the proposed project would not result in a substantial adverse effect on a scenic vista, and this topic will not be further analyzed in the EIR.
- b) **No impact.** There are no officially designated state scenic highways in the vicinity of the proposed project (Caltrans, 2014). The only officially designated scenic highway within Orange County is a portion of SR-91. Eligible State Scenic Highways within the County include: SR-1, SR-74, portions of SR-91, and a portion of SR-57, none of which are in the vicinity of the project site. Likewise, there are no County-designated scenic highways that run through the City of Santa Ana. Additionally, as described in 5.a below, there are no recorded historical resources located near the project site. Further, the proposed project site is relatively flat and surrounded by an urban built environment, and there are no other scenic resources, including trees and rock outcroppings, within or adjacent to the project area. Therefore, impacts related to scenic resources within a state scenic highway would not occur.
- c) **Potentially significant impact.** The proposed project would redevelop the project site to include between 1,240 and 1,401 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and a 66,000 square foot office building. The project would alter the visual character and/or quality of the project

from the existing industrial character to a high density mixed use residential character. Potential impacts related to the visual character or quality of the site and its surroundings will be analyzed in the EIR.

- d) **Potentially significant impact.** The project site is located within an urban area, adjacent to two arterial roadways. Existing sources of light in the project area include: street lights, parking lot lighting, building illumination, security lighting, landscape lighting, and lighting from building interiors that pass through windows. The proposed project would include the provision of nighttime lighting for security purposes around all of the residential buildings and parking structures. In addition, the residential uses that would be introduced by the proposed project would generate more nighttime activity and exterior lighting from vehicles than generated by the existing industrial uses, which may result in glare from automobile headlights. As such, impacts in this regard will be further analyzed within the EIR.

## References

California Department of Transportation (Caltrans), Caltrans Scenic Highway Mapping System, official website, [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways](http://www.dot.ca.gov/hq/LandArch/scenic_highways). Accessed November 2014.

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# Agricultural and Forest Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>2. AGRICULTURAL AND FOREST RESOURCES —</b>				
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p> <p><b>Would the project:</b></p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No impact.** The proposed project area is developed and currently used for industrial activities. The project vicinity is also void of any agricultural uses. The California Department of Conservation Important Farmland Map for Orange County identified the project site as urban and built up land (CDC, 2010). No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by the project or converted to a non-agricultural use. Thus, no impact would occur.
- b) **No impact.** As stated above, the project area is void of any agricultural uses. The project is zoned M1 (Light Industrial). No agricultural zoning is located to the site or within the project area and no parcels within the project vicinity have Williamson Act contracts (DLRP, 2004). Therefore, implementation of the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impacts would result.
- c) **No impact.** As stated above, the existing project site is zoned as M1 (Light Industrial) and is surrounded by urban non-forest/timberland uses. No zoning for forest land, timberland, or timberland zoned Timberland Production would be affected by the project.



- d) **No impact.** As described above, the project site is developed and utilized for industrial uses. The site does not contain, nor is it surrounded by forest land. The project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur.
  
- e) **No impact.** Refer to Responses 4.2(a) through 4.2(c). No other changes to the existing environment would occur from implementation of the proposed project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur.

## References

California Department of Conservation, *Orange County Important Farmland 2010*.  
<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/ora10.pdf>, 2010.

Division of Land Resource Protection, Williamson Act County Maps, *Agricultural Preserves 2004*,  
[ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange\\_WA\\_03\\_04.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange_WA_03_04.pdf). 2004.

# Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>3. AIR QUALITY —</b>				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
<b>Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** The City of Santa Ana is located within the South Coast Air Basin (Basin), which consists of the urbanized areas of Los Angeles, Riverside, San Bernardino, and Orange Counties. The South Coast Air Quality Management District (SCAQMD) monitors the Basin for pollutants and is responsible for regulating and controlling emissions, primarily from stationary sources. The Basin is currently under both federal and state non-attainment status in ozone and particulate matter smaller than 10 and 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively). SCAQMD and the Southern California Association of Governments (SCAG) are responsible for preparing the air quality management plan (AQMP) to address federal and state Clean Air Act requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin and to bring it into attainment of the national and state ambient air quality standards. The most recent AQMP was adopted by the SCAQMD Governing Board on December 12, 2012.

Implementation of the proposed project would generate pollutant emissions during both construction and operation of the development. During construction, sources of pollutant emissions include heavy off-road equipment as well as on-road motor vehicles and workers' commutes to and from the site. Construction activities would result in emissions of particulate matter, as well as nitrous oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) which are precursors to ozone formation. During operations, the project would generate long-term regional emissions of criteria pollutants and ozone precursors associated with mobile sources and area sources, such as natural gas consumption,

landscaping, applications of architectural coatings, and consumer products. Compared to the existing on-site uses, which includes a 10,700 square foot data center, 5,367 square feet of office space, and a 71,000 square foot warehousing storage facility, a net increase of air pollutant emissions could occur from project implementation that may result in significant impacts to air quality. Overall, the net pollutant emissions associated with the proposed project could result in potentially significant impacts to air quality in the area, and could potentially conflict with SCAQMD's AQMP. Thus, the potential for implementation of the project to conflict with or obstruct implementation of the AQMP will be evaluated in the EIR.

- b) **Potentially significant impact.** As discussed under Item 3(a), the Basin is currently under both federal and state non-attainment status in ozone,  $PM_{10}$ , and  $PM_{2.5}$ . Implementation of the proposed project would result in pollutant emissions generated from the construction and operation of the new mixed use developments at the project site. Construction of the developments would involve activities such as demolition of existing structures and pavement, site preparation, grading, and building construction, which would result in fugitive dust and equipment exhaust emissions. Construction worker and delivery vehicle trips would also generate temporary pollutant emissions. These construction-related emissions could adversely affect the regional ambient air quality in the Basin and locally within the project area. Additionally, operation of the residential and commercial uses on the project site may result in increased emissions of air pollutants from new stationary sources and from an increase in vehicle trips. Thus, the pollutant emissions generated from implementation of the project may violate an air quality standard or contribute to an existing or projected air quality violation. Therefore, this impact is considered to be potentially significant and will be analyzed in the EIR.
- c) **Potentially significant impact.** As indicated under Item 3(b), short-term construction activities and long-term operation of the proposed project may generate emissions that could result in either a violation of an ambient air quality standard or contribute to an existing air quality violation. Due to the elevated concentrations of air pollutants that currently occur in the Basin, when combined with other past, present, or reasonably foreseeable future projects in the area, the net increase of criteria pollutants could cumulatively contribute to the nonattainment designations of pollutants in the Basin. Thus, the EIR will evaluate the potential for the proposed project to generate a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment.
- d) **Potentially significant impact.** Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). Examples of land uses that can be classified as sensitive receptors include residences, schools, daycare centers, parks, recreational areas, medical facilities, rest homes, and convalescent care facilities. Existing sensitive receptors in the vicinity of the project site include the adjacent Candlewood Suites hotel located to the east. Additionally, as the project would be developed in phases within the

project site, future residential uses developed in one portion of the project site could also be exposed to pollutant emissions generated from construction activities occurring at another portion of the site. The EIR will evaluate the potential for construction and operation of the proposed project to expose sensitive receptors to substantial pollutant concentrations. Mitigation measures will be identified if necessary.

- e) **Less than significant impact.** The SCAQMD Air Quality Handbook identifies the following uses as having a potential odor issues: wastewater treatment plants, food processing plants, agricultural uses, chemical plants, composting, refineries, landfills, dairies, and fiberglass moldings. The proposed project would implement commercial and residential development within the project area. These land uses do not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by new and existing non-residential land uses are required to be in compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

During construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary and are not expected to affect a substantial number of people. Therefore, impacts relating to both operational and construction activity odors would be less than significant, and odors will not be evaluated in the EIR.

## References

California Air Resources Board (CARB), *Area Designation Maps/State and National*, official website, [www.arb.ca.gov/desig/adm/adm.htm](http://www.arb.ca.gov/desig/adm/adm.htm), accessed November 4, 2014.

South Coast Air Quality Management District (SCAQMD), *Final 2012 Air Quality Management Plan*, 2013.

United States Environmental Protection Agency (USEPA), *The Greenbook Nonattainment Areas for Criteria Pollutants*, <http://www.epa.gov/air/oaqps/greenbk/index.html>, 2013, accessed November 4, 2014.

# Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>4. BIOLOGICAL RESOURCES — Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No impact.** The project site is developed with a large building that is surrounded by paved surfaces, a small area of ornamental landscaping exists near the entrance to the office and trees and landscaping is scattered throughout parking areas. The project site is located within an urbanized area. No endangered, rare, threatened, or special status plant species (or associated habitats) or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on or adjacent to the site. Project implementation would not result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive species, and impacts would not occur.
- b) **No impact.** Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors. As described above, the project site is developed and does not contain any natural habitats, including riparian. Additionally, the project site is located within an urban area that is bound by development. No riparian

- habitat or other sensitive natural communities occur adjacent to the project area. The project area is not included in any local or regional plans, policies, and regulations that identify riparian habitat or other sensitive natural community. Therefore, no impact would occur. This topic will not be evaluated in the EIR.
- c) **No impact.** Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The project area is developed and does not contain natural wetlands. Therefore, the project would not result in impacts to wetlands, and this topic will not be evaluated in the EIR.
- d) **No impact.** The project site and surrounding areas are completely developed and/or disturbed. The project site is surrounded by urban uses on all four sides; therefore, the site does not function as a wildlife movement corridor. The project area contains some ornamental trees; however, they exist in small groupings lining the roadway, project boundary, or in the parking lot and do not provide substantial suitable nesting habitat for migratory birds. Project implementation would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This topic will not be evaluated in the EIR.
- e) **No impact.** There are no local biological related policies or ordinances, such as a tree preservation policy or ordinance that is applicable to the proposed project. Public trees in Santa Ana are protected under Chapter 33, Article VII of the Municipal Code, which regulates the planting, maintenance, and removal of trees in public locations in the City. The project site contains existing ornamental trees that are on private property and not subject to the City ordinance. Therefore, implementation of the proposed project would not conflict with local polices or ordinances protecting trees and no impact would occur. This topic will not be evaluated in the EIR.
- f) **No impact.** The project site is developed and used for industrial uses. The project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not result in impacts to biological habitat plans and this topic will not be evaluated in the EIR.

## References

California Department of Fish and Wildlife (CDFW), *Orange County Transportation Authority NCCP Plan Summary*, <http://www.dfg.ca.gov/habcon/nccp/status/OrangeTransport>, 2013.

City of Santa Ana, *City of Santa Ana Municipal Code*, official website, [https://www.municode.com/library/ca/santa\\_ana/codes/code\\_of\\_ordinances](https://www.municode.com/library/ca/santa_ana/codes/code_of_ordinances)>, accessed November 2014.

United States Fish and Wildlife Service (USFWS), National Wetlands Inventory Wetland Mapper, official website, <http://www.fws.gov/wetlands/data/mapper.HTML>, accessed November 12, 2014.

# Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>5. CULTURAL RESOURCES — Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No impact.** Aerial photographs for the property and surrounding areas identify historical usage of the site and adjacent properties. The photographs show the project site as agricultural land in the 1930s, 1960s, and 1970s. In 1978 the project site was developed with a 366,000 square feet warehouse/distribution building and parking area with some landscaping, which still exists today. From the time the site was developed through approximately 2001, the building was occupied by various furniture manufacturing companies and a bicycle company. Manufacturing activities at the site appear to have been discontinued prior to 2001. From 2001 to the present, the building has been occupied by various telecommunications, office, and warehousing tenants. Similarly, the photographs show the surrounding area as being used for agricultural purposes through the 1950s and 1960s. By the 1980s the surrounding area is largely developed. The existing structure on the project site was developed in the late 1970s and is not a historical resource. The adjacent areas were similarly developed in the late 1970s or 1980s and are not historic resources. Therefore, the proposed project would not result in a substantial change in a historical resource and impacts would not occur.
- b) **Potentially significant impact.** As noted above, the site exists within a highly developed area and the project site has been completely disturbed and graded. No known archaeological resources exist within the boundaries of the site. Exhibit A-11 of the City’s General Plan Land Use Element does not identify the site as being within an area of archaeological sensitivity. However, archaeological resources could still be present in soils that have been previously disturbed. Construction of the project would include excavation to construct the subterranean parking area, which could disturb unknown resources. Therefore, significant impacts may occur. This topic will be evaluated in the EIR and mitigation measures will be identified if necessary.
- c) **Potentially significant impact.** As noted above, the site exists within a highly developed area and the project site has been completely disturbed and graded. No known



paleontological resources exist within the boundaries of the site. Although it is not expected that paleontological resources would be encountered during construction, the project would require excavation for construction of the proposed subterranean parking level. Thus, ground-disturbing activities could unearth undocumented subsurface paleontological resources, which may result in a significant impact. This topic will be evaluated in the EIR and mitigation measures will be identified if necessary.

- d) **No impact.** There are no known human remains in the project area. The project area is not part of a formal cemetery and is not known to have been used for disposal of human remains. In addition, the ground has been previously disturbed by construction of existing land uses. Thus, human remains are not expected to be encountered during construction of the proposed project.

In addition, existing state regulations (California Health and Safety Code Section 7050.5) requires that in the unanticipated event of discovery or recognition of any human remains, there shall be no further excavation until the coroner has made recommendations concerning the treatment and disposition of the human remains to the person responsible. If the coroner determines that the remains are not subject to his or her authority and has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Implementation of the proposed project would comply with provisions of state law regarding discovery of human remains, and impacts relating to the disturbance of human remains would be less than significant. This topic will not be evaluated in the EIR.

## References

City of Santa Ana, *City of Santa Ana General Plan, 1982-2009*.

Stantec Consulting Services, Inc. (Stantec), *Phase I Environmental Site Assessment: Commercial Building, 2001 Dyer Road, Santa Ana, California. Stantec Project No. 185802802*, prepared by Melissa Baernstein, November 23, 2012.

# Geology, Soils, and Seismicity

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>6. GEOLOGY, SOILS, AND SEISMICITY —</b>				
<b>Would the project:</b>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a.i) **No impact.** The Site, as is most of Southern California, is located in a seismically active area. According to the General Plan Seismic Safety Element, no faults, active, potentially active, or inactive are known to exist within the City. The closest known active or potentially active faults are the Elsinore Fault Zone and the Newport Inglewood Fault Zone, which are located approximately 20 miles to the northeast, 10 miles to the southwest, respectively (Stantec, 2012). Since no known faults exist in the site vicinity and the site is not located within an Alquist-Priolo Earthquake Fault Zone, impacts related to rupture of a known earthquake fault would not occur.
- a.ii) **Potentially significant impact.** There are several known active faults in the region, including the Elsinore Fault Zone and the Newport Inglewood Fault Zone. A major earthquake along any the region’s major active faults could cause seismic ground shaking in Santa Ana. Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), which

has been included in the City’s Municipal Code [Part II, Chapter 8, Article II (Building Code)] and contains provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of ground motion. However, strong seismic ground shaking could result in liquefaction and other impacts that could expose people and structures to adverse effects. Therefore, implementation of the proposed project could result in significant hazards arising from strong ground shaking. Impacts related to seismic ground shaking would be evaluated in the EIR.

- a.iii) **Potentially significant impact.** Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires “mobility” sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils. Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

The project site is located within the liquefaction zone identified in the State of California Seismic Hazard Zones Map (Tustin Quadrangle) and may be prone to liquefaction due to a shallow groundwater condition, especially during wetter years, which is associated with high liquefaction potential. Therefore, a risk of ground deformation due to liquefaction exists and potential impacts related to liquefaction will be studied further in the EIR.

- a.iv) **No impact.** Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits. As described above, the proposed project site is located in a seismically active region subject to strong ground shaking. However the project site is not located within or adjacent to an earthquake-induced landslide area (CDMG, 1999). The project site is located in a flat developed urban area that does not contain large slopes, and the proposed project would not generate large slopes. As a result, implementation of the project would not expose people or structures to substantial adverse effects involving landslides, and impacts related to landslides would not occur and will not be analyzed further in the EIR.

- b) **Potentially significant impact.** The proposed project is located within a developed urban area and would be developed within areas that are largely covered with impervious surfaces. However, construction activities, such as excavation for the subterranean parking, building foundations, and utility lines, would disturb onsite soils, which have the potential to result in erosion and/or topsoil loss. Therefore, this potential impacts related to erosion will be evaluated in the EIR.

- c) **Potentially significant impact.** The project site is located within an area that is susceptible to liquefaction and lateral spreading as described above in Section 3.6.a.iii and will be further evaluated in the EIR.

The project site is level and located in an area that does not contain any hillsides or substantial slopes. As described above in Section 3.6.a.iv and potential impacts related to landslides are less than significant and will not be evaluated further in the EIR.

Exhibit 4 of the Seismic Safety Element of the City's General Plan indicates that the project site is not located within an area subject to subsidence. Subsidence usually occurs as a result of excessive groundwater pumping or oil extraction. No oil extraction would occur as a result of the proposed project. While the project would likely require dewatering during construction as a consequence of the proposed subterranean parking structure and high ground water table, dewatering would be temporary and would not result in the substantial drawdown of groundwater and would not cause effects related to subsidence. Potential impacts related to landslides are less than significant and will not be evaluated further in the EIR.

- d) **Potentially significant impact.** Expansive soils are fine-grained soils (generally high plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. The site is underlain by silty and sandy clay loam soils (Stantec, 2012), which are considered expansive and could be susceptible to soil shrink and swell effects. Therefore, potential impacts related to expansive soils will be further evaluated in the EIR.
- e) **No impact.** The project area is served by a sewer system; septic tanks would not be utilized by the proposed project. All development associated with the proposed project would connect to and be served by the existing public sewer system for wastewater discharge and treatment. No impacts related to septic systems would occur as a result of the proposed project and this issue requires no further analysis in the EIR.

## References

California Department of Conservation, *State of California Seismic Hazard Zones Map (Tustin Quadrangle)*, January 2001.

City of Santa Ana, *City of Santa Ana General Plan*, 1982-2009.

California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the Tustin Quadrangle*, 1998.

Stantec Consulting Services, Inc. (Stantec), *Phase I Environmental Site Assessment: Commercial Building, 2001 Dyer Road, Santa Ana, California. Stantec Project No. 185802802*, prepared by Melissa Baernstein, November 23, 2012.

# Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>7. GREENHOUSE GAS EMISSIONS — Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. The principal GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Construction and operation of development permitted by the proposed project would generate GHG emissions, both directly and indirectly. Construction activities are short-term and cease to emit GHGs upon completion. Operation emissions associated with the residential and commercial uses would include GHG emissions from mobile sources (transportation), energy, water use and treatment, and waste disposal. GHG emissions generated by electricity and natural gas use by the future residential and commercial uses are indirect GHG emissions from the energy that is produced off-site. These sources would have the potential to generate GHGs and result in a significant impact on the environment. Therefore, impacts associated with GHG emissions are potentially significant and will be evaluated in the EIR.
- b) **Potentially significant impact.** Assembly Bill (AB) 32, signed by Governor Arnold Schwarzenegger in 2006, directs the State of California to reduce statewide GHG emissions to 1990 levels by the year 2020. In accordance with AB 32, CARB developed the Climate Change Scoping Plan (Scoping Plan), which outlines how the state will achieve the necessary GHG emission reductions to achieve this goal (CARB, 2008). Additionally, the City is currently developing a comprehensive Climate Action Plan (CAP). As part of the development process, the City has proposed 35 CAP measures, which include 28 community and seven municipal measures in the area of energy, transportation and land use, solid waste, and water and wastewater. On May 6, 2014, the City Council approved emissions reduction targets for forecast years of 2020 and 2035 of 15 percent and 30 percent below 2008 levels, respectively. The GHG emissions generated from construction and operation of the proposed project could conflict with the Scoping Plan’s strategies as well as the City’s policies for reducing the emission of GHGs. Thus, this issue will be evaluated in the EIR.

## References

California Air Pollution Control Officers Association (CAPCOA), *CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, January 2008.

CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008.

City of Santa Ana, *Proposed Climate Action Plan Measures*, [http://www.ci.santa-ana.ca.us/climateactionplan/documents/proposed\\_measures\\_matrix.pdf](http://www.ci.santa-ana.ca.us/climateactionplan/documents/proposed_measures_matrix.pdf), March 2014.

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# Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>7. HAZARDS AND HAZARDOUS MATERIALS — Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less than significant impact.** A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or the local implementing agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

There are multiple state and local laws that regulate the storage, use, and disposal of hazardous materials. The County of Orange Environmental Health Division was designated by the State Secretary for Environmental Protection on January 1, 1997, as the Certified Unified Program Agency (CUPA) for Orange County (County of Orange

Health Care Agency Environmental Health Services, 2014), including the City of Santa Ana. The CUPA is the local administrative agency that coordinates the following six programs regulating hazardous materials and hazardous wastes: Hazardous Waste, Underground Storage Tanks (UST), Aboveground Petroleum Storage Tanks (APST), Hazardous Materials Disclosure (HMD), Business Plan, and California Accidental Release Program (CalARP). Additionally, the Orange County Code of Ordinances provides regulations for the use and storage of hazardous materials. Section 3-3-14 of Chapter 27 requires the Orange County Fire Authority Chemical Classification packet to be completed and approved prior to approval of plans and/or the storage, use, or handling of chemicals on any premise.

The proposed project includes development of residential, retail space, restaurant space, and commercial office space. The proposed construction activities would involve transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by county, state and federal regulations, which the project construction activities are required to strictly adhere to. As a result, hazardous material impacts related to construction activities would be less than significant.

Operation of the project includes limited storage and use of hazardous materials for residential and commercial uses, which include cleaning and degreasing solvents, fertilizers, pesticides, herbicides, degreasers, paints, cooking oils, chlorinated products, paints and other materials used for property maintenance. However, these products would only be used and stored in limited quantities and the normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the project. In addition, operation of the proposed retail, restaurant and office spaces would not result in the production of large amounts of hazardous waste. Compliance with existing safety standards related to the handling, use, and storage of hazardous materials, and compliance with applicable federal, state and local laws and regulations would be required. Therefore, the proposed project would result in less than significant impacts related to the routine transport, use, or disposal of hazardous materials and this will not be further evaluated in the EIR.

- b) **Potentially significant impact.** The project site is developed with a building that has been used for industrial uses that include manufacturing activities, involving: milling, assembly, finishing, paint/lacquer. In addition, the building has been used for office and warehouse space. Excavation for development of subterranean parking structures, building foundations, and utility connections could unearth unknown contaminants that may be present in soil and/or groundwater from current and/or historic site usage. The potential for the proposed project to produce significant impacts to the public during the transportation of hazards or involving the potential release of hazardous materials will be evaluated in the EIR.



- c) **Less than significant impact.** The closest existing school to the project site is the Sycamore High School, which is located approximately one mile away from the project site at 15400 Lansdowne Road in Tustin. In addition, the Tustin Legacy project includes an elementary school and a high school, which are planned to be developed slightly over one mile from the project site. Thus, the project site is not within one-quarter mile of an existing or proposed school and impacts would be less than significant. However, as described above in Item 7.b) excavation activities of the project could unearth unknown contaminants that may be present in soil and/or groundwater from current and/or historic site usage; thus, environmental impacts related to the potential release of hazardous materials will be evaluated in the EIR.
- d) **Potentially significant impact.** The California State Water Resources Control Board GeoTracker database indicates that a perchlorate plume in groundwater exists below the project site (GeoTracker, 2014). The data indicates the groundwater plume emanates from a facility located at 1831 East Carnegie Avenue located northwest and upgradient of the project site (Stantec, 2012). Due to the shallow depth to groundwater in the project area, potential impacts could occur during excavation required for the subterranean parking and installation of underground utilities. Therefore, potential for hazardous materials to impact the public and environment will be evaluated in the EIR.
- e) **Potentially significant impact.** John Wayne Airport is located approximately 1.8 miles southwest of the project site. The project site is not located within John Wayne Airport's Safety Compatibility Zones or Airport Impact Zones. The ALUC has adopted the Federal Aviation Regulations (FAR) Part 77 as the criteria for determining height restrictions in Orange County. According to the General Plan Airport Environs Element, the project site is located within the Airport Environs Land Use Plan (AELUP) Notification Area for John Wayne Airport. FAR Part 77 requires notification to Federal Aviation Administration (FAA) for any project that will be more than 200 feet in height above the ground level pursuant to FAR Part 77 Section 77.13. The project would involve three phases of construction of four stories of residential above one story of retail space, which would be 50 feet in height. The fourth phase would construct a 161 unit residential building or a 66,000 square foot office building that would be five stories high, on top of three-levels of parking (one of which is subterranean) that would be 70 feet in height above the ground surface. Thus, the proposed project would not exceed FAA's notification requirement of 200 feet. However, the proposed project site is located almost underneath the airports flight path. Thus, the project would introduce residential uses, and overall higher density development, that is near the flight path, which could introduce a safety hazard associated with airport operations for people residing, working, and visiting the project site. As a result, potential impacts related to the location of the project site and the airport uses will be further analyzed in the EIR.
- f) **No impact.** There are no private airstrips located in the vicinity of the project site. Therefore, the project would not result in a safety hazard from a private airstrip, and therefore, this issue area will not be further analyzed in the EIR.

- g) **Less than significant impact.** The proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Direct access to the project site is provided from East Dyer Road and Redhill Avenue which are adjacent to the project site. Construction activities would occur within the project site and would not restrict access of emergency vehicles to the project site or adjacent areas. In addition, travel along surrounding roadways would remain open and would not interfere with emergency access in the site vicinity. The project is required to design and construct internal access, and size and location of fire suppression facilities (e.g., hydrants and sprinklers) to conform to Orange County Fire Authority standards. The Orange County Fire Authority would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.
- h) **No impact.** The proposed project site is located within an urban developed area and is not located within an identified wildland fire hazard area, as identified by the City's General Plan Public Safety Element Exhibit 4, Flood and Fire Hazard Areas, and the Orange County General Plan Figure IX-1 Fire Hazard Severity Zones. Implementation of the proposed project would also be required to adherence to the following chapters of the City's Municipal Code to reduce potential fire hazards: Chapter 8.2 Uniform Building Code, Chapter 8.4 Uniform Mechanical Code, Chapter 8.5 National Electric Code, and Chapter 14 City of Santa Ana Fire Code. Additionally, the project would be in compliance with any further guidelines from the Orange County Fire Authority related to fire prevention and is subject to approval by the City's Building Division. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death from wildfires.

## References

Orange County Health Care Agency, Environmental Health. <http://occupainfo.com/>, accessed November 2014.

City of Santa Ana, *City of Santa Ana General Plan Public Safety Element*,

<http://www.ci.santa-ana.ca.us/generalplan/documents/PublicSafety.pdf>, 1982.

City of Santa Ana, *City of Santa Ana Municipal Code*, official website,

[https://www.municode.com/library/ca/santa\\_ana/codes/code\\_of\\_ordinances](https://www.municode.com/library/ca/santa_ana/codes/code_of_ordinances), accessed November 2014.

County of Orange, *County of Orange General Plan Safety Element Figure IX-1 Fire Hazard Severity Zones*, <http://ocplanning.net/civicax/filebank/blobdload.aspx?blobid=8591>, 1997.

State Water Resources Control Board Geo Tracker Website (GeoTracker, 2014).

<http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2001+e+dyer+road%2C+santa+ana+ca>, , accessed November 2014.

Orange County Airport Land Use Commission, *Airport Environs Land Use Plan for John Wayne Airport*, [http://www.ocair.com/commissions/aluc/docs/JWA\\_AELUP-April-17-2008.pdf](http://www.ocair.com/commissions/aluc/docs/JWA_AELUP-April-17-2008.pdf), amended April 17, 2008.

Stantec Consulting Services, Inc, *Phase I Environmental Site Assessment: Commercial Building, 2001 Dyer Road, Santa Ana, California. Stantec Project No. 185802802*, prepared by Melissa Baernstein, November 23, 2012.

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# Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>9. HYDROLOGY AND WATER QUALITY — Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** Construction activities that would be implemented by the proposed project would disturb soils and would utilize equipment and hazardous substances that, if not properly contained, could degrade surrounding water quality. Operation of the proposed project would result in residential and commercial uses that would increase the number of residents and vehicles within the project site that could increase pollutants such as pesticides, vehicle fuels and oils, and litter; all of which, if not

properly contained, could degrade existing water quality. Potential impacts related to water quality standards and waste discharge requirements will be addressed in the EIR.

- b) **Potentially significant impact.** The project area receives water services from the City of Santa Ana who also owns and maintains the water system network. The two major sources of water for the City are groundwater from the Orange County Groundwater Basin and water imported from the Colorado River and northern California by the Metropolitan Water District of Southern California (MWD). The City relies on groundwater for about 62 percent of its water supplies and imported water for the remaining 38 percent (Malcolm Pirnie, 2011). The project would result in population growth; thereby increasing demand on water supplies and the groundwater basin. The proposed project would develop 1,240 residential dwelling units, approximately 12,633 square feet of retail space and 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, and is, therefore required to develop a water supply assessment in accordance with State Senate Bill 610 to demonstrate that an assured water supply is available to support the proposed project. The EIR will include a quantification of the water supplies needed for the proposed project and an analysis of potential local groundwater impacts that could result.
- c) **Potentially significant impact.** According to Federal Emergency Management Agency's Flood (FEMA) Insurance Rate Maps that include the project area (0602320278J and 0602320278H), the project site is not located in a flood zone, and no existing surface drainages or rivers are located in the plan area. The proposed project would construct the project within an already developed and mostly paved urban area. After implementation of the project development, runoff would continue to flow over either paved or landscaped areas that would reduce the potential for erosion to occur. However, construction for the project would excavate and expose bare soil that could be subject to erosion, potentially resulting in a significant impact. This issue will be further discussed in the EIR.
- d) **Less than significant impact.** The project site is largely covered with impervious surfaces that include the building, parking areas, loading dock areas, and surrounding pavement. The site is flat and is located within an urbanized area that does not contain any streams or rivers. The project would not require or result in a substantial change in topography of the project site or surrounding area, and would not result in a substantial change in impervious areas. Thus, the project would not alter any the course of a stream or river, or otherwise substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
- e) **Less than significant impact.** The proposed project would redevelop an existing urban area that largely consists of paved areas, with small areas of landscaping. The proposed project would not result in a substantial change in impervious surfaces that could increase the amount of runoff water or change the drainage patterns in a manner that could exceed

drainage systems. Impacts related to an increase in runoff and the capacity of drainage systems would be less than significant, and will not be further discussed in the EIR.

- f) **Potentially significant impact.** The potential water quality impacts from construction and operation of the proposed project will be analyzed in the EIR as described in Items a) through c) above.
- g) **No impact.** According to the Flood Insurance Rate Maps (FIRM) for the project area (0602320278J and 0602320278H), the project site is located within “Zone X”, which is an area determined to be outside of the 0.2% annual chance flood. As such, impacts related to a 100-year flood hazard would not occur.
- h) **No Impact.** As described above, the project site is located within “Zone X”, which is an area determined to be outside of the 0.2% annual chance flood. As such, impacts in related to a 100-year flood hazard would not occur.
- i) **No impact.** Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. As shown in Exhibit 4 of the Public Safety Element of the City of Santa Ana General Plan, the project site is not located within the flood inundation area for the Prado Dam, which is located approximately 19 miles northeast of the project site, and the site is not located within a 100-year flood zone. As such, the proposed project would not result in any impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. No impact would occur.
- j) **No impact.** A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no inland water bodies near enough to the project area to pose a flood hazard to the site through a seiche. Therefore, no seiche impacts would occur. This topic will not be evaluated in the EIR.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project area is approximately eight miles from the Pacific Ocean, outside of the Tsunami Hazard Zone identified by the California Emergency Management Agency (Cal EMA, 2009). Therefore, impacts related to tsunamis would not occur.

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. The project area is flat and not near any hillsides that could be susceptible to mudflow. Thus, no mudflow impacts would occur and mudflows will not be evaluated in the EIR.

## References

- California Emergency Management Agency, *Tsunami Inundation Map for Emergency Planning, Newport Beach Quadrangle, 2009*,  
[http://www.conservation.ca.gov/cgs/geologic\\_hazards/Tsunami/Inundation\\_Maps/Orange/Documents/Tsunami\\_Inundation\\_NewportBeach\\_Quad\\_Orange.pdf](http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Orange/Documents/Tsunami_Inundation_NewportBeach_Quad_Orange.pdf), accessed November 2014.
- City of Santa Ana, *2010 Urban Water Management Plan*, prepared by Malcom Pirnie, Inc., June 2011.
- Stantec Consulting Services, Inc. (Stantec), *Phase I Environmental Site Assessment: Commercial Building, 2001 Dyer Road, Santa Ana, California. Stantec Project No. 185802802*, prepared by Melissa Baernstein, November 23, 2012.
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# Land Use and Land Use Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>10. LAND USE AND LAND USE PLANNING —</b>				
<b>Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less than significant impact.** The project site is currently developed with a 366,000 square foot warehouse/distribution building and parking area that was developed in 1978. The building is currently occupied by several short and long-term tenants that include: a data center that occupies 10,700 square feet; office space that occupies 5,367 square feet; and warehousing storage that occupies 71,000 square feet. The remainder of the building, which is approximately 276,633 square feet (75.6 percent of the building) is vacant. The project site is surrounded by commercial office, retail, light industrial and hotel uses. The land across Redhill Avenue is undeveloped, but planned for a variety of uses. The northeastern corner of Redhill Avenue is planned for commercial business uses followed by commercial core uses along Dyer Road/Barranca Parkway that include single and multi-family residential, retail, and office. In addition, areas on the east side of Redhill Avenue, north of Warner Avenue are planned for transitional/emergency housing, educational uses, and parks. In summary, the project site is largely vacant and surrounded by a variety of existing and planned uses.

The proposed project would result in a new community from development of 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building. These planned uses would accommodate the existing office uses on site and are similar to the uses that are planned for areas across Redhill Avenue. In addition, the proposed project would redevelop the project site and would not change roadways or areas outside of the project site. Thus, the proposed project would result in less than significant impacts related to physical division of an established community. This topic will not be further evaluated in the EIR.

- b) **Potentially significant impact.** The proposed project includes a proposed General Plan Amendment from PAO (Professional and Administrative Office) to a District Center designation and a Zone Change from M-1 (Light Industrial) to a Specific Development



designation. The proposed project would result in increases in development intensity and changes in land uses that could conflict with an applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project's compatibility with existing plans, policies, and regulations will be assessed in an EIR.

- c) **No impact.** The project site is developed and used for industrial uses. The project site does not contain any natural lands that are subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not result in impacts to Habitat Conservation Plan, Natural Community Conservation Plan and this topic will not be evaluated in the EIR.

## References

California Department of Fish and Wildlife (CDFW), *Orange County Transportation Authority NCCP Plan Summary*, <http://www.dfg.ca.gov/habcon/nccp/status/OrangeTransport>, 2013.

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# Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>11. MINERAL RESOURCES — Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No impact.** No active mining operations exist in the City of Santa Ana. The project site is mapped in Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey (CDMG, 1994), indicating that it is an area where adequate geologic information indicates that no significant mineral deposits are present, or that the likelihood for occurrence of significant mineral deposits is nil or slight (CDMG, 2014). The project area is developed with industrial urban uses and has no history of mining. Implementation of the project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur. This topic will not be evaluated in the EIR.
- b) **No impact.** The project area and the surrounding vicinity are highly urbanized, and they are not in or near a mining site identified by the City of Santa Ana General Plan. The proposed project would not cause a loss of availability of mining sites or gas fields, and no impact would occur. This topic will not be evaluated in the EIR.

## References

- California Division of Mines and Geology, *Generalized Mineral Land Classification of Orange County, California: Aggregate Resources Only. Open File Report 94-15, Plate 1*,: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR\\_94-15/OFR\\_94-15\\_Plate\\_1.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-15/OFR_94-15_Plate_1.pdf), 1994, accessed November 12, 2014.
- California Division of Mines and Geology, Guidelines for Classification and Designation of Mineral Lands, <http://www.consrv.ca.gov/smg/Guidelines/Documents/ClassDesig.pdf>, accessed November 12, 2014.

# Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>12. NOISE — Would the project:</b>				
a) Result in Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** Noise levels generated by construction and operation of the proposed residential and commercial uses could result in the exposure of persons to or generation of noise levels in excess of standards established in the City of Santa Ana’s General Plan Noise Element and Noise Ordinance. Noise-sensitive land uses that are currently located in the project site vicinity include the Candlewood Suites Hotel located adjacent to the site on the east. During project construction, this off-site sensitive receptor location would be exposed to temporary increases in ambient noise levels. Additionally, as the project would be developed in phases within the project site, future residential uses developed in one portion of the project site could also be exposed to noise levels generated from construction activities occurring at another portion of the site. Section 18-314 (Special Provisions) in Article VI (Noise Control) of the City’s Municipal Code specifically prohibits noise sources associated with construction between the hours of 8:00 p.m. to 7:00 a.m. on weekdays and Saturdays. Once developed, operational noise levels generated by the new residential and commercial uses would include stationary sources (e.g., heating, ventilation, and air conditioning equipment) as well as mobile sources (e.g., traffic noise) in the project area. For residential uses, the City of Santa Ana has established in its General Plan Noise Element interior and exterior noise standards of 45 dB and 65 dB CNEL, respectively. As construction and operational noise levels associated with the proposed project could potentially exceed or violate City noise standards and/or regulations, these potential impacts will be assessed in the EIR.

- b) **Potentially significant impact.** During construction activities at the project site, the existing Candlewood Suites hotel may be exposed to excessive groundborne vibration or groundborne noise levels from the operation of heavy equipment. Additionally, as the project would be developed in phases within the project site, future residential uses developed in one portion of the project site could also be exposed to groundborne vibration generated from construction activities occurring at another portion of the site. These impacts would generally only occur for a short duration. However, because existing and future sensitive receptors may be subject to disturbance and/or annoyance by groundborne noise or vibration, potential impacts could occur and this issue will be evaluated in the EIR.

The proposed project would develop commercial and residential uses at the project site. These land uses that do not involve the types of uses that would involve any major sources (mobile or stationary) of vibration, which are more typical of large industrial facilities. Thus, once developed, the operation of the new land uses at the project site is not anticipated to generate vibration levels that would adversely affect existing or future sensitive receptors. As a result, operational vibration impacts associated with the proposed project would be less than significant and would not require further analysis in the EIR.

- c) **Potentially significant impact.** Development of the proposed project may result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project primarily from potential increases in traffic noise. Additionally, noise from new stationary sources (e.g., heating, ventilation, and air conditioning equipment) would also be introduced at the site associated with the new residential and commercial buildings. As a result, these potential noise impacts will be analyzed in the EIR.
- d) **Potentially significant impact.** Development of the proposed project may result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project during construction activities at the site. The operation of construction equipment at the project site would result in increased noise levels in the site's vicinity, which could adversely affect off-site sensitive receptors located nearby including the Candlewood Suites Hotel. In addition, construction traffic associated with the new development may also result in a temporary or periodic increase in noise levels on the local roadways in the project area. As such, potential noise impacts on existing sensitive receptors from exposure to temporary construction noise levels will be evaluated in the EIR.
- e) **Less than significant impact.** The closest airport to the project site is the John Wayne Airport, which is located approximately 1.8 miles southwest of the project site. Based on the 2013 CNEL noise contours for the airport, a portion (the western side) of the project site is located within the airport's 60 dB CNEL noise contour while the remainder of the site is located outside the 60 dB CNEL noise contour.

Based on the City's General Plan Noise Element, residential uses have an exterior noise standard of 65 dB CNEL. Because the entire project site is located outside of the 65 dB CNEL noise contour, the project would not expose people to excessive noise from an airport, and therefore, this issue area would not be further analyzed in the EIR.

- f) **No impact.** There are no private airstrips located in the vicinity of the project site. Therefore, the project would not expose people to excessive noise from a private airstrip, and therefore, this issue area would not be further analyzed in the EIR.

## References

City of Santa Ana, *City of Santa Ana General Plan Noise Element*, September 20, 1982.

City of Santa Ana, *City of Santa Ana Municipal Code*, official website, [https://www.municode.com/library/ca/santa\\_ana/codes/code\\_of\\_ordinances](https://www.municode.com/library/ca/santa_ana/codes/code_of_ordinances), accessed November 2014.

John Wayne Airport Orange County. *John Wayne Airport 2013 Annual 60, 65, 70, and 75 CNEL Noise Contours*, <http://www.ocair.com/reportspublications/AccessNoise/cnelnoisecontours/2013.pdf>, 2013.

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# Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>13. POPULATION AND HOUSING — Would the project:</b>				
a) Induce substantial 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** The proposed project would develop 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase in employees on the project site. Therefore, the project would directly induce population growth and significant impacts may occur. Impacts of the proposed project on population and housing in the City of Santa Ana and surrounding region will be evaluated in the EIR.
- b) **No impact.** The proposed project site is currently developed for industrial uses and is void of any existing residential development. As such, the proposed project would not displace any existing housing and would not result in the construction of replacement housing elsewhere. No impact would occur.
- c) **No impact.** The proposed project is currently developed for industrial uses and is partially used. The proposed project would replace the existing uses with commercial and residential uses with space that could accommodate the data center that currently occupies 10,700 square feet and the office space that occupies 5,367 square feet. The project would be phased to accommodate the existing uses while developing the new residential and retail uses. Therefore, the project would not displace substantial numbers of people and would not result in the construction of replacement housing elsewhere. No impact would occur.

# Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>14. PUBLIC SERVICES — Would the project:</b>				
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

a.i) **Potentially significant impact.** Fire protection and emergency medical services in the City of Santa Ana are provided by the Orange County Fire Authority (OCFA). The three nearest OCFA stations to the project area are:

- Fire Station 6 is 1.7 miles from the project site, 3180 Barranca Parkway, Irvine
- Fire Station 79 is 1.5 miles from the project site, 1320 East Warner, Santa Ana
- Fire Station 76 is 2.9 miles from the project site, located at 950 W. MacArthur Boulevard, Santa Ana (OCFA 2014)

The proposed would develop 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase of in employees on the project site. Therefore, implementation of the project would result in increased demand for fire protection and emergency medical services, potentially resulting in significant impacts. The OCFA will be consulted for assistance in assessing impacts of project existing services and any resulting need for new or expanded facilities. Potential fire protection impacts from implementation of the proposed project will be evaluated in the EIR.

a.ii) **Potentially significant impact.** The Santa Ana Police Department (SAPD) provides police services to the project area. The SAPD main building is located at 60 Civic Center Plaza, which is 5.5 miles from the project site and the SAPD also has a sub-stations open to the public that is located at 3750 W. McFadden Avenue (7.5 miles from the project

site). Implementation of the proposed project would result in increased numbers of residents and employees and increased development intensity in the project area. Therefore, implementation of the project would result in increased demand for police services, potentially resulting in the need for new or expanded police facilities. The SAPD will be consulted for assistance in assessing impacts of the project on SAPD services and any resulting need for new or expanded facilities and resources. Impacts on police services will be evaluated in the EIR.

- a.iii) **Potentially significant impact.** The project area is in the Santa Ana Unified School District (SAUSD) and in the attendance areas of James Monroe Elementary School (417 E. Central Ave); McFadden Intermediate (2701 S. Raitt Street); and Century High School (1401 S. Grand Avenue) (SAUSD, 2014). The proposed project would develop between 1,240 and 1,401 residential units. Therefore, implementation of the project would increase the number of students attending SAUSD schools. The EIR will evaluate the anticipated number of students that would be generated from the proposed project along with the existing the existing capacity and enrollment trends of the SAUSD schools that would be attended by project residents.
- a.iv) **Potentially significant impact.** The proposed project includes construction of a park that would include an outdoor theatre, putting green, and par course/walking/running trail with seating. In addition, the project would develop various recreation amenities for residents that would include a pool and spa, fire pits, dog park, outdoor bbq area, fitness area, community center, tennis and basketball courts, and children's play area. The Santa Ana Municipal Code identifies the City's general standard of providing two acres of property devoted to parks and recreational purposes for each 1,000 persons residing within the City of Santa Ana. The project would generate a new residential population from development of between 1,240 and 1,401 residential units, which would result in an increase in use of neighborhood and regional parks and the potential need for additional parkland. Potential substantial adverse physical impacts associated with the provision of, or the need for new parks will be evaluated in the EIR.
- a.v) **Potentially significant impact.** Implementation of the project may result in an increased need for public facilities and/or additional maintenance of existing public facilities including libraries. Library resources and services in Santa Ana are provided by the City. The City has two library locations; the main library is located at 26 Civic Center Plaza (five miles from the project site) and the Newhope Library Learning Center is located at 122 North Newhope Street (eight miles from the project site). In addition, the Orange County Public Library has a branch located at 345 East Main Street in Tustin that is 3.6 miles from the project site (OCPL, 2014). The project would permit between 1,240 and 1,401 new dwelling units and generate new residents. Therefore, implementation of the proposed project would result in an increased need for library services, resources, and facilities, and other public facilities. The EIR will evaluate the potential impacts of future development on public facilities.



## References

City of Santa Ana Library, *City of Santa Ana Library Services*, <http://www.ci.santa-ana.ca.us/library/about/hours.asp>, accessed November 2014.

Orange County Fire Authority, official website, <http://www.ocfa.org/menu/departments/Operations/StationList.aspx>, accessed November 2014.

Orange County Public Library, official website, <http://ocpl.org/>, accessed November 2014.

Santa Ana Unified School District School Locator, official website, <http://www2.sausd.us/maps/locator1.asp>, accessed November 2014.

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# Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>15. RECREATION — Would the project:</b>				
a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** The proposed project would result in development of 1,240 dwelling units and approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase of in employees on the project site. This increase in onsite population would likely result in an increase in use of recreational facilities in the project region, potentially contributing to their deterioration. Therefore, significant impacts may occur. The EIR will analyze the proposed project’s compliance with the City of Santa Ana’s park acreage standards and its potential to physically deteriorate recreational facilities.
- b) **Potentially significant impact.** The project includes construction of a park that would include an outdoor theatre, putting green, and par course/walking/running trail with seating. In addition, the project would develop various recreation amenities for residents that would include a pool and spa, fire pits, dog park, outdoor bbq area, fitness area, community center, tennis and basketball courts, and children’s play area. Each building would have a common area rooftop deck with outdoor kitchen and seating areas. The impacts of development of the proposed recreation amenities are part of the impacts of the proposed project as a whole, which will be analyzed in the EIR.

# Transportation and Traffic

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>16. TRANSPORTATION AND TRAFFIC — Would the project:</b>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** The proposed project would develop 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase of in employees on the project site. Therefore, the project would result in both temporary construction traffic and long-term operational traffic that would be generated by the project. The increased intensity of uses on the project site could potentially have a significant impact on area roadways, including the potential for conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, potential impacts related to performance of the circulation system in relation to applicable policies and ordinances will be evaluated in the EIR.
- b) **Potentially significant impact.** The Orange County Transportation Authority (OCTA) is the Congestion Management Agency (CMA) responsible for the creation and implementation of the Orange County Congestion Management Program (CMP), which was last updated in 2013. The Program establishes a Highway System, which includes a

series of intersections and highways throughout Orange County, also known as OCTA's Smart Street network, and establishes minimum performance thresholds for these CMP facilities. The nearest CMP Highway System is located about 1.5 miles north of the project site at Edinger Avenue and State Route (SR) 55 (OCTA, 2013). Projects must demonstrate consistency with the OCTA's performance thresholds on the Highway System if the project is estimated to either generate 2,400 or more Average Daily Trips (ADT) or contribute 1,600 or more ADT directly onto the highway system. As described above, the project would result in implementation of a mixed use project that would result in both residential and commercial related uses. The potential for the project to result in impacts to the CMP intersections and conflicts with the Orange County CMP will be evaluated in the EIR.

- c) **No impact.** John Wayne Airport is the nearest airport facility to the project site located approximately 1.8 miles southwest of the project site. The project site is not located within John Wayne Airport's Safety Compatibility Zones or Airport Impact Zones, and the 70 foot maximum building height would not exceed FAA's notification requirement of 200 feet. Given the residential and commercial nature of the proposed project and its distance from the airport, construction and operation of the project would not result in a change to air traffic or alter air traffic patterns. Therefore, no impacts would occur.
- d) **Potentially significant impact.** Operation of the proposed mixture of multi-family residential, retail commercial, and office commercial uses that would utilize various parking structures on the project site would alter circulation patterns in the project area, particularly during peak traffic hours. The circulation patterns that would be generated by the proposed project may result in queuing, which may be considered a hazardous condition. As such, on and offsite circulation effects from the proposed design will be further analyzed within the EIR.

The project does not include uses that are incompatible with the proposed residential and commercial mixed uses, such as farm equipment. Traffic impacts related to incompatible uses will not be discussed in the EIR.

- e) **Less than significant impact.** The proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Direct access to the project site is provided from East Dyer Road and Redhill Avenue which are adjacent to the project site. Construction activities would occur within the project site and would not restrict access of emergency vehicles to the project site or adjacent areas. In addition, travel along surrounding roadways would remain open and would not interfere with emergency access to the site vicinity. The project is required to design and construct internal access, and size and location of fire suppression facilities (e.g., hydrants and sprinklers) to conform to Orange County Fire Authority standards. The Orange County Fire Authority would review the development plans prior to approval to ensure adequate emergency access. The project would be required to meet fire access requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part

9). As such, the proposed project would result in adequate emergency access, and impacts would be less than significant.

- f) **No impact.** The OCTA provides transit services and bus stops within the immediate vicinity of the project site. There is an existing bus stop in front of the project site on Dyer Road, bus routes currently run along Dyer Road and Redhill Avenue. These OCTA Bus Routes include: 59, 72, 213, and 472, which is a Metrolink feeder line that provides service to the Tustin Metrolink Station that is approximately three miles from the project site (2975 Edinger Avenue). The existing bus service and access to regional Metrolink station would allow project site residents and employees to convenient access to alternative transportation. The proposed project would not alter or conflict with existing bus stops and schedules, and impacts related to OCTA transit services would not occur.

There are several roadways in the project vicinity, including Barranca Parkway, Redhill Avenue, and Alton Parkway that have Class II bicycle lanes, which are on-road striped lanes. The project would include onsite bicycle facilities, pursuant to the City's Bicycle Support Facilities Guidelines, and would not involve any offsite improvements or result in any identified offsite impacts to bicycle routes. Therefore, no conflicts are expected to occur to any bicycle facilities.

The project site is bound by sidewalks along Dyer Road and Redhill Avenue. The proposed project would retain the existing sidewalks, which would facilitate pedestrian use and walking. Therefore, the proposed project would not conflict adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of any facilities. No impacts would occur and this will not be further analyzed in the EIR.

## References

City of Santa Ana Planning and Building Agency, *City of Santa Ana Citywide Design Guidelines, Chapter 16 Bicycle Support Facility Guidelines*, [http://www.ci.santa-ana.ca.us/pba/planning/documents/Chapter\\_16\\_BicycleFacilities.pdf](http://www.ci.santa-ana.ca.us/pba/planning/documents/Chapter_16_BicycleFacilities.pdf), accessed November 2014.

Orange County Transportation Authority, *2013 Congestion Management Program*, <http://www.octa.net/pdf/Final%202013%20CMP.pdf>, 2013, accessed November 2014.

# Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>17. UTILITIES AND SERVICE SYSTEMS —</b>				
<b>Would the project:</b>				
a) Conflict with wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** The City of Santa Ana Public Works is responsible for wastewater collection in the project area, including from the project site. Wastewater collected within Santa Ana is transported to Plant 1 or Plant 2 operated by the Orange County Sanitation District (OCSD) for treatment. The project site currently sends wastewater associated with the existing office buildings to OCSD for treatment. While the proposed project would not result in the discharge of wastewater to any surface water, operational discharges would be sent to the sewer system, which would ultimately be treated at OCSD. The wastewater treatment plants are required to comply with associated waste discharge requirements (WDRs) and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Prior to connection to the sewer or a change in discharge, permission from OCSD shall be obtained. The proposed project would increase the amount of wastewater generated on site as a result of the new residential uses and increased commercial uses. The EIR will analyze the anticipated change in wastewater generation and the anticipated capacity of OCSD to accommodate the increased wastewater generated, as well as compliance with the wastewater treatment requirements of the applicable Regional Water Quality Control Board.

- b) **Potentially significant impact.** The proposed project would develop 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase in employees on the project site. Therefore, the project would substantially increase the demand for water and wastewater treatment services. An evaluation of the existing water and sewer infrastructure will be prepared as part of the EIR to determine whether existing water and wastewater treatment facilities are adequate to serve the project, or if new or expanded facilities would be needed.
- c) **Potentially significant impact.** The proposed project would construct the project within an already developed and mostly paved urban area. After implementation of the project development, runoff would continue to flow over either paved or landscaped areas. However, the project would change the existing drainage on the project site; thus, the EIR will evaluate the hydrological effects of the proposed project and analyze whether existing storm drain facilities are adequate to collect and convey runoff generated by the project or if new facilities would be needed.
- d) **Potentially significant impact.** The City of Santa Ana is served by its own municipal water system. The two major sources of water for the City are groundwater from the Orange County Groundwater Basin and water imported from the Colorado River and northern California by the Metropolitan Water District of Southern California (MWD). The City relies on groundwater for about 62 percent of its water supplies and imported water for the remaining 38 percent. The City forecasts that it will have sufficient water supplies through 2035 in both normal and dry years (Malcolm Pirnie, 2011).

The proposed project would develop 1,240 residential dwelling units, approximately 12,633 square feet of retail space and 5,427 square feet of restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, thereby increasing demand on water supplies. The project is required to develop a water supply assessment in accordance with State Senate Bill 610 to demonstrate that an assured water supply is available to support the proposed project. The EIR will include a quantification of the water supplies needed for the proposed project and an analysis of potential impacts that could result.

- e) **Potentially significant impact.** As described above, the project would result in an increase in residents and employees on site that would increase demands for wastewater treatment. An evaluation of wastewater treatment capacity will be prepared as part of the EIR to determine whether facilities are adequate to treat wastewater generated by the project or if new facilities would be needed.
- f) **Potentially significant impact.** The City of Santa Ana is under contract with Waste Management of Orange County for solid waste hauling and disposal. In 2013, 95 percent of solid waste generated in Santa Ana was taken to the Frank R. Bowerman Sanitary Landfill, which is owned and operated by the Orange County Waste and Recycling

Department (CalRecycle, 2014). Construction and operation of new development would generate substantial amounts of solid waste and significant impacts could occur. Therefore, existing and planned landfill capacity and estimated solid waste generation resulting from buildout of the proposed project will be evaluated in the EIR.

- g) **No impact.** The project would be required to be in compliance with all federal, state, and local statutes related to solid waste. These regulations include the U.S. Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA), which provides the federal government with "cradle to grave" authority over the disposal of solid waste and hazardous materials. The project would also be required to comply with Assembly Bills 939 and 1327, which require measures to enhance recycling and source reduction. Thus, impacts related to compliance with regulations related to solid waste would be less than significant.

## References

CalRecycle, *Jurisdiction Disposal Reporting System*,  
<http://www.calrecycle.ca.gov/lgcentral/Reports/DRS/Destination/JurDspFa.aspx>, accessed November 2014.

City of Santa Ana, *2010 Urban Water Management Plan*, prepared by Malcom Pirnie, Inc., June 2011.



# Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
<b>Would the project:</b>				
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially significant impact.** Implementation of the proposed project could degrade the quality of the environment. The project could result in air quality, greenhouse gas emission, noise, hydrology, water quality, and traffic impacts. Potentially significant biological impacts are not anticipated because the project area is in a highly developed urban area and there are no rare or endangered plants or animal species, no riparian habitat or other natural sensitive area. The City’s General Plan Land Use Element does not identify the site as being within an area of archaeological or paleontological sensitivity. However, archaeological and paleontological resources could still be present in soils that could be impacted during project construction activities. Based on the responses throughout this Initial Study, the proposed project has the potential to degrade the quality of the environment. Therefore, the impact areas described previously will be evaluated further in the EIR.
- b) **Potentially significant impact.** As described above, the project would develop 1,240 dwelling units, approximately 12,633 square feet of retail space, approximately 5,427 square feet restaurant space, and either a 161 unit residential building or a 66,000 square foot office building, which would result in a new resident population and an increase in employees on the project site. Therefore, implementation of the proposed project may result in cumulative impacts to aesthetics, air quality, cultural resources, greenhouse gas emissions, hazardous materials, hydrology and water quality, land use, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. The extent and significance of potential cumulative impacts resulting

from the combined effects of the proposed project plus other past, present, and reasonably foreseeable future projects will be evaluated in the EIR.

- c) **Potentially significant impact.** As described above, the project would result in potentially significant impacts that could substantially affect human beings, directly or indirectly to several environmental areas including: aesthetics, air quality, cultural resources, greenhouse gas emissions, hazardous materials, hydrology and water quality, land use, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. Impacts in each of these areas will be evaluated in the EIR.
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