Draft Environmental Impact Report

SCH No. 2020031172

Goodman Logistics Center Fullerton Project

PRJ2019-00173

City of Fullerton, California

City of Fullerton
303 W. Commonwealth Avenue
Fullerton, CA 92832

Public Review Draft | August 2020

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SCH No. 2020031172

Lead Agency:

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SECTION S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000 et seq.) requires that public agencies consider the potential environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. An Environmental Impact Report (EIR) is a public document designed to provide lead, responsible, trustee, and interested agencies; special districts; local and State government agency decision-makers; and the public with an analysis of potential environmental consequences of a project to support informed decision-making.

The City of Fullerton is the Lead Agency under CEQA and is responsible for preparing the EIR for the proposed Goodman Logistics Center Fullerton Project (Project). The City, as the Lead Agency, will review and consider this EIR in its decision whether or not to approve the Project. This EIR has been prepared pursuant to the requirements of CEQA and the Guidelines for the Implementation of CEQA (State CEQA Guidelines) (Title 14, California Code of Regulations, Chapter 3, Section 15000 et seq.) and identifies, analyzes, and mitigates to the extent feasible the potential environmental effects associated with the construction and implementation of the Project. This EIR is structured as a Project EIR. However, as discussed in Section 1.2, *Type of Environmental Impact Report*, and in accordance with CEQA, this EIR relies on the analysis presented in *The Fullerton Plan 2030 Final Environmental Impact Report* (The Fullerton Plan EIR) (State Clearinghouse [SCH] No. 2011051019) certified by the City of Fullerton on May 1, 2012. This is because the Project site is part of the Southeast Industrial Focus Area, and the development proposed by the Project Applicant is consistent with the land use and growth assumptions for the Southeast Industrial Focus Area, as anticipated in The Fullerton Plan; and the environmental impacts of future development under The Fullerton Plan have been evaluated in The Fullerton Plan EIR.

This EIR has been prepared to utilize information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the State CEQA Guidelines (Section 15084[d–e]), this EIR has been prepared by a consultant under the direction of City planning staff. However, prior to certification, the City must independently review the methodologies and conclusions reached in the EIR to ensure that the information included in and the conclusions reached in the EIR represent the City's independent judgment regarding the potential environmental impacts of the Project.

A summary description of the proposed Goodman Logistics Center Fullerton Project is provided in Section S.2 below; a complete description of the Project is provided in Section 3.0, Project Description. This document focuses on those environmental impacts identified as potentially significant in the Notice of Preparation (NOP) completed for this Project (refer to Section 1.3, EIR Scope, Format, and Content, and Appendix A of this EIR). In addition to the analysis of the Project impacts and identification of potentially significant environmental impacts, this EIR identifies appropriate, feasible Project-specific mitigation measures, and discusses potential alternatives to the Project and the ability of alternatives to reduce or eliminate impacts. Following is a summary

of the Project; Project alternatives; areas of controversy; issues to be resolved; potential adverse impacts, and corresponding mitigation.

S.2 PROJECT SUMMARY

S.2.1 PROJECT LOCATION AND SETTING

The approximately 65.4-net-acre[1] Kimberly-Clark site is located at 2001 E. Orangethorpe Avenue in the City of Fullerton, Orange County, California, at the northeast corner of the E. Orangethorpe Avenue and Acacia Avenue intersection. The Project site comprises Assessor Parcel Numbers (APNs) APNs 073-120--31 and -33. The Project Applicant may pursue development of the adjacent approximately 0.7-acre property at 2301 E. Orangethorpe Avenue (APN 073-120-09). In the event the Project Applicant acquires this property ("potential expansion site"), the Project site could be expanded, resulting in a 66.1-net-acre Project site (74.0-gross-acre Project site). Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark Fullerton Mill site and the potential expansion site.

The Project site is bounded by Acacia Avenue to the west, Kimberly Avenue and BNSF railroad tracks to the north, State College Boulevard to the east, and E. Orangethorpe Avenue to the south. With the exception of State College Boulevard, there are existing driveways along these roadways that provide access to the Project Kimberly-Clark site. Access to the potential expansion site is provided from E. Orangethorpe Avenue. Regional access to the Project site is provided from State Route (SR)-57 and SR-91, which are located approximately 0.7 miles east and approximately 0.4 miles south of the Project site, respectively.

The Kimberly-Clark site is currently occupied by the Kimberly-Clark manufacturing facility, which includes 1,210,720 square feet (s.f.). of existing manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.). Kimberly-Clark began manufacturing operations at its mill in Fullerton in 1955, and continued operations until closing in 2020. In addition to the buildings, other improvements that were associated with the Kimberly-Clark facility and remain onsite include, but are not limited to paved parking areas, water tanks, landscaping, and driveways. The east-central portion of the site contains rows of ornamental orange trees; the fruit from these trees is not harvested or sold. Additionally, a storage lot used for recreational vehicles was operated in the northeast corner of the Project site under a lease agreement with Kimberly-Clark. Kimberly-Clark operations and the operations of uses at the site that were subject to lease agreements terminated in June 2020. The City of Fullerton Public Works Department maintains a water well facility (Kimberly Well No. 2) in the north-central portion of the site west of the Kimberly Avenue access driveway, and there is a Southern California Edison (SCE) substation generally in the center of the Project site. The potential expansion site is developed with two structures and associated facilities formerly occupied by Chapman Coast Roof Company, Inc., including a 2,904-square-foot, two-story office building and a 2,656-square-foot workshop/warehouse.

[1] The Project site encompasses approximately 73.1 gross acres, which includes an easement for City of Fullerton Public Works Department facilities, areas to be dedicated for access improvements along the site-adjacent roadways, and public roadway right-of-way.

The Project site contains non-native vegetation, and ornamental landscaping (including a remnant orange orchard in the eastern portion of the Kimberly-Clark site). No natural biological habitats, riparian habitats, or other sensitive habitats are present on the Project site.

The Project site is surrounded by urban development in the City of Fullerton (to the north, east, south, and west) and in the City of Anaheim (further south) including public facility uses, manufacturing uses, business park/commercial uses, office uses, and residential uses. Specifically, warehousing, manufacturing, business park/commercial uses, and City of Fullerton Fire Department Station No. 3 is located to the north; non-residential uses including commercial and industrial are located to the east; industrial, commercial, office uses, and residential uses are located to the south; and industrial uses including warehouses and manufacturing facilities are located to the west.

The Project site is within the Southeast Industrial Focus Area of the City and has an “Industrial” community development type. Most of the Project site is zoned M-P-200-ES (Manufacturing Park, 200,000 square feet [s.f.] minimum lot size, in an Emergency Shelter Overlay Zone), and the southeast corner of the Project site is zoned M-G ES (Manufacturing General in an Emergency Shelter Overlay Zone). The potential expansion site is also zoned as M-G-ES.

S.2.2 PROJECT DESCRIPTION

As described in Section 3.0 of this EIR, the Project involves redevelopment of the Project site with an industrial logistics center consisting of four buildings (up to 1,609,384 s.f.). This would include 1,504,384 s.f. of warehouse space and 105,000 s.f. of office space. Table 3-1 in Section 3.0, Project Description, of this EIR, summarizes the site area and floor area for each building. Existing structures and improvements on the Project site would be demolished to accommodate the Project, with the exception of the existing City of Fullerton well facility; the easement for this facility would be expanded to the east.

For purposes of analysis in this EIR, as applicable, it is assumed that up to 50 percent of the building square footage would consist of a high-cube fulfillment center warehouse, and 50 percent would consist of a high-cube cold storage warehouse. The new warehouse buildings would have a maximum building height of 55-feet at the top of the parapet, and would have a contemporary architectural style. The buildings would be constructed of concrete tilt-up panels and low-reflective, blue/green glass. Loading docks would be located within enclosed/screened truck courts, and passenger vehicle parking would be provided at each building.

Access to the proposed buildings would be provided from E. Orangethorpe Avenue (six driveways with the Project and seven driveways with the Optional Site Plan), Kimberly Avenue (seven driveways), and State College Boulevard (one driveway). Each driveway would accommodate full access except for the westernmost driveway on E. Orangethorpe Avenue, which would be restricted to right-in/right-out access only for passenger cars. As required by the City, the Project includes various improvements in the public roadway right-of-way along the Project site frontage, including, but not limited to, rehabilitation of pavement over the entire width of Kimberly Avenue and E. Orangethorpe Avenue; and, modified turning radii, as needed, and as feasible, to

accommodate truck turning movements; and, improvements to substandard curb ramps, as needed. The Project would also involve the sidewalk improvements along the Project site's frontage, and installation of Americans with Disabilities Act (ADA)-compliant curb ramps, as required by the City. Additionally, a new concrete bus pad would be installed at the bus stop on the north side of E. Orangethorpe Avenue adjacent to the Project.

Existing trees and other vegetation on the Project site would be removed and replaced with ornamental landscaping consisting of trees, shrubs, and drought-tolerant accent plants, and groundcovers. Approximately 4.5 acres of the Project site would be landscaped. The Project would include various exterior lighting elements to ensure safety and security of the facilities, and signage for Project identification, wayfinding, and tenant identifications. Walls and fences would be installed for screening and security.

Municipal and private utility services necessary to serve the Project are currently available within or adjacent to the Project site. On-site utility infrastructure necessary to serve the proposed logistics center — including water, sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity, natural gas, telecommunications) — would be installed with the Project and would connect to the existing utility lines. The existing SCE substation on-site would be removed, and existing wooden poles carrying overhead telecommunications lines along the Project site frontage with E. Orangethorpe Avenue would be removed and the telecommunications lines would be placed underground.

Approval actions required from the City to implement the Project include: (1) adoption of a Zone Change to change the zoning designation for the southeast portion of the Project site from M-G-ES (Manufacturing General in an Emergency Shelter Overlay Zone) to M-P-200-ES (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone) to allow for consistent zoning across the Project site; (2) approval of a Parcel Map to subdivide the Project site into four parcels to accommodate the proposed buildings (Buildings 1, 2, 3, and 4); (3) approval of a Variance to allow the proposed buildings to exceed the maximum height permitted in the M-P-200-ES zone (building height of up to 55-feet compared to a maximum 45-foot height limit); (4) a Major Site Plan for review of site, architectural, and landscape plans; and, (5) certification of the EIR. Additionally, the Project Applicant is requesting adoption of a Development Agreement.

Upon Project approval, it is anticipated that the construction of the proposed logistics center would begin in spring 2021 and be completed by summer 2022.

S.3 PROJECT ALTERNATIVES

CEQA requires that an EIR identify ways to mitigate or avoid the significant effects that a Project may have on the environment; therefore, in accordance with Section 15126.6 of the State CEQA Guidelines, Section 5.0, Alternatives, of this EIR addresses alternatives to the Project. It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or

operation of a project to a less than significant level. However, as discussed under Section S.6, below, and as demonstrated through the analysis presented in Section 4.1 through Section 4.13 of this EIR, the Project would not result in any significant and unavoidable impacts. The Project's potential impacts are less than significant with incorporation of applicable mitigation measures from The Fullerton Plan EIR, or with implementation and Project-level mitigation measures.

Alternatives considered and not carried forward for detailed analysis in this EIR include an alternative site and an alternative development project on-site, as further described in Section 5.2 of this EIR.

- **Alternative Site.** Development of the Project at an alternative site would need to occur within the City of Fullerton, and specifically within the Southeast Industrial Focus Area or in other Focus Areas where the City of Fullerton anticipates future development, as identified in The Fullerton Plan. Locating the Project at other parcels within the City would require lot consolidation, demolition, and displacement of existing land uses to provide a site similar to the size of the Project site (approximately 66.1 acres). Additionally, implementation of the Project at an alternative site that is a similar size as the Project would result in environmental impacts similar to those identified for the Project.
- **Alternative Development Project On-Site.** Implementation of an alternative development scenario at the Project site that could potentially meet the established Project objectives would require the removal of the existing Kimberly-Clark Fullerton Mill buildings and associated facilities, site preparation, grading/excavation, building construction and utility installation (including subsurface detention chambers). Project impacts that require Project-level mitigation are associated with construction activities, not operation, and would therefore also occur under a potential alternative development scenario onsite. For that reason, there is no need to further evaluate alternative development scenarios.

As required by CEQA, Section 5.3.1 of this EIR addresses the No Project Alternative - Reuse of Existing Buildings (No Project Alternative), as described below. The No Project Alternative represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed.

- **No Project Alternative – Reuse of Existing Buildings.** Under the No Project Alternative, the existing buildings and associated facilities on the Kimberly-Clark site and potential expansion site would be retained and reoccupied for use consistent with that allowed by right pursuant to Section 15.40, Industrial Zone Classifications, of the City's Zoning Code. This includes, but is not limited to, ongoing manufacturing uses. The Project is consistent with The Fullerton Plan community development type for the Project site and a General Plan revision is not needed. Similarly, the Project does not conflict with the land uses allowed by the existing zoning for the site. Although a zone change is proposed, it is only proposed to provide a single consistent zoning designation for the Project site. Thus, with the exception of the exceedance of the building height, which is allowed with an approved variance, the Project represents the development that would be allowed under current City regulations. It should be noted that development of the Project site consistent with existing

community development type and zoning designation is also addressed through the discussion of alternative development scenarios.

There are no alternatives evaluated in Section 5.0 that would be considered environmentally superior to the Project.

S.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the Project, the key issues to be resolved include decisions by the City of Fullerton as the Lead Agency, as to:

- Whether this environmental document adequately describes the potential environmental impacts of the Project;
- Whether the recommended mitigation measures should be modified and/or adopted;
- Whether the project benefits override the environmental impacts that cannot be feasibly avoided or mitigated to less than significant levels;
- Whether other mitigation measures should be applied to the project besides those identified in the EIR; and
- Whether there are any alternatives to the Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

S.5 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the public. This EIR has taken into consideration the comments received from the public and various agencies in response to the Notice of Preparation (NOP) of a Draft EIR. Written comments received during the NOP and scoping period are contained in Appendix A. Section 1.3.1, *EIR Scope*, summarizes the NOP comment letters; no comments were received at the Draft EIR scoping meeting. Environmental issues in the comment letters are summarized in Table 1-1 of this EIR, and are addressed in each relevant issue area analyzed in Sections 4.1 through 4.13 of this EIR.

Based on input received from the public during the scoping process, there are no “areas of controversy” known to the City at this time.

S.6 SUMMARY OF ENVIRONMENTAL IMPACTS

Table S-1 presents a summary of the environmental impacts resulting from the Project, including each of the environmental topics identified in the NOP as having potentially significant impacts.

Section 6.0, Other CEQA Considerations, of this EIR discusses the environmental topics for which it was determined that no further analysis is required.

Based on the NOP, the environmental topics identified for further study in this EIR include: Aesthetics, Air Quality, Cultural Resources, Energy, Greenhouse Gas (GHG) Emissions, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. The potential direct and indirect impacts and cumulative impacts for these topical issues are addressed in Sections 4.1 through 4.13 of this EIR. Growth-inducing impacts and significant irreversible environmental changes are addressed in Section 6.0, Other CEQA Considerations.

For each environmental topic, Table S-1 identifies The Fullerton Plan EIR mitigation measures that are applicable to the Project, and additional Project-specific mitigation measures for impacts determined to be potentially significant even with implementation of The Fullerton Plan EIR mitigation measures. Project-specific mitigation measures are required to reduce potentially significant impacts for the following topical issues: Geology and Soils (due to the potential to encounter paleontological resources), and Hazards and Hazardous Materials (due to potential soil contamination). These potentially significant impacts are associated with construction activities, not operation of the Project, and would be reduced to a less than significant level with mitigation incorporated. The Project would not result in any significant and unavoidable impacts.

S.7 MITIGATION MONITORING

State law requires the preparation of a mitigation monitoring and reporting program (MMRP) to ensure that measures that would avoid or lessen significant environmental effects of the project are adopted as conditions of approval for the project. The mitigation measures identified in this EIR have been described in sufficient detail to provide the necessary information to identify the party or parties responsible for carrying out the mitigation, when the mitigation will be implemented, and why the mitigation has been required. An MMRP would be adopted by the City at the time of Project approval.

TABLE S-1 SUMMARY OF ENVIRONMENTAL IMPACTS RESULTING FROM THE PROJECT

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.1 AESTHETICS		
Threshold a: Scenic vistas in the City include views of the West and East Coyote Hills from the southern portion of the City as well as distant views of the City and surrounding region from within the area. No impacts to a scenic vista would occur.	No mitigation is required.	No Impact
Threshold b: The Project site is not in proximity to a State scenic highway. Therefore, the Project would not have the potential to degrade scenic resources within a State scenic highway. No impacts would occur.	No mitigation is required.	No Impact
Threshold c: The Project would be developed in accordance with the development standards included in the City's Municipal Code, with approval of a variance for exceedance of the established building height limit, and in accordance with the City's General Plan policies related to scenic quality. The Project would not result in conflicts with the City's applicable zoning and other regulations governing scenic quality. No impacts would occur. Notwithstanding this conclusion, MM AES-2 from The Fullerton Plan EIR, which is required to be implemented by development projects in the City to reduce aesthetic impacts during construction, is applicable to the Project.	***Applicable The Fullerton Plan EIR Mitigation Measure*** **MM AES-2** Construction documents shall include language requiring that construction vehicles be kept clean and free of mud and dust prior to leaving the development site. Streets surrounding the development site shall be swept daily and maintained free of dirt and debris.	No Impact
Threshold d: The Project site is in an urban area subject to existing light and glare, and the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. This impact is less than significant.	No mitigation is required.	Less than Significant Impact
4.2 AIR QUALITY		
Threshold a: Project construction and operational-source emissions would not exceed the regional or localized significance thresholds, and the Project would not result in or cause National Ambient Air Quality	No mitigation is required.	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) violations. Additionally, the Project is consistent with the growth assumptions in the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) The Project therefore would be consistent with the AQMP. No impact would result.		
Threshold b: The Project's net air pollution emissions during construction and operation would not exceed the SCAQMD regional thresholds of significance. As such, the Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is in non-attainment. Impacts would be less than significant. Notwithstanding this conclusion, mitigation measures from The Fullerton Plan EIR, which are required to be implemented by development projects in the City to reduce air pollutant emissions during construction and operation, are applicable to the Project.	***Applicable The Fullerton Plan EIR Mitigation Measures*** **MM AQ-1** Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors: • All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust; • Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), according to manufacturers' specifications; • All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour; • On-site vehicle speed shall be limited to 15 miles per hour;	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	• All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized; • Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible; • All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site; • Track-out devices shall be used at all construction site access points; • All delivery truck tires shall be watered down and/or scraped down prior to departing the job site; • A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to fugitive dust generation; • Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway; and • Replace ground cover in disturbed areas as quickly as possible. **MM AQ-2** All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. Prior to the issuance of grading permits, the Applicant shall demonstrate to the City of Fullerton how the project operations subject to that specification during hauling activities shall	

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	comply with the provisions set forth in Sections 23114(b)(F), (e)(4). **MM AQ-3** The following measures shall be implemented to reduce VOC emissions resulting from application of architectural coatings: • Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent; • Use required coatings and solvents with a VOC content lower than required under Rule 1113; • Construct/build with materials that do not require painting; and • Use pre-painted construction materials. **MM AQ-4** Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans and specifications stipulate that ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Equipment maintenance records and equipment design specifications data sheets shall be kept on site during construction. The City Inspector shall be responsible for ensuring that contractors comply with this measure during construction. **MM AQ-5** Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval shall be required by the City of Fullerton Building and Safety Division prior to issuance of grading permits.	

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	MM AQ-6 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow. **MM AQ-7** Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes. **MM AQ-9**[2] Proposed developments within the City of Fullerton shall include, to the extent feasible, as a part of construction and building management contracts, the following measures: • All residential and commercial structures shall be required to incorporate high efficiency/low polluting heating, air conditioning, appliances, and water heaters. • All residential and commercial structures shall be required to incorporate thermal pane windows and weather-stripping. • All residential, commercial, and industrial structures shall be required to incorporate light colored roofing materials.	

[2] With respect to these measures, the Project shall conform to the State Building Code, including the CALGreen Code, or MM AQ-9, whichever is more restrictive.

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	MM AQ-10 Future development projects within the City that include employers with 250 employees or more shall comply with SCAQMD Rule 2202, which requires the implementation of employee commute reduction programs. **MM AQ-12** Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.	
Threshold c: Localized construction and operational emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Project-related operational diesel particulate matter (DPM) emissions would not expose nearby sensitive receptors to substantial pollutant concentrations. The Project would not cause a significant human health or cancer risk to nearby residences or workers during construction. Furthermore, the Project is not anticipated to result in a CO hot spot in the Project area. Impacts to sensitive receptors would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold d: The Project does not include a land use that is typically associated with odor complaints. Potential sources of odor associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction. Compliance with SCAQMD Rule 402 and Fullerton Municipal Code Section 15.40.080, which regulate odors is required. Therefore, odors associated with the Project's construction and operation would be less than significant.	No mitigation is required.	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.3 CULTURAL RESOURCES		
Threshold a: Existing structures at the Project site and the on-site remnant orange orchard are not eligible for listing in the California Register of Historical Resources (CRHR) or as City of Fullerton Landmarks under any criteria. No impacts to historic resources would occur.	No mitigation is required.	No Impact
Threshold b: The Project site is previously disturbed, and covered with buildings, pavement, and landscaping. Ground disturbing activities have a low potential to encounter unidentified archaeological resources, resulting in a potentially less than significant impact. In the unlikely event archaeological resources are discovered during construction activities, the actions outlined in The Fullerton Plan EIR MM CR-3 to protect the resources (refer to Section 4.12, Tribal Cultural Resources) would be implemented.	No mitigation is required.	Less than Significant Impact
Threshold c: Due to the level of past ground disturbance at the Project site, it is not anticipated that human remains, including those interred outside formal cemeteries, would be encountered during earthmoving or ground-disturbing activities for the Project. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered (refer to The Fullerton Plan EIR MM CR-4), potential impacts would be less than significant.	***Applicable The Fullerton Plan EIR Mitigation Measure*** **MM CR-4** In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.	Less than Significant Impact
4.4 ENERGY		
Threshold a: The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, the Project would not result in wasteful, inefficient,	No mitigation is required.	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation. Impacts would be less than significant.		
Threshold b: The Project would be consistent with or otherwise would not conflict with State or local plans related to energy conservation. No impact would occur.	No mitigation is required.	No Impact
4.5 GEOLOGY AND SOILS		
Threshold a: i. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and the Project would not directly or indirectly expose people or structures to substantial adverse effects related to ground rupture. No impact would occur. ii. The Project site is in a seismically active area of Southern California and is expected to experience ground shaking during the lifetime of the Project. Compliance with the City's Building Code and California Building Code (CBC) and incorporation of recommendations from the Geotechnical Study regarding site-specific seismic and soil conditions would ensure that people and/or structures would not be exposed to potential substantial adverse effects from strong seismic ground shaking. This impact would be less than significant. iii. The Project site is not within a liquefaction hazard zone, and the groundwater table is in excess of 50 feet. Liquefaction is not considered to be a design concern for the Project. Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. No impact would occur.	No mitigation is required.	i, iii. and iv. – No impact ii. - Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
iv. The Project site and the surrounding area do not contain any hillsides or steep, natural, or man-made, slopes. The Project site is not in an area that is susceptible to landslides. No impact would occur.		
Threshold b: Existing topsoil in landscaped areas and the remnant orange orchard would be disturbed with the implementation of the Project. However, no commercial agricultural operations currently exist or are planned for the site, and the disturbance would have less than significant effect on the loss of productive topsoil. Grading and construction activities that would occur on the Project site would result in the removal of stabilizing ornamental vegetation and building materials and would disturb and expose soils. Once the Project is operational, the potential for soil erosion via wind and water would be minimized. With adherence to City, regional, and State regulations related to management of erosion from stormwater and winds, there would be a less than significant impact related to soil erosion during construction and operation of the Project.	No mitigation is required.	Less than Significant Impact
Threshold c: The Project site is underlain with unsuitable soils that consist of undocumented artificial fill. Some of these soils possess a moderate potential for consolidation settlement when loaded. There is also a potential for subsidence/shrinkage. Impacts related to instability of the site's geologic materials would be less than significant for the Project with adherence to the City's Building Code and CBC, which include grading standards, and implementation of the recommendations of the Geotechnical Study.	No mitigation is required.	Less than Significant Impact
Threshold d: Expansion index testing of the near-surface soils was performed during the preparation of the Geotechnical Study, which indicated that on-site	No mitigation is required.	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
soils possess very low expansion potential. Impacts would be less than significant.		
Threshold e: The Project would connect to the existing City of Fullerton sewer system. The Project does not include the use of septic tanks or alternative wastewater disposal systems. No impacts would occur.	No mitigation is required.	No Impact
Threshold f: The Project site is underlain by Holocene-age alluvial deposits, which have a low paleontological potential; however, the Holocene-age sediments may transition into older Pleistocene-age deposits, which have a high paleontological potential, at depth as shallow as 8 feet bgs. Proposed excavation activities have the potential to encounter unique paleontological features, resulting in a potentially significant impact. Implementation of Project-level mitigation measures (MM) 5-1 through MM 5-7 would reduce this impact to a level considered less than significant.	***Project-Level Mitigation Measures*** **MM 5-1** Prior to the start of earthwork, a qualified Project Paleontologist shall be retained to oversee the paleontological monitoring program and shall attend the pre-construction meeting to consult with Project contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, the Project Paleontologist shall identify a professional repository to receive any discovered fossils. A qualified Project Paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology that is experienced with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Orange County, and who has worked as a paleontological mitigation project supervisor for at least one year. A professional repository is defined as a recognized paleontological specimen repository (e.g., an American Alliance of Museums [AAM]-accredited museum or university) with a permanent curator capable of storing fossils in a facility with adequate security against theft, loss, damage, fire, pests, and adverse climate conditions. **MM 5-2** A paleontological monitor shall be on-site during all earthwork operations at or exceeding 8 feet below the ground surface (bgs) (i.e., trenching for deep utilities and storm water drains) that directly impact Quaternary young alluvial fan deposits. The paleontological monitor shall be equipped to salvage	Less than Significant Impact with Mitigation

Potential Impacts	Mitigation Measures (MMs)		Level of Significance After Mitigation
		fossils as they are unearthed (including bulk matrix samples containing microvertebrate fossils). Paleontological monitoring may be reduced (e.g., part-time monitoring or spot-checking) or eliminated, at the discretion of the Project Paleontologist and with approval from the City of Fullerton if the Project Paleontologist determines there is a low risk of encountering paleontological resources. Changes to the paleontological monitoring schedule shall be based on the results of the mitigation program as it unfolds during site development, and current and anticipated conditions in the field. A paleontological monitor is defined as an individual with a college degree in paleontology or geology who has experience in the recognition and salvage of fossil materials. The paleontological monitor shall work under the direction of the Project Paleontologist.	
	MM 5-3	If fossils are discovered, the Project Paleontologist (or paleontological monitor) shall make an initial assessment to determine their significance. All identifiable vertebrate fossils (large or small) and uncommon invertebrate, plant, and trace fossils are considered to be significant and shall be recovered. Representative samples of common invertebrate, plant, and trace fossils shall also be recovered. Although fossil salvage can often be completed in a relatively short period of time, the Project Paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt earthwork in his or her discretion during the initial assessment phase if additional time is required to salvage fossils. If it is determined by the Project Paleontologist that the fossil(s) are to be recovered, the recovery shall be completed in a timely manner. Some fossil specimens (e.g., a large mammal skeleton) may require an extended salvage period. Because of the potential for the recovery of small fossil remains (e.g., isolated teeth of small	

Potential Impacts	Mitigation Measures (MMs)		Level of Significance After Mitigation
		vertebrates), it may be necessary to collect bulk-matrix samples for screen washing.	
	MM 5-4	In the event that fossils are discovered during a period when a paleontological monitor is not on site (i.e., an inadvertent discovery), earthwork within the vicinity of the discovery site shall temporarily halt, and the Project Paleontologist shall be contacted to evaluate the significance of the discovery. If the Project Paleontologist determines that the inadvertent discovery is significant, the fossils shall be recovered, as outlined in MM 5-3.	
	MM 5-5	Fossil remains that are collected shall be cleaned, repaired, sorted, taxonomically identified, and cataloged. Fossil preparation may also include screen-washing of bulk matrix samples for microfossils or other laboratory analyses (e.g., radiometric carbon dating), if warranted in the discretion of the Project Paleontologist. Fossil preparation and curation activities may be conducted at the laboratory of the contracted Project Paleontologist, at an appropriate outside agency, and/or at the designated repository, and shall follow the standards of the designated repository.	
	MM 5-6	Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be curated at a professional repository. The Project Paleontologist shall have a written repository agreement with the professional repository prior to start of earthwork operations at or exceeding 8 feet bgs.	
	MM 5-7	A final summary report shall be completed at the conclusion of ground disturbing activities that outlines the results of the mitigation program. The report and inventory, if applicable, shall be submitted to the City of Fullerton, along with confirmation of the curation of recovered specimens into a professional repository, if applicable.	

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.6 GREENHOUSE GAS EMISSIONS		
Threshold a: When taking into consideration existing greenhouse gas (GHG) emissions associated with operation of the Kimberly-Clark Fullerton Mill, the annual net GHG emissions associated with the construction and operation of the Project are estimated to be 8,675.29 MTCO2e per year, which would not exceed the screening threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold b: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, including the City of Fullerton Climate Action Plan (CAP), and Senate Bill (SB) 32 (California Air Resources Board [CARB] 2017 Scoping Plan). No impacts would occur.	No mitigation is required.	No Impact
4.7 HAZARDS AND HAZARDOUS MATERIALS		
Threshold a, b: Construction of the Project would potentially involve exposure of the public to hazardous materials associated with potential identify recognized environmental conditions (RECs) (including residual contaminated soils), asbestos containing materials (ACMs), lead based paint (LBP), and universal wastes. Construction and operation of the Project would also involve the handling of hazardous materials in limited quantities and typical to urban environments. Potential Project impacts associated with creating a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, would be potentially significant.	***Applicable The Fullerton Plan EIR Mitigation Measure*** **MM HAZ-2** Prior to potential remedial excavation and grading activities, impacted areas shall be cleared of all maintenance equipment and materials (e.g., solvents, grease, waste oil), construction materials, miscellaneous stockpiled debris (e.g., scrap metal, pallets, storage bins, construction parts), above-ground storage tanks, surface trash, piping, excess vegetation, and other deleterious materials. These materials shall be removed off-site and properly disposed of at an approved disposal facility. Once removed, a visual inspection of the areas beneath the removed materials shall be performed. Any stained soils observed underneath the removed materials shall be sampled. In the event concentrations of materials are detected above regulatory cleanup levels during demolition or construction activities, the Project Applicant shall comply with	Less than Significant Impact with Mitigation

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
With adherence to existing regulations applicable to the Project, implementation of The Fullerton Plan EIR MM HAZ-2, and incorporation of MM 7-1, these impacts would be reduced to a level considered less than significant with mitigation.	the following measures in accordance with Federal, State, and local requirements: • Excavation and disposal at a permitted, off-site facility; • On-site remediation, if necessary; or • Other measures as deemed appropriate by the City of Fullerton Fire Department. ***Project-Level Mitigation Measure*** **MM 7-1** Prior to the issuance of a grading permit, a Soil Management Plan (SMP) shall be developed and submitted to the City of Fullerton. The SMP shall be implemented under applicable requirements of the regulatory oversight agency to ensure worker protection during construction activities that might encounter and disturb impacted soil (e.g., excavation, backfilling, and grading activities). The SMP shall include guidelines for managing soil suspected to be impacted and shall also set forth appropriate response actions in the event that previously unknown impacted soils are encountered, including at the potential expansion site (2301 E. Orangethorpe Avenue). The following items shall be addressed in the SMP: • Site-Specific Health and Safety for Construction Personnel • Working Training • Field Screening • Air Monitoring • Impacted Soil Excavation and Segregation • Confirmation Sampling • Stockpile Management and Sampling • Impacted Soil Disposal • Backfill • Import Soil Sampling and Tracking	

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	In accordance with the SMP, if potentially contaminated soils are identified during soil-disturbing activities on site, the soil shall be analyzed for the presence of contamination. If the results of the testing show that chemical levels exceed potential risk criteria for commercial/industrial land use, the soil management procedures in the SMP shall be followed for the removal, handling, stockpiling, and disposal of the impacted soils in accordance with applicable requirements, with oversight by the regulatory oversight agency.	
Threshold c: The Project site is not located within 0.25 mile of an existing or proposed school; the nearest school to the Project site is approximately 0.4 mile to the north at 2200 East Commonwealth Avenue. This school is not along a designated truck route that would be used by the Project. Further, the Project would be required to comply with federal, State, and local regulations related to the transport of hazardous substances or materials to- and from- the Project site during construction and long-term operation. The Project would not emit hazardous emission or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impact would result.	No mitigation is required.	No Impact
Threshold d: The Kimberly-Clark facility is included on the list of hazardous material sites due to the previous leaking underground storage tank (LUST). Although the case is closed, there is a potential for residual contaminated soil from the LUST to be present, resulting in a potentially significant impact. With the incorporation of The Fullerton Plan EIR MM HAZ-2 and Project-specific MM 7-1, potential hazards to the public and the environment would be reduced to a less than significant level. This impact is less than significant with mitigation.	***Applicable The Fullerton Plan EIR Mitigation Measures*** MM HAZ-2 shall apply. ***Project-Level Mitigation Measures*** MM 7-1 shall apply	Less than Significant Impact with Mitigation
Threshold e: The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport to the Project site is the Fullerton Municipal Airport located	No mitigation is required.	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
approximately 4.4 miles to the west-northwest. Implementation of the Project would not result in a safety hazard or excessive noise related to airport operations for people residing or working in the Project area. No impacts would occur.		
Threshold f: During the Project's construction, there would be temporary and limited partial lane closures during construction. The Project would implement The Fullerton Plan EIR Mitigation Measure MM HAZ-5, which requires preparation of a Traffic Control Plan, to ensure the Project's construction-related impacts would not interfere with the flow of traffic. The Project does not include any features that would impair or physically interfere with the implementation of an emergency response or emergency evacuation plan. Impacts would be less than significant.	***Applicable The Fullerton Plan EIR Mitigation Measures*** **MM HAZ-5** Prior to construction, future developers shall prepare a Traffic Control Plan for implementation during the construction phase, as deemed necessary by the City Traffic Engineer. The Plan may include the following provisions, among others: • At least one unobstructed lane shall be maintained in both directions on surrounding roadways. • At any time only a single lane is available, the developed shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions. • If construction activities require the complete closure of a roadway segment, the developer shall provide appropriate signage indicating detours/alternative routes. • Identification of construction truck routes.	Less than Significant Impact
Threshold g: The Project site is not within a wildfire risk are and is not within a very high fire hazard severity zone. No impacts would occur.	No mitigation is required.	No Impact
4.8 HYDROLOGY AND WATER QUALITY		
Threshold a: Construction and operation of the Project would generate pollutants that may enter the stormwater and affect surface water; however, compliance with existing regulations and implementation of The Fullerton Plan EIR MM HYD-1 and MM HYD-2, which require the implementation of BMPs outlined in the SWPPP, would prevent the violation of water quality standards and waste discharge requirements during construction and	***Applicable The Fullerton Plan EIR Mitigation Measures*** **MM HYD-1** Prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the National Pollutant Discharge Elimination System (NPDES) requirements, a Notice of Intent shall be prepared and submitted to the Santa Ana Regional Water Quality Control Board (RWQCB) providing notification and intent to comply	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
operation. No degradation of water quality would occur and impacts would be less than significant.	with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Engineering for water quality construction activities on site. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source-control and/or treatment-control Best Management Practices (BMPs) to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable." All recommendations in the Plan shall be implemented during area preparation, grading, and construction. The Project Applicant shall comply with each of the recommendations detailed in the study and other such measure(s) as the City deems necessary to mitigate potential stormwater runoff impacts. **MM HYD-2** Prior to issuance of any Grading Permit, future development projects shall prepare, to the satisfaction of the Director of Engineering, a Water Quality Management Plan or Stormwater Mitigation Plan, which includes BMPs, in accordance with the Orange County Drainage Area Management Plan (DAMP). All recommendations in the Plan shall be implemented during the post-construction/operation phase. The Project Applicant shall comply with each of the recommendations detailed in the study and other such measure(s) as the City deems necessary to mitigate potential water quality impacts.	
Threshold b: The Project would result in a net reduction in water demand as compared to existing conditions, and the Project site is not in an OCWD groundwater recharge area; therefore, implementation of the Project would not interfere with groundwater recharge. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold c: Consistent with existing conditions, stormwater runoff from the Project site would flow through an on-site private storm drain system to existing	***Applicable The Fullerton Plan EIR Mitigation Measures*** MM HYD-2 shall apply.	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
public storm drain facilities and ultimately to the Fullerton Channel. With the implementation of The Fullerton Plan EIR MM HYD-2, which requires preparation of a WQMP and implementation of identified BMPs, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, 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, or impede or redirect flood flows. Impacts would be less than significant.		
Threshold d: The Project site is not within a 100-year flood zone, is not within a tsunami zone, and is not within proximity to an enclosed or partially enclosed body of water that is capable of producing seiches. Therefore, there would be no impact related to risk of release of pollutants due to project inundation from a flood, tsunami or seiche. The Project site is within a dam inundation; however, the potential for risk of release of pollutants due to inundation from dam failure would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold e: Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan (Santa Ana Basin Plan). With adherence to the Construction General Permit and Fullerton Municipal Code, and implementation of The Fullerton Plan EIR MM HYD-1 and MM HYD-2, which require preparation of an SWPPP during construction, and a WQMP for operation, the potential for the Project to generate pollutants and impact water quality during	***Applicable The Fullerton Plan EIR Mitigation Measures*** MM HYD-1 and MM HYD-2 shall apply	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
construction and operation would be less than significant and the Project would not conflict with the Basin Plan. No impacts would occur. The Project site is within the Coastal Plain of Orange County Basin (Basin 8-1). The California Department of Water Resources (DWR), classifies this basin as a medium-priority basin. The Project would not entail the extraction of groundwater located beneath the site during Project operation, and would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Further, due to the presence of the Project site within the North Basin Groundwater Protection Project plume protection boundary, no infiltration is allowed or proposed. Therefore, the Project would not obstruct or conflict with a sustainable groundwater management plan. No impacts would occur.		
4.9 LAND USE AND PLANNING		
Threshold a: The Project involves the redevelopment of the Project site, which is developed and surrounded by non-residential development, with non-residential uses, and would not disrupt the physical arrangement of an established community. No impact would result.	No mitigation is required.	No Impact
Threshold b: Implementation of the Project would not result in conflicts with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect, including the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS), Connect SoCal, The Fullerton Plan, and the Fullerton Municipal Code. No impact would result.	No mitigation is required.	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.10 NOISE		
Threshold a: Construction-related noise, operational-related noise, and Project-related off-site traffic noise increases would not exceed established thresholds of significance for noise increases, with the exception of traffic noise at two roadway segments. However, neither of these segments includes noise sensitive receivers; therefore, impacts would be less than significant. Therefore, the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and impacts would be less than significant. No mitigation measures are required. Notwithstanding this conclusion, as required by the City, The Fullerton Plan EIR operational noise mitigation (MM N-1, MM N-2, MM N-3, and MM N-6) would be implemented by the Project Applicant.	***Applicable The Fullerton Plan EIR Mitigation Measures*** **MM N-1** Project applicants shall ensure through contract specifications that construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading or building permit (whichever is issued first). The construction BMPs shall include the following: • Ensure that construction equipment is properly muffled according to industry standards and be in good working condition. • Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible. • Schedule high noise-producing activities between the hours of 7:00 AM and 8:00 PM on any day except Sunday or a City-recognized holiday to minimize disruption on sensitive uses. • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources. • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes. • Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	corrective action, and report the action taken to the reporting party. **MM N-2** Project applicants shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit. **MM N-3** Project applicants shall ensure by contract specifications that construction staging areas along with the operation of earthmoving equipment within the City would be located as far away from vibration and noise sensitive sites as possible. Should construction activities take place within 25 feet of an occupied structure, a project specific vibration impact analysis shall be conducted to determine the specific vibration control mechanisms that would be incorporated into the project's construction bid documents, if necessary. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit. **MM N-6** The City shall require mechanical equipment from future development to be placed as far practicable from sensitive receptors. Additionally, the following shall be considered prior to HVAC installation: proper selection and sizing of equipment, installation of equipment with proper acoustical shielding, and incorporating the use of parapets into the building design.	
Threshold b: Vibration impacts associated with construction and operation of the Project would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold c: The Project would not expose people residing or working in the Project area to excessive noise levels associated with airports, and no impact would occur.	No mitigation is required.	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
4.11 TRANSPORTATION		
Threshold a: Implementation of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, including the SCAG 2016-2040 RTP/SCS, Connect SoCal, The Fullerton Plan, and the 2019 Orange County Congestion Management Plan (CMP). No impact would result.	No mitigation is required.	No Impact
Threshold b: Pursuant to the *City of Fullerton Transportation Assessment Policies and Procedures* relative to conducting a VMT assessment, the Project, which is within an established low vehicle miles traveled (VMT) area, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact is less than significant.	No mitigation is required.	Less than Significant Impact
Threshold c: The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. This impact would be less than significant. Notwithstanding this conclusion, Project-level MM 11-1 has been developed to provide a comprehensive measure addressing preparation of Traffic Control Plans for Project construction activities.	***Project-level Mitigation Measure*** **MM 11-1** Prior to issuance of demolition and grading permits, the Property Owner/Developer shall prepare a Traffic Control Plan for review and approval by the City Engineer. The Traffic Control Plan shall include the following: • Identify construction routes and Project site access driveway for construction vehicles. • Route construction trucks away from congested streets or sensitive receptors. • Signal synchronization to improve traffic flow, if necessary. • Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site. • Maintain at least one unobstructed lane in both directions on surrounding roadways, if feasible. • Provide and maintain all necessary flag persons, barricades, delineators, signs, flashers, and any other safety equipment as set forth in the latest publication of the State of California, Manual of Traffic Control, or as required by the Public Works	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	Department permit requirements to ensure safe passage of pedestrian and vehicular traffic. • Identify and provide signage for safe detours for vehicles, bicyclists, and pedestrians, as necessary. • Construction schedules that require construction activities that affect traffic flow on the arterial system to occur during off-peak hours. • Consolidation of truck deliveries.	
4.12 TRIBAL CULTURAL RESOURCES		
Threshold a.i: Based on the records search conducted at the South Central Coastal Information Center, and review of existing literature related to cultural and historic resources within the Project site, no tribal cultural resources listed or eligible for listing in the CRHR or a local register of historical resources were identified. No impacts would occur.	No mitigation is required.	No Impact
Threshold a.ii: Ground disturbing activities have a remote potential to encounter unidentified tribal cultural resources. However, with mandatory compliance with The Fullerton Plan EIR MM CR-2, MM CR-3, and MM CR-4, impacts would be less than significant.	***Applicable The Fullerton Plan Mitigation Measures*** **MM CR-2** If the Phase I Cultural Resources Study required under Mitigation Measure CR-1 determines that monitoring during construction by a professional archaeologist and/or paleontologist is needed for the subject development project, the project proponent shall retain a professional archaeologist and/or paleontologist, subject to approval by the City of Fullerton, prior to the issuance of grading permits. The task of the professional archaeologist and/or paleontologist shall be to verify implementation of the mitigation measures identified in the City-approved Phase I Cultural Resources Study and to monitor the initial ground-altering activities, including but not limited to, debris removal, vegetation removal, tree removal, grading, trenching, or other site preparation activities. The professional archaeologist and/or paleontologist shall be empowered to temporarily halt or divert construction equipment to allow recording and removal of the unearthed	Less than Significant Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	resources. All artifacts and/or fossils discovered at the subject development site shall be inventoried and analyzed by the professional archaeologist and/or paleontologist. If any artifacts of Native American origin are discovered, a Native American Tribal monitor shall be asked to help analyze the Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. A report of the findings, including an itemized inventory of recovered artifacts and/or fossils, shall be prepared and shall include a discussion of the significance and disposition of the recovered artifacts and/or fossils. The report and inventory shall be submitted to the City of Fullerton, signifying completion of the program to mitigate impacts to archaeological and/or paleontological resources. **MM CR-3** In the event that cultural resources (archaeological, historical, paleontological) resources are inadvertently unearthed during excavation and grading activities of any future development project, the contractor shall immediately cease all earth disturbing activities within a 100-foot radius of the area of discovery. If not already retained due to conditions present pursuant to CR-2, the project proponent shall retain a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), subject to approval by the City of Fullerton, to evaluate the significance of the finding and appropriate course of action (refer to Mitigation Measures CR-1, CR-2 and CR-4). If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.	

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
	MM CR-4 In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.	
4.13 UTILITIES AND SERVICE SYSTEMS		
Threshold a: Utility infrastructure installation and associated improvements would occur within the identified physical impact area for the Project (on-site and within the public right-of-way along adjacent streets) as addressed throughout this EIR, and in compliance with applicable requirements of the utility providers. No additional impacts would result and this impact would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold b: The Project would result in an estimated average annual net water demand decrease of approximately 1,754 acre-feet per year (AFY), and the City of Fullerton, the water provider, would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.	No mitigation is required.	Less than Significant Impact
Threshold c: Implementation of the Project would result in a substantial decrease in the amount of wastewater generated from the Project site and treated at the Orange County Sanitation District (OCSD) facilities. No impact would result.	No mitigation is required.	No Impact

Potential Impacts	Mitigation Measures (MMs)	Level of Significance After Mitigation
Threshold d: Construction and operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, including landfills that would receive solid waste from the site, or otherwise impair the attainment of solid waste reduction goals, resulting in a less than significant.	No mitigation is required	Less than Significant Impact
Threshold e: The Project would be constructed and operated in compliance with the applicable statutes and regulations related to solid waste management and reduction, including AB 341 (Mandatory Commercial Recycling), and the California Solid Waste Reuse and Recycling Act of 1991. Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939), diversion requirements for construction waste included in the CALGreen Code, and any other applicable local, State, and federal solid waste management regulations. No impact would occur.	No mitigation is required.	No Impact

SECTION 1.0 INTRODUCTION

This Environmental Impact Report (EIR) represents the independent judgment of the City of Fullerton, acting as the Lead Agency pursuant to the California Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.). This EIR has been prepared in accordance with the criteria, standards, and procedures of CEQA and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.). This EIR evaluates the physical environmental effects that could result from constructing and operating the proposed Goodman Logistics Center Fullerton Project (hereafter, the "Project"). To implement the Project, the Project Applicant has requested the City of Fullerton's approval of a Zone Change, Major Site Plan, Tentative Parcel Map, Variance, and Development Agreement, as described in Section 3.0, *Project Description*, of this EIR. Other related discretionary and administrative actions that are required to construct and operate the Project also are also described in Section 3.0.

1.1 PURPOSES OF CEQA AND LEGAL AUTHORITY

As stated by the CEQA Guidelines Section 15002(a), the basic purposes of CEQA are to:

1) Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.;
2) Identify the ways that environmental damage can be avoided or significantly reduced.
3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4) Disclose to the public the reasons why the governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Pursuant to CEQA Section 21067 and CEQA Guidelines Article 4 and Section 15367, the City of Fullerton is the Lead Agency under whose authority this EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action to approve the Project, the City of Fullerton must: (1) ensure that this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making process; (3) make a statement that this EIR reflects the City of Fullerton's independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the Project that outweigh its unavoidable adverse effects (CEQA Guidelines Sections 15090 through 15093).

Pursuant to CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City of Fullerton will have the legal authority to do any of the following:

1) Approve the Project;

2) Require feasible changes in any or all activities involved in the Project to substantially lessen or avoid significant effects on the environment;

3) Deny approval of the Project, if necessary, to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or

4) Approve the Project even though the Project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that there is no feasible way to lessen the effect or avoid the significant effect, and expected benefits from the Project will outweigh significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for the Project. The California Public Resource Code (Section 21104) requires that EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines Section 15082 and Section 15086[a]). The EIR will also serve as a source document for responsible agencies to issue permits and approvals, as required, for construction and operation of the Project. Section 3.4, *Summary of Requested Actions*, of this EIR, lists the government agencies that are expected to use the Project's EIR during their consultation and review of the Project, and provides a summary of the anticipated Project-related approvals and permits.

This EIR has been prepared utilizing information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the CEQA Guidelines (Section 15084[d–e]), this EIR has been prepared by a consultant under the direction of professional City planning staff. However, prior to certification, the City must independently review the methodologies and conclusions reached in the EIR. The City is undertaking an independent review of this EIR by having City planning staff work with the consultant on the EIR. If certified by the City, the information included in and the conclusions reached in the EIR will represent the City's independent judgment regarding the potential environmental impacts of the Project.

1.2 TYPE OF ENVIRONMENTAL IMPACT REPORT

The Project site is located within the geographical limits of the City of Fullerton and is covered by the City's General Plan, entitled *The Fullerton Plan.* The City of Fullerton adopted The Fullerton Plan in May 2012. The Project site is located within one of the designated Focus Areas where future development in the City is anticipated. Specifically, the Project site is part of the Southeast Industrial Focus Area (Focus Area K), and the industrial development proposed by the Project is consistent with the land use and growth assumptions for the Southeast Industrial Focus Area, as anticipated in The Fullerton Plan. The environmental impacts resulting from implementation of future development under The Fullerton Plan have been evaluated in *The Fullerton Plan 2030 Final Environmental Impact Report* (The Fullerton Plan EIR) (State Clearinghouse [SCH] No. 2011051019) certified by the City of Fullerton on May 1, 2012. The Fullerton Plan EIR is a program EIR and was prepared in accordance with CEQA and the CEQA Guidelines. The Program EIR contains information relevant to the Project site. Subsequent actions, including the Project, will be reviewed as required by Section 21166 of the California Public Resources Code and Section 15162 of the CEQA Guidelines.

The environmental analysis for the Project presented in this EIR relies on the analysis presented in The Fullerton Plan EIR, when applicable, and The Fullerton Plan EIR is incorporated by reference (refer to Section 1.4, below). Following preliminary review of the Project's application materials, the City of Fullerton concluded that the Project and its associated implementing actions have the *potential* to result in significant environmental effects; as such, the City proceeded with preparation of this EIR pursuant to CEQA Guidelines Section 15060(d). The City determined that a Project EIR, as described in CEQA Guidelines Section 15161, was required. Accordingly, this document serves as a Project EIR. As required by CEQA Guidelines Section 15161, this Project EIR shall "…focus primarily on the changes in the environment that would result from the development project," and "…examine all phases of the project including planning, construction, and operation."

1.3 EIR SCOPE, FORMAT, AND CONTENT

1.3.1 EIR SCOPE

The City filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The Project was described in the NOP and potential environmental effects associated with Project implementation were identified. The NOP was filed with the State Clearinghouse and distributed to potential Responsible Agencies, Trustee Agencies, and other interested parties on March 30, 2020, for a 30-day public review period. The NOP was distributed for public review to solicit responses to help the City identify the scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

Additionally, a publicly-noticed EIR Scoping Meeting was held on April 20, 2020. Due to the State Emergency related to COVID-19 and as allowed pursuant to Executive Order N-25-20 and N-29-20, the City of Fullerton Community and Economic Development Department hosted the EIR Scoping Meeting via an internet-based video and phone conferencing service. The EIR Scoping Meeting provided public agencies, interested parties, and members of the public an additional opportunity to comment on the scope and range of potential environmental concerns to be addressed in this EIR. No comments on the scope of the EIR were received during the Scoping Meeting.

The NOP and comments received by the City during the NOP public review period are provided in Appendix A to this EIR. Table 1-1, *Summary of NOP Comments Received*, presents a summary of the environmental topics that were expressed by public agencies, interested parties, and members of the public to be of primary interest, and identifies the sections of the EIR where the topic is addressed. Table 1-1, Summary of NOP Comments Received, is not intended to list every comment received by the City during the NOP review period. Regardless of whether an environmental or CEQA-related comment is listed in the table, relevant comments received in response to the NOP are addressed in this EIR.

TABLE 1-1 SUMMARY OF NOP COMMENTS RECEIVED

Agency	Date	Comments	Addressed in Section(s)
State Agencies			
California Air Resources Board (CARB)	April 29, 2020	• Requests that air pollution and health risks resulting from the Project, including cumulative health risks to sensitive receptors and construction-related health risks be evaluated. • Requests that the air pollutant emissions and potential cancer risks from on-site transport refrigeration units (TRU) be evaluated. • Requests that the impacts to disadvantaged communities be addressed. • Recommends that the Project include existing and emerging zero-emission technologies to minimize air pollutant and greenhouse gas emissions.	Section 4.2 Section 4.6
California Department of Fish and Wildlife (CDFW)	April 22, 2020	• Requests that the EIR address the potential to impact avian species. • Requests that nesting bird surveys be conducted in accordance with State regulations in place to protect nesting birds.	Section 6.1
California Department of Transportation (Caltrans)	April 28, 2020	• Requests that the EIR address the Project's potential to impact State facilities, including State Route (SR)-91 and SR-57 traffic operations. • Requests truck counts and truck trip generation be considered. • Requests that the EIR consider a multimodal connectivity and access to the Project site. • Requests that designated delivery areas be included in the Project.	Section 4.11

Agency	Date	Comments	Addressed in Section(s)
California Native American Heritage Commission (NAHC)	April 1, 2020	• Outlines requirements for Native American consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18. • Provides standard guidance on the scope of the analysis of potential impacts to tribal cultural resources. • Recommends Native American tribal consultation with tribes that are traditionally and culturally affiliated with the geographic area of the Project site.	Section 4.12
California Office of Planning and Research State Clearing House	April 29, 2020	• Acknowledges that the City has complied with the State Clearinghouse review requirement for environmental documents pursuant to CEQA	N/A
Regional Agencies			
Southern California Association of Governments (SCAG)	April 28, 2020	• Requests that the consistency of the Project with the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) be addressed. • Identifies that the most recently adopted growth forecasts should be used. • Recommends that the 2016 RTP/SCS Final Program EIR mitigation measures be used for guidance, as appropriate. • Acknowledges that Connect SoCal (the 2020 RTP/SCS) is scheduled for adoption.	Section 4.9 Section 6.1

Agency	Date	Comments	Addressed in Section(s)
South Coast Air Quality Management District (South Coast AQMD)	April 7, 2020	• Provides recommendations on the scope of the air quality and health risk analysis for the Project, including modeling, and truck trip generation rates to be used. • Requests that Project-related air quality impacts be identified and quantified against the South Coast AQMD regional and localized significance thresholds. • Requests that cumulative impacts from warehouse projects in communities with existing industrial sources be addressed. • Identifies the requirement for feasible mitigation measures be identified for significant impact, and identifies suggested mitigation measures.	Section 4.2
Local Agencies			
City of Anaheim	April 27, 2020	• Requests that the EIR address impacts to roadway segments and intersections within the jurisdiction of the City of Anaheim based on the City of Anaheim traffic study guidelines. • Requests that the EIR analyze the impact of increased truck traffic to roadway operations and pavement.	Section 4.11
City of La Habra	April 30, 2020	• Requests review of the EIR Traffic Study.	N/A
Orange County Transportation Authority (OCTA)	April 28, 2020	• Identifies Orangethorpe Avenue and State College Boulevard as part of the Congestion Management Program Highway System and that potential impacts should be analyzed.	Section 4.11
Orange County Water District (OCWD)	April 8, 2020	• Identifies the Project site is located within the North Basin Groundwater Protection Project plume protection boundary, and infiltration is not allowed if will impact groundwater conditions.	Section 4.8

Agency	Date	Comments	Addressed in Section(s)
Organizations and Individuals			
Matt Bagne	April 13, 2020	• Requests that traffic operations at the intersection of Acacia Avenue and Kimberly Avenue be evaluated.	Section 4.11
Juaneño Band of Mission Indians, Acjachemen Nation – Belardes	April 10, 2020	• Request to continue Native American consultation.	Section 4.12
Julia Roper	April 9, 2020 April 27, 2020	• Requests that potential impacts associated with driveway spacing be addressed, including turning movement conflicts, vehicle queues on southbound State College Boulevard, the potential conflict with traffic movements at the intersection at Cypress Way, and line of sight and operational impacts. • Requests that modifications to the existing retaining wall and fence separating the Project site from the adjoining property, and potential drainage impacts be addressed • Requests that the EIR address compatibility of the Project with adjoining property.	Section 4.8 Section 4.9 Section 4.11

As identified in the NOP, the City of Fullerton concluded that the Project would clearly result in (1) no impacts, or (2) less than significant impacts for the following topical issues: agriculture and forestry resources, biological resources, mineral resources, population and housing, public services, recreation, and wildfire. Refer to Section 6.0, Other CEQA Considerations, of this EIR, for a discussion of these topical issues.

In consideration of the comments received by the City in response to the NOP, this EIR provides a detailed analysis of the Project's potential to cause adverse effect under the following topics:

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Cultural Resources (Section 4.3)
- Energy (Section 4.4)
- Geology and Soils (Section 4.5)
- Greenhouse Gas Emissions (Section 4.6)

- Hazards and Hazardous Materials (Section 4.7
- Hydrology and Water Quality (Section 4.8)
- Land Use and Planning (Section 4.9)
- Noise (Section 4.10)
- Transportation (Section 4.11)
- Tribal Cultural Resources (Section 4.12)
- Utilities and service Systems (Section 4.13)

The topics listed above are evaluated in EIR Section 4.0, *Environmental Analysis*.

1.3.2 EIR FORMAT AND CONTENT

This EIR contains the information required to be included in an EIR as specified by the CEQA Statute and Guidelines (California Public Resources Code, Section 21000 *et. seq.* and California Code of Regulations, Title 14, Chapter 5). Table 1-2, *Location of CEQA Required Topics*, provides a reference guide for locating key CEQA-required information within this EIR, as outlined in Article 9, Content of Environmental Impact Reports, of the CEQA Guidelines.

TABLE 1-2 LOCATION OF CEQA REQUIRED TOPICS

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Table of Contents	Section 15122	Table of Contents
Summary	Section 15123	Section S.0
Project Description	Section 15124	Section 3.0
Environmental Setting	Section 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	Section 15126	Sections 4.1 through 4.13
Significant Environmental Effects Which Cannot be Avoided if the Project is Implemented	Section 15126.2(c)	Section 4.0 and Subsection 5.1
Significant Irreversible Environmental Changes Which Would be Caused by the Project Should it be Implemented	Section 15126.2(d)	Subsection 5.2
Growth-Inducing Impact of the Project	Section 15126.2(e)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	Section 15126.4	Sections 4.1 though 4.13
Consideration and Discussion of Alternatives to the Project	Section 15126.6	Section 5.0
Effects Not Found to be Significant	Section 15128	Section 6.4
Organizations and Persons Consulted	Section 15129	Section 7.0 and Technical Appendices
Discussion of Cumulative Impacts	Section 15130	Section 4.0 and Sections 4.1 through 4.13
Energy Conservation	Section 15126.2(b) and Appendix F	Section 4.4

In summary, the content and format of this EIR are as follows:

- **Section S.0, Executive Summary**, provides an overview of the EIR document and CEQA process and describes, in brief: the Project, the location and regional setting of the Project site, and the potential alternatives to the proposed Project as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the Project's Mitigation, Monitoring, and Reporting Program (MMRP).
- **Section 1.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City of Fullerton, serving as the Lead Agency for this EIR; the type of EIR, and an overview of the scope of the EIR and EIR format.
- **Section 2.0, Environmental Setting**, summarizes the environmental setting, including descriptions of the Project site's physical conditions and surrounding context used as the baseline for analysis in this EIR.
- **Section 3.0, Project Description**, provides a description of the Project pursuant to CEQA Guidelines Section 15124, including its location, objectives, design features, construction characteristics, and operational characteristics expected over the Project's lifetime. Also, the discretionary actions required of the City of Fullerton and other government agencies to authorize implementation of the Project are discussed.
- **Sections 4.1 through 4.13, Environmental Analysis**, provide an analysis of potential direct, indirect, and cumulative impacts that may occur with the implementation of the Project for each topical issue listed in Section 1.3.1. A conclusion concerning significance is reached for each impact area and mitigation measures are presented as warranted. Additional information regarding the information presented in Section 4.1 through Section 4.13 is presented in Section 4.0, Introduction to the Environmental Analysis.
- **Section 5.0, Project Alternatives**, describes and evaluates alternatives to the Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives, including a "No Project" alternative, that will foster informed decision making and public participation.
- **Section 6.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the Project. Section 6.0 also includes a discussion of the potential environmental effects that were found not to be significant during the preparation of this EIR.
- **Section 7.0, List of Preparers and Organizations Consulted**, cites all the persons and contributors who authored or participated in preparing this EIR.

1.4 INCORPORATION BY REFERENCE

CEQA Guidelines Section 15147 states that the "information contained in an EIR shall include summarized…information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "[p]lacement of highly technical and specialized analysis and data in the body of an EIR shall be avoided through the inclusion of supporting information and analyses as appendices to the main body of the EIR." CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR.

The documents listed below were relied upon or consulted in the preparation of this EIR and are hereby incorporated by reference:

- *The Fullerton Plan*, approved by the City of Fullerton on May 1, 2012, including amendments through May 2020.
- *The Fullerton Plan 2030 Final Environmental Impact Report* (SCH No. 2011051019), certified by the City of Fullerton on May 1, 2012.

Additionally, this EIR relies on following Project-specific technical studies, reports, and supporting documentation that comprise the Technical Appendices to this EIR:

A: NOP and NOP Comment Letters
B1: Air Quality Impact Analysis
B2: Health Risk Assessment
B3: Construction Health Risk Assessment
C: Cultural Resources Study
D: Energy Assessment
E: Geotechnical Investigation
F: Paleontological Resources Study
G: Greenhouse Gas Analysis
H1: Phase I Environmental Site Assessment (ESA)
H2: Phase II ESA
H3: Asbestos and Lead Testing
I1: Water Quality Management Plan (WQMP)
I2: Preliminary Hydrology Report
J: Noise Impact Analysis
K1: Vehicular Miles Traveled (VMT) Assessment
K2: CEQA Support Traffic Analysis
L1: Water Supply Assessment (WSA)
L2: Sewer Capacity Memorandum
L3: Water Infrastructure Summary

These documents are incorporated by reference and published for public review as part of the Draft EIR. Other reference sources used in preparation of this Draft EIR are listed in each topical section of this EIR.

1.5 PUBLIC REVIEW OF THE DRAFT EIR

This Draft EIR is being circulated for review and comment to the public and other interested parties, agencies, and organizations. The comment period will begin on August 4, 2020 and end on September 17, 2020. During this period, the Draft EIR will be available for review at the following locations:

- **City of Fullerton Community and Economic Development Department**
  City of Fullerton – City Hall
  303 West Commonwealth Avenue
  Fullerton, California 92832
  (714) 773-5773

In-person review of the Draft EIR will be offered in accordance with the operating parameters of the City of Fullerton, the City Hall facility, and the Community and Economic Development Department in response to COVID-19. City Hall is open to the public between the hours of 9:00 a.m. to 3:00 p.m., by appointment only. Appointments may be scheduled by calling 714-738-6559 or emailing planning@cityoffullerton.com.

Alternatively, the public may request an electronic copy of the Draft EIR by contacting the Community and Economic Department. CDs with the Draft EIR will be available for pick up at City Hall within 24-hours of the request.

The Draft EIR will also be available on the City's website 24 hours/day, 7 days per week:

https://www.cityoffullerton.com/gov/departments/dev_serv/development_activity/goodman_logistics.asp

Following the Draft EIR's public review period, responses to comments received will be prepared and published in a Final EIR. The Final EIR—which will consist of the Draft EIR (or a revision of the Draft EIR), a list of commenters, comments received on the Draft EIR, and written responses to comments—will be considered for certification by the City of Fullerton, consistent with Section 15090 of the CEQA Guidelines. Responses to comments submitted for this Draft EIR will be provided at least ten days prior to final action on the project, as required by CEQA. The City of Fullerton must consider the Final EIR prior to any decision to approve the proposed project; the discretionary actions can only be approved if this EIR is certified.

SECTION 2.0 ENVIRONMENTAL SETTING

2.1 INTRODUCTION

In conformance with Section 15125(a) of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must include a description of the physical environmental conditions from a local and regional perspective in the vicinity of the project site, normally as they exist at the time the Notice of Preparation (NOP) is published or, if no NOP is published, at the time the environmental analysis commences. The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. This section provides a summary overview of the current regional and local settings of the Project. A detailed description of the environmental setting (baseline conditions), as required by CEQA, is provided in the impact analysis Sections 4.1 through 4.13, which address individual environmental topics.

Unless otherwise noted, references to the "Project site" in this section collectively refer to the Kimberly-Clark site and proposed expansion site, as further discussed below. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

2.2 LOCATION AND SETTING

2.2.1 REGIONAL

The Project site is in the City of Fullerton, which is located approximately 22 miles southeast of metropolitan Los Angeles, in an urbanized area in the center of North Orange County. At 22.3 square miles, the City of Fullerton is also one of the largest cities in Orange County by area. Fullerton is primarily bordered to the north by the cities of La Habra and Brea; to the east by the City of Placentia; to the south by the City of Anaheim; and to the west by the City of Buena Park. The Project site is located approximately 0.7 mile west of State Route (SR)-57 and approximately 0.4 mile north of SR-91. The site's location in a regional context is shown in Figure 3-1, *Regional Map*, in Section 3.0, *Project Description*, of this EIR.

According to the California Department of Finance (DOF), as of January 2020, the estimated population for Orange County was 3,194,322 persons (DOF, 2020). The Southern California Association of Governments (SCAG) projects that the population of Orange County will increase to approximately 3,535,000 persons by the year 2045 (SCAG, 2020a). The County's labor force consisted of 1,602,900 persons, of which approximately 1,545,200 individuals were employed, as of March 2020 (EDD, 2020).

2.2.2 LOCAL

Fullerton is approximately 90 percent built-out, and includes a mix of residential, commercial, industrial, educational, and cultural environments. The remaining area in the City consists of various open space and park and recreational facilities, with natural open spaces located in the northern portion of the City. There are no natural open space areas in the vicinity of the Project

site. According to the California Department of Finance (DOF), as of January 2020, the estimated population for Fullerton was 141,862 persons (DOF, 2020). The Southern California Association of Governments (SCAG) projects that the population of Fullerton will increase to approximately 158,300 persons by the year 2045 (SCAG, 2020a). This is comparable to the population projection in The Fullerton Plan EIR (Table 3-6), which anticipates 165,303 persons by 2030 (Fullerton, 2012b). In March 2020, the Fullerton's labor force consisted of 69,500 persons, of which approximately 67,000 individuals were employed, as of March 2020 (EDD, 2020).

The approximately 65.4-net-acre[1] Kimberly-Clark site, located at 2001 E. Orangethorpe Avenue, is bounded to the north by Kimberly Avenue and BNSF railroad tracks; to the east by State College Boulevard; to the south by E. Orangethorpe Avenue; and the west by Acacia Avenue. The site's location in a local context is shown in Figure 3-2, *Vicinity Map*, and Figure 3-3, *USGS Topographic Map*, in Section 3.0 of this EIR. The Kimberly-Clark site includes Assessor Parcel Numbers (APNs) 073-120-31 and 073-120-33. As further discussed in Section 2.4.1, *Land Use*, below, the Kimberly-Clark site is currently occupied by the Kimberly-Clark manufacturing facility, which includes 1,210,720 square feet (s.f.). of existing manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.). Kimberly-Clark facility ceased operations in June 2020.

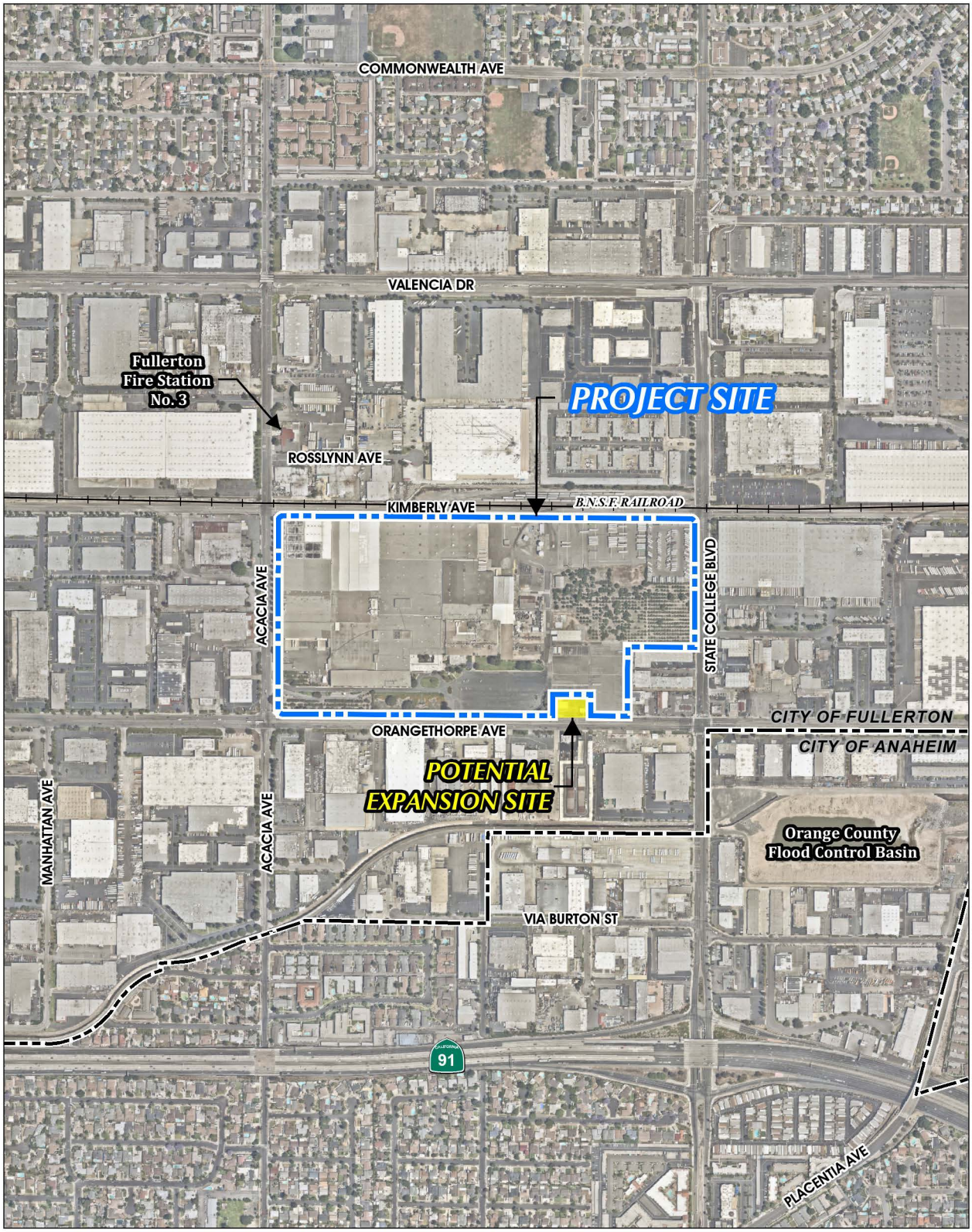
The Project Applicant may pursue the acquisition of an off-site, approximately 0.7-acre property (2301 E. Orangethorpe Avenue; APN 073-120-09), located immediately south of the proposed Building 3 and north of E. Orangethorpe Avenue. This property is developed with two structures and associated facilities formerly occupied by Chapman Coast Roof Company, Inc., including a 2,904-square-foot, two-story office building and a 2,656-square-foot workshop/warehouse. In the event the Project Applicant acquires this property ("potential expansion site"), the proposed development area could be expanded, resulting in a 66.1-net-acre (74.0-gross-acre) development area.

The proposed development at the Kimberly-Clark site is presented in Figure 3-4 in Section 3.0, Project Description, of this EIR, and the development with the potential expansion site is depicted in the "Optional Site Plan" presented in Figure 3-5. In the impact analysis sections of this EIR, the potential expansion site is evaluated to provide a conservative estimate of Project impacts.

Based on field reconnaissance and review of aerial images, existing land uses in the area surrounding the Project site are described below. The Project site and surrounding land uses are depicted in Figure 2-1, *Aerial Photograph*.

- **North.** Kimberly Avenue and the BNSF railroad tracks are immediately north of the Project site. The BNSF railroad tracks are actively used for freight operations. To the north, northeast and northwest, there are various industrial uses within the City of Fullerton, primarily consisting of warehouse, manufacturing, and business park/commercial uses.

[1] The Project site encompasses approximately 73.1 gross acres, which includes an easement for City of Fullerton Water Department facilities, areas to be dedicated for access improvements along the site-adjacent roadways, and public roadway right-of-way.



Source(s): ESRI, Nearmap Imagery (2020), OC Landbase (2019)

Figure 2-1

0 225 450 900 Feet

Aerial Photograph

Fullerton Fire Department Station No. 3 is located north of Kimberly Avenue and east of Acacia Avenue. Residential uses are located further to the north, beyond the industrial uses.

- **East**. The property adjacent to and southeast of the Project site (northwest of the intersection of E. Orangethorpe Avenue and State College Boulevard) is developed with non-residential uses, including commercial (automotive service centers and a gas station) and industrial uses. The properties located east of the Project site (east of State College Boulevard) are also developed with commercial (restaurant, veterinarian services, a liquor store) and industrial uses (warehouse and manufacturing) in the City of Fullerton.
- **South.** The properties south of the Project site (south of E. Orangethorpe Avenue) are developed with various industrial, commercial and office uses in the City of Fullerton. Residential uses in the City of Anaheim are located further to the south. There are commercial uses located at the southeast corner of E. Orangethorpe Avenue and State College Boulevard in the City of Anaheim. Industrial uses and an Orange County Flood Control District facility (Placentia Basin) are located southeast of the Project site (south of E. Orangethorpe Avenue).
- **West.** The properties west of the Project site (west of Acacia Avenue) in the City of Fullerton are also developed with various industrial uses, including warehouses and manufacturing facilities.

2.3 PLANNING CONTEXT

2.3.3 CITY OF FULLERTON GENERAL PLAN (THE FULLERTON PLAN)

The City of Fullerton's prevailing planning document is *The Fullerton Plan*, which serves as the City's General Plan. The City adopted The Fullerton Plan on May 1, 2012. The Fullerton Plan identifies 12 Focus Areas that present opportunities where land use and design change can help fully implement the City's vision. The Fullerton Plan identifies recommended densities and intensities and potential development types for each Focus Area. For parcels within a Focus Area, the underlying community development type (i.e., land use designation)[2] applies until a specific plan, master plan, or other implementing document is prepared through a community-based planning process, at which point a General Plan Amendment may be required to redesignate the land, if necessary. The Project site is in The Fullerton Plan's approximately 712-acre Focus Area K: Southeast Industrial. The Southeast Industrial Focus Area encompasses the largest concentration of Fullerton's industrial base, accessible from the SR-91 and SR-57 and the railroad, and is mainly composed of large parcels with one- and two-story buildings. The Southeast Industrial Focus Area is envisioned as one of the City's primary employment-generating areas. This Focus Area is characterized by industrial uses that will support expanding industries, including high tech and clean technology, research and development, creative industries, and medical research.

[2] In The Fullerton Plan, "land use designations" have been renamed "community development types" to reflect the addition of descriptions of the intended form and character that provide guidance on creating a sense of place. The community development types function as land use designations under General Plan law, as codified in the California Government Code.

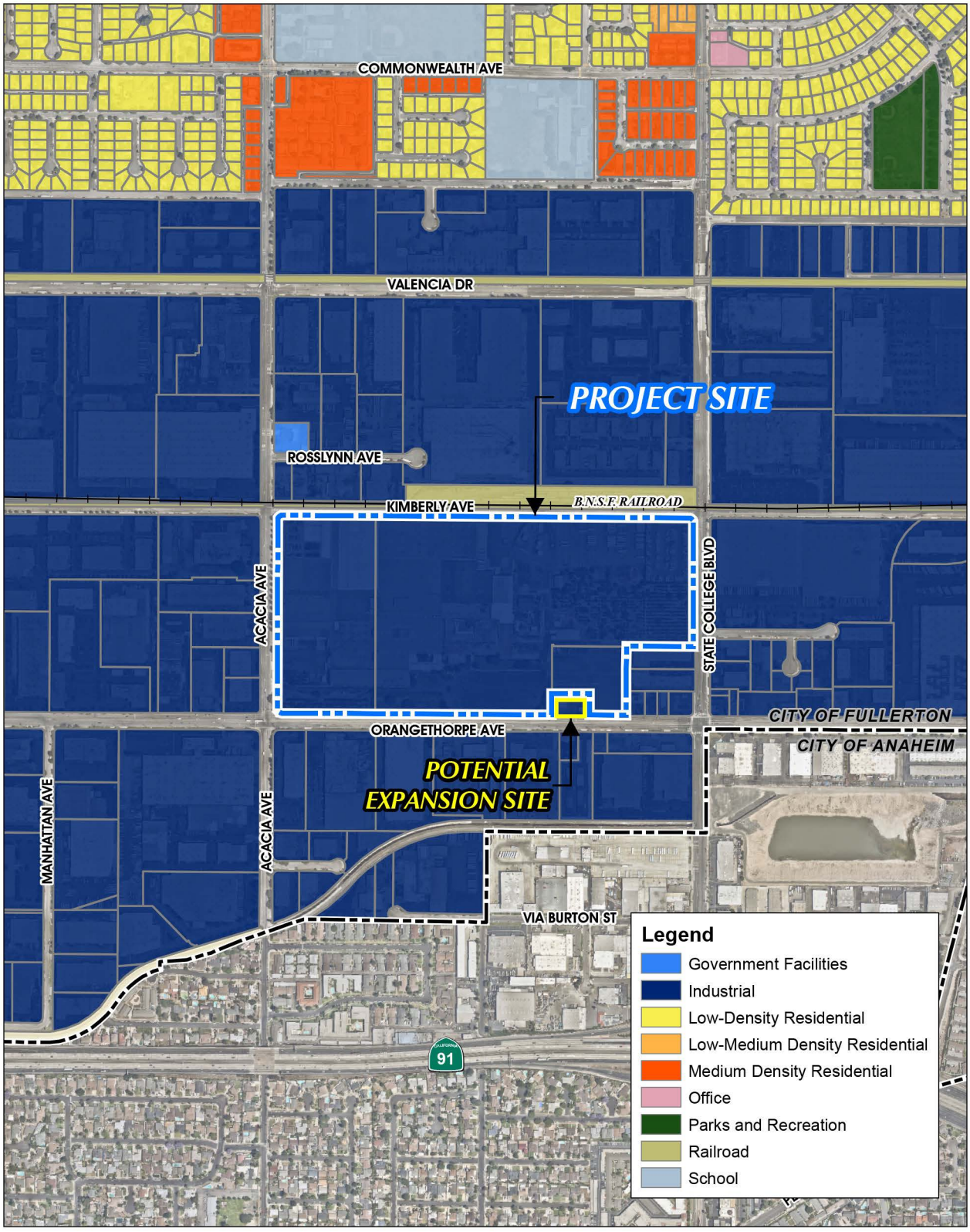
As shown in Figure 2-2, *Existing Community Development Types,* the Project site has an "Industrial" community development type (Fullerton, 2012a). The "Industrial" community development type is intended to protect and enhance the City's major employment areas by accommodating manufacturing activities, wholesale operations, storage, and warehousing facilities, research and development uses, and various activities normally not permitted in other designations (Fullerton, 2012b; Fullerton, 2012a). The Project does not involve a change to the community development type designation for the Project site.

2.3.4 ZONING

The Fullerton Zoning Ordinance (Municipal Code, Title 15) contains the regulatory framework that specifies allowable uses for real property by zone and includes the development standards such as building intensity/density, site layout, building setbacks, heights, lot coverage, parking, landscaping, signs, and other standards to implement the General Plan; it also includes the procedures for complying with the zoning regulations. As shown in Figure 2-3, *Existing Zoning Classifications*, which reflects the City of Fullerton Zoning Map, the majority of the Kimberly-Clark site is zoned M-P-200-ES (Manufacturing Park, 200,000 s.f. minimum lot size, in an Emergency Shelter Overlay Zone), and the southeast corner of the Kimberly-Clark site is zoned M-G ES (Manufacturing General in an Emergency Shelter Overlay Zone). The potential expansion site is also zoned as M-G-ES. According to Chapter 15.40, Industrial Zone Classifications, of the Fullerton Municipal Code, the M-P and M-G zones are established to allow compatible industrial uses in proximity to each other while protecting the public health, safety, and welfare through development standards and site plan review process. The M-P zone is intended for a wide range of light industrial activities, often based on a multiple-tenant development type. The M-G zone is intended for more intensive uses. Both zones focus on minimizing impacts on any nearby residential use. In addition, as identified in Chapter 15.42, Emergency Shelter Overlay Zone, of the Fullerton Municipal Code, the intent and purpose of the ES Overlay are to identify areas within the City in which emergency shelters for homeless and multi-service centers for homeless may, but are not required to, be established. The requirements imposed by the ES zone are intended to supplement the requirements contained in the base zone. The Project Applicant proposes to change the zoning classification applied to the southeast corner of the property to M-P-200ES to provide a single, consistent zoning designation across the entire Kimberly-Clark site.

2.3.5 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an

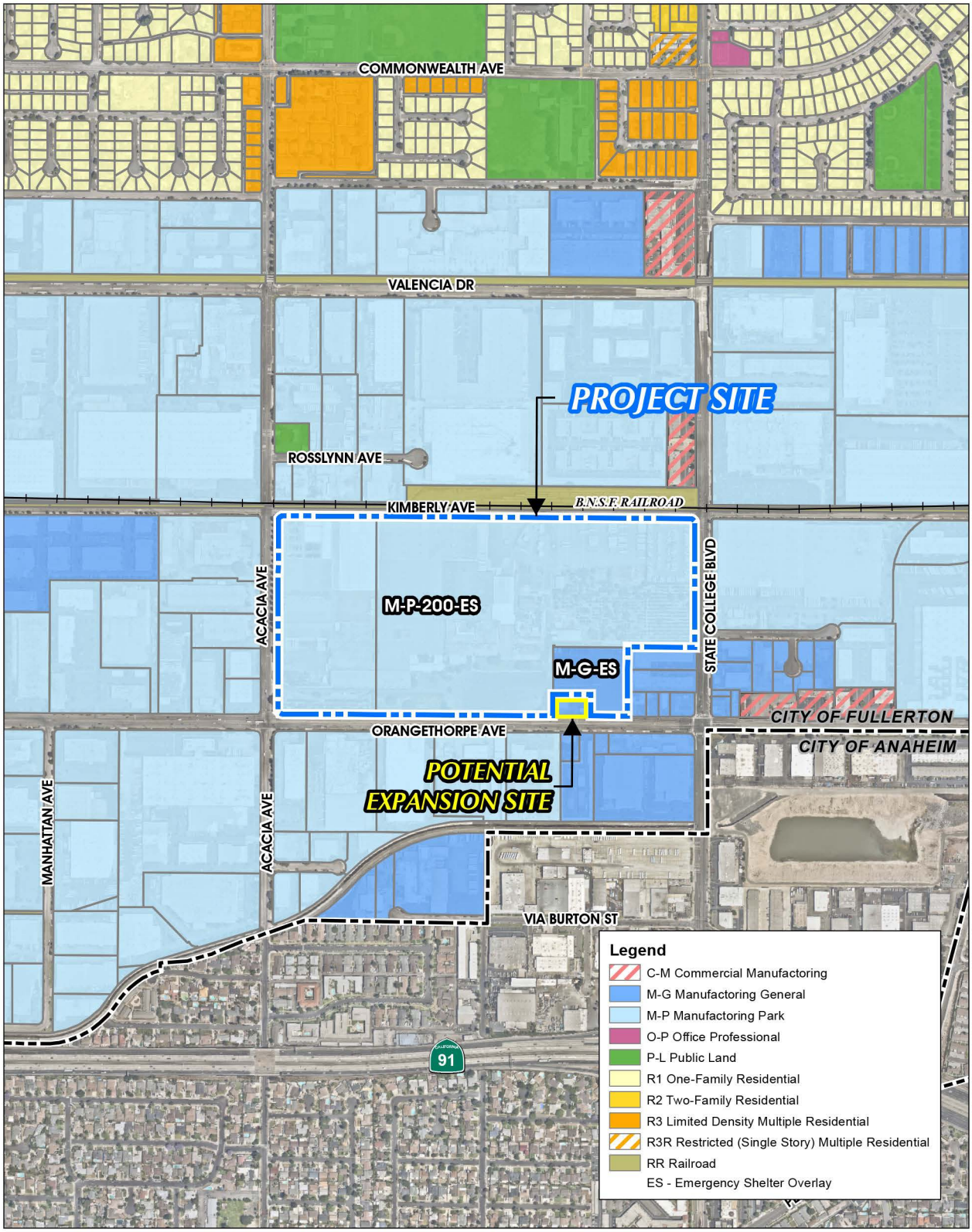


Source(s): City of Fullerton (2018), ESRI, Nearmap Imagery (2020), OC Landbase (2019)

Figure 2-2

0 225 450 900 Feet

Existing Community Development Types



Source(s): City of Fullerton (2018), ESRI, Nearmap Imagery (2020), OC Landbase (2019)

Figure 2-3

0 225 450 900 Feet

Existing Zoning Classifications

area covering more than 38,000 square miles. SCAG develops long-range regional transportation plans including sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations, and other plans for the region (SCAG, 2020b).

On April 7, 2016, SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) to address the region's future needs for "mobility, economy, and sustainability" (SCAG, 2016). On May 7, 2020, SCAG's Regional Council adopted *Connect SoCal* (SCAG's 2020-2045 RTP/SCS) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider the approval of *Connect SoCal* in its entirety and for all other purposes within 120 days from May 7, 2020 (September 2020).

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2016-2040 RTP/SCS and *Connect SoCal* each include a Technical Appendix titled "Goods Movement" that applies to the Project because the Project entails a use that is closely associated with, and relies directly on the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing).

2.3.6 SCAG INDUSTRIAL WAREHOUSING

In April 2018, SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways, and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. Since 2016, the region has experienced continued growth for warehousing, distribution, cold storage, and truck terminal facilities, with the square footage of total facility space exceeding 1.2 billion (SCAG, 2020c). These regions attract robust logistics activities and are a major reason the region is a critical node in the global supply chain. (SCAG, 2018)

2.4 EXISTING PHYSICAL CONDITIONS

2.4.1 LAND USE

As shown in Figure 2-1, *Aerial Photograph*, the Kimberly-Clark site is currently occupied by the former Kimberly-Clark manufacturing facility, which includes 1,210,720 s.f. of existing single-story manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.). Kimberly-Clark began manufacturing operations at its mill in Fullerton in 1955, and continued operations until closing in 2020. In addition to the buildings, other improvements that were associated with the Kimberly-Clark facility and remain onsite include, but are not limited to paved parking areas, water tanks, landscaping, and driveways. Kimberly-Clark also owned and operated a cogeneration facility at

the site, which generated electricity and steam to support mill operations. The cogeneration facility, which includes an approximately 13.4-MegaWatt gas turbine generator set and an approximately 2-MegaWatt steam turbine generator set, was removed from the site by Kimberly-Clark and will be relocated to a Kimberly-Clark facility in Kentucky. The east-central portion of the site contains rows of ornamental orange trees; the fruit from these trees is not harvested or sold. Additionally, a storage lot used for recreational vehicles was operated in the northeast corner of the site under a lease agreement with Kimberly-Clark. Kimberly-Clark operations and the operations of uses at the site that were subject to lease agreements terminated in June 2020 (after the NOP for the Project was prepared). The Kimberly-Clark facility operated 24 hours per day, seven days per week, with employees working in three shifts.

The City of Fullerton Public Works Department maintains a water well facility (Kimberly Well No. 2) in the north-central portion of the site west of the Kimberly Avenue access driveway, and there is a Southern California Edison (SCE) substation generally in the center of the Project site.

The potential expansion site is occupied by two buildings formerly occupied by the Chapman Coast Roof Company, Inc.: a 2,904-square-foot, two-story office building and a 2,656-square-foot workshop/warehouse. The site is covered in asphalt paving, except for a small landscaped area between the office building and a sidewalk along E. Orangethorpe Avenue.

2.4.2 AESTHETICS AND TOPOGRAPHIC FEATURES

The Kimberly-Clark site is developed with the Kimberly-Clark facility, with ornamental landscaping, including trees and groundcover, primarily around the perimeter of the Project site, and at the main entrance to the Kimberly-Clark facility in the southwest portion of the Project site. Additionally, the east-central portion of the Kimberly-Clark site contains a remnant orange orchard. The potential expansion site is also developed with existing structures and includes ornamental landscaping. The visual character of the Project site is depicted in the site photographs provided in Section 4.1, *Aesthetics*, of this EIR. The overall visual character of the Project site and surrounding area is urban in nature and dominated by non-residential uses, including various types of industrial buildings.

The Project site is visible from immediately surrounding land uses and to drivers, pedestrians, and bicyclists along adjacent public roadways. Because the topography of the Project site and surrounding area is relatively flat, and the surrounding area is densely developed, views of the Project site from vantage points beyond the adjacent roadways and land uses are obstructed by intervening development and mature trees.

The Kimberly-Clark site is relatively flat and gradually slopes from southeast to northwest. The site's high point is approximately 184 feet above mean sea level (amsl) in the northeastern portion of the site and its low point is approximately 174 feet amsl in the northwest portion of the site. The potential expansion site slopes north to south. There is approximate 1-foot drop across the potential expansion site with a maximum elevation of 183 feet amsl. The grades surrounding the potential expansion site range from 183 to 181 feet amsl. Figure 3-3, *USGS Topographic Map*, in EIR Section 3.0, *Project Description*, depicts the existing topographic conditions of the Project

site and surrounding areas. The Project site does not contain any rock outcroppings and no other unique topographic or aesthetic features.

2.4.3 AIR QUALITY AND CLIMATE

The Project site is in the 6,745-square mile South Coast Air Basin (SoCAB), which includes portions of Los Angeles, Riverside, and San Bernardino County, and all of Orange County. The SoCAB is bound to the north by the San Gabriel, San Bernardino, and the San Jacinto Mountains to the north and east, by the Pacific Ocean to the west, and San Diego County to the south. The SoCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SoCAB into conformity with federal and State air quality standards. At the regional level, air quality in the SoCAB has improved over the past several decades; however, the SoCAB is currently not in attainment of State and/or federal standards established for Ozone (O_3; one-hour and eight-hour), and particulate matter (PM_{10} [State standard only] and $PM_{2.5}$). No areas of the SoCAB exceed federal or State standards for nitrogen dioxide (NO_2), sulfur dioxide (SO_2), or carbon monoxide (CO) (Urban Crossroads, 2020a).

Refer to Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, of this EIR for a more detailed discussion of the existing air quality and climate setting in the Project area, including existing air quality and greenhouse gas emissions from Kimberly-Clark operations.

2.4.4 BIOLOGICAL RESOURCES

The Project site is within an urban area and are surrounded by development that consists of commercial and industrial uses. The Project site was previously disturbed/developed and contains non-native vegetation, and ornamental landscaping (including a remnant orange orchard on the Kimberly-Clark site). No natural biological habitats, riparian habitats, or other sensitive habitats are present on the Project site. Further, the Project site does not include any State or federally protected wetlands and does not provide habitat for wildlife movement, and are not near areas of the City that contain significant plant and animal populations.

2.4.5 CULTURAL RESOURCES & TRIBAL CULTURAL RESOURCES

The City of Fullerton was founded in 1887 and was primarily an agricultural community until World War II. In the post-war era of the 1950s, the City of Fullerton experienced an industrial expansion that attracted new businesses and industries that gradually replaced agriculture. As discussed above, the Project site and immediately surrounding areas are developed with non-residential (primarily industrial) uses.

As further discussed in Section 4.3, *Cultural Resources*, of this EIR, although the Kimberly-Clark Fullerton mill is potentially significant for its association with postwar industrial development in Fullerton and for the Mid-Century Modern architecture of the original building, the property does not have sufficient integrity to convey any of its historical associations. The on-site remnant orange orchard lacks sufficient integrity to convey their association with Fullerton's agricultural

history. The orchards are similar to numerous other orchards in the region, no distinctive activities occurred there, and no notable persons were found to be associated specifically with the orchards.

The two buildings on the potential expansion site have no historical significance. Because none of the buildings are recommended eligible for listing in the California Register of Historic Resources or the City of Fullerton Historical Landmarks register under any criteria, they are not considered CEQA historical resources. No archaeological or tribal cultural resources are known to exist at the Project site and were not observed during the field survey. (ASM, 2020)

2.4.6 GEOLOGY

The Project area is within the northern portion of the Peninsular Ranges Geomorphic Province characterized by northwest-southeast treading mountains and faults. The regional surficial geology is described as Holocene to Late Pleistocene age young alluvial-fan deposits consisting of unconsolidated to moderately consolidated silt, sand, cobbles, and boulders common to alluvial fan deposits. The nearest known active fault in the El Modeno fault, which is located approximately 2.25 miles southeast. The Project site is not within a designated Alquist-Priolo Special Studies Zone.

The Kimberly-Clark site is underlain by artificial fill that generally consists of medium stiff to very stiff to coarse sandy clays and loose to medium dense clayey fine sands, fine sandy silts, and silty fine to coarse sands. Additionally, alluvium underlays the site and generally consists of loose to medium dense silty sands and fine to coarse sands with variable amounts of fine to coarse gravel, trace clay, occasional fine root fibers, and iron oxide staining (SCG, 2020). The soils underlying the potential expansion site can be reasonably expected to be similar to the Kimberly-Clark site.

No paleontological resources are known to exist at the Project site. The Holocene-age alluvial deposits underlying the Project site have a low paleontological potential; however, the Pleistocene-age alluvial deposits located on the Project site between 8 feet and 16 feet below the ground surface (bgs) have a high paleontological sensitivity. (PaleoServices, 2020)

Refer to Section 4.5, *Geology and Soils*, of this EIR, for a more detailed discussion of the existing geologic setting of the Project area.

2.4.7 HAZARDS AND HAZARDOUS MATERIALS

The Kimberly-Clark paper manufacturing and processing activities have been supported by numerous processes and chemicals. The Environmental Data Resources (EDR) database search identified multiple environmental listings for the Kimberly-Clark site, as discussed in the Phase I Environmental Site Assessment (ESA) included in Appendix H1 of this EIR (Stantec, 2019a). Therefore, the Kimberly-Clark site is included on the list of hazardous material sites compiled pursuant to California Government Code Section 65962.5. Historically, the Kimberly-Clark manufacturing facility used underground storage tanks (USTs) generally in the center of the

facility (near the boiler house west of the orchard; the USTs were removed in 1985. Petroleum contamination was discovered at the time of the UST removals, and was excavated to the extent feasible in multiple excavations that occurred at the time of the UST removal and during subsequent excavations. The previous leaking UST case (Case No. 083001032T) was closed in 1992 (SWRCB, 2020).

As further discussed in Section 4.7, *Hazards and Hazardous Materials*, of this EIR, based on a Phase I Environmental Site Assessment (ESA) prepared for the Kimberly-Clark site, there are various on-site recognized environmental conditions (RECs) in connection with the Kimberly-Clark operations and facilities, and the on-site remnant orange orchard. The potential expansion site is identified as one of the properties near the Kimberly-Clark site that have, or may have, contributed volatile organic compounds (VOCs) and other contaminants to soil, groundwater, and soil vapor, that may impact the Project site. Additionally, the Project site is located over a VOC-contaminated groundwater plume (North Basin Groundwater Protection Project plume). (Stantec, 2019a)

A subsequent Phase II ESA did not report the presence of constituents of potential concern (COPCs) above regulatory screening levels at the locations tested. However, there is a potential for residual impacted soils associated with the former USTs. If present, it is anticipated the residual impacted soils would be located beneath an existing building (Stantec, 2019b).

2.4.8 HYDROLOGY

The Project site lies within the Santa Ana River watershed, which drains an approximately 2,650-square mile area and is the principal surface flow water body within the region. The Santa Ana River starts in the Santa Ana Canyon in the southern San Bernardino Mountains and runs southwesterly across San Bernardino, Riverside, and Orange Counties, where it discharges into the Pacific Ocean at the City of Huntington Beach. The Project site and vicinity are within the purview of the Santa Ana Regional Water Quality Control Board (RWQCB). The *Water Quality Control Plan for the Santa Ana River Basin* (Basin Plan) is the governing water quality plan for the region, which sets forth goals and objectives for protecting water quality within the region (RWQCB, 2016).

Runoff from the Project site flows via sheet flow or through existing storm drains to storm drain facilities in adjacent roadways and ultimately to the existing public storm drain laterals located beneath Kimberly Avenue that convey stormwater runoff to the existing concrete channel that runs north of Kimberly Avenue. The Kimberly Storm Channel connects to the Fullerton Creek Channel, which joins the Coyote Creek, which flows into the San Gabriel River and ultimately drains to the Pacific Ocean.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06059C0132J dated December 3, 2009, the Project site and potential expansion site are located within FEMA Zone X (Shaded). FEMA Zone X (Shaded) is correlated with areas of moderate flood hazard with a 0.2 percent annual chance (500-year storm event) of a flood (FEMA, 2009).

The Project site is within the Orange County Groundwater Basin. Groundwater was not encountered during subsurface borings, which extended to a depths of approximately 30-feet. Previous water level readings in 2010 at the monitoring well on-site (City of Fullerton Kimberly Well No. 2), indicate a high ground water level of approximately 88-feet (SCG, 2020). The Project site is located over a contaminated groundwater plume (North Basin Groundwater Protection Project plume), which prohibits the use of infiltration for water quality treatment.

Refer to Section 4.8, *Hydrology and Water Quality*, of this EIR, for a more detailed discussion of the Project site's existing hydrology and water quality setting.

2.4.9 NOISE

As previously discussed, the Project site is within an urbanized and industrial area of the City of Fullerton. The Project site is developed with an existing manufacturing facility and industrial buildings and the surrounding properties are developed with existing industrial and commercial businesses. The primary source of noise in the Project site's vicinity is traffic noise from vehicles traveling along abutting roadways. Urban Crossroads, Inc. collected 24-hour noise measurements at 7 locations in the Project vicinity on April 29, 2020. Measured daytime noise levels taken from April 29, 2020, ranged from 54.8 dBA L_{eq} to 65.4 dBA L_{eq} and nighttime noise levels taken from April 29, 2020, ranged from 50.6 dBA L_{eq} to 62.2 dBA L_{eq}.[3] The measured noise levels correlate to a Community Noise Equivalent Level (CNEL) ranging from 58.1 CNEL to 68.9 CNEL. (Urban Crossroads, 2020b) Refer to Section 4.10, *Noise*, of this EIR, for a more detailed discussion of the Project site's existing noise setting.

2.4.10 TRANSPORTATION

Regional access to the Project site is provided from SR-57 and SR-91, which are located approximately 0.7 miles east and approximately 0.4 miles south of the Project site, respectively. There are freeway interchanges at E. Orangethorpe Avenue/SR-57 and State College Boulevard/SR-91. SR-91 provides access to Interstate 5 (I-5) (located approximately 4.7 miles west of the site) and SR-57 provides access to SR-60 (located approximately 10 miles north of the site).

As previously discussed, the Project site is bounded by E. Orangethorpe Avenue, Acacia Avenue, State College Boulevard, and Kimberly Avenue. Existing traffic on nearby roadways consists of both passenger vehicles and trucks passing through the area and accessing nearby land uses. Each of these roadways is designated as a truck route by the City of Fullerton. With the exception of State College Boulevard, there are existing driveways along these roadways that provide access to the Kimberly-Clark site. Access to the potential expansion site is provided from E. Orangethorpe Avenue. Based on available information provided by Kimberly-Clark, it is estimated

[3] These measurements represent background ambient noise conditions during the mandatory State of California stay at home order due to the Covid-19 pandemic. Due to the stay at home order, the noise level measurements that were taken on April 29, 2020, were approximately 2.5 decibels equivalent sound level (dBA Leq) lower than the existing noise level measurements taken in December 2019.

that on-site operations generated an average of 650 daily passenger trips and 80 truck trips per day.

With respect to alternative modes of transportation, in the vicinity of the Project site there are Class II (on-street) bike lanes currently along Acacia Avenue (between Chapman Avenue and the southern City boundary) and E. Orangethorpe Avenue (between State College Boulevard and Raymond Avenue) in the City of Fullerton. There are sidewalks on both sides of State College Boulevard and the west side of Acacia Avenue. Orange County bus routes that travel along E. Orangethorpe Avenue and State College Boulevard.

The BNSF railroad track that travels in an east-west direction north of Kimberly Avenue is actively used for freight service in the area, and was previously used by Kimberly-Clark via two railroad spurs that extend south into the north-central portion of the Kimberly-Clark site.

Refer to Section 4.11, *Transportation*, of this EIR, for a more detailed discussion of the Project site's existing transportation setting.

2.4.11 Utilities and Service Systems

There is existing municipal and private utility infrastructure within the Project site and along the roadways adjacent to the Project site, including water, sanitary sewer, drainage, and dry utilities (e.g., electricity, natural gas, cable). The existing infrastructure serves the existing uses on the Project site.

The City of Fullerton Public Works Department maintains a water well facility in the north-central portion of the site, west of the Kimberly Avenue access driveway. There is also an SCE substation generally located in the center of the Kimberly-Clark site, which served the Kimberly-Clark facility and would be removed with the implementation of the Project.

The City of Fullerton contracts with MG Disposal, a private company, to provide solid waste collection and recycling services. The solid waste generated in the City of Fullerton is disposed of at landfills within the Orange County (OC) Waste & Recycling landfill system, which have remaining capacity (Arnau, 2020).

Refer to Section 4.13, *Utilities and Services Systems*, of this EIR, for a more detailed discussion on the Project's existing utility providers.

2.4.12 Rare and Unique Resources

As required by CEQA Guidelines Section 15125(c), the environmental setting should place special emphasis on resources that are rare or unique to that region and would be affected by the project. Based on the existing conditions described on the preceding pages and discussed in more detail in Section 4.1 through Section 4.13 of this EIR, the Project site, and the potential expansion site, do not contain any resources that are rare or unique to the region.

2.5 REFERENCES

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SECTION 3.0 PROJECT DESCRIPTION

This section provides the information required of an Environmental Impact Report (EIR) Project Description by the California Environmental Quality Act (CEQA) Guidelines Section 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's characteristics; and a description of the intended uses of this EIR, including a list of agencies that are expected to use this EIR in their decision-making processes, a list of the permits and approvals that are required to implement the Project, and a list of related environmental review and consultation requirements.

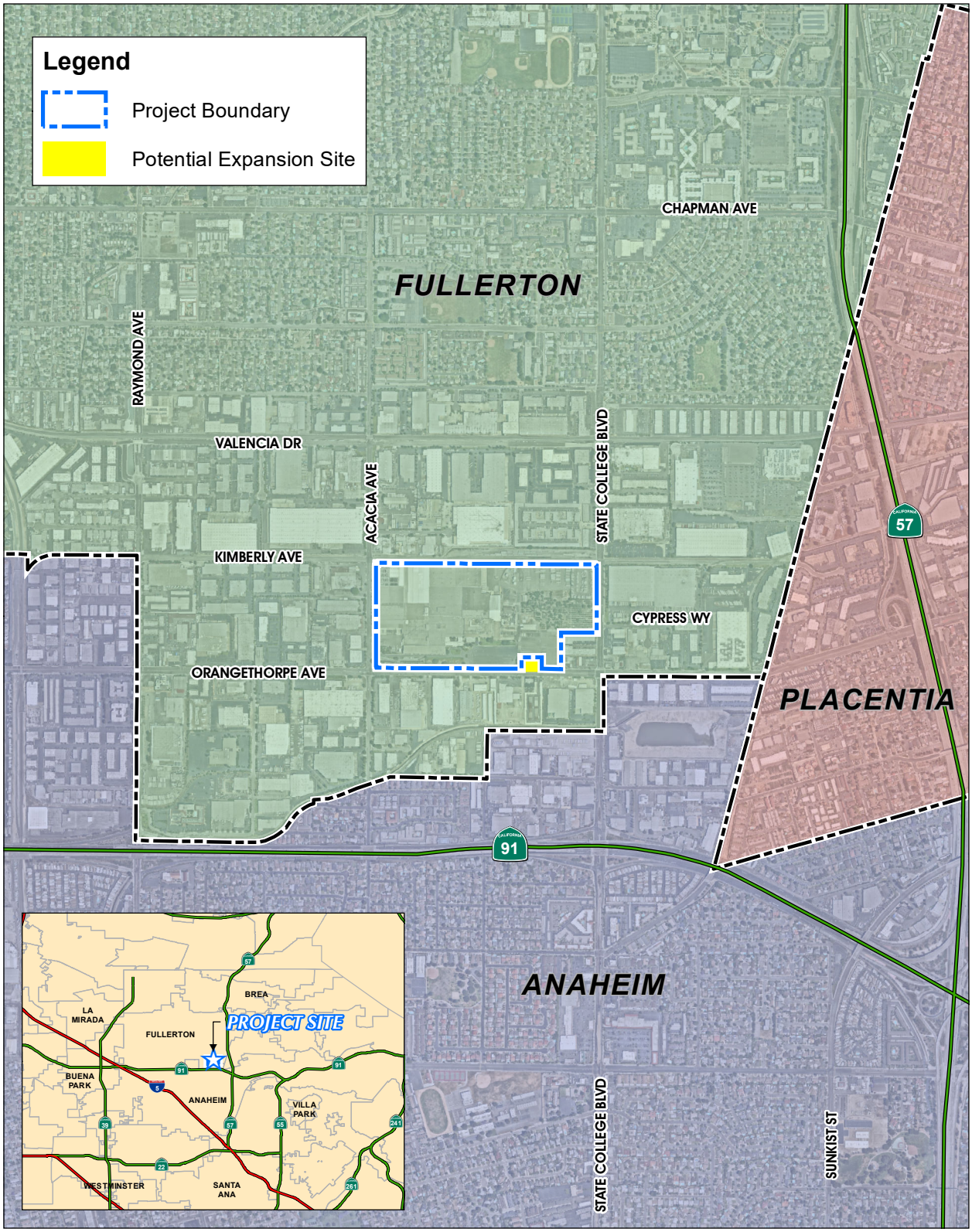
In summary, the Goodman Logistics Center Fullerton Project (Project) involves the demolition of the existing Kimberly-Clark manufacturing facility and associated improvements, and redevelopment of the site as a logistics center with four buildings. Approximately 1,561,522 square feet (s.f.) of high cube warehouse space (expected to be used for fulfillment center and cold storage uses) and associated office space would be provided on the Kimberly-Clark site upon completion of the Project. The Project Applicant may pursue the acquisition of an additional property located north of E. Orangethorpe Avenue that abuts the southern boundary of the Project site (referred to as the "potential expansion site"). In the event this property is acquired, the two existing buildings on that property would also be demolished and a maximum of approximately 1,609,384 s.f. of high cube warehouse and office space would be provided on the Project site (which includes the Kimberly-Clark site and the potential expansion site). The Project also includes on-site landscaping, internal drive aisles, parking, lighting, signage, and utility connections, as necessary to serve the Project.

3.1 PROJECT LOCATION

The approximately 65.4-net-acre[1] Kimberly-Clark site is located at located at 2001 E. Orangethorpe Avenue in the City of Fullerton, Orange County, California, at the northeast corner of the E. Orangethorpe Avenue and Acacia Avenue intersection. The site is bounded by Acacia Avenue to the west, Kimberly Avenue and BNSF railroad tracks to the north, State College Boulevard to the east, and E. Orangethorpe Avenue to the south. The Kimberly-Clark site comprises Assessor Parcel Numbers (APNs) APNs 073-120--31 and -33. The potential expansion site at 2301 E. Orangethorpe Avenue that may be acquired by the Project Applicant encompasses approximately 0.7 acres (APN 073-120-09). Unless otherwise noted, references to the "Project site" in this section collectively refer to the Kimberly-Clark site and proposed expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted. The location of the Project site is shown on Figure 3-1, *Location Map*, and Figure 3-2, *USGS Topographic Map*.

Refer to EIR Section 2.0, *Environmental Setting*, for general information related to the regional and local setting of the Project site.

[1] The Project site encompasses approximately 73.1 gross acres, which includes an easement for City of Fullerton Public Works Department facilities, areas to be dedicated for access improvements along the site-adjacent roadways, and public roadway right-of-way.

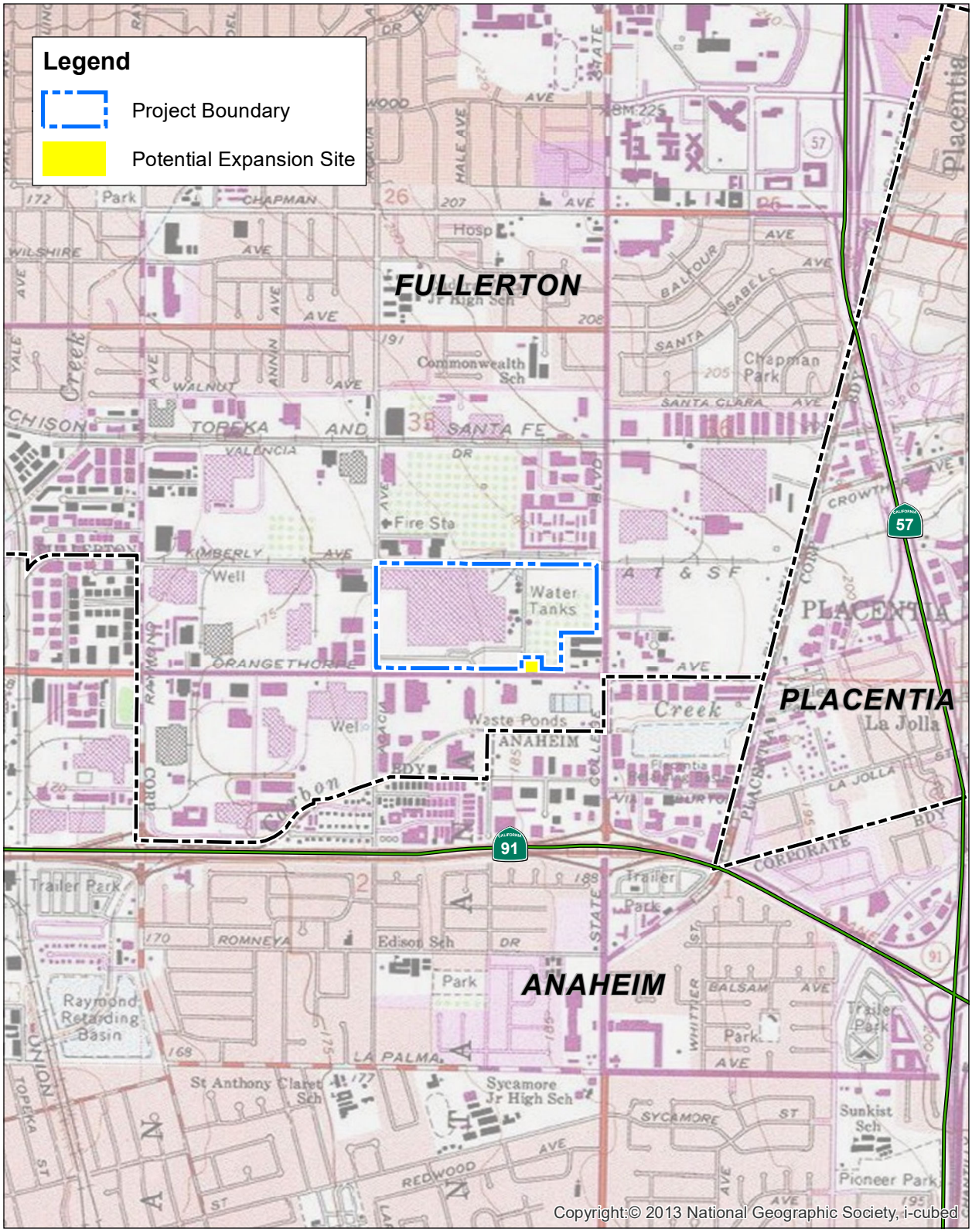


Source(s): ESRI, Nearmap Imagery (2020), OC Landbase (2019)

Figure 3-1

0 425 850 1,700 Feet

Location Map



Source(s): ESRI, USGS (2013)

Figure 3-2

0 425 850 1,700 Feet

USGS Topographic Map

3.2 PROJECT OBJECTIVES

The fundamental purpose and goal of the Project is to accomplish the orderly redevelopment of a former manufacturing facility with modern industrial buildings, and to increase employment opportunities in furtherance of a jobs to housing balance in the City. This underlying purpose aligns with various aspects of the Southern California Association of Governments' (SCAG's) Connect SoCal (the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]), related to accommodating goods movement industries and balancing job and housing opportunities in local areas to reduce long commutes from home to work. The Project would achieve its underlying purpose and goal through the following objectives.

A. Ensure that redevelopment of the Project site is accomplished, consistent with applicable goals and policies of the City of Fullerton as set forth in *The Fullerton Plan, the City's general plan.*

B. Increase revenues for the City of Fullerton by maximizing opportunities for warehouse uses.

C. To develop Class A speculative industrial buildings in the City of Fullerton that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar industrial buildings in the local area and region.

D. To create employment-generating businesses in the City of Fullerton to reduce the need for members of the local workforce to commute outside the area for employment, and to improve the jobs to housing balance.

E. To develop a project with an architectural design and operational characteristics that complement other existing buildings in the immediate vicinity and minimize conflicts with other nearby land uses.

F. To develop industrial warehouse buildings in close proximity to an already-established industrial area, designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways.

G. To develop a property that has access to available infrastructure, including roads and utilities to be used as part of the Southern California supply chain and goods movement network.

3.3 PROJECT COMPONENTS

The Project involves discretionary legislative and site development actions by the City of Fullerton. The legislative action includes a Zone Change; the general intent of the Zone Change is to provide uniform zoning across the entire site. The site development actions include a Major Site Plan, Tentative Parcel Map, Variance, and Development Agreement; the general intent of these actions is to permit the development and operation of a four-building logistics center. The individual components of the Project are described in this section.

3.3.1 ZONE CHANGE

The Project includes a Zone Change that would modify the zoning designation for approximately 3.7 acres comprising the southeast corner of the Kimberly-Clark site. The zoning designation for this area would change from M-G-ES (Manufacturing General in an Emergency Shelter Overlay Zone) to M-P-200-ES (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone). The remaining approximately 61.7 acres of the Kimberly-Clark site is zoned M-P-200-ES under existing conditions and would be unaffected by the proposed Zone Change. The proposed Zone Change is illustrated on Figure 3-3, *Proposed Zone Change*.

3.3.2 MAJOR SITE PLAN

The proposed Major Site Plan establishes a development concept, including site layout, architectural design, landscape design, and associated physical design features, for a four-building logistics center. The proposed buildings are designated “Building 1,” “Building 2,” “Building 3,” and “Building 4” for reference purposes. The proposed logistics center would include 1,561,522 s.f. of total building area. The conceptual site plan for the Project is illustrated on Figure 3-4, *Conceptual Site Plan*. As previously discussed, the Project Applicant may pursue acquisition of an off-site approximately 0.7-acre property. In the event the Project Applicant is able to acquire the potential expansion site, the Project could be expanded to include 1,609,384 s.f. of total building floor area as shown on Figure 3-5, *Optional Site Plan*. The proposed Major Site Plan and the Optional Site Plan are summarized in Table 3-1, *Major Site Plan Summary*. The analysis in this EIR addresses the potential effects of both the proposed Major Site Plan and the Optional Site Plan.

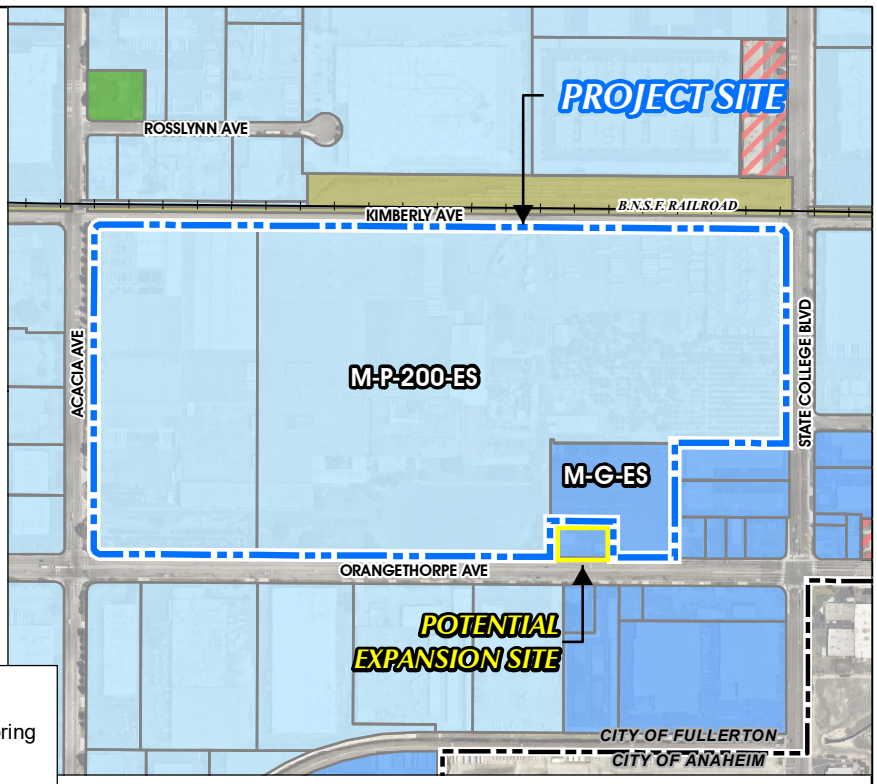
TABLE 3-1 MAJOR SITE PLAN SUMMARY

	Building 1	Building 2	Building 3	Building 4	Total
Proposed Project					
Office Floor Space	30,000 s.f.	30,000 s.f.	30,000 s.f.	15,000 s.f.	105,000 s.f.
Warehouse Floor Space	312,695 s.f.	515,255 s.f.	465,290 s.f.	163,282 s.f.	1,456,522 s.f.
Proposed Building Floor Area	*342,695 s.f.*	*545,255 s.f.*	*495,290 s.f.*	*178,282 s.f.*	*1,561,522 s.f.*
Optional Site Plan					
Added Warehouse Floor Space	--	--	+47,862 s.f.	--	+47,862 s.f.
Maximum Project Building Area	**342,695 s.f.**	**545,255 s.f.**	**543,152 s.f.**	**178,282 s.f.**	**1,609,384 s.f.**

Existing Zoning

Classification:

- **M-G-ES**
  (Manufacturing General in an Emergency Shelter Overlay Zone)
- **M-P-200-ES**
  (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone)



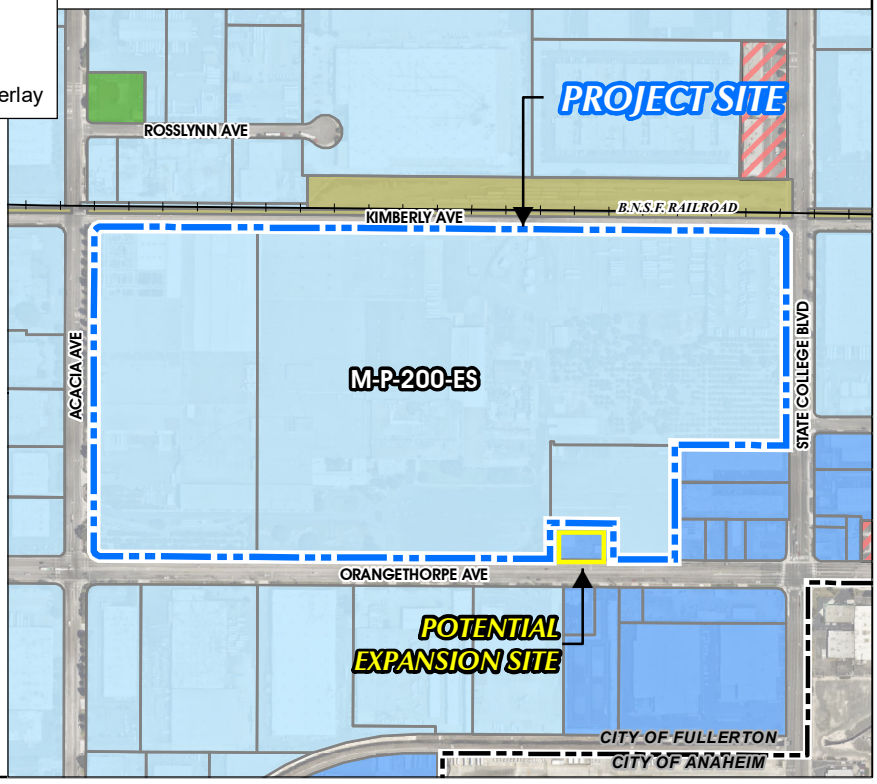
Legend

- C-M Commercial Manufactoring
- M-G Manufactoring General
- M-P Manufactoring Park
- P-L Public Land
- RR Railroad
- ES - Emergency Shelter Overlay

Proposed Zoning

Classification:

- **M-P-200-ES**
  (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone)

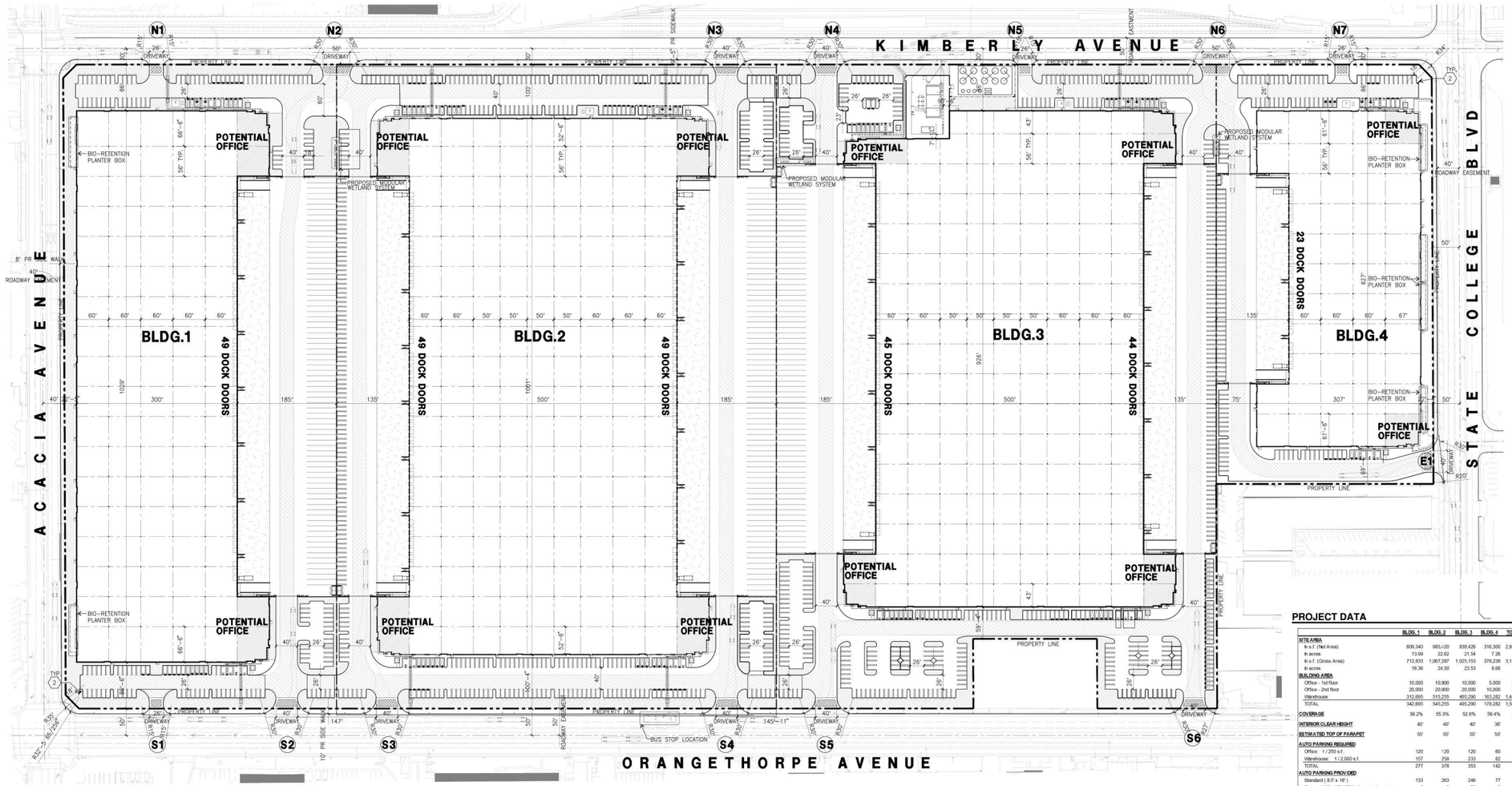


Source(s): City of Fullerton (2018), ESRI, Nearmap Imagery (2020), OC Landbase (2019)

Figure 3-3

0 175 350 700 Feet

Proposed Zone Change



VICINITY MAP

PROJECT DATA

	BLDG. 1	BLDG. 2	BLDG. 3	BLDG. 4	TOTAL
SITE AREA					
In s.f. (Net Area)	609,340	985,420	938,426	316,300	2,849,486 s.f.
In acres	13.99	22.62	21.54	7.26	65.42 ac
In s.f. (Gross Area)	712,833	1,067,287	1,025,153	378,238	3,183,511 s.f.
In acres	16.36	24.50	23.53	8.68	73.08 ac
BUILDING AREA					
Office - 1st floor	10,000	10,000	10,000	5,000	35,000 s.f.
Office - 2nd floor	20,000	20,000	20,000	10,000	70,000 s.f.
Warehouse	312,695	515,255	465,290	163,282	1,456,522 s.f.
TOTAL	342,695	545,255	495,290	178,282	1,561,522 s.f.
COVERAGE	56.2%	55.3%	52.8%	56.4%	54.8%
INTERIOR CLEAR HEIGHT	40'	40'	40'	36'	
ESTIMATED TOP OF PARAPET	55'	55'	55'	50'	
AUTO PARKING REQUIRED					
Office: 1 / 250 s.f.	120	120	120	60	420 stalls
Warehouse: 1 / 2,000 s.f.	157	258	233	82	730 stalls
TOTAL	277	378	353	142	1,150 stalls
AUTO PARKING PROVIDED					
Standard (8.5' x 18')	133	263	246	77	719 stalls
Compact (8' x 16') 30% of required space	0	0	29	0	29 stalls
Accessible Parking (9' x 18')	5	6	7	4	
Accessible Van Parking (12' x 18')	1	2	2	1	
EV Parking (8.5' x 18')	8	22	24	5	
EV Standard Accessible (9' x 18')	1	1	1	1	
EV Van Accessible (12' x 18')	1	1	1	1	
EV Ambulatory (10' x 18')	0	0	1	0	
Clean Air/ Van pool (8.5' x 18')	16	31	35	11	
Total	165	326	346	100	937
Parking inside truck yard	0	89	82	43	214
GRAND TOTAL	165	415	428	143	1,151 stalls
Visitor Parking (20% of total)	33	83	86	29	230 stalls
Bicycle Parking required					
short term - exterior (5% of visitor parking)	2	4	4	1	12 stalls
long term - interior (5% of non-visitor parking)	7	17	17	6	46 stalls
Bicycle Parking provided					
short term - exterior (5% of visitor parking)	5	5	5	5	20 stalls
TRAILER PARKING PROVIDED					
Trailer (10' x 55')	76	76	70		222 stalls

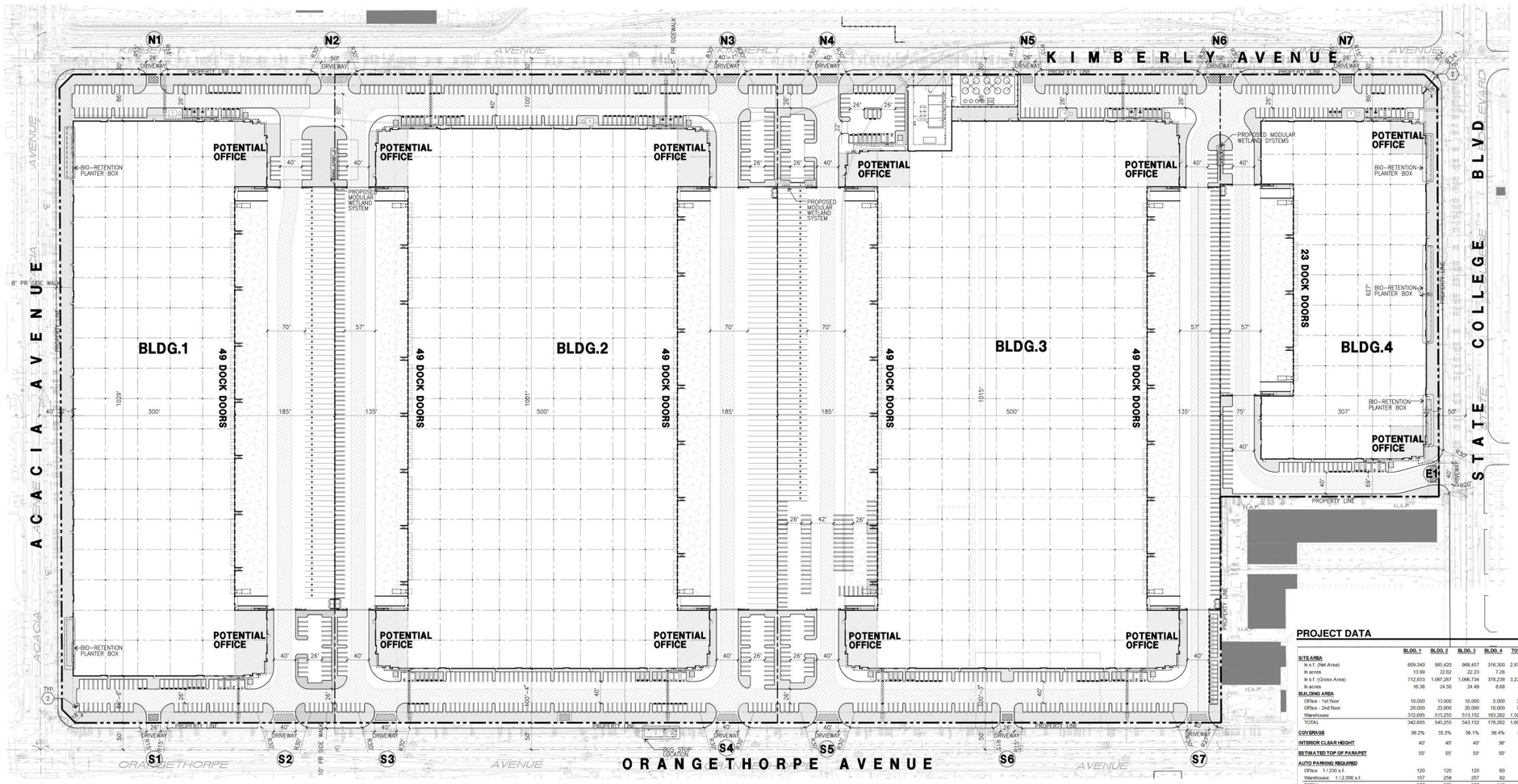
LANDSCAPE REQUIREMENT		
Area - Open parking area (w/ th driveway)	52,473	143,659	125,200	57,561	378,893 s.f.
Area - Parking area (w/ thout driveway)	25,425	50,130	52,501	15,471	143,527 s.f.
PLANTER LANDSCAPE AREA REQUIRED		
1.8% open parking area s.f. (w/ th driveway)	4,198	11,493	10,016	4,605	30,311 s.f.
2. Min 25 s.f. per parking space	4,125	10,375	10,700	3,575	28,775 s.f.
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	10,700	4,605	30,995 s.f.
LANDSCAPE AREA PROVIDED		
Area	58,809	50,174	54,062	34,046	197,091 s.f.
SHADED AREA REQUIRED		
Area - 50% Parking area (w/ thout driveway)	12,713	25,065	26,251	7,736	71,764 s.f.
TREE SHADED ARE PROVIDED		
Area	12,861	26,206	30,580	7,769	77,486 s.f.
ZONING ORDINANCE FOR CITY		
Zoning Designation - Manufacturing Park (M-P)		
MAXIMUM BUILDING HEIGHT		
Height - 55'		
MAXIMUM FLOOR AREA RATIO		
N/A		
SETBACKS		
Building	Landscape	
along public St. - 20'	20'	
along public alley - 5'		
along property w th a P-L zone - 10'		

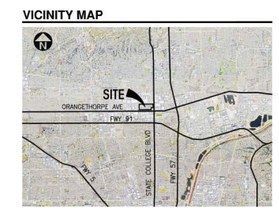
Source(s): HPA (06-10-2020)

Figure 3-4

Not to Scale

Conceptual Site Plan





PROJECT DATA

	BLDG. 1	BLDG. 2	BLDG. 3	BLDG. 4	TOTAL	
SITE AREA						
In s.f. (Net Area)	609,340	985,420	968,457	316,300	2,879,517 s.f.	
In acres	13.99	22.62	22.23	7.26	66.10 ac.	
In s.f. (Gross Area)	712,833	1,067,287	1,066,734	378,238	3,225,092 s.f.	
In acres	16.36	24.50	24.49	8.68	74.04 ac.	
BUILDING AREA						
Office - 1st floor	10,000	13,000	10,000	5,000	35,000 s.f.	
Office - 2nd floor	20,000	20,000	20,000	10,000	70,000 s.f.	
Warehouse	312,695	515,255	513,152	163,282	1,504,384 s.f.	
TOTAL	342,695	543,255	543,152	178,282	1,609,384 s.f.	
COVERAGE	56.2%	55.3%	56.1%	56.4%	55.9%	
INTERIOR CLEAR HEIGHT	40'	40'	40'	38'		
ESTIMATED TOP OF PARAPET	55'	55'	55'	50'		
AUTO PARKING REQUIRED						
Office: 1 / 250 s.f.	120	120	120	60	420	stalls
Warehouse: 1 / 2,000 s.f.	157	258	257	82	754	stalls
TOTAL	277	378	377	142	1,174	stalls
AUTO PARKING PROVIDED						
Standard (8.5' x 18')	133	263	182	77	655	stalls
Compact (8' x 16') 30% of required space	0	0	20	0	20	stalls
Accessible Parking (9' x 18')	5	6	7	4		
Accessible Van Parking (12' x 18')	1	2	2	1		
EV Parking (8.5' x 18')	8	22	25	5		
EV Standard Accessible (9' x 18')	1	1	1	1		
EV Van Accessible (12' x 18')	1	1	1	1		
EV Ambulatory (10' x 18')	0	0	1	0		
Clean Air Van pool (8.5' x 18')	16	31	37	11		
Total	165	326	276	100	867	
Parking inside truck yard	0	89	176	43	308	
GRAND TOTAL	165	415	452	143	1,175	stalls
Visitor Parking (20% of total)	33	83	90	29	235	stalls
Bicycle Parking required						
short term - exterior (5% of visitor parking)	2	4	5	1	12	stalls
long term - interior (5% of non-visitor parking	7	17	18	6	47	stalls
Bicycle Parking provided						
short term - exterior (5% of visitor parking)	5	5	5	5	20	stalls
TRAILER PARKING PROVIDED						
Trailer (10' x 55')	76	76	58		210	stalls

LANDSCAPE REQUIREMENT					
Area - Open parking area (w ith drivew ay)	52,473	143,659	108,222	57,561	361,915 s.f.
Area - Parking area (w ithout drivew ay)	25,425	50,130	42,016	15,471	133,042 s.f.
PLANTER LANDSCAPE AREA REQUIRED					
1.8% open parking area s.f. (w ith drivew ay)	4,198	11,493	8,658	4,605	28,953 s.f.
2 /Mi 25 s.f. per parking space	4,125	10,375	11,300	3,575	29,375 s.f.
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	11,300	4,605	31,595 s.f.
LANDSCAPE AREA PROVIDED					
Area	58,809	50,174	51,630	34,046	194,659 s.f.
SHADED AREA REQUIRED					
Area - 50% Parking area (w ithout drivew ay)	12,713	25,065	21,008	7,736	66,521 s.f.
TREE SHADED AREA PROVIDED					
Area	12,861	26,266	21,218	7,769	68,114 s.f.

ZONING ORDINANCE FOR CITY

Zoning Designation - Manufacturing Park (M-P)

MAXIMUM BUILDING HEIGHT

Height - 55'

MAXIMUM FLOOR AREA RATIO

N/A

SETBACKS

Building	Landscape
along public St. - 20'	20'
along public alley - 5'	
along property w ith a P-L zone - 10'	

Source(s): HPA (06-10-2020)

Figure 3-5

Not to Scale

Optional Site Plan

Following is a description of the physical and operational Project characteristics associated with implementation of the proposed Major Site Plan and Operational Site Plan:

A. Site Layout and Building Architecture
B. Circulation and Parking
C. Conceptual Landscaping, Lighting, and Signage Plans
D. Walls and Fences
E. Utility Improvements
F. Construction Activities
G. Operational Activities

A. Site Layout and Building Architecture

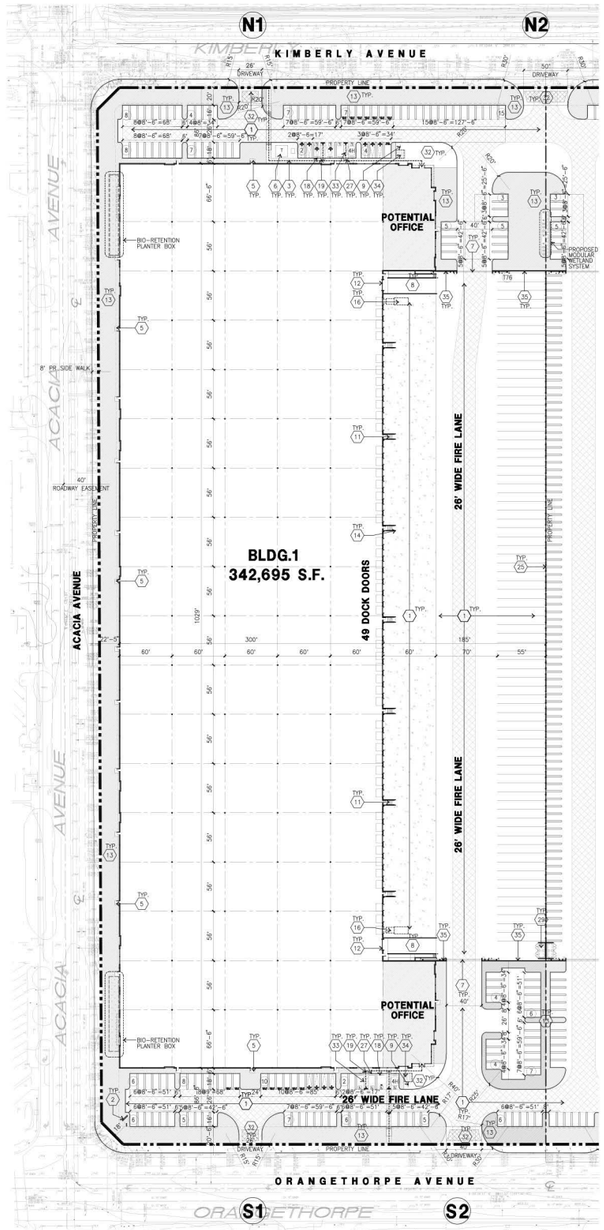
The four buildings provided by the Major Site Plan are described below, along with a discussion of the Optional Site Plan for Building 3. The future occupants of the buildings are not known at the time of writing this EIR. However, for purposes of analysis in this EIR, it is assumed that up to 50 percent of the building square footage would be occupied by high-cube fulfillment center warehouse uses and the remaining 50 percent would be occupied by high-cube cold storage warehouse uses.

Prior to the issuance of building permits to construct Buildings 1, 2, 3, and 4, the Project Applicant would be required to submit construction documents/plans to the City of Fullerton for review and approval. The construction documents/plans would be required to comply with the City of Fullerton Building Code, which is based on the California Building Code and is included in Title 14 of the City of Fullerton Municipal Code. Further, the Project would be constructed in compliance with California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 23 Standards) and the Title 24 California Green Building Standards Code (CALGreen Code).

Building 1

Building 1 is a rectangular building located on the western portion of the Project site, adjacent to Acacia Avenue (refer to Figure 3-6, *Building 1 Site Plan*). Building 1 includes approximately 342,695 s.f. of floor area (30,000 s.f. office space and 312,695 s.f. of warehouse space). The office space consists of 10,000 s.f. on the first floor and 20,000 s.f. on the second floor (mezzanine). There would be access from office breakrooms to adjacent outdoor patio areas. Building 1 features 49 loading docks on the east side of the building within an enclosed/screened truck court; there are no proposed loading docks facing Acacia Avenue. Passenger vehicle parking stalls are distributed along the north and south sides of Building 1.

Building 1 is designed with a varied roofline and its height would range from approximately 40 feet to a maximum of approximately 50 feet above the finished floor elevation. The maximum building height would be 55 feet at the top of parapet. The clear height under beam would be 40-feet. The building would be constructed of concrete tilt-up panels and low-reflective, blue/green



Property owner

GLC FULLERTON LLC
18201 VON KARMAN AVENUE, SUITE 1170
IRVINE, CA 92612
TEL: 949-407-0100
EMAIL: Blair.Dahl@goodman.com

Address of the property

2001E ORANGETHORPE AVE FULLERTON, CA 92831

Assessor's Parcel Number

073-120-31 / 073-120-33 / 073-120-09

Legal description

APN: 073-120-31 & 33
THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF FULLERTON, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
PARCEL 1:
THE SOUTH HALF OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THE SOUTHERLY 953.10 FEET OF THE EASTERLY 478.83 FEET OF THE WEST 10 FEET OF THE EASTERLY 909.50 FEET MEASURED ALONG THE EASTERLY AND SOUTHERLY LINES RESPECTIVELY THEREOF. ALSO EXCEPT THE SOUTHERLY 20 FEET THEREOF.
PARCEL 2:
THE EAST 10.00 FEET OF THE SOUTH 478.83 FEET OF THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE SOUTH LINE OF SAID SECTION 35, DISTANT 899.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION; THENCE WEST 449.75 FEET ON SAID SECTION LINE TO THE SOUTHEAST CORNER OF THE LAND DESCRIBED IN THE DEED TO PETER JACOBSON, RECORDED IN BOOK 308, PAGE 169 OF DEEDS; THENCE NORTH 483.00 FEET ON THE EAST LINE OF SAID LAND TO THE NORTHEAST CORNER THEREOF, SAID CORNER ALSO BEING ON THE SOUTH LINE OF THE LAND DESCRIBED IN THE DEED TO ROBERT ROMEIN AND CHARLES HILL, RECORDED IN BOOK 83, PAGE 512 OF DEEDS, RECORDS OF LOS ANGELES COUNTY, CALIFORNIA; THENCE EAST 449.75 FEET ALONG SAID SOUTH LINE; THENCE SOUTH 483 FEET TO THE POINT OF BEGINNING. EXCEPT THE SOUTH 180 FEET THEREOF.
PARCEL 3:
THE WEST 444.50 FEET OF THE EAST 899.50 FEET OF THE SOUTH 468.83 FEET OF THE SOUTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THAT PORTION THEREOF INCLUDED WITHIN THE WEST 231.00 FEET OF THE EAST 909.50 FEET OF THE SOUTH 180.00 FEET OF SAID SOUTHEAST QUARTER OF SECTION 35.
PARCEL 4:
THAT PORTION OF THE SOUTHWEST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SAID SOUTHEAST QUARTER IS SHOWN ON A MAP FILED IN BOOK 10, PAGE 13 OF RECORDS OF SURVEYS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EAST LINE OF SAID SECTION 35, DISTANT NORTH 468.83 FEET FROM THE SOUTHEAST CORNER OF SAID SECTION; THENCE NORTH 484.27 FEET ALONG SAID EAST LINE; THENCE WEST 899.50 FEET PARALLEL WITH THE SOUTH LINE OF SAID SECTION; THENCE SOUTH 484.27 FEET PARALLEL WITH THE EAST LINE OF SAID SECTION; THENCE EAST 899.50 FEET TO THE POINT OF BEGINNING. SAID LAND IS SHOWN ON A MAP FILED IN BOOK 29, PAGE 17 OF RECORDS OF SURVEY IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 073-120-09
THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF FULLERTON, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS: THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, SAN BERNARDINO BASE AND MERIDIAN, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE SOUTH LINE OF SAID SECTION 35, 909.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION 35, SAID POINT OF BEGINNING ALSO THE SOUTHWEST CORNER OF THE LAND DESCRIBED IN THE REGISTRAR'S CERTIFICATE OF TITLE NO. 5637; THENCE NORTH 180 FEET; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID SECTION 35, 231 FEET; THENCE SOUTH PARALLEL WITH THE EAST LINE OF SAID SECTION 180 FEET TO A POINT IN A POINT IN THE SOUTH LINE THEREOF AND THENCE WEST ALONG SAID SOUTH LINE 231 FEET TO THE POINT OF BEGINNING.

Zoning Ordinance for City

CURRENT ZONING: M-P AND M-C
PROPOSED ZONING: M-P

Applicant

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TEL: 949-407-0100
EMAIL: Blair.Dahl@goodman.com

Applicant's respresentative

HPA INC.
18831 BARDEEN AVE, STE#100
IRVINE, CA 92612
TEL. NO.: (949) 862-2112
CONTACT: ANDY MENDETO

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. FUTURE MONUMENT SIGN TBD.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. 14'-6" HIGH CONCRETE TILT UP SCREEN WALL WITH 10'-0" HIGH PILASTER.
5. 5'-4"X5'-4"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. PROPOSE TRANSORMER LOCATION.
7. 8'-0" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES. DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE. CONCRETE RAMP.
8. BIKE RACK TYPICAL.
9. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
11. EXTERIOR CONCRETE STAIR.
12. 12'W X 14'H' OVERHEAD DOOR @ DRIVE THRU.
13. ALL LANDSCAPE AREAS INDICATED BY SHADING
14. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
15. ENHANCED HARDSCAPE -- PAVING FINISH A (VEHICULAR)
1. SEE CIVIL PLANS WHERE CONCRETE CURBS OCCUR. COLORED BANDS TO BE SEPARATED FROM CURB WITH EXPANSION JOINT.
2. PERIMETER BAND WITH TOOLED JOINTS
2.1. COLORED CONCRETE -- INTEGRAL COLOR WITH LIGHT BROOM FINISH.
2.2. COLOR TO BE SCOFIELD D-25, SOMBRERO BUFF
3. INTERIOR ACCENT PAVING
3.1. COLORED CONCRETE -- INTEGRAL COLOR WITH LIGHT BROOM FINISH.
3.2. COLOR TO MATCH PERIMETER BAND
3.3. PROVIDE TOOLED CONTROL JOINTS AT 48" O.C. AT 45 DEGREES EACH DIRECTION.
3.4. CENTER OVERALL PATTERN WITHIN PERIMETER BAND SUCH THAT THERE ARE NOT SMALL TRIANGLE PIECES WITH SIDES LESS THAN 3" LONG.
16. TRASH COMPACTOR PROVIDED BY OWNER
18. PRE-CAST CONC. WHEEL STOP.
19. TRUNCATED DOME.
24. GRADE LEVEL EXIT DOOR CONNECTED TO PATH OF TRAVEL
25. 8'-0" HIGH BLACK PAINTED METAL TUBULAR FENCE
26. ACCESSIBLE ENTRY SIGN.
27. ACCESSIBLE PARKING STALL SIGN
29. TRASH ENCLOSURE
32. ENHANCED CONCRETE PAVING
33. PAINTING STRIPE
34. EMPLOYEE PATIO BREAK AREA
35. 10'-0" HIGH CONCRETE TILT UP SCREEN WALL

SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

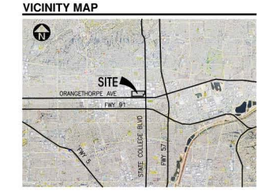
SITE PLAN GENERAL NOTES

CONCRETE PAVING - RE: CIVIL DRAWINGS THICKNESS
HYBRID PARKING STALL 8'-6" X 18'
ACCESSIBLE PARKING STALL, 9' X 18 + 5' W ACCESSIBLE AISLE
VAN ACCESSIBLE 12' X 18' + 5' W ACCESSIBLE AISLE
EV CHARGING STATION NEEDED 8'-6" X 18'
CLEAN AIR VANPOOL/EV 10% OF PARKING PROVIDED
LIGHT STANDARD
26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT

PROJECT DATA

	BLDG. 1	BLDG. 2	BLDG. 3	BLDG. 4
SITE AREA				
In s.f. (Net Area)	609,340	985,420	938,426	316,300
In acres	13.99	22.62	21.54	7.26
In s.f. (Gross Area)	712,833	1,067,287	1,025,153	378,238
In acres	16.36	24.50	23.53	8.68
BUILDING AREA				
Office - 1st floor	10,000	10,000	10,000	5,000
Office - 2nd floor	20,000	20,000	20,000	10,000
Warehouse	312,695	515,255	465,290	163,282
TOTAL	342,695	545,255	495,290	178,282
COVERAGE	56.2%	55.3%	52.8%	56.4%
INTERIOR CLEAR HEIGHT	40'	40'	40'	36'
ESTIMATED TOP OF PARAPET	55'	55'	55'	50'
AUTO PARKING REQUIRED				
Office: 1 / 250 s.f.	120	120	120	60
Warehouse: 1 / 2,000 s.f.	157	258	233	82
TOTAL	277	378	353	142
AUTO PARKING PROVIDED				
Standard (8.5' x 18')	133	264	246	77
Compact (8' x 16') 30% of required space	0	0	29	0
Accessible Parking (9' x 18')	5	6	7	4
Accessible Van Parking (12' x 18')	1	2	2	1
EV Parking (8.5' x 18')	8	21	24	5
EV Standard Accessible (9' x 18')	1	1	1	1
EV Van Accessible (12' x 18')	1	1	1	1
EV Ambulatory (10' x 18')	0	0	1	0
Clean Air/ Van pool (8.5' x 18')	16	31	35	11
Total	165	326	346	100
Parking inside truck yard	0	89	82	43
GRAND TOTAL	165	415	428	143
Visitor Parking (20% of total)	33	83	86	29
Bicycle Parking required				
short term - exterior (5% of visitor parking)	2	4	4	1
long term - interior (5% of non-visitor parking)	7	17	17	6
Bicycle Parking provided				
short term - exterior (5% of visitor parking)	5	5	5	5
TRAILER PARKING PROVIDED				
Trailer (10' x 55')	76	76	70	
LANDSCAPE REQUIRMENT				
Area - Open parking area (w ith driveway)	52,473	143,659	125,200	57,561
Area - Parking area (w ithout driveway)	25,425	50,130	52,501	15,471
PLANTER LANDSCAPE AREA REQUIRED				
1.5% open parking area s.f. (w ith driveway)	4,198	11,493	10,016	4,605
2. Min 25 s.f. per parking space	4,125	10,375	10,700	3,575
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	10,700	4,605
LANDSCAPE AREA PROVIDED				
Area	58,809	50,174	54,062	34,046
SHADED AREA REQUIRED				
Area - 50% Parking area (w ithout driveway)	12,713	25,065	26,251	7,736
TREE SHADED ARE PROVIDED				
Area	12,861	26,266	30,590	7,769
ZONING ORDINANCE FOR CITY				
Zoning Designation - Manufacturing Park (M-P)				
MAXIMUM BUILDING HEIGHT				
Height - 55'				
MAXIMUM FLOOR AREA RATIO				
N/A				
SETBACKS				
Building	Landscape			
along public St. - 20'	20'			
along public alley - 0'				
along property w ith a P-L zone - 10'				

VICINITY MAP



Source(s): HPA (06-30-2020)

Figure 3-6

Not to Scale

Building 1 Site Plan

glass. The building's exterior color palette would be comprised of various shades of white and gray with green accents. Decorative building elements include panel reveals, metal louvers, parapets, mullions, and canopies at office entries. Conceptual architectural elevations for Building 1 are illustrated on, Figure 3-7, *Conceptual Architectural Elevations – Building 1*. Representative colored elevations for the proposed buildings are provided in Figure 3-8, *Representative Colored Building Elevations*, a conceptual rendering is provided in Figure 3-9.

Building 2

Building 2 is a rectangular building located on the west-central portion of the Project site, to the east of proposed Building 1 and to the west of proposed Building 3. Building 2 includes approximately 545,255 s.f. of floor area (30,000 s.f. office space and 515,255 s.f. of warehouse space) (refer to Figure 3-10, *Building 2 Site Plan*). The office space consists of 10,000 s.f. on the first floor and 20,000 s.f. on the second floor (mezzanine). There would be access from office breakrooms to adjacent outdoor patio areas.

Building 2 is a cross-dock building, meaning that loading docks are located on opposite sides of the building; Building 2 provides 49 loading docks on both the west and east sides of the building within enclosed/screened truck courts. Passenger vehicle parking stalls are distributed along the north, south, and west sides of Building 2. Building 2 is designed with a varied roofline and its height would range from approximately 41 feet to a maximum of approximately 50 feet above the finished floor elevation. The maximum building height would be 55 feet at the top of parapet. The clear height under beam would be 40 feet. To provide a cohesive aesthetic character, the architectural style, building materials, and decorative building elements for Building 2 would be the same as that identified above for Building 1. Conceptual architectural elevations for Building 2 are illustrated on Figure 3-11, *Conceptual Architectural Elevations – Building 2*.

Building 3

Building 3 is a rectangular building located on the east-central portion of the Project site, to the west of proposed Building 4 and to the east of proposed Building 2 (refer to Figure 3-12, *Building 3 Site Plan*). Building 3 is a cross-dock building that contains 495,290 s.f. of floor area (30,000 s.f. office space and 465,290 s.f. of warehouse space). There would be access from office breakrooms to adjacent outdoor patio areas. Loading docks would be located on the west (45 loading docks) and east (44 loading docks) sides of the building within enclosed/screened truck courts. Passenger vehicle parking stalls are distributed along the north, south, and east sides of Building 3.

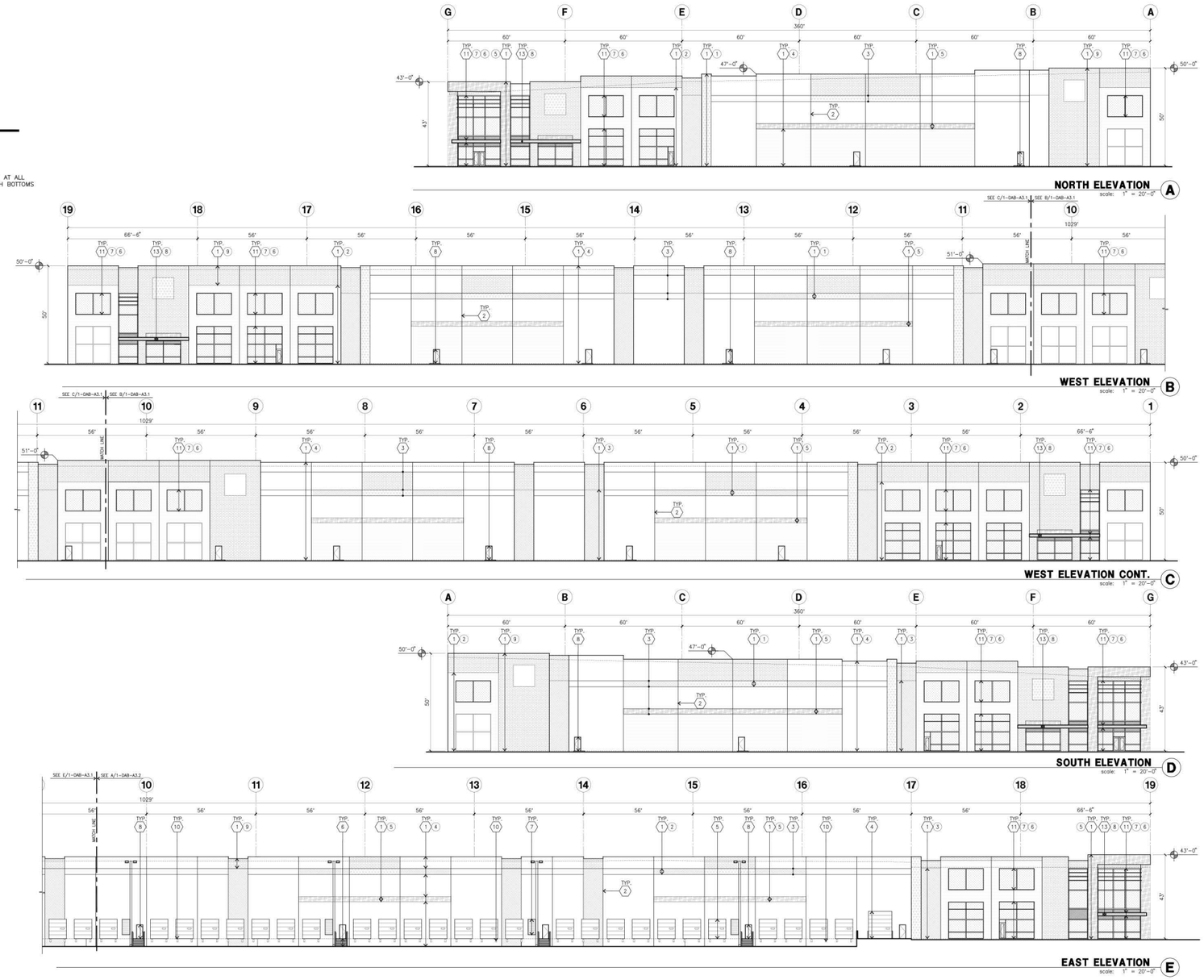
As previously noted, that the Project Applicant may acquire an additional parcel south of Building 3 that would allow for a larger building footprint (approximately 47,862 s.f. of additional floor area), which would bring Building 3's total floor area to 543,152 s.f. and the proposed Project's total floor area to 1,609,384 s.f.. Under the Optional Site Plan, changes to Building 3 include: modifying the truck courts on the west and east sides of the building to provide 49 loading docks each and reconfiguring passenger vehicle parking.

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/4" DEPTH CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS. SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. NOT USED
13. EXTERIOR CANOPY
14. EXTERIOR DOWNSPOUT.

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

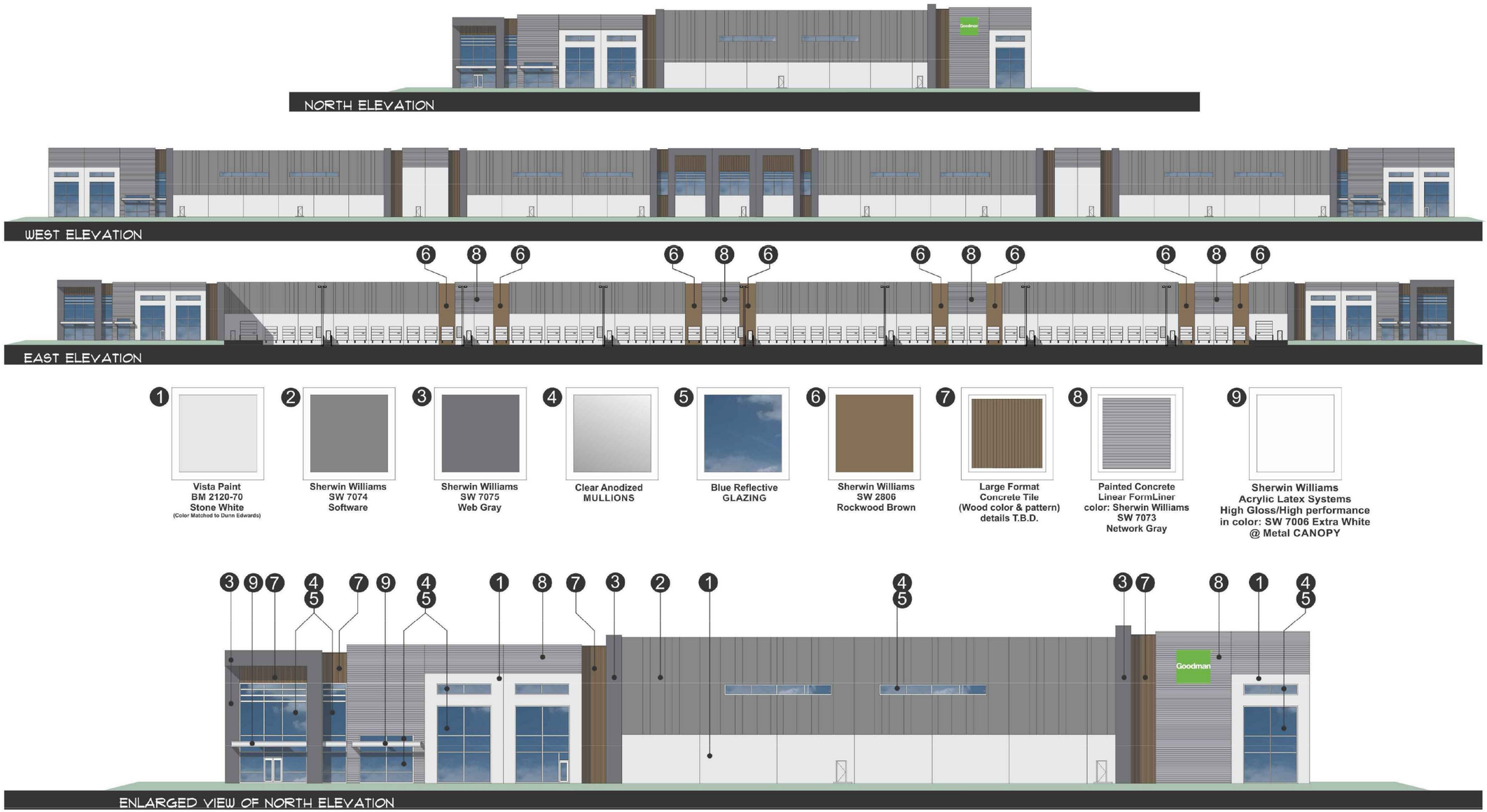


Source(s): HPA (06-10-2020)

Figure 3-7

Not to Scale

Conceptual Architectural Elevations – Building 1



Source(s): HPA (07-27-2020)

Figure 3-8

Not to Scale

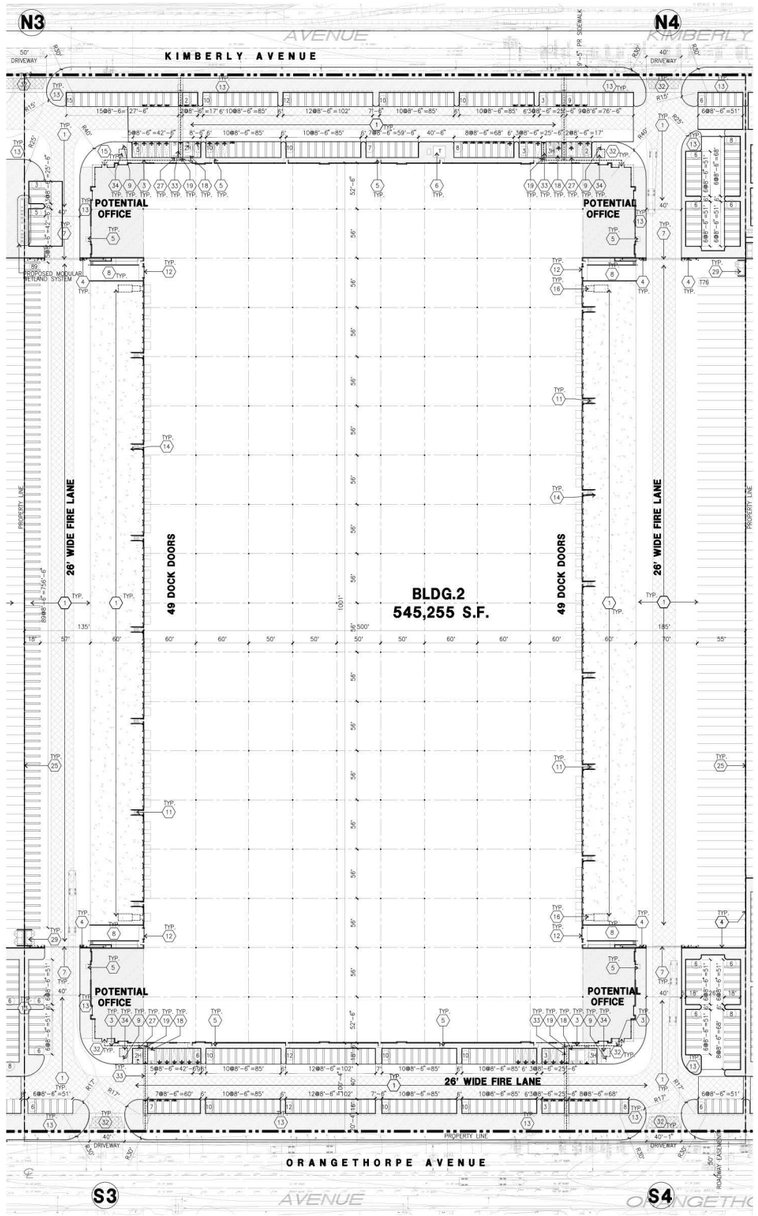
Representative Colored Building Elevations

Source(s): Bogza (07-30-2020)

Figure 3-9

Not to Scale

Conceptual Rendering



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Address of the property

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Assessor's Parcel Number

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Legal description

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PARCEL 1:
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PARCEL 2:
THE EAST 10.00 FEET OF THE SOUTH 478.83 FEET OF THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE SOUTH LINE OF SAID SECTION 35, DISTANT 899.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION; THENCE WEST 449.75 FEET ON SAID SECTION LINE TO THE SOUTHEAST CORNER OF THE LAND DESCRIBED IN THE DEED TO PETER JACOBSSON, RECORDED IN BOOK 308, PAGE 189 OF DEEDS; THENCE NORTH 483.00 FEET ON THE EAST LINE OF SAID LAND TO THE SOUTHEAST CORNER OF THE LAND DESCRIBED IN THE DEED TO WILLIAM FRONHEIN, RECORDED IN BOOK 308, PAGE 190 OF DEEDS; THENCE WEST 449.75 FEET ON THE SOUTH LINE OF SAID LAND DESCRIBED IN THE AGREEMENT BETWEEN WILLIAM FRONHEIN AND CHARLES HILL, RECORDED IN BOOK 83, PAGE 512 OF DEEDS, RECORDS OF LOS ANGELES COUNTY, CALIFORNIA; THENCE EAST 449.75 FEET ALONG SAID SOUTH LINE; THENCE SOUTH 483 FEET TO THE POINT OF BEGINNING. EXCEPT THE SOUTH 180 FEET THEREOF.
PARCEL 3:
THE WEST 444.50 FEET OF THE EAST 899.50 FEET OF THE SOUTH 468.83 FEET OF THE SOUTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THAT PORTION THEREOF INCLUDED WITHIN THE WEST 231.00 FEET OF THE EAST 909.50 FEET OF THE SOUTH 180.00 FEET OF SAID SOUTHEAST QUARTER OF SECTION 35.
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THE PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SAID SOUTHEAST QUARTER IS SHOWN ON A MAP FILED IN BOOK 10, PAGE 13 OF RECORD OF SURVEYS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EAST LINE OF SAID SECTION 35, DISTANT NORTH 468.83 FEET FROM THE SOUTHEAST CORNER OF SAID SECTION; THENCE NORTH 484.27 FEET ALONG SAID EAST LINE; THENCE WEST 899.50 FEET PARALLEL WITH THE SOUTH LINE OF SAID SECTION; THENCE SOUTH 484.27 FEET PARALLEL WITH THE EAST LINE OF SAID SECTION; THENCE EAST 899.50 FEET TO THE POINT OF BEGINNING. SAID LAND IS SHOWN ON A MAP FILED IN BOOK 29, PAGE 17 OF RECORDS OF SURVEY IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 073-120-09
THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF FULLERTON, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS: THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, SAN BERNARDINO BASE AND MERIDIAN, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE SOUTH LINE OF SAID SECTION 35, 909.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION 35, SAID POINT OF BEGINNING ALSO THE SOUTHWEST CORNER OF THE LAND DESCRIBED IN THE REGISTRAR'S CERTIFICATE OF TITLE NO. 5637; THENCE NORTH 180 FEET; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID SECTION 35, 231 FEET; THENCE SOUTH PARALLEL WITH THE EAST LINE OF SAID SECTION 180 FEET TO A POINT IN A POINT IN THE SOUTH LINE THEREOF AND THENCE WEST ALONG SAID SOUTH LINE 231 FEET TO THE POINT OF BEGINNING.

Zoning Ordinance for City

CURRENT ZONING: M-P AND M-G
PROPOSED ZONING: M-P

Applicant

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18201 VON KARMAN AVENUE, SUITE 1170
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TEL NO.: (949) 862-2112
CONTACT: ANDY WIYANTO

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. FUTURE MONUMENT SIGN TBD.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. 14'-6" HIGH CONCRETE TILT UP SCREEN WALL WITH 16'-0" HIGH PILASTER.
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR PLATFORM AT EXIT DOOR. ALL CONCRETE DOORS TO LANDSCAPE'D AREAS, FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. PROPOSE TRANSORMER LOCATION.
7. 8'-0" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES. DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE.
8. CONCRETE RAMP.
9. BIKE RACK TYPICAL.
10. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
11. EXTERIOR CONCRETE STAIR.
12. 12'W X 14'H' OVERHEAD DOOR @ DRIVE THRU.
13. ALL LANDSCAPE AREAS INDICATED BY SHADING
14. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
15. ENHANCED HARDSCAPE - PAVING FINISH A (VEHICULAR)
1. SEE CIVIL PLANS WHERE CONCRETE CURBS OCCUR. COLORED BAND, TO BE SEPARATED FROM CURB WITH EXPANSION JOINT.
2. PERIMETER BAND WITH TOOLED JOINTS
2.1. COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
2.2 COLOR TO BE SCOFIELD D-25, SOMBRERO BUFF
3. INTERIOR ACCENT PAVING:
3.1 COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
3.2. COLOR TO MATCH PERIMETER BAND
3.3. PROVIDE TOOLED CONTROL JOINTS AT 48" O.C. AT 45 DEGREES EACH DIRECTION.
3.4. CENTER OVERALL PATTERN WITHIN PERIMETER BAND SUCH THAT THERE ARE NOT SMALL TRIANGLE PIECES WITH SIDES LESS THAN 3" LONG.
16. TRASH COMPACTOR PROVIDED BY OWNER
18. PRE-CAST CONC. WHEEL STOP.
19. TRUNCATED DOME.
24. GRADE LEVEL EXIT DOOR CONNECTED TO PATH OF TRAVEL
25. 8'-0" HIGH BLACK PAINTED METAL TUBULAR FENCE
26. ACCESSIBLE ENTRY SIGN.
27. ACCESSIBLE PARKING STALL SIGN
29. TRASH ENCLOSURE
32. ENHANCED CONCRETE PAVING
33. PAINTING STRIPS
34. EMPLOYEE PATIO BREAK AREA
35. 10'-0" HIGH CONCRETE TILT UP SCREEN WALL

SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

SITE PLAN GENERAL NOTES

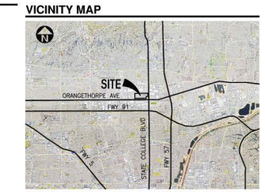
CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
HYBRID PARKING STALL 8'-6" X 18'
ACCESSIBLE PARKING STALL, 9' X 18' + 5' W ACCESSIBLE AISLE
VAN ACCESSIBLE 12' X 18' + 5' W ACCESSIBLE AISLE
EV CHARGING STATION NEEDED 8'-6" X 18'
CLEAN AIR VANPOOL/EV 10% OF PARKING PROVIDED
LIGHT STANDARD
26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT

PROJECT DATA

	BLDG.1	BLDG.2	BLDG.3	BLDG.4
SITE AREA				
In s.f. (Net Area)	609,340	985,420	938,426	316,300
In acres	13.99	22.62	21.54	7.26
In s.f. (Gross Area)	712,633	1,067,267	1,025,153	378,238
In acres	16.36	24.50	23.53	8.68
BUILDING AREA				
Office - 1st floor	10,000	10,000	10,000	5,000
Office - 2nd floor	20,000	20,000	20,000	10,000
Warehouse	312,695	515,255	465,290	163,282
TOTAL	342,695	545,255	495,290	178,282
COVERAGE	56.2%	55.3%	52.8%	56.4%
INTERIOR CLEAR HEIGHT	40'	40'	40'	36'
ESTIMATED TOP OF PARAPET	50'	55'	55'	50'
AUTO PARKING REQUIRED				
Office: 1 / 250 s.f.	120	120	120	60
Warehouse: 1 / 2,000 s.f.	157	258	233	82
TOTAL	277	378	353	142
AUTO PARKING PROVIDED				
Standard (8.5' x 18')	133	264	246	77
Compact (8' x 16') 30% of required space	0	0	29	0
Accessible Parking (9' x 18')	5	6	7	4
Accessible Van Parking (12' x 18')	1	2	2	1
EV Parking (8.5' x 18')	8	21	24	5
EV Standard Accessible (9' x 18')	1	1	1	1
EV Van Accessible (12' x 18')	1	1	1	1
EV Ambulatory (10' x 18')	0	0	1	0
Clean Air Van pool (8.5' x 18')	16	31	35	11
Total	165	326	346	100
Parking inside truck yard	0	89	82	43
GRAND TOTAL	165	415	428	143
Visitor Parking (20% of total)	33	83	86	29
Bicycle Parking required				
short term- exterior (5% of visitor parking)	2	4	4	1
long term - interior (5% of non-visitor parking)	7	17	17	6
Bicycle Parking provided				
short term- exterior (5% of visitor parking)	5	5	5	5
TRAILER PARKING PROVIDED				
Trailer (10' x 55')	76	76	70	
LANDSCAPE REQUIREMENT				
Area - Open parking area (w ith drivew ay)	52,473	143,659	125,200	57,561
Area - Parking area (w ithout drivew ay)	25,425	50,130	52,501	15,471
PLANTER LANDSCAPE AREA REQUIRED				
1.8% open parking area s.f. (w ith drivew ay)	4,198	11,493	10,016	4,605
2. Min 25 s.f. per parking space	4,125	10,375	10,700	3,575
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	10,700	4,605
LANDSCAPE AREA PROVIDED				
Area	58,809	50,174	54,062	34,046
SHADED AREA REQUIRED				
Area - 50% Parking area (w ithout drivew ay)	12,713	25,065	26,251	7,736
TREE SHADED ARE PROVIDED				
Area	12,861	26,266	30,590	7,769

ZONING ORDINANCE FOR CITY	
Zoning Designation - Manufacturing Park (M-P)	
MAXIMUM BUILDING HEIGHT	
Height - 55'	
MAXIMUM FLOOR AREA RATIO	
N/A	
SETBACKS	
Building	Landscape
along public St. - 20'	20'
along public alley - 5'	
along property w ith a P-L zone - 10'	

VICINITY MAP



Source(s): HPA (06-30-2020)

Figure 3-10

Not to Scale

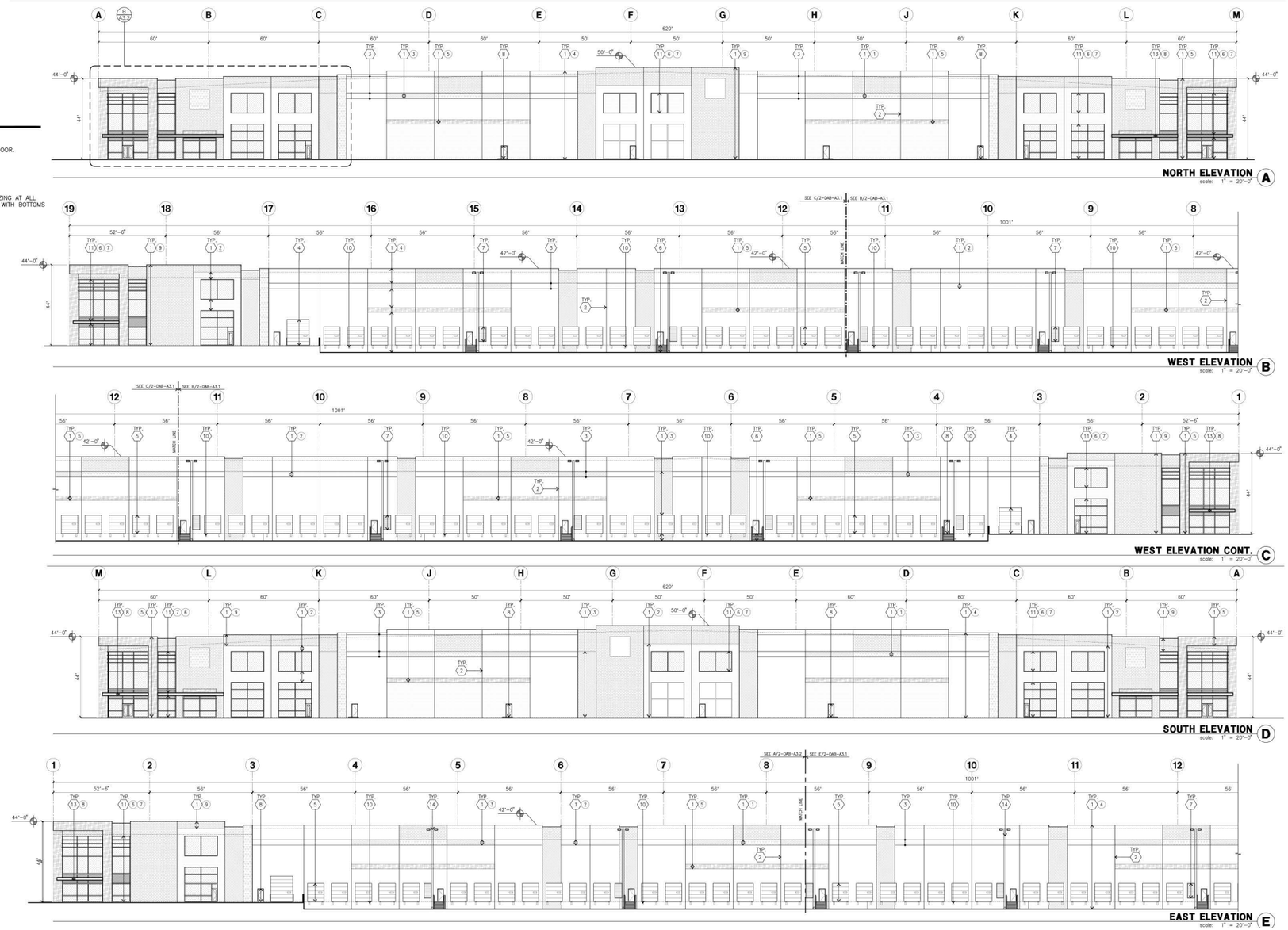
Building 2 Site Plan

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/4" DEPTH CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. NOT USED
13. EXTERIOR CANOPY
14. EXTERIOR DOWNSPOUT.

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

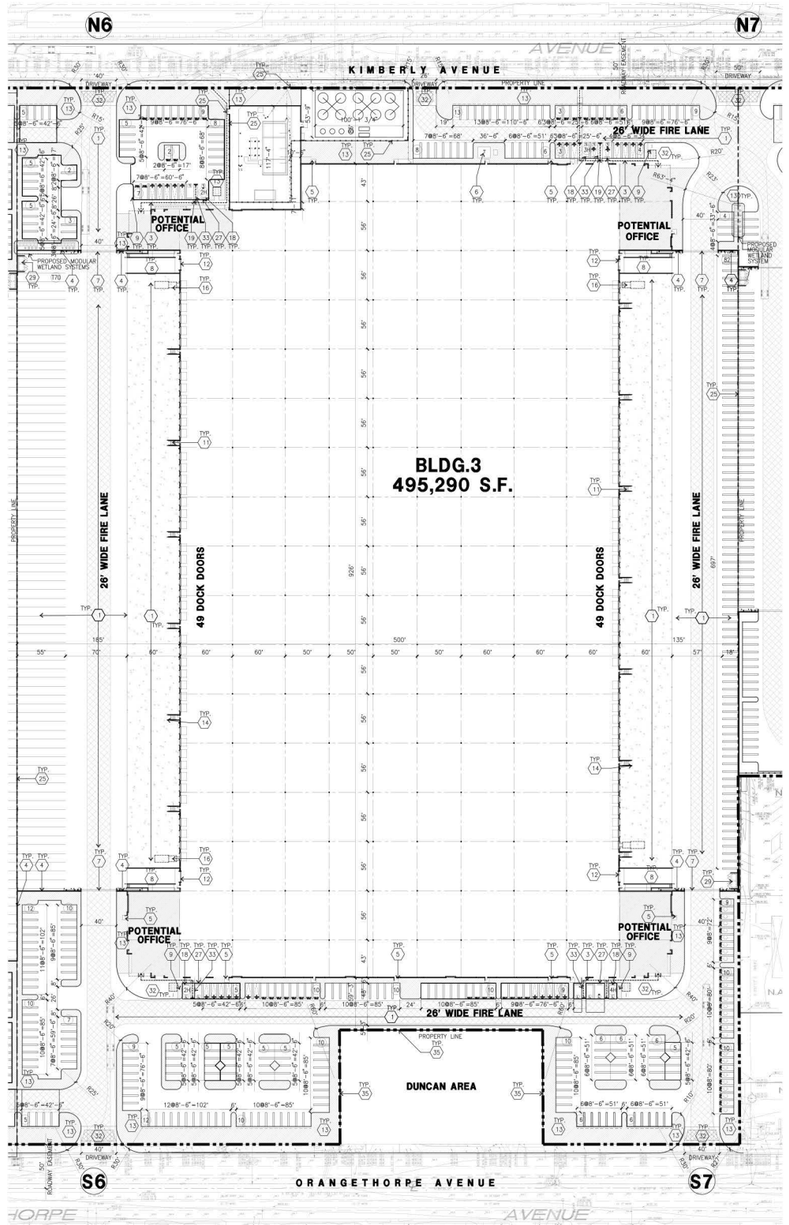


Source(s): HPA (06-10-2020)

Figure 3-11

Not to Scale

Conceptual Architectural Elevations – Building 2



Property owner

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18201 VON KARMAN AVENUE, SUITE 1170
IRVINE, CA 92612
TEL: 949-407-0100
EMAIL: Bisi.Dahl@goodman.com

Address of the property

2001E. ORANGETHORPE AVE. FULLERTON, CA 92831

Assessor's Parcel Number

073-120-31 / 073-120-33 / 073-120-09

Legal description

APN: 073-120-31 & 33
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PROPOSED ZONING: M-P

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6. PROPOSE TRANSORMER LOCATION.
7. 8'-0" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES, DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE.
8. CONCRETE RAMP.
9. BIKE RACK TYPICAL.
10. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
11. EXTERIOR CONCRETE STAIR.
12. 12'W X 14'H' OVERHEAD DOOR @ DRIVE THRU.
13. ALL LANDSCAPE AREAS INDICATED BY SHADING
14. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
15. ENHANCED HARDSCAPE – PAVING FINISH A (VEHICULAR)
    1. SEE CIVIL PLANS WHERE CONCRETE CURBS OCCUR. COLORED BANDS TO BE SEPARATED FROM CURB WITH EXPANSION JOINT.
    2. PERIMETER BAND WITH TOOLED JOINTS".
    2.1. COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
    2.2. COLOR TO BE SCOFIELD D-25, SOMBRERO BUFF
    3. INTERIOR ACCENT PAVING
    3.1. COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
    3.2. COLOR TO MATCH PERIMETER BAND
    3.3. PROVIDE TOOLED CONTROL JOINTS AT 48" O.C. AT 45 DEGREES EACH DIRECTION.
    3.4. CENTER OVERALL PATTERN WITHIN PERIMETER BAND SUCH THAT THERE ARE NOT SMALL TRIANGLE PIECES WITH SIDES LESS THAN 3" LONG.
16. TRASH COMPACTOR PROVIDED BY OWNER
17. PRE-CAST CONC. WHEEL STOP.
18. TRUNCATED DOME.
19. GRADE LEVEL EXIT DOOR CONNECTED TO PATH OF TRAVEL
20. 8'-0" HIGH BLACK PAINTED METAL TUBULAR FENCE
21. ACCESSIBLE ENTRY SIGN.
22. ACCESSIBLE PARKING STALL SIGN
23. TRASH ENCLOSURE
24. ENHANCED CONCRETE PAVING
25. PAINTING STRIPS
26. EMPLOYEE PATIO BREAK AREA
27. 10'-0" HIGH CONCRETE TILT UP SCREEN WALL

SITE PLAN GENERAL NOTES

1. ALL LIGHTING SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. SEE CIVIL AND STRUCTURAL FOR SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET A2.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL DWGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARD.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND NPDES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

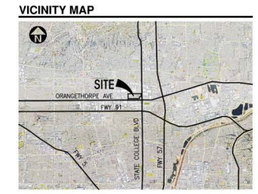
SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- HYBRID PARKING STALL 8'-6" X 18' ACCESSIBLE PARKING STALL, 9' X 18 + 5' W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12' X 18' + 5' W ACCESSIBLE AISLE
- EV CHARGING STATION NEEDED 8'-6" X 18'
- CLEAN AIR VANPOOL/EV 10% OF PARKING PROVIDED
- LIGHT STANDARD
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT

PROJECT DATA

	BLDG. 1	BLDG. 2	BLDG. 3	BLDG. 4	TOTAL
SITE AREA					
In s.f. (Net Area)	609,340	985,420	938,426	316,300	2,849,486 s.f.
In acres	13.99	22.62	21.54	7.26	65.42 ac
In s.f. (Gross Area)	712,933	1,067,287	1,025,153	378,238	3,183,511 s.f.
In acres	16.36	24.50	23.53	8.68	73.08 ac
BUILDING AREA					
Office - 1st floor	10,000	10,000	10,000	5,000	35,000 s.f.
Office - 2nd floor	20,000	20,000	20,000	10,000	70,000 s.f.
Warehouse	312,695	515,255	465,290	163,282	1,456,522 s.f.
TOTAL	342,695	545,255	495,290	178,282	1,561,522 s.f.
COVERAGE	56.2%	55.3%	52.8%	56.4%	54.8%
INTERIOR CLEAR HEIGHT	40'	40'	40'	36'	
ESTIMATED TOP OF PARAPET	55'	55'	55'	50'	
AUTO PARKING REQUIRED					
Office: 1 / 250 s.f.	120	120	120	60	420 stalls
Warehouse: 1 / 2,000 s.f.	157	258	233	82	730 stalls
TOTAL	277	378	353	142	1,150 stalls
AUTO PARKING PROVIDED					
Standard (8.5' x 18')	133	263	246	77	719 stalls
Compact (8' x 16') 30% of required space	0	0	29	0	29 stalls
Accessible Parking (9' x 18')	5	6	7	4	
Accessible Van Parking (12' x 18')	1	2	2	1	
EV Parking (8.5' x 18')	8	22	24	5	
EV Standard Accessible (9' x 18')	1	1	1	1	
EV Van Accessible (12' x 18')	1	1	1	1	
EV Ambulatory (10' x 18')	0	0	1	0	
Clean Air/ Van pool (8.5' x 18')	16	31	35	11	
Total	165	325	346	100	937
Parking inside truck yard	0	89	82	43	214
GRAND TOTAL	165	415	428	143	1,151 stalls
Visitor Parking (20% of total)	33	83	86	29	230 stalls
Bicycle Parking required					
short term - exterior (5% of visitor parking)	2	4	4	1	12 stalls
long term - interior (5% of non-visitor parking)	7	17	17	6	46 stalls
Bicycle Parking provided					
short term - exterior (5% of visitor parking)	5	5	5	5	20 stalls
TRAILER PARKING PROVIDED					
Trailer (10' x 55')	76	76	70		222 stalls
LANDSCAPE REQUIREMENT					
Area - Open parking area (w/ 8ft drive way)	52,473	143,659	125,200	57,561	378,893 s.f.
Area - Parking area (w/ 8foot drive way)	25,425	50,130	52,501	15,471	143,527 s.f.
PLANTER LANDSCAPE AREA REQUIRED					
1.6% open parking area s.f. (w/ 8ft drive way)	4,198	11,493	10,016	4,605	30,311 s.f.
2. Min 25 s.f. per parking space	4,125	10,375	10,700	3,575	28,775 s.f.
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	10,700	4,605	30,989 s.f.
LANDSCAPE AREA PROVIDED					
Area	58,809	50,174	54,062	34,046	197,091 s.f.
SHADED AREA REQUIRED					
Area - 50% Parking area (w/ 8foot drive way)	12,713	25,065	26,251	7,736	71,764 s.f.
TRE SHADED AREA PROVIDED					
Area	12,661	26,266	30,590	7,769	77,486 s.f.
ZONING ORDINANCE FOR CITY					
Zoning Designation - Manufacturing Park (M-P)					
MAXIMUM BUILDING HEIGHT					
Height - 55'					
MAXIMUM FLOOR AREA RATIO					
N/A					
SETBACKS					
Building		Landscape			
along public St. - 23'		20'			
along public alley - 0'					
along property w/ th a P-L zone - 10'					

VICINITY MAP



Source(s): HPA (06-30-2020)

Figure 3-12

Not to Scale

Building 3 Site Plan

Under both building scenarios, Building 3 is designed with a varied roofline and its height would range from approximately 41 feet to a maximum of approximately 51 feet above the finished floor elevation. The maximum building height would be 55 feet at the top of parapet. The clear height under beam would be 40-feet. To provide a cohesive aesthetic character, the architectural style, building materials, and decorative building elements for Building 3 would be the same as that identified above for Building 1. Conceptual architectural elevations for Building 3 are illustrated on Figure 3-13, *Conceptual Architectural Elevations – Building 3*.

Building 4

Building 4 is a rectangular building located on the northeastern portion of the Project site, adjacent to Kimberly Avenue and State College Boulevard (refer to Figure 3-14, *Building 4 Site Plan*). Building 4 includes approximately 178,282 s.f. of building area (15,000 s.f. office space and 163,282 s.f. of warehouse space). There would be access from office breakrooms to adjacent outdoor patio areas. Building 4 includes 23 loadings docks on the west side of the building within an enclosed/screened truck court; there would not be loading docks facing State College Boulevard.

Passenger vehicle parking stalls are distributed along the north, south, and west sides of Building 4, including within the truck court. Access to Building 4 would be provided from two private driveways connecting to Kimberly Avenue (one of which would be shared with proposed Building 3) and one private driveway connecting to State College Boulevard.

Building 4 is designed with a varied roofline and its height would range from approximately 39 feet to a maximum of approximately 47 feet above the finished floor elevation. The maximum building height would be 50 feet at the top of parapet. The clear height under beam would be 36-feet. To provide a cohesive aesthetic character, the architectural style, building materials, and decorative building elements for Building 4 would be the same as that identified above for Building 1. Conceptual architectural elevations for Building 4 are illustrated on Figure 3-15, *Conceptual Architectural Elevations – Building 4*.

B. Circulation and Parking

Vehicular Circulation

The existing public street network abutting the Project site consists of Acacia Avenue to the west, Kimberly Avenue to the north, State College Avenue to the east, and E. Orangethorpe Avenue to the south. Typical street sections for these roadways are presented in Figure 3-16.

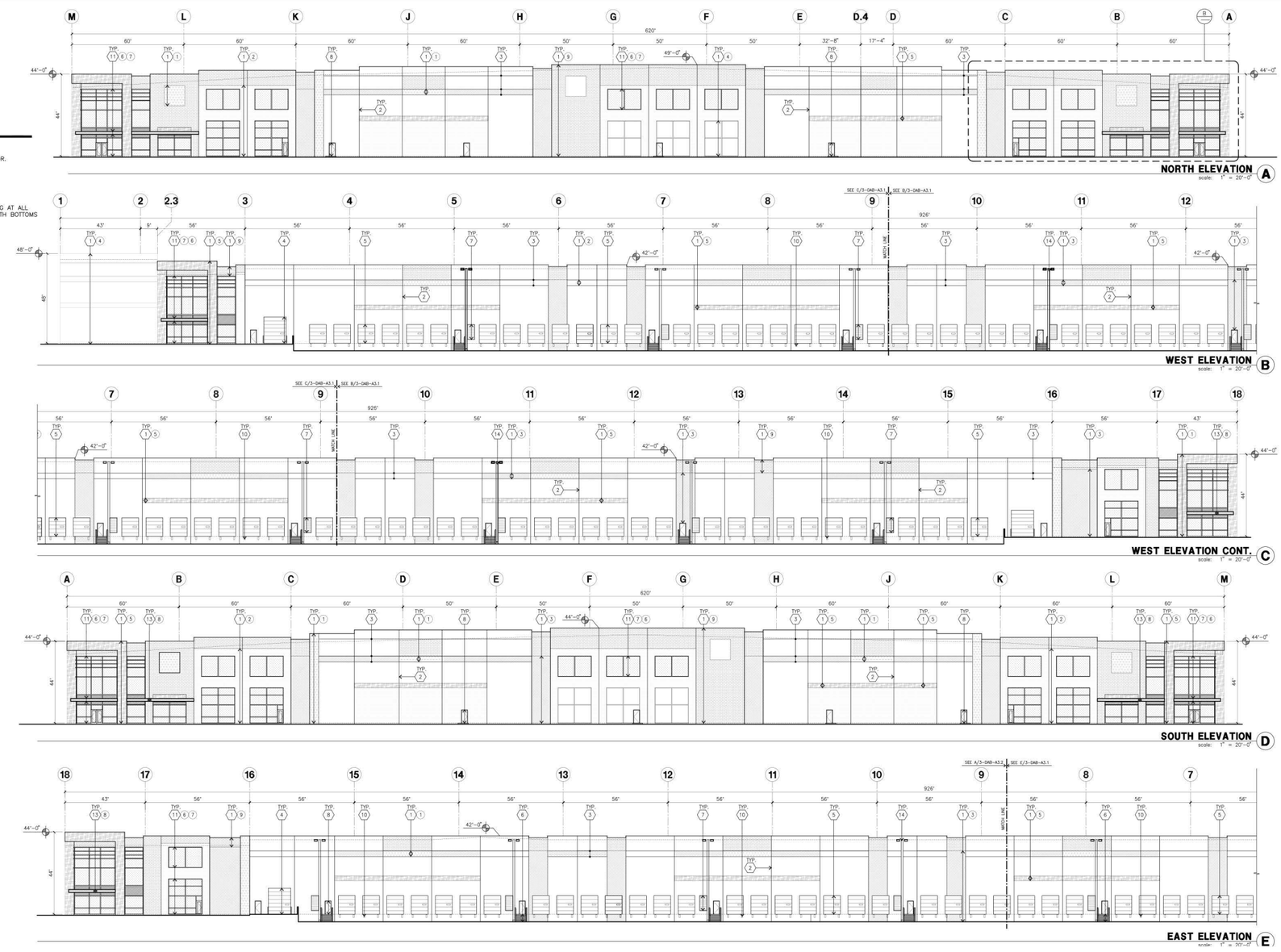
As shown on Figure 3-17, *Site Access*, access to the proposed buildings would be provided from E. Orangethorpe Avenue (six driveways with the Project and seven driveways with the Optional Site Plan), Kimberly Avenue (seven driveways), and State College Boulevard (one driveway), as described below. The location and configuration of driveways would be reviewed and approved by the City Traffic Engineer. As shown, and based on the conceptual site plan, each driveway would have a stop control and would accommodate full access, with the exception of the westernmost driveway on E. Orangethorpe Avenue, which would be restricted to right-in/right-out access only for passenger cars:

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/4" DEPTH CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. NOT USED
13. EXTERIOR CANOPY
14. EXTERIOR DOWNSPOUT.

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

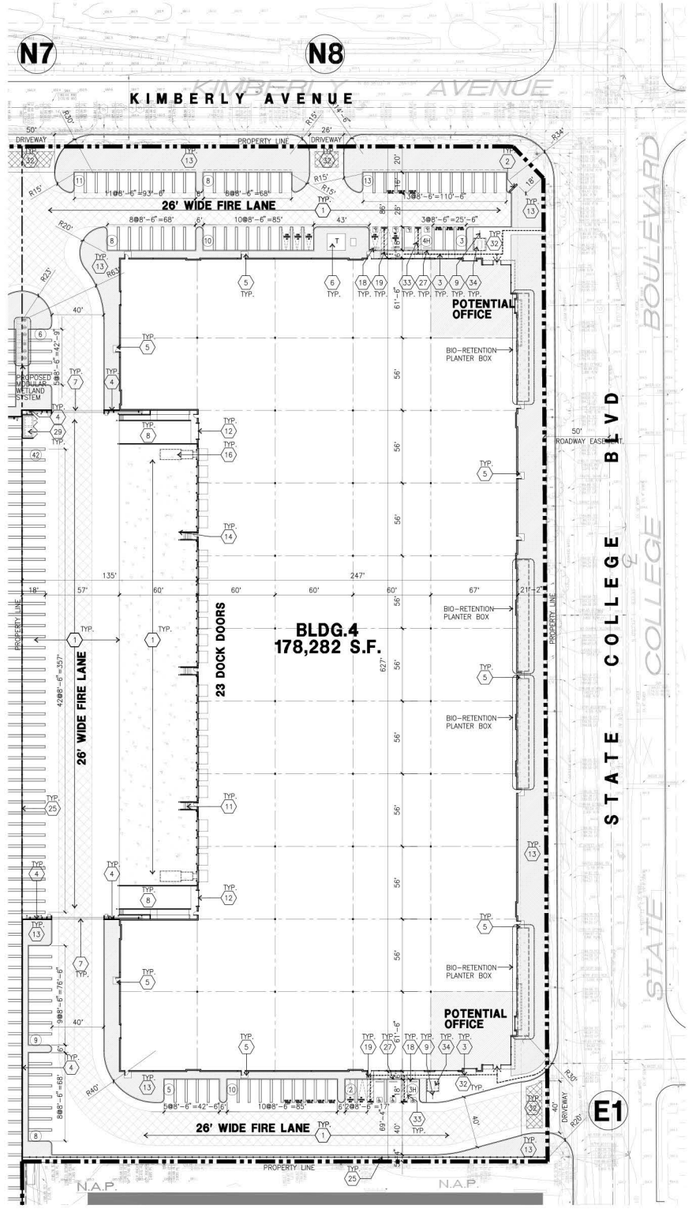


Source(s): HPA (06-10-2020)

Figure 3-13

Not to Scale

Conceptual Architectural Elevations – Building 3



Property owner

GLC FULLERTON LLC
18201 VON KARMAN AVENUE, SUITE 1170
IRVINE, CA 92612
TEL: 949-407-0100
EMAIL: Blair.Dahl@goodman.com

Address of the property

2001E ORANGETHORPE AVE FULLERTON, CA 92831

Assessor's Parcel Number

073-120-31 / 073-120-33 / 073-120-09

Legal description

APN: 073-120-31 & 33
THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF FULLERTON, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:
PARCEL 1:
THE SOUTH HALF OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THE SOUTHERLY 353.10 FEET OF THE EASTERLY 899.50 FEET MEASURED ALONG THE EASTERLY AND SOUTHERLY LINES RESPECTIVELY THEREOF. ALSO EXCEPT THE SOUTHERLY 478.83 FEET OF THE WEST 10 FEET OF THE EASTERLY 909.50 FEET MEASURED ALONG THE EASTERLY AND SOUTHERLY LINES RESPECTIVELY THEREOF. ALSO EXCEPT THE NORTH 20 FEET THEREOF.
PARCEL 2:
THE EAST 10.00 FEET OF THE SOUTH 478.83 FEET OF THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE SOUTH LINE OF SAID SECTION 35, DISTANT 899.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION; THENCE WEST 444.75 FEET ON SAID SECTION LINE TO THE SOUTHEAST CORNER OF THE LAND DESCRIBED IN THE DEED TO ROBERT E. BOLTON, ET UX, RECORDED IN BOOK 7, PAGE 17 OF DEEDS, RECORDS OF SAID COUNTY; THENCE NORTH 1°00' EAST ALONG THE EAST LINE OF SAID LAND TO THE NORTHEAST CORNER THEREOF, SAID CORNER ALSO BEING ON THE SOUTH LINE OF THE LAND DESCRIBED IN THE AGREEMENT BETWEEN WILLIAM FROMHEIN AND CHARLES HILL, RECORDED IN BOOK 83, PAGE 512 OF DEEDS, RECORDS OF LOS ANGELES COUNTY, CALIFORNIA; THENCE EAST 449.75 FEET ALONG SAID SOUTH LINE; THENCE SOUTH 483 FEET TO THE POINT OF BEGINNING, EXCEPT THE SOUTH 180 FEET THEREOF.
PARCEL 3:
THE WEST 444.50 FEET OF THE EAST 899.50 FEET OF THE SOUTH 468.83 FEET OF THE SOUTHEAST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPT THAT PORTION THEREOF INCLUDED WITHIN THE WEST 231.00 FEET OF THE EAST 909.50 FEET OF THE SOUTH 180.00 FEET OF SAID SOUTHEAST QUARTER OF SECTION 35.
PARCEL 4:
THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SAID SOUTHEAST QUARTER IS SHOWN ON A MAP FILED IN BOOK 10, PAGE 13 OF RECORD OF SURVEYS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EAST LINE OF SAID SECTION 35, DISTANT NORTH 468.83 FEET FROM THE SOUTHEAST CORNER OF SAID SECTION; THENCE NORTH 484.27 FEET ALONG SAID EAST LINE; THENCE WEST 899.50 FEET PARALLEL WITH THE SOUTH LINE OF SAID SECTION; THENCE SOUTH 484.27 FEET PARALLEL WITH THE EAST LINE OF SAID SECTION; THENCE EAST 899.50 FEET TO THE POINT OF BEGINNING. SAID LAND IS SHOWN ON A MAP FILED IN BOOK 29, PAGE 17 OF RECORDS OF SURVEY IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
APN: 073-120-09
THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF FULLERTON, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS: THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, SAN BERNARDINO BASE AND MERIDIAN, IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT IN THE SOUTH LINE OF SAID SECTION 35, 909.50 FEET WEST OF THE SOUTHEAST CORNER OF SAID SECTION 35, SAID POINT OF BEGINNING ALSO THE SOUTHWEST CORNER OF THE LAND DESCRIBED IN THE REGISTRAR'S CERTIFICATE OF TITLE NO. 5637; THENCE NORTH 180 FEET; THENCE EAST PARALLEL WITH THE SOUTH LINE OF SAID SECTION 35, 231 FEET; THENCE SOUTH PARALLEL WITH THE EAST LINE OF SAID SECTION 180 FEET TO A POINT IN A POINT IN THE SOUTH LINE THEREOF AND THENCE WEST ALONG SAID SOUTH LINE 231 FEET TO THE POINT OF BEGINNING.

Zoning Ordinance for City

CURRENT ZONING: M-P AND M-O
PROPOSED ZONING: M-P

Applicant

GLC FULLERTON LLC
18201 VON KARMAN AVENUE, SUITE 1170
IRVINE, CA 92612
TEL: 949-407-0100
EMAIL: Blair.Dahl@goodman.com

Applicant's respresentative

HPA INC.
18831 BARDEEN AVE, STE#100
IRVINE, CA 92612
TEL. NO.: (949) 862-2112
CONTACT: ANDY WYANTS

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. FUTURE MONUMENT SIGN TBD.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. 14'-0" HIGH CONCRETE TILT UP SCREEN WALL WITH 18'-0" HIGH PILASTER.
5. 5'-0"X5'-0"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. PROPOSE TRANSFORMER LOCATION.
7. 8'-0" HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY. CONTRACTOR TO DESIGN & DETAIL GATES. DRAWINGS AND CALCULATIONS PRIOR TO FABRICATION. PROVIDE CONDUIT FOR FUTURE.
8. CONCRETE RAMP.
9. BIKE RACK TYPICAL.
10. FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POST
11. EXTERIOR CONCRETE STAIR.
12. 12'W X 14'H' OVERHEAD DOOR @ DRIVE THRU.
13. ALL LANDSCAPE AREAS INDICATED BY SHADING
14. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
15. ENHANCED HARDSCAPE – PAVING FINISH A (VEHICULAR)
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2. PERIMETER BAND WITH TOOLED JOINTS"
2.1. COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
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3.1. COLORED CONCRETE – INTEGRAL COLOR WITH LIGHT BROOM FINISH.
3.2. COLOR TO MATCH PERIMETER BAND
3.3. PROVIDE TOOLED CONTROL JOINTS AT 48" O.C. AT 45 DEGREES EACH DIRECTION.
3.4. CENTER OVERALL PATTERN WITHIN PERIMETER BAND
SUCH THAT THERE ARE NOT SMALL TRIANGLE PIECES WITH SIDES LESS THAN 3" LONG.
16. TRASH COMPACTOR PROVIDED BY OWNER
18. PRE-CAST CONC. WHEEL STOP.
19. TRUNCATED DOME.
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16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

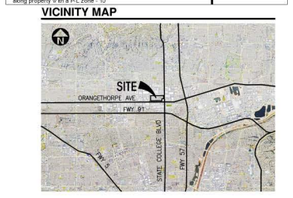
SITE PLAN GENERAL NOTES

- CONCRETE PAVING – RE: CIVIL DRAWINGS THICKNESS
- HYBRID PARKING STALL 8'-6" X 18'
- ACCESSIBLE PARKING STALL, 9' X 18 + 5' W ACCESSIBLE AISLE
- VAN ACCESSIBLE 12' X 18' + 5' W ACCESSIBLE AISLE
- EV CHARGING STATION NEEDED 8'-6" X 18'
- CLEAN AIR VANPOOL/EV 10% OF PARKING PROVIDED
- LIGHT STANDARD
- 26' WIDE FIRE LANE. PROVIDE RED CURBS AND SIGNAGE PER FIRE DEPT REQUIREMENT

PROJECT DATA

	BLDG. 1	BLDG. 2	BLDG. 3	BLDG. 4
SITE AREA				
In s.f. (Net Area)	609,340	985,420	938,426	316,300
In acres	13.99	22.62	21.54	7.26
In s.f. (Gross Area)	712,833	1,067,287	1,025,153	378,238
In acres	16.36	24.50	23.53	8.68
BUILDING AREA				
Office - 1st floor	10,000	10,000	10,000	5,000
Office - 2nd floor	20,000	20,000	20,000	10,000
Warehouse	312,695	515,255	465,290	163,282
TOTAL	342,695	545,255	495,290	178,282
COVERAGE	56.2%	55.3%	52.8%	56.4%
INTERIOR CLEAR HEIGHT	40'	40'	40'	36'
ESTIMATED TOP OF PARAPET	55'	55'	55'	50'
AUTO PARKING REQUIRED				
Office: 1 / 250 s.f.	120	120	120	60
Warehouse: 1 / 2,000 s.f.	157	258	233	82
TOTAL	277	378	353	142
AUTO PARKING PROVIDED				
Standard (8.5' x 18')	133	264	246	77
Compact (8' x 16') 30% of required space	0	0	29	0
Accessible Parking (9' x 18')	5	6	7	4
Accessible Van Parking (12' x 18')	1	2	2	1
EV Parking (8.5' x 18')	8	21	24	5
EV Standard Accessible (9' x 18')	1	1	1	1
EV Van Accessible (12' x 18')	1	1	1	1
EV Ambulatory (10' x 18')	0	0	1	0
Clean Air/ Van pool (8.5' x 18')	16	31	35	11
Total	165	326	346	100
Parking inside truck yard	0	89	82	43
GRAND TOTAL	165	415	428	143
Visitor Parking (20% of total)	33	83	86	29
Bicycle Parking required				
short term - exterior (5% of visitor parking)	2	4	4	1
long term - interior (5% of non-visitor parking)	7	17	17	6
Bicycle Parking provided				
short term - exterior (5% of visitor parking)	5	5	5	5
TRAILER PARKING PROVIDED				
Trailer (10' x 55')	76	76	70	
LANDSCAPE REQUIREMENT				
Area - Open parking area (w ith drivew ay)	52,473	143,659	125,200	57,561
Area - Parking area (w ithout drivew ay)	25,429	50,130	52,501	15,471
PLANTER LANDSCAPE AREA REQUIRED				
1.8% open parking area s.f. (w ith drivew ay)	4,198	11,493	10,016	4,605
2. Min 25 s.f. per parking space	4,125	10,375	10,700	3,575
PLANTER LANDSCAPE AREA REQUIRED	4,198	11,493	10,700	4,605
LANDSCAPE AREA PROVIDED				
Area	58,809	50,174	54,062	34,046
SHADED AREA REQUIRED				
Area - 50% Parking area (w ithout drivew ay)	12,713	25,065	26,251	7,736
TREE SHADED AREA PROVIDED				
Area	12,861	26,266	30,590	7,769
ZONING ORDINANCE FOR CITY				
Zoning Designation - Manufacturing Park (M-P)				
MAXIMUM BUILDING HEIGHT				
Height - 55'				
MAXIMUM FLOOR AREA RATIO				
N/A				
SETBACKS				
Building	Landscape			
along public St. - 20'	20'			
along public alley - 5'				
along property w ith a PL zone - 10'				

VICINITY MAP



Source(s): HPA (06-30-2020)

Figure 3-14

Not to Scale

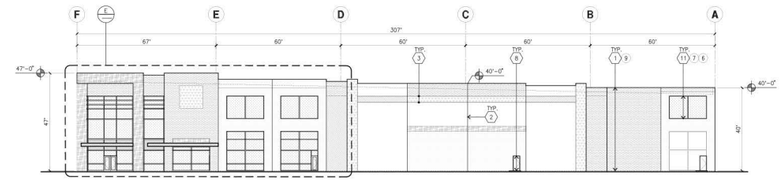
Building 4 Site Plan

KEYNOTES - ELEVATIONS

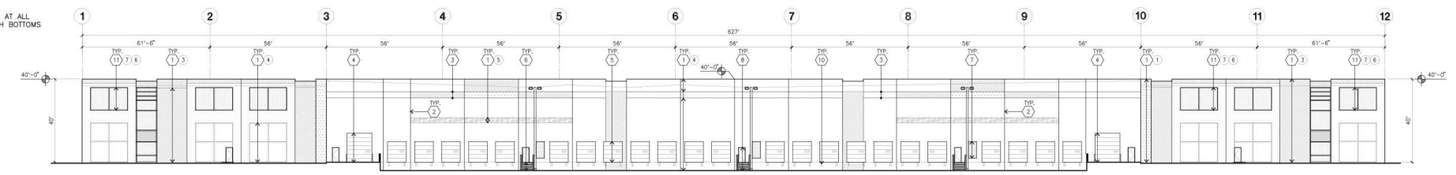
1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/4" DEPTH CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. NOT USED
13. EXTERIOR CANOPY
14. EXTERIOR DOWNSPOUT.

GENERAL NOTES - ELEVATIONS

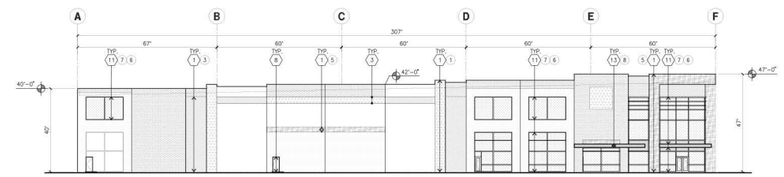
A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON



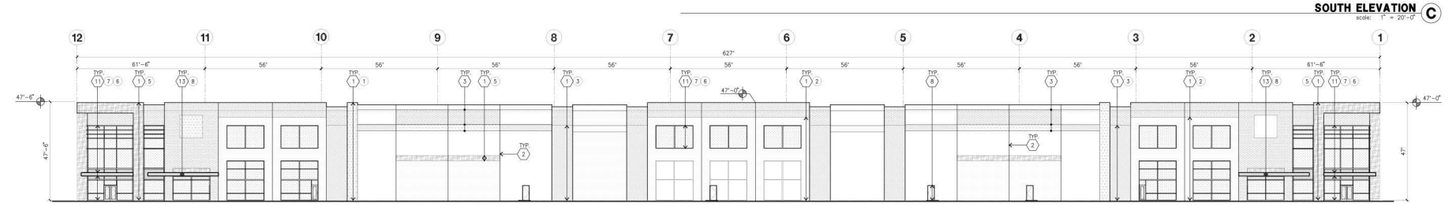
NORTH ELEVATION (A)
scale: 1" = 20'-0"



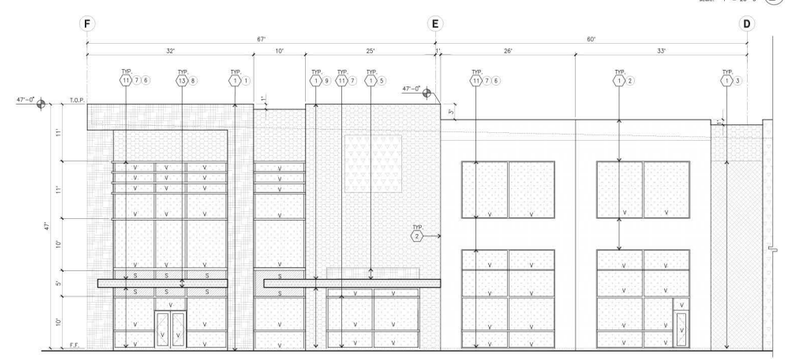
WEST ELEVATION (B)
scale: 1" = 20'-0"



SOUTH ELEVATION (C)
scale: 1" = 20'-0"



EAST ELEVATION (D)
scale: 1" = 20'-0"



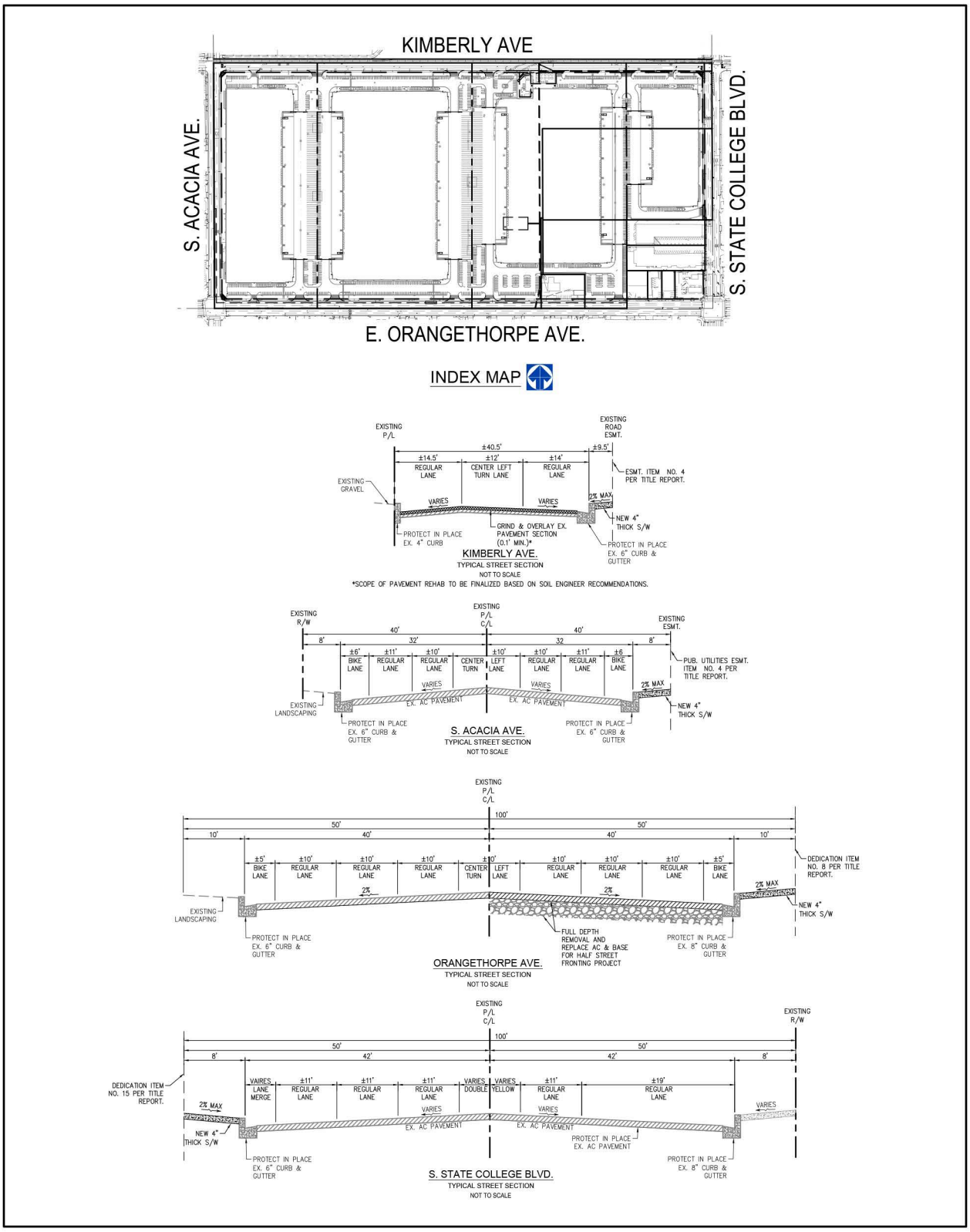
ENLARGED NORTH ELEVATION (E)
scale: 1/8" = 1'-0"

Source(s): HPA (06-10-2020)

Figure 3-15

Not to Scale

Conceptual Architectural Elevations – Building 4

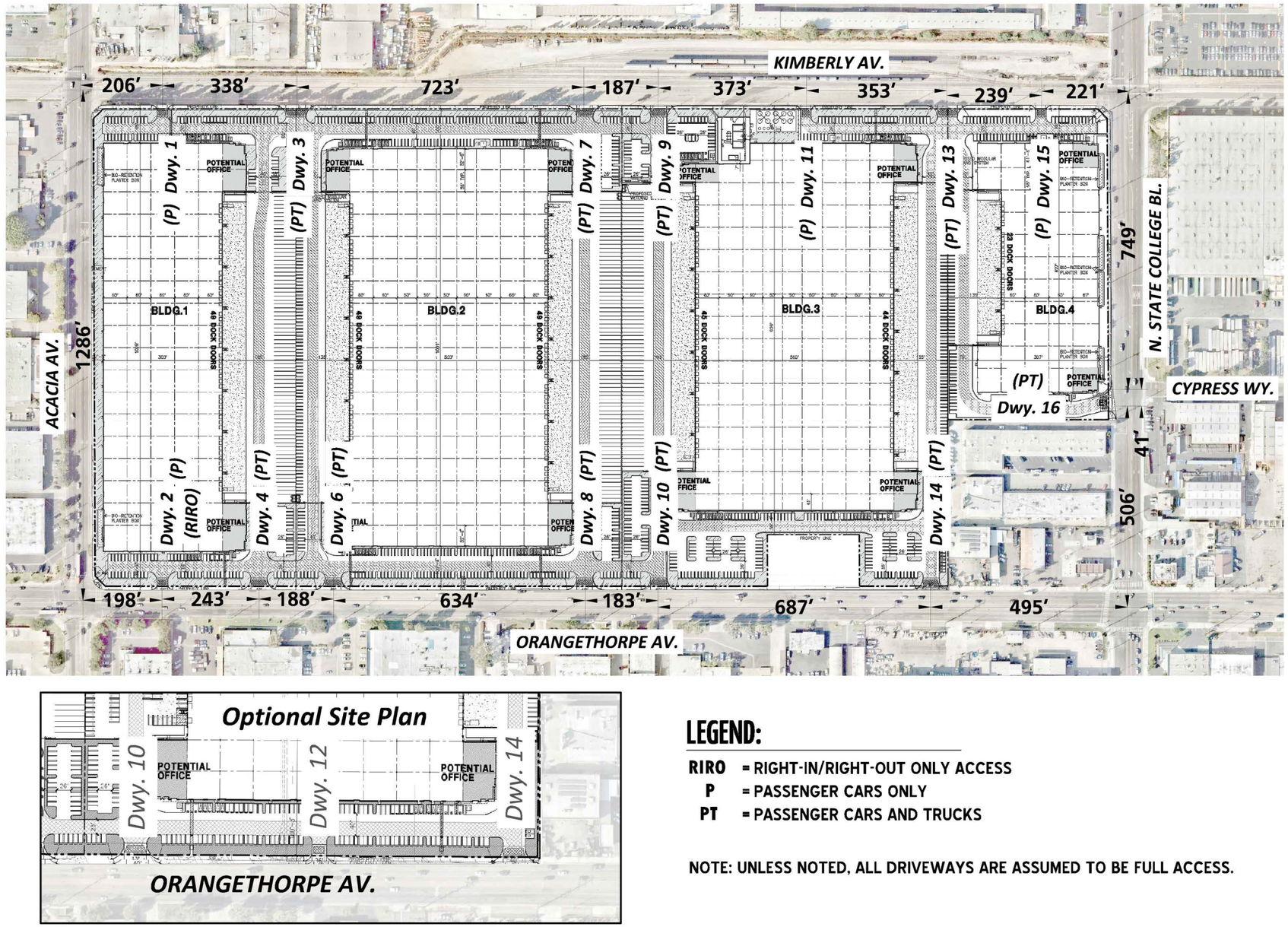


Source(s): TAIT (06-10-2020)

Figure 3-16

Not to Scale

Typical Street Sections



LEGEND:

RIRO = RIGHT-IN/RIGHT-OUT ONLY ACCESS
P = PASSENGER CARS ONLY
PT = PASSENGER CARS AND TRUCKS

NOTE: UNLESS NOTED, ALL DRIVEWAYS ARE ASSUMED TO BE FULL ACCESS.

Source(s): Urban Crossroads (07-16-2020)

Figure 3-17

Not to Scale

Site Access

- **Building 1.** Two private driveways connecting to E. Orangethorpe Avenue (Driveways 2 and 4) and two private driveways connecting to Kimberly Avenue (Driveway 1 and shared Driveway 3). Driveways 1 and 2 along Kimberly Avenue and E. Orangethorpe Avenue would be for passenger cars only and the other driveways would be for passenger cars and trucks.
- **Building 2.** Two private driveways connecting to E. Orangethorpe Avenue (Driveways 6 and 8) and two private driveways connecting to Kimberly Avenue (shared Driveway 3, and Driveway 7). All driveways would accommodate passenger cars and trucks. Driveway 6 aligns with an existing driveway on the south side of E. Orangethorpe Avenue and shall be designed with a shared left-through-right turn lane.
- **Building 3.** Two private driveways connecting to E. Orangethorpe Avenue (three driveways with the Optional Site Plan) (Driveways 10, 12, and 14), and three private driveways connecting to Kimberly Avenue (Driveways 9, 11 and shared Driveway 13). The center driveways would be for passenger cars only and the other driveways would be would be for passenger cars and trucks.
- **Building 4.** Two private driveways connecting to Kimberly Avenue (shared Driveway 13 and Driveway 15) and one private driveway connecting to State College Boulevard (Driveway 16). The eastern driveway along Kimberly Avenue would be for passenger cars only and the other driveways would be for passenger cars and trucks.

An internal network of drive aisles would be provided to serve each building, which would meet City of Fullerton Fire Department standards for access, width, and turning radii.

In addition to the construction of access driveways and the internal circulation improvements, the Project would require implementation of various improvements within the public right-of-way to accommodate vehicular circulation. The anticipated improvements are identified below based on the preliminary conditions of approval established by the City for the Project, and would be confirmed by the City during final design taking into consideration feasibility based on existing conditions and constraints, and following completion of construction.

- Rehabilitate asphalt concrete (AC) pavement over the entire width of Kimberly Avenue and E. Orangethorpe Avenue.
- Removal of existing driveways that are no longer needed, and installation of a full height curb and gutter and sidewalk within the driveway removal limits.
- Acacia Avenue and State College Boulevard adjacent to the Project site were improved in 2017 and 2018, respectively, including repaving, and any improvements along these roadways would be subject to the City's paving requirements in moratorium streets. Further, any damage caused during construction would be repaired in compliance with City standards.

In addition to the roadway improvements to be implemented in compliance with the City's conditions of approval, the Project would include modified turning radii and roadway geometrics, as needed, and as feasible, to accommodate truck turning movements.

Non-Vehicular Circulation and Transit

As further discussed in EIR Section 4.11, Transportation, the Project site is located in a Transit Priority Area.[2] Specifically, Orange County Transportation Authority (OCTA) bus routes are located along State College Boulevard and E. Orangethorpe Avenue. In the vicinity of the Project site, there are bus stops on the north and south side of E. Orangethorpe Avenue, on the east side of State College Boulevard, and at the intersections of E. Orangethorpe Avenue with Acacia Avenue and State College Boulevard, and State College Boulevard with Kimberly Avenue. To facilitate use of transit and non-vehicular circulation and to meet applicable requirements for accessibility pursuant to the Americans with Disabilities Act (ADA), the Project would include improvements in the public right-of-way along the Project site frontage. The improvements are identified below based on the preliminary conditions of approval established for the Project, and would be confirmed by the City during final design taking into consideration existing conditions, and feasibility based on constraints (e.g., the presence of transmission poles and traffic signals):

- Installation of full-width sidewalks per City standards along the Project site frontage where sidewalks do not currently exist.
- Removal and replacement of existing damaged/uplifted concrete sidewalk and curb and gutter along the Project site frontage, and repair of sidewalks damaged during construction. Replacement sidewalks would adhere to City standards.
- If existing curb ramps do not meet current ADA standards, improve curb and sidewalk returns along the Project site frontage, based on existing conditions, and as feasible. This includes but is not limited to re-grading, installation of landscaping/irrigation, reconstruction of concrete sidewalk, relocation of pull boxes, and the access ramp in accordance with the current City standards and ADA requirements.,.
- Construct a new concrete bus pad at the bus stop(s) on the north side of E. Orangethorpe Avenue per Orange County Transportation Authority (OCTA) standards. The conceptual site plan identifies a bus pad south of Building 2, but the final location of the bus stop would be determined in coordination with the City and OCTA.

In the vicinity of the Project site there are Class II (on-street, striped) bicycle lanes currently along Acacia Avenue and E. Orangethorpe Avenue. In compliance with Section 15.40.070 of the City's Municipal Code, which identifies required transportation demand strategies to reduce single occupancy vehicles, interior bicycle storage would be provided at Buildings 1 through 4 to encourage bicycle travel to the Project site. Additionally, exterior bicycle racks would be provided at each building.

With development of the Project, the existing railroad spurs that extend into the site from the railroad track to the north (northeast of proposed Building 3) would be removed.

[2] A Transit Priority Area is within a ½ mile of an existing or planned major transit stop or an existing stop along a high-quality transit corridor.

Parking

The Project has been designed to comply with Section 15.40.050, of the City of Fullerton Zoning Ordinance, related to parking requirements in Industrial zones, and the CalGreen Code. As shown on the detailed building site plans (refer to Figure 3-6, Figure 3-10, Figure 3-12, and Figure 3-14), parking would be provided as described below. In the event of future parking space striping revisions that alter the number or locations of on-site passenger vehicle and/or trailer parking spaces, such revisions would also be required to comply with the City's Zoning Ordinance.

- **Building 1.** The truck court for Building 1 includes 76 trailer parking stalls, and 165 passenger vehicle parking stalls are distributed along the north and south sides of Building 1.
- **Building 2.** The truck court on the east side of Building 2 also includes 76 trailer parking stalls, and 415 passenger vehicle parking stalls are distributed along the north, south, and west sides of the building. Approximately 89 of the vehicle parking stalls are provided within the truck court located on the west side of the building.
- **Building 3.** The truck court on the west side of the Building 3 includes 70 trailer parking stalls, and 428 passenger vehicle parking stalls are distributed along the north, south, and east sides of the building. Approximately 82 of the vehicle parking stalls are provided within the truck court located on the east side of the building.

  In the event that the Optional Site Plan is implemented, the truck court on the west side of Building 3 would provide 58 trailer parking stalls, and 452 passenger vehicle parking stalls would be provided (including approximately 176 in the truck court located within the truck court on the east side of the building).
- **Building 4.** 143 passenger vehicle parking stalls are distributed along the north, south, and west sides of Building 4, including approximately 43 spaces within the truck court.

Automobile parking would consist of standard and compact stalls, van accessible stalls, clean air/vanpool/electric vehicle stalls and accessible stalls. The total number of automobile parking stalls provided would meet the City's parking requirements for the Project and Optional Site Plan. In summary, for the Project there are 1,150 automobile stalls required and 1,151 stalls provided, and for the Optional Site Plan there are 1,174 stalls required and 1,175 stalls provided. Required bicycle parking would also be provided. A reciprocal parking and access agreement would be developed for the Project to allow for reciprocal parking and access between the respective parcels/buildings; it is anticipated this agreement would be accomplished through the Project's Covenants, Conditions & Restrictions (CC&Rs) and easements, as applicable.

C. Conceptual Landscape, Lighting, and Signage Plans

Landscaping

All existing trees and other vegetation on the Project site are proposed to be removed and replaced with the plant materials shown on Figure 3-18, *Conceptual Landscape Plan*. Proposed landscaping would be ornamental in nature and would feature trees, shrubs, and drought-tolerant accent plants in addition to a variety of groundcovers; approximately 197,100 s.f. (or approximately 4.5 acres) of the Project site would be landscaped. As shown on Figure 3-18, trees, shrubs, and groundcover are proposed along the Project site's frontages with all abutting public streets and along the southeast property boundary.

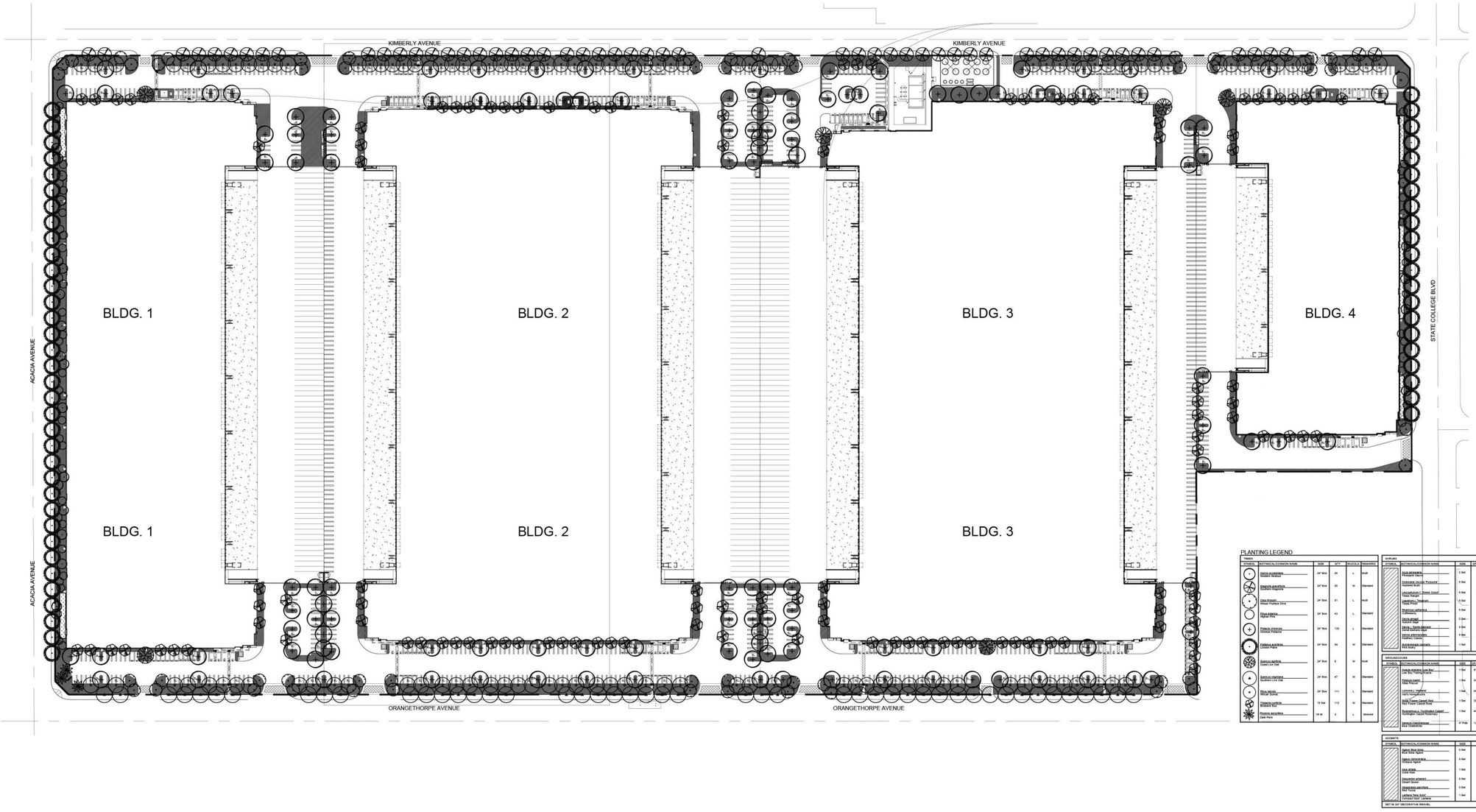
Landscaping also would be provided at building entries and in and around passenger vehicle parking areas (excluding passenger vehicle parking areas located within the truck courts). Existing tree wells along the abutting streets would be replaced with sidewalks, and new trees would be planted on-site behind the sidewalk. Prior to the issuance of building permits to construct Buildings 1, 2, 3, and 4, the Project Applicant would be required to submit final planting and irrigation plans to the City of Fullerton for review and approval. The final landscape plans would be required to comply with the City's "Landscape and Irrigation Requirements" (Fullerton Municipal Code Chapter 15.50), which establish requirements for landscape design, shade requirements, automatic irrigation system design, and water-use efficiency.

Lighting

The Project would include various lighting elements to ensure safety and security of the facilities. The proposed lighting would be in compliance with applicable lighting standards established by the City of Fullerton, the CalGreen Code, and the Title 24 Energy Efficiency Standards. New sources of light would be located on-site and primarily include parking lot pole-mounted lights, and building-mounted outdoor security lighting (refer to Figure 3-19, *Conceptual Exterior Lighting Plan*. Light poles would be 25-feet high and would have LED cut-off fixtures. Existing street lights along the Project frontages would be converted from high voltage to low voltage, and would be upgraded to current City standards including replacement of existing luminaires with City-approved LED luminaries.

Signs

Signage would be installed throughout the Project site for Project identification, wayfinding, and tenant identifications, as appropriate, and in compliance with Chapter 15.49, Sign Standards and Regulations, of the City's Municipal Code. Notably, pole signs identifying the Project would be located at the southwest corner of State College Boulevard/Kimberly Avenue and the northeast corner of E. Orangethorpe Avenue/Acacia Avenue. Directional signs would be provided at the Project driveways. Customer signs would be provided at each office, and "Goodman" wall signs would be provided on each building. The conceptual signage plan is presented on Figure 3-20.

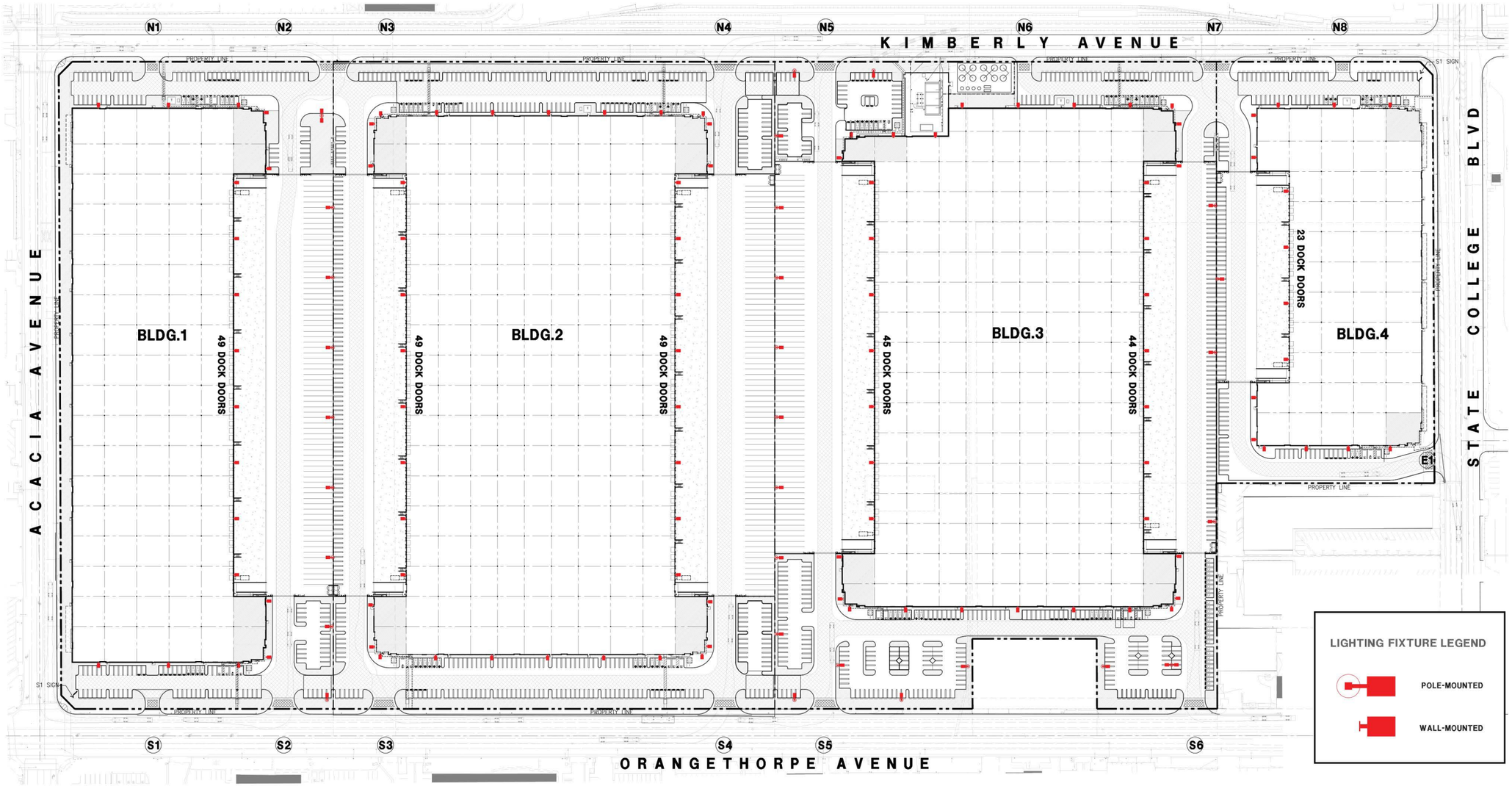


Source(s): Hunter Landscape (06-11-2020)

Figure 3-18

Not to Scale

Conceptual Landscape Plan

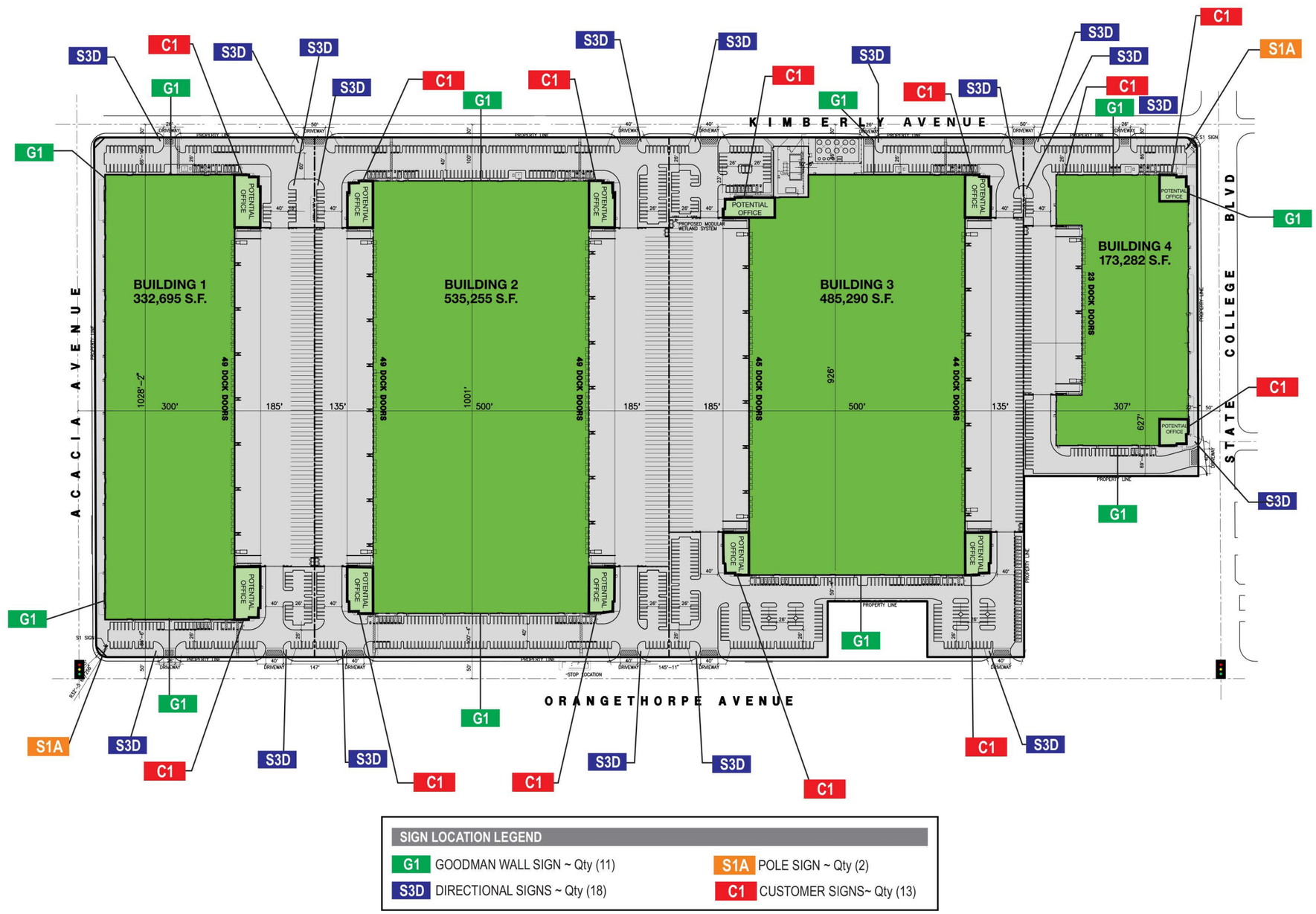


Source(s): HPA (06-30-2020)

Figure 3-19

Not to Scale

Conceptual Exterior Lighting Plan



Source(s): Sign Industries Incorporated (06-15-2020)

Figure 3-20

Not to Scale

Conceptual Signage Plan

D. Walls and Fences

A conceptual wall and fence plan for the Project is provided on Figure 3-21. As shown, the Project would provide approximately 14-foot 6-inch-high concrete tilt up screen walls with 16-foot-hit pilasters along the north and south boundaries of the truck courts for all buildings to screen the truck courts from view along abutting public streets. The return walls would be painted to match the abutting building wall panel. Access to the truck courts would be controlled by 8-foot-tall metal gates with knox-box per City of Fullerton standards. Eight-foot-tall, black-painted tubular steel fences would be installed along the perimeters of all truck courts not visible from public view (i.e., the west and/or east truck court boundaries). An 8-foot-tall non-view obscuring, black-painted tubular steel fence also would be installed along the perimeter of the City of Fullerton easement area located on the north-central portion of the Kimberly-Clark site. Any portion of this fence in the setback from Kimberly Avenue would require approval from the Community and Economic Development Director, as it would exceed the 3-foot height limit. No retaining walls are required on-site.

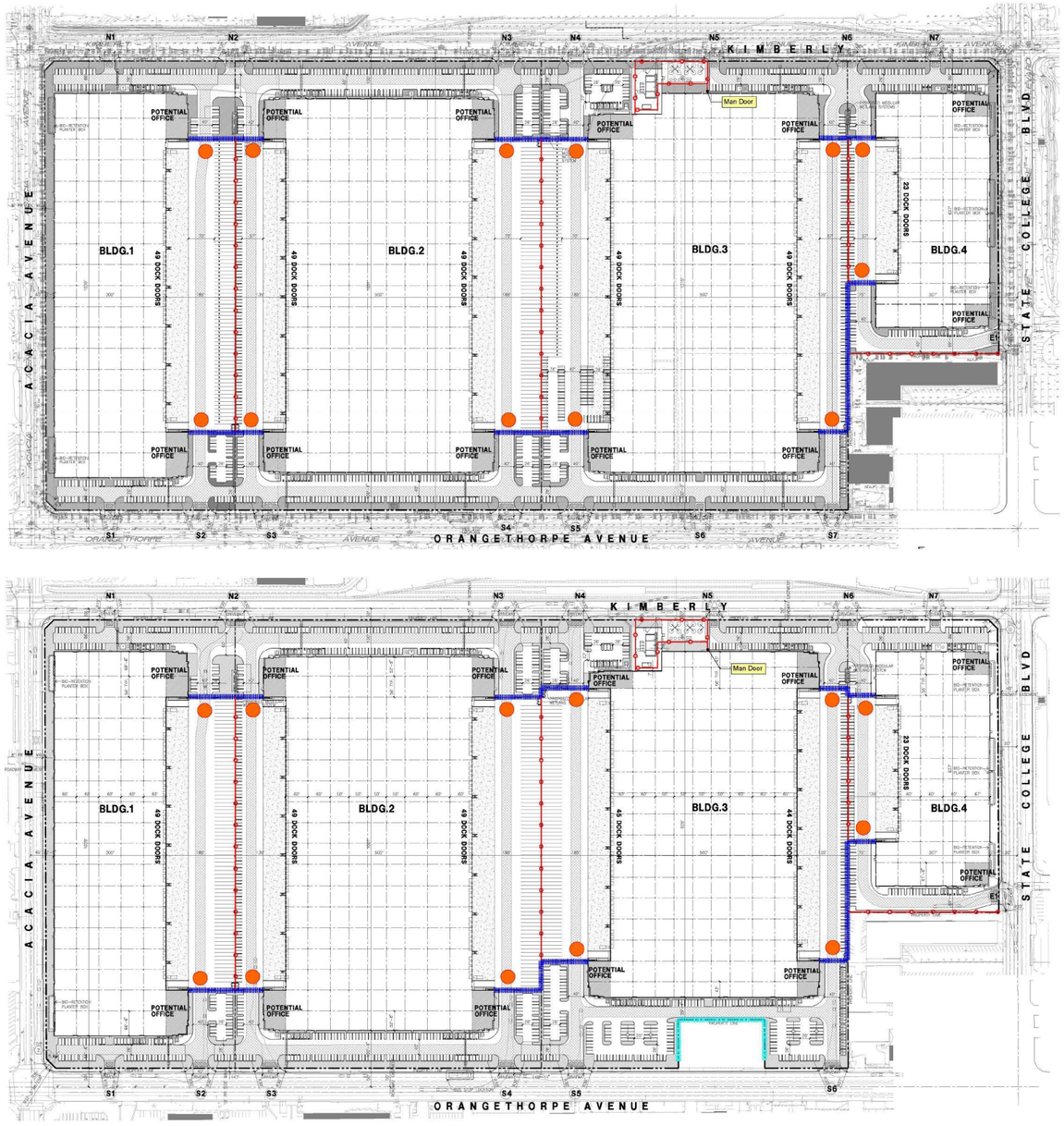
E. Utility Improvements

Municipal and private utility services necessary to serve the Project are currently available within or adjacent to the Project site. On-site utility infrastructure necessary to serve the proposed project—including water, sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity, natural gas, and telecommunications)—would be installed with the proposed development and would connect to the existing utility lines. The final sizing and design of on-site facilities would occur during final design. Following is a description of existing and proposed infrastructure.

Water Infrastructure

The City of Fullerton provides water service to the Project site and maintains an existing 18-inch diameter line in Acacia Avenue, a 12-inch diameter line in E. Orangethorpe Avenue, a 10-inch line in State College Boulevard, and 12- and 14-inch diameter lines in Kimberly Avenue. The Project would connect to existing lines beneath E. Orangethorpe Avenue and Kimberly Avenue for domestic and fire water service. As further discussed in EIR Section 4.13, Utilities and Service Systems, the Project would have a reduced water demand compared to the Kimberly-Clark facility. No expansion, extension, re-construction, or other modifications to existing off-site public water service lines would be required to serve the Project. Existing water and fire services not utilized would be abandoned at the main per City standards. The proposed water service plan for the Project is illustrated on Figure 3-22, *Conceptual Utility Plan – West* and Figure 3-23, *Conceptual Utility Plan – East*.

The proposed buildings would be fully sprinklered. Based on fire flow test data on Kimberly Avenue, a site fire pump would not be needed. However, with the high pile storage at the warehouse, each building may require a fire pump to maintain the residual pressure along with the required flow rate. A fire flow analysis would be completed at the final stages of the Project design. If required, fire pumps would be located on-site; these pumps could be in each building or located in stand-alone structures (pump houses) near the trash enclosures.



FENCING LEGEND

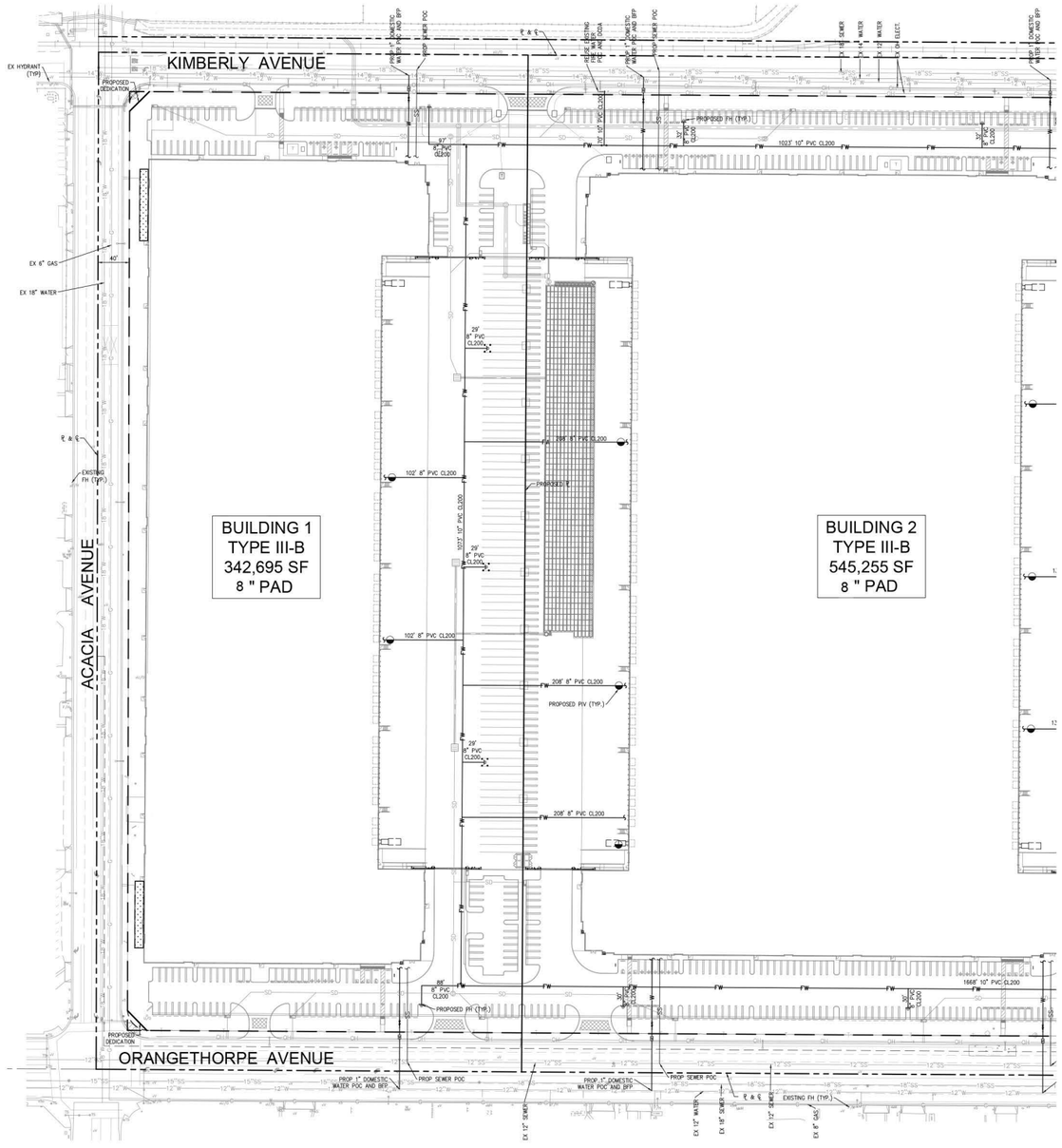
- 14'-6" High concrete tilt up screen wall with 16'-0" high pilaster.
- 8'-0" High Tubular steel gate (Painted Black) + Fire department approved Knox pad.
- 8'-0" High metal tubular fence - Painted Black.
- 10'-0" High concrete tilt up screen wall with 12'-0" high pilaster.

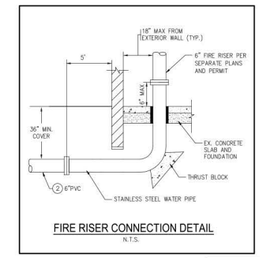
Source(s): HPA (06-10-2020)

Figure 3-21

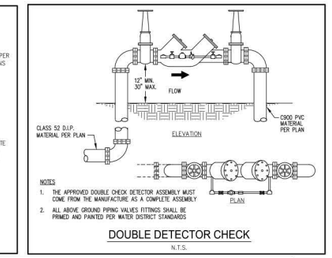
Not to Scale

Conceptual Wall and Fence Plan

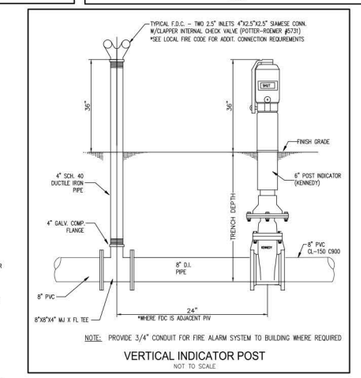




FIRE RISER CONNECTION DETAIL
N.T.S.



DOUBLE DETECTOR CHECK
N.T.S.



VERTICAL INDICATOR POST
NOT TO SCALE

LEGEND

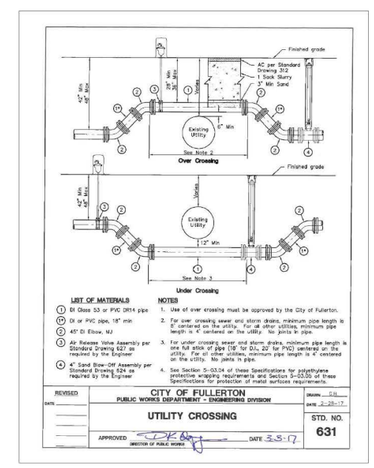
- EXISTING PROPERTY LINE
- PROPOSED PROPERTY LINE
- EXISTING RIGHT-OF-WAY WITH ROADWAY EASEMENT
- CENTERLINE
- PROPOSED EASEMENT
- EXISTING EASEMENT
- PROPOSED DOMESTIC WATER
- PROPOSED SANITARY SEWER
- PROPOSED FIRE WATER
- PROPOSED STORM DRAIN
- PROPOSED ELECTRIC
- PROPOSED TELECOM
- PROPOSED GAS
- PROPOSED BACK-FLOW PREVENTOR
- PROPOSED DOUBLE CHECK DETECTOR ASSEMBLY
- PROPOSED POST INDICATOR VALVE
- PROPOSED WATER VALVE
- PROPOSED FIRE HYDRANT
- EXISTING FIRE HYDRANT
- PROPOSED TRANSFORMER
- PROPOSED CAPACITOR
- PROPOSED PAD MOUNTED SWITCHES
- POC AT BUILDING. CONTINUATION PER BUILDING MEP PLANS.

ABBREVIATIONS

EX	EXISTING
FW	FIRE WATER
NAP	NOT A PART
PROP	PROPOSED
SS	SANITARY SEWER
W	DOMESTIC WATER
POC	POINT OF CONNECTION

NOTES

1. ALL PROPOSED SEWER LATERALS SHALL BE 6"VCP PER CITY STD. PLAN 209A AND 209B.
2. ALL PROPOSED DOMESTIC WATER SERVICES TO BE 1" WITH 1.5" METER PER CITY STD. PLAN 601.
3. ALL DOMESTIC WATER BACKFLOW DEVICES PER CITY STD. 604
4. ALL FIRE DOUBLE DETECTOR CHECK ASSEMBLY TO BE PER CITY. STD. 721.
5. ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS SHALL BE ABANDONED, QUITCLAIMED OR RELOCATED IN CONJUNCTION WITH THE FILING OF THE FINAL PARCEL MAP.

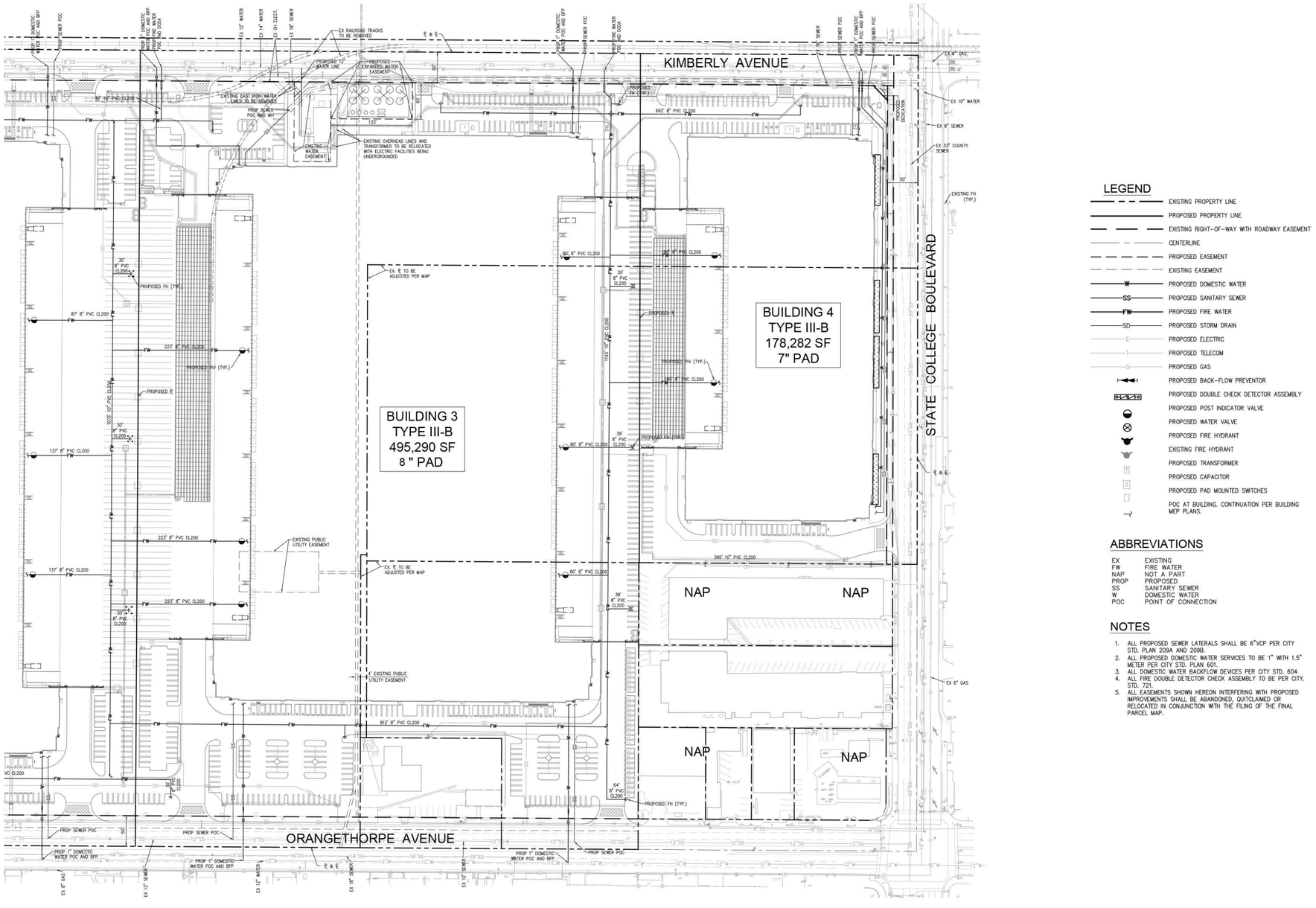


Source(s): TAIT (07-13-2020)

Figure 3-22

Not to Scale

Conceptual Utility Plan – West



Source(s): TAIT (07-13-2020)

Figure 3-23

Not to Scale

Conceptual Utility Plan – East

The City of Fullerton Public Works Department has a well in a city easement in the north-central portion of the Kimberly-Clark site, abutting Kimberly Avenue. The well has a 60,000-gallon tank with three booster pumps that connect to the 12- and 14-inch diameter water line in Kimberly Avenue. The Project would not affect the existing well facilities or involve the installation of new facilities associated with the well operations; however, the easement for these facilities would be modified with an expansion to the east as shown on the Figure 3-4. Additionally, the existing cast iron pipes from the booster pumps to the existing 12- and 14-inch diameter water lines beneath Kimberly Avenue would be removed and a new water line would be installed on-site.

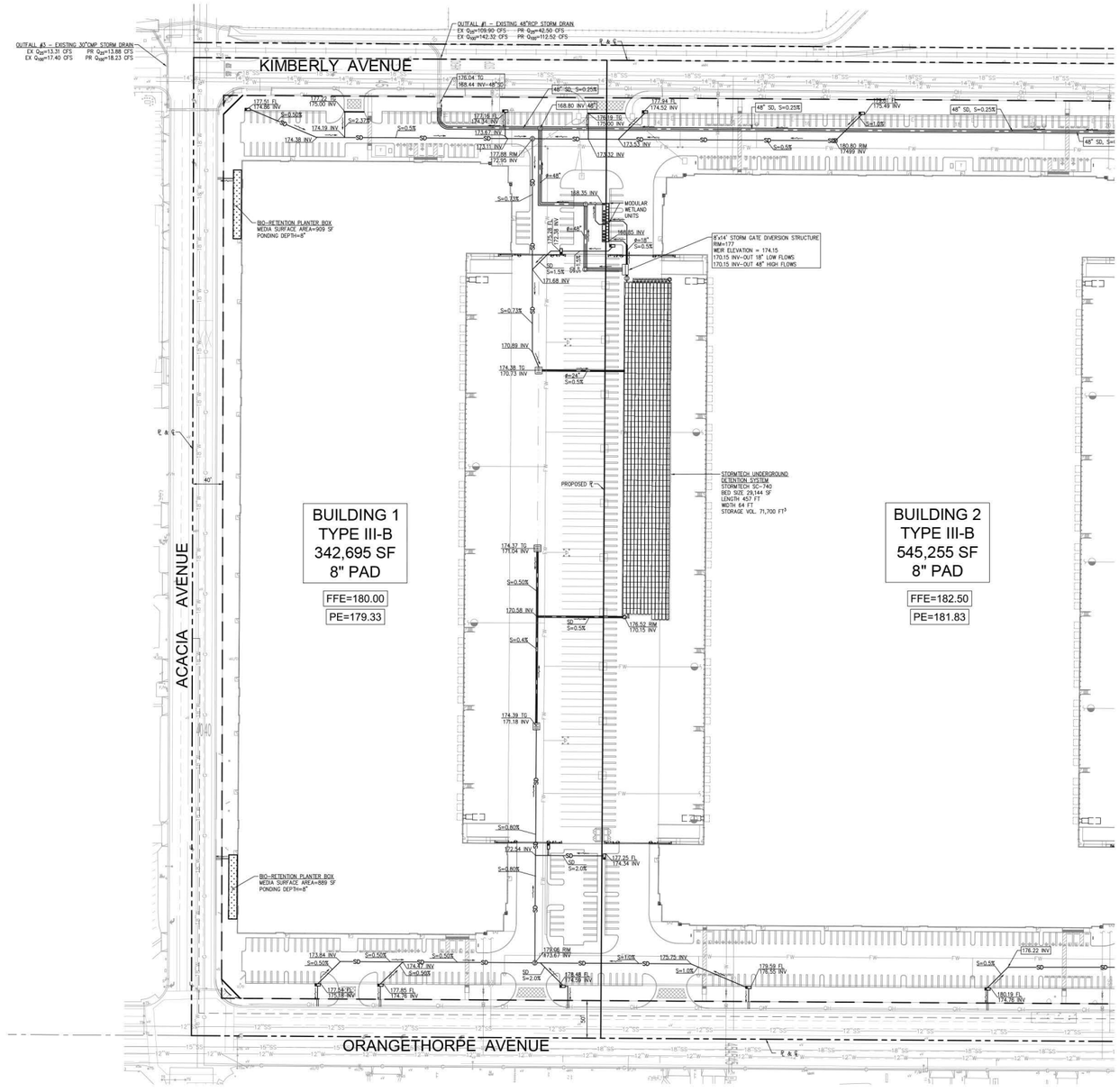
Wastewater Infrastructure

The City of Fullerton provides sewer collection services to the Project site. The Project would connect to existing public sewer service lines beneath E. Orangethorpe Avenue and Kimberly Avenue (12- and 18-inches, respectively). Each building would have its own 6-inch sewer lateral. As further discussed in EIR Section 4.13, Utilities and Service Systems, with the reduction in water demand, the Project would generate less wastewater compared to the Kimberly-Clark facility. No expansion, extension, re-construction, or other modifications to existing off-site public sewer lines would be required to service the Project. The proposed sewer service plan for the Project is illustrated on Figure 3-22 and Figure 3-23.

Storm Drain System and Water Quality Treatment

The proposed on-site private storm drain system has been designed in accordance with Orange County methods to accommodate storm water flows associated with the proposed site plan. Stormwater from the Project site would ultimately flow to existing public storm drain facilities in Kimberly Avenue, consistent with existing conditions. The proposed on-site storm drain system would be installed as part of the Project, and would consist of a network of catch basins, underground storm drain pipes, modular wetland units, bio-filtration planters, and subsurface detention chambers that would collect, treat, and detain (as needed) stormwater runoff from the majority of the Project site. Figure 3-24, *Conceptual Stormwater Drainage Plan – West*, and Figure 3-25*, Conceptual Stormwater Drainage Plan – East,* depict the proposed preliminary stormwater drainage system for the Project, subject to refinement during final design. “First flush” stormwater runoff flows for the majority of the Project site would be conveyed to the bio-filtration planters for treatment or to subsurface detention chambers, which would discharge stormwater to modular wetland units for treatment (refer to Figure 3-26, *Conceptual Water Quality Management Plan*). Treated flows from the bio-retention areas and the modular wetland units would be carried by underground storm drain pipes to an existing public storm drain laterals located beneath Kimberly Avenue (24- and 48-inch reinforced concrete pipes [RCP]) that convey stormwater runoff to the existing channel that runs north of Kimberly Avenue. As shown on Figure 3-26, source control best management practices (BMPs) would also be implemented.

The southern perimeter of the Project would consist of parking lot and landscaped islands. Stormwater flows from this area would sheet flow to curb and gutter which divert flows to proposed catch basins, or would be discharged into proposed bio-filtration planters that would connect to storm drain lines that ultimately flow to the storm drain facilities in Kimberly Avenue.



LEGEND

- EXISTING PROPERTY LINE
- PROPOSED PROPERTY LINE
- EXISTING RIGHT-OF-WAY WITH ROADWAY EASEMENT
- CENTERLINE
- EXISTING EASEMENT
- PROPOSED EASEMENT
- SD — PROPOSED STORM DRAIN LINE ≤ 12"
- PROPOSED STORM DRAIN LINE > 12"
- 184.31 TG — PROPOSED ELEVATION
- 2-48" SD, S=0.25% — PROPOSED STORM DRAIN INFORMATION
- PROPOSED STORM DRAIN LINE DIRECTION OF FLOW
- PROPOSED STORM DRAIN MANHOLE
- BIO-RETENTION PLANTER BOX
- MODULAR WETLAND UNIT

ABBREVIATIONS

EX	EXISTING
FS	FINISHED SURFACE
FG	FINISHED GRADE
FFE	FINISHED FLOOR ELEVATION
FL	FLOWLINE
FW	FIRE WATER
GB	GRADE BREAK
HP	HIGH POINT
INV	INVERT
NAP	NOT A PART
PROP	PROPOSED
PE	PAD ELEVATION
R/W	RIGHT OF WAY
S=	SLOPE
SS	SANITARY SEWER
SD	STORM DRAIN
TC	TOP OF CURB
TG	TOP OF GRATE
W	DOMESTIC WATER

EASEMENT NOTE

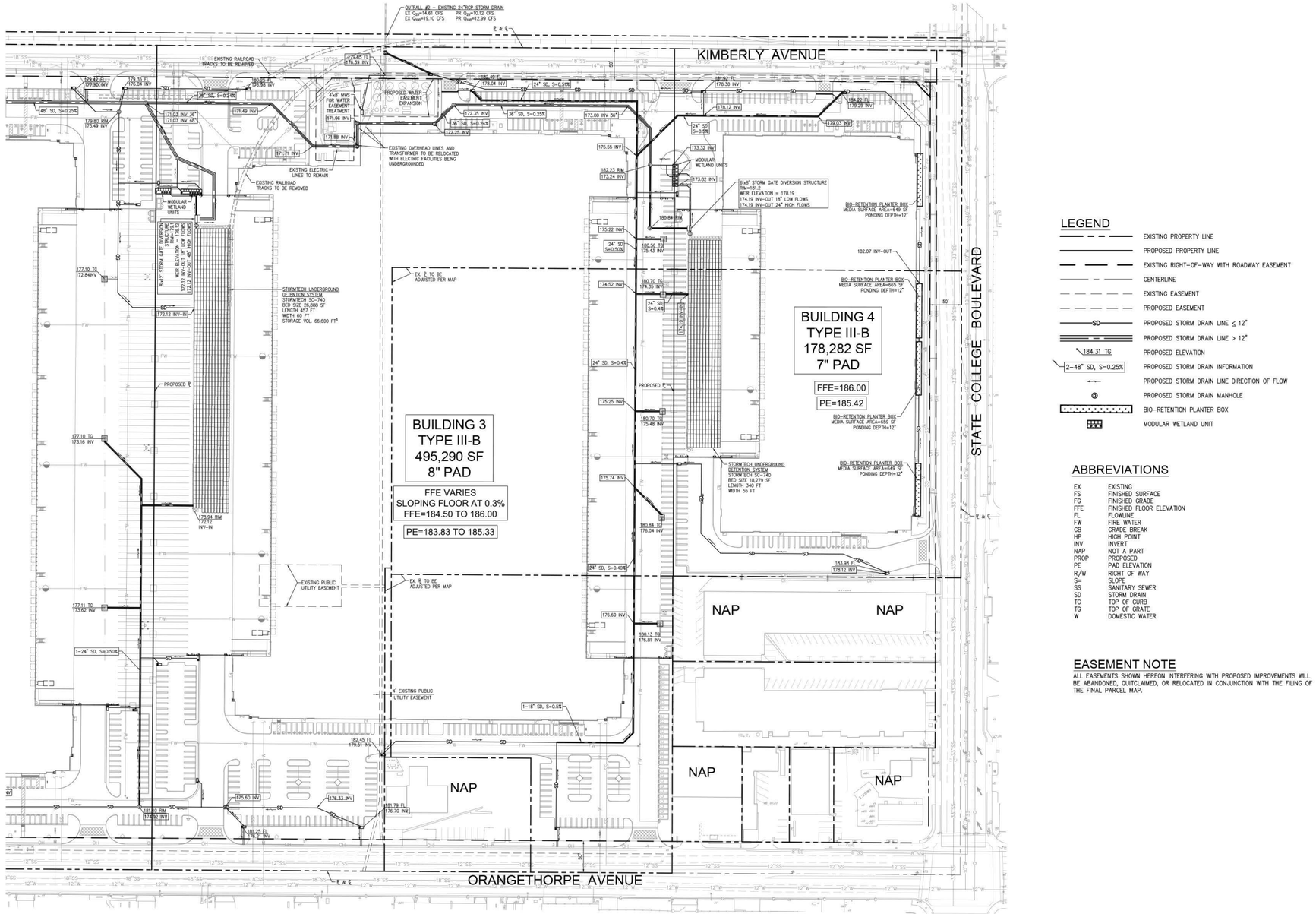
ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS WILL BE ABANDONED, QUITCLAIMED, OR RELOCATED IN CONJUNCTION WITH THE FILING OF THE FINAL PARCEL MAP.

Source(s): TAIT (07-13-2020)

Figure 3-24

Not to Scale

Conceptual Stormwater Drainage Plan – West

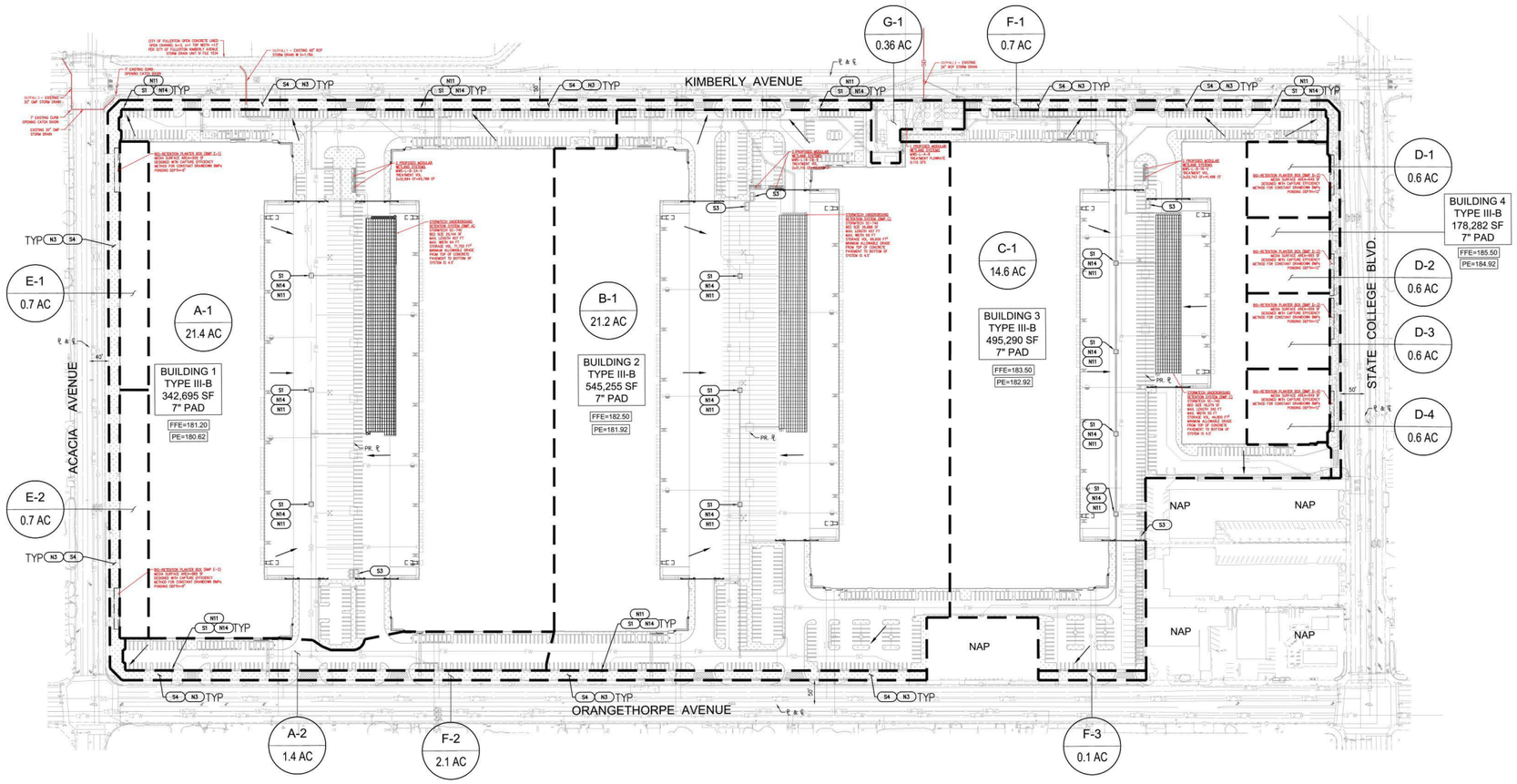


Source(s): TAIT (07-13-2020)

Figure 3-25

Not to Scale

Conceptual Stormwater Drainage Plan – East



PROPOSED DMA SUMMARY

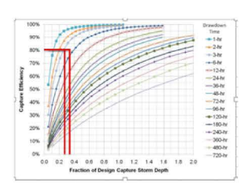
Area ID	Area (sf)	Area (ac)	85th percentile depth (in)	Pervious Area (sf)	Impervious Area (sf)	Percent Impervious	Runoff Coefficient	DCV (cf)
A-1	932,100	21.398	0.9	23,622	908,478	0.9747	0.8810	61,588
A-2	61,085	1.402	0.9	5,589	55,500	0.9085	0.8214	3,809
B-1	924,137	21.215	0.9	27,493	896,644	0.9703	0.8777	60,833
C-1	635,581	14.591	0.9	29,833	605,748	0.9531	0.8648	41,224
D-1	26,830	0.616	0.9	0	26,830	1.0000	0.9000	1,811
D-2	26,964	0.619	0.9	0	26,964	1.0000	0.9000	1,820
D-3	26,962	0.619	0.9	0	26,962	1.0000	0.9000	1,820
D-4	26,698	0.613	0.9	0	26,698	1.0000	0.9000	1,802
E-1	30,695	0.705	0.9	0	30,695	1.0000	0.9000	2,072
E-2	30,696	0.705	0.9	0	30,696	1.0000	0.9000	2,072
F-1	31,777	0.729	0.9	27,285	4,492	0.1414	0.2560	610
F-2	91,601	2.103	0.9	80,903	10,698	0.1168	0.2376	1,632
F-3	4,416	0.101	0.9	3,496	920	0.2083	0.3063	101
G-1	15,785	0.362	0.9	1,425	14,360	0.9097	0.8323	985
TOTALS	**2,865,331**	**65.8**		**199,646**	**2,665,685**	**0.930**	**0.85**	**182,180**

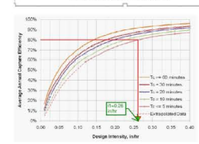
BMP SIZING (BIO-1) BIO-RETENTION W/UNDERDRAIN

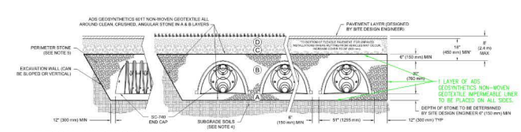
CAPTURE EFFICIENCY METHOD FOR BIORETENTION WITH UNDERDRAINS									
Area ID	K_{DESIGN} (IN/HR)	$D_{PONDING}$ (IN)	$D_{PONDING}$ (FT)	DD Drawdown Time (HR)	X_L	85Th Percentile Storm Depth (IN)	Fraction 85th $D_{FRACTION}$	$D_{FRACTION}$*D CV	Footprint Area (SF)
D-1	2.5	12	1.00	4.8	0.34	0.9	0.306	616	616
D-2	2.5	12	1.00	4.8	0.34	0.9	0.306	619	619
D-3	2.5	12	1.00	4.8	0.34	0.9	0.306	619	619
D-4	2.5	12	1.00	4.8	0.34	0.9	0.306	613	613
E-1	2.5	8	0.67	3.2	0.28	0.9	0.252	580	870
E-2	2.5	8	0.67	3.2	0.28	0.9	0.252	580	870

BMP SIZING (BIO-7) PROPRIETARY BIO-FILTRATION FLOW BASED

CAPTURE EFFICIENCY METHOD FOR FLOW-BASED BMPs SEE WORKSHEET D						
AREA ID	AREA (AC)	IMPERVIOUS FRACTION	RUNOFF COEFF.	T_C (MIN)	I_{DESIGN} (IN/HR)	Q_{DESIGN} (CFS)
G-1	0.362	0.9097	0.8323	2.5	0.26	0.078







1 TYPICAL UNDERGROUND DETENTION DETAIL
NO SCALE

SOURCE CONTROL BMPs:

- S1 PROVIDE STORM DRAIN SYSTEM STENCILING & SIGNAGE.
- S3 DESIGN AND CONSTRUCT TRASH AND WASTE STORAGE AREAS TO REDUCE POLLUTION INTRODUCTION.
- S4 USE EFFICIENT IRRIGATION SYSTEMS & LANDSCAPE DESIGN, WATER CONSERVATION, SMART CONTROLLERS, AND SOURCE CONTROL.
- S6 LOADING DOCK AREAS (S0-3S) COVER LOADING DOCK AREAS, OR DESIGN DRAINAGE TO PRECLUDE RUN-ON AND RUNOFF. SEE WQMP MAINTENANCE PLAN FOR MORE INFORMATION.
- N3 COMMON AREA LANDSCAPE MANAGEMENT.
- N13 HOUSEKEEPING OF LOADING DOCKS.
- N14 COMMON AREA CATCH BASIN INSPECTION.

EASEMENT NOTE
ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS WILL BE ABANDONED, QUITCLAIMED, OR RELOCATED IN CONJUNCTION WITH THE FILING OF THE FINAL PARCEL MAP.

ENGINEER'S NOTE:
THE FOOTPRINT OF THE UNDERGROUND BASINS ON THIS EXHIBIT HAVE BEEN ESTABLISHED TO EXCEED THE DESIGN CAPTURE VOLUME; HOWEVER, THE FINAL LENGTH AND WIDTH WILL BE DETERMINED ONCE INFILTRATION RATES ARE AVAILABLE FROM THE SOILS REPORT INVESTIGATION.

LEGEND

- EXISTING PROPERTY LINE
- PROPOSED PROPERTY LINE
- CENTERLINE
- EXISTING EASEMENT
- SURFACE DIRECTION OF FLOW
- EXISTING STORM DRAIN
- PROPOSED STORM DRAIN
- AREA BOUNDARY
- X-# — AREA ID
- #.##AC — AREA (AC)

Source(s): TAIT (06-10-2020)

Figure 3-26

Not to Scale

With the Optional Site Plan, the additional 0.7-acre parcel located at 2301 E. Orangethorpe Avenue would continue to discharge to E. Orangethorpe Avenue. Proposed catch basins would be located at the most southern curb of the parking area, and these catch basins would convey low flows to a proposed detention basin. High flows would be discharged to Orangethorpe via a parkway drain.

The Project would not require the physical expansion of existing off-site public storm drains; however, substandard storm drain connections, or connections that are in poor condition may need to be upgraded or replaced. The Project Applicant may also be required to pay its fair share for storm drain improvement to address existing deficiencies; these payment provisions would be addressed through the Development Agreement between the City and the Project Applicant.

Dry Utilities

Southern California Edison (SCE) would provide electric service to the Project; existing electric facilities consist of overhead 66 kV transmission and 12 kV distribution lines on wooden poles on the south side of Kimberly Avenue and the west side of State College Boulevard abutting the Project site. There are also overhead telecommunication lines for two providers (AT&T and Crown Castle) on the wooden poles along Kimberly Avenue and E. Orangethorpe Avenue. Pursuant to Chapter 16.05.060, *Underground Utilities and Service Lines*, of the City's Municipal Code, the existing overhead electrical transmission lines along Kimberly Avenue or State College Boulevard would not be placed underground. The telecommunication lines on these poles would also remain in place. Additionally, removal of smaller wooden poles holding telecommunication lines would be removed, as necessary. As part of the Project, existing wooden poles carrying overhead telecommunications lines along the Project site frontage with E. Orangethorpe Avenue would be removed and the telecommunications lines would be placed underground. The undergrounding along E. Orangethorpe would extend slightly to the east of the Project site due to the location of the existing poles. Joint trenching of telecommunications and SCE facilities would occur, as feasible. There is an existing SCE substation located on-site that served the Kimberly-Clark facility, which would be removed as part of the Project.

To serve the proposed development, and as shown on Figure 3-22 and Figure 3-23, new above ground transformers would be installed at the north side of each building near Kimberly Avenue, and pad mounted switches would be installed along Kimberley Avenue. Additionally, it is anticipated that one capacitor would be installed in the north-central portion of the Project site, adjacent to Kimberly Avenue.

SiFi Networks, AT&T, and Crown Castle would have the ability to provide telecommunications service to the Project. SiFi Networks is currently installing and will operate a city-wide fiber optic network, which will include facilities within Kimberly Avenue. The point of feed for the Project is anticipated to be at the northwest corner of the Project site. The Project would connect to AT&T and Crown Castle facilities in Kimberly Avenue and E. Orangethorpe Avenue. Joint trenching of telecommunications and SCE facilities would occur, as feasible.

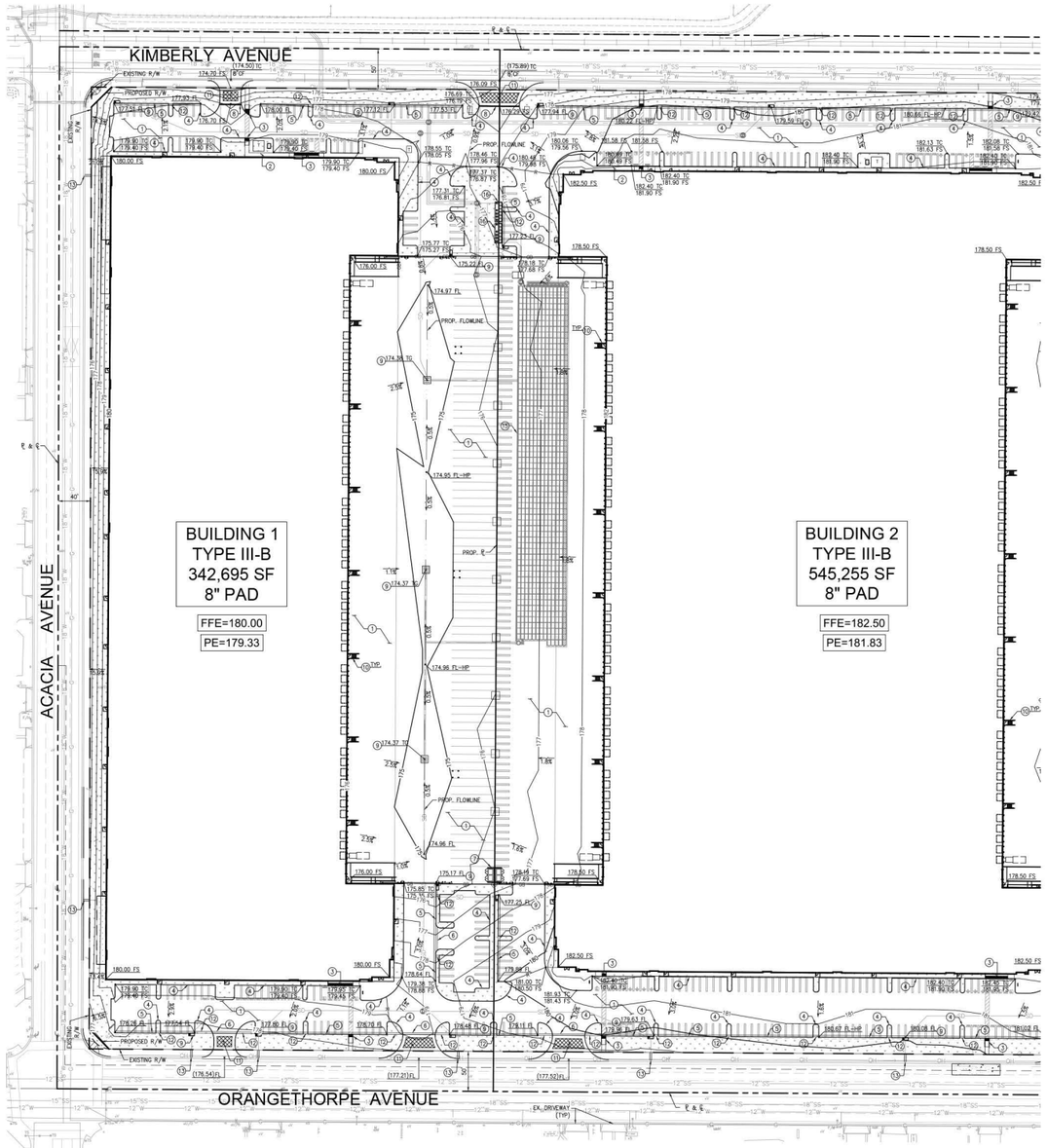
Southern California Gas (SoCal Gas) provides natural gas service to the Project site, and currently has a 6-inch gas line along the east side of Acacia Avenue, a 6-inch gas line on the east

side of State College Boulevard, and an 8-inch gas line on the south side of E. Orangethorpe Avenue. However, natural gas service to the Project is not required and the Project does not include the installation of natural gas lines.

F. Construction Activities

The Project Applicant anticipates that Project construction would occur over an approximate 15-month duration, expected to begin in Spring 2021 and end in Summer 2022. The construction activities for individual buildings would overlap, but would be staggered during this period. The sequence of building construction is dependent on various factors, including but not limited to the schedule for removal of the existing SCE substation, market demand, etc. As part of Project construction, existing structures and improvements on the Project site, which were not removed by Kimberly-Clark, would be demolished and/or removed, with the exception of the existing City of Fullerton Water Department facilities. As required by the City of Fullerton and California Green Building Code, the majority of the demolition materials that are to be hauled off-site would be recycled. The concrete, brick and asphalt paving would be processed and remain on-site. Following completion of demolition or removal of existing buildings and improvements at each building site, site work (including grading and installation of utility infrastructure) and vertical building construction would be initiated.

The conceptual grading plan for the Project is illustrated on Figure 3-27, *Conceptual Grading Plan – West*, and Figure 3-28, *Conceptual Grading Plan – East*. Based on the conceptual grading plan, approximately 144,100 cubic yards (CY) of grading cut and 242,500 CY of grading fill would be required to implement the Project. Concrete and asphalt demolition debris generated on-site would be crushed/pulverized and re-used on-site as grading fill material and would preclude the need to import substantial quantities of soil/fill materials to the site. It is estimated that there would be 100,660 tons of demolished concrete and approximately 21,440 tons of pulverized asphalt. While the grading operation may ultimately balance on-site, for purposes of analysis, it is estimated that approximately 2,310 CY of material would be exported from the Project site. When taking into consideration the Optional Site Plan, there would be approximately 144,200 cubic yards (CY) of grading cut and 242,400 CY of grading fill, with an estimated import of 3,060 CY. The anticipated depth of excavation would vary for the Project components, but would likely extend to maximum depths of 20-feet below the ground service (bgs) for removal of existing foundations or other related subterranean features, and 10- to 12-feet bgs for the installation of utility infrastructure, including the subsurface detention chambers. Following the completion of grading, foundations, slabs and tilt-up wall panels would be poured and the proposed buildings would be erected, connected to the underground utility system, and painted. Lastly, finish grading/paving would occur and landscaping and fencing/walls would be installed.



LEGEND

- PROPOSED PROPERTY LINE
- EXISTING PROPERTY LINE
- EXISTING RIGHT-OF-WAY WITH ROADWAY EASEMENT
- PROPOSED EASEMENT
- EXISTING EASEMENT
- CENTERLINE
- 180 — PROPOSED CONTOUR
- GB — GRADE BREAK
- R — RIDGE LINE
- 0.5% — PROPOSED SLOPE
- XXX.XX FS — PROPOSED ELEVATION
- (XXX.XX) FS — EXISTING ELEVATION
- SD — PROPOSED STORM DRAIN LINE ≤ 12"
- PROPOSED STORM DRAIN LINE > 12"
- PROPOSED CATCH BASIN
- PROPOSED BIO-RETENTION PLANTER BOX
- MODULAR WETLAND UNIT

ABBREVIATIONS

EX	EXISTING
FS	FINISHED SURFACE
FFE	FINISHED FLOOR ELEVATION
FL	FLOWLINE
GB	GRADE BREAK
HP	HIGH POINT
INV	INVERT
NAP	NOT A PART
PROP	PROPOSED
PE	PAD ELEVATION
R/W	RIGHT OF WAY
SD	STORM DRAIN
TC	TOP OF CURB
TG	TOP OF GRATE

EARTHWORK

STATEMENT OF QUANTITIES:

NET CUT:	144,100 CY
NET FILL:	242,500 CY
IMPORT	98,400 CY

CRUSHED MATERIAL FROM DEMOLITION	
100,660 TONS OF CRUSHED PCC	61,350 CY
21,440 TONS OF PULVERIZED AC	34,740 CY

IF ALL MATERIAL FROM DEMOLITION IS UTILIZED ON-SITE THE PROJECT WILL GENERATE IMPORT IN THE AMOUNT OF 2,310 CY.

NOTES:

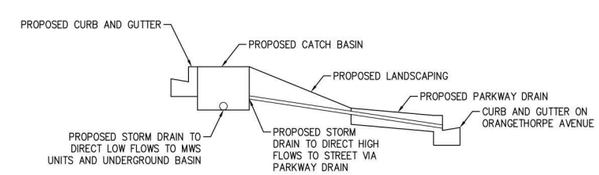
1. EARTHWORK NUMBERS BASED ON EXISTING GRADES FROM AERIAL TOPO
2. THE QUANTITIES AS SHOWN HEREON ARE FOR PERMIT AND/OR BONDING PURPOSES ONLY. THE GRADING CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFICATION OF QUANTITIES PRIOR TO THE START OF GRADING AND ACCOUNT FOR DISTRIBUTING ANY EXCESS MATERIAL OR SUPPLYING ANY DEFICIENCIES TO BRING SITE TO DESIGN GRADE. THE ABOVE CUT AND FILL FIGURES REPRESENT PURE VOLUME FIGURES ONLY. UNLESS NOTED OTHERWISE, THERE IS NO CONSIDERATION TAKEN FOR SHRINKAGE, SUBSIDENCE, OR ANY OTHER LOSS FACTOR. THE CONTRACTOR'S BID WILL BE THE SOLE BASIS FOR ALL PAYMENTS FOR WORK DONE.

EASEMENT NOTE

ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS WILL BE ABANDONED, QUITCLAIMED, OR RELOCATED IN CONJUNCTION WITH THE FILING OF THE FINAL PARCEL MAP.

PRECISE GRADING NOTES

1. CONSTRUCT PCC PAVEMENT SECTION, 7" PCC OVER 12" 95% COMPACTED NATIVE PER GEOTECHNICAL REQUIREMENTS.
2. CONSTRUCT 4" THICK PCC SIDEWALK PER GEOTECHNICAL REQUIREMENTS. SEE LANDSCAPE PLAN FOR FINISHING REQUIREMENTS.
3. CONSTRUCT ADA COMPLIANT CURB RAMP PER SPPWC STD. PLAN 111-5
4. CONSTRUCT 6" CURB PER SPPWC STD. PLAN 120-2, A1-6.
5. CONSTRUCT 6" CURB & GUTTER PER SPPWC STD. PLAN 120-2, A2-6.
6. CONSTRUCT 4' WIDE VALLEY GUTTER
7. CONSTRUCT TRASH ENCLOSURE PER ARCHITECTURAL PLAN
8. INSTALL TRENCH DRAIN PER STORM DRAIN PLAN
9. CONSTRUCT DRAINAGE INLET PER STORM DRAIN PLAN
10. CONSTRUCT STAIR AND HAND RAILS PER ARCHITECTURAL PLAN
11. CONSTRUCT DECORATIVE PCC CROSSWALK, 6" PCC OVER 12" 95% COMPACTED NATIVE, PER GEOTECHNICAL REQUIREMENTS, SEE LANDSCAPE PLANS FOR FINISHING REQUIREMENTS.
12. CONSTRUCT 24" WIDE CHANNEL U-GUTTER
13. CONSTRUCT PARKWAY DRAIN PER SPPWC STD. PLAN 151-2.
14. CONSTRUCT 8' WIDE VALLEY GUTTER
15. CONSTRUCT UNDERGROUND DETENTION BASIN PER STORM DRAIN PLAN
16. CONSTRUCT MODULAR WETLAND SYSTEM PER STORM DRAIN PLAN



DISCHARGE TO ORANGETHORPE AVENUE

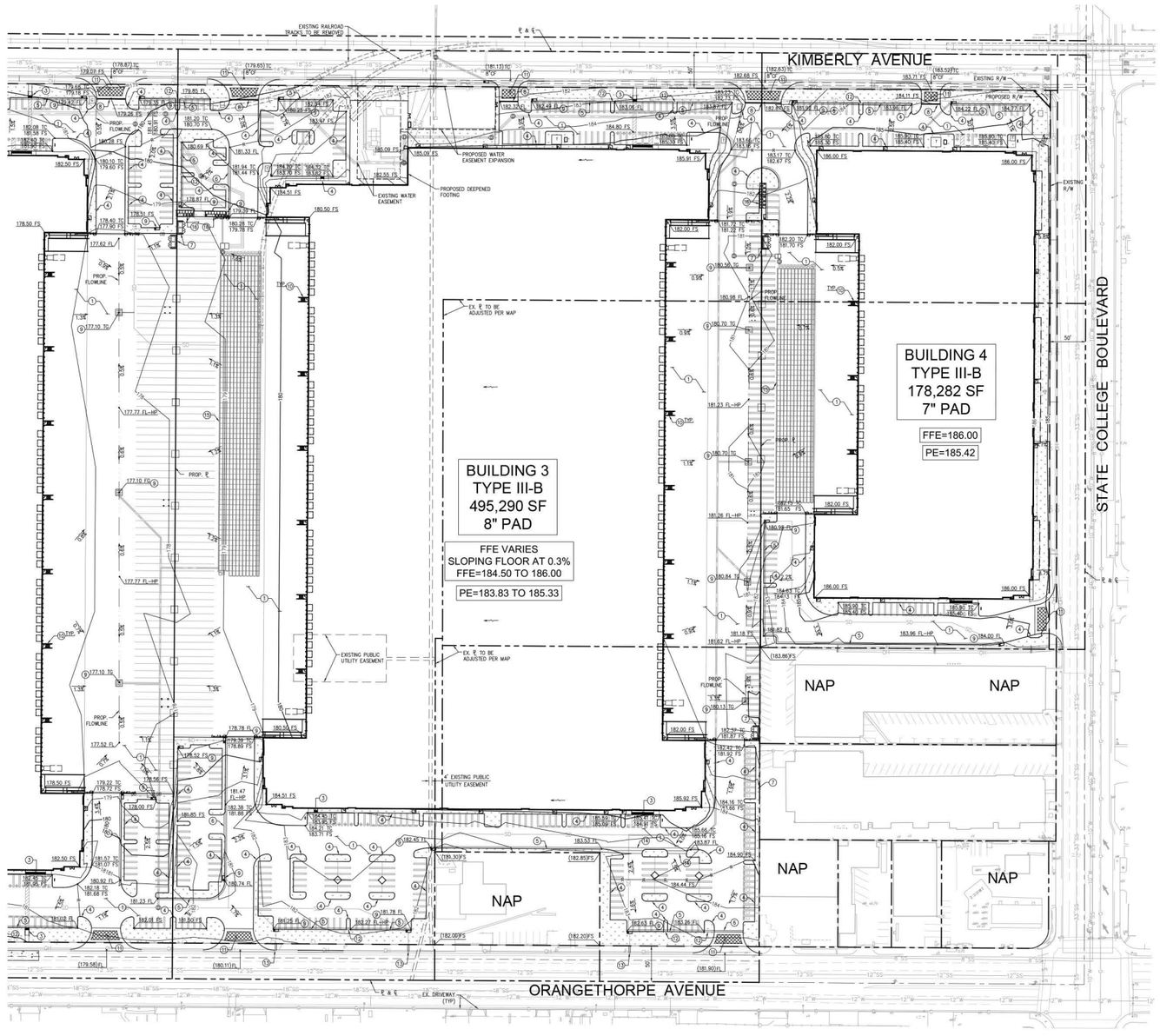
NTS

Source(s): TAIT (07-13-2020)

Figure 3-27

Not to Scale

Conceptual Grading Plan – West



LEGEND

- PROPOSED PROPERTY LINE
- EXISTING PROPERTY LINE
- EXISTING RIGHT-OF-WAY WITH ROADWAY EASEMENT
- PROPOSED EASEMENT
- EXISTING EASEMENT
- CENTERLINE
- 180 — PROPOSED CONTOUR
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- R — RIDGE LINE
- 0.5% — PROPOSED SLOPE
- XXX.XX FS — PROPOSED ELEVATION
- (XXX.XX) FS — EXISTING ELEVATION
- SD — PROPOSED STORM DRAIN LINE ≤ 12"
- PROPOSED STORM DRAIN LINE > 12"
- PROPOSED CATCH BASIN
- PROPOSED BIO-RETENTION PLANTER BOX
- MODULAR WETLAND UNIT

ABBREVIATIONS

EX	EXISTING
FS	FINISHED SURFACE
FFE	FINISHED FLOOR ELEVATION
FL	FLOWLINE
GB	GRADE BREAK
HP	HIGH POINT
INV	INVERT
NAP	NOT A PART
PROP	PROPOSED
PE	PAD ELEVATION
R/W	RIGHT OF WAY
SD	STORM DRAIN
TC	TOP OF CURB
TG	TOP OF GRATE

EASEMENT NOTE

ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS WILL BE ABANDONED, QUITCLAIMED, OR RELOCATED IN CONJUNCTION WITH THE FILING OF THE FINAL PARCEL MAP.

PRECISE GRADING NOTES

1. CONSTRUCT PCC PAVEMENT SECTION, 7" PCC OVER 12" 95% COMPACTED NATIVE PER GEOTECHNICAL REQUIREMENTS.
2. CONSTRUCT 4" THICK PCC SIDEWALK PER GEOTECHNICAL REQUIREMENTS. SEE LANDSCAPE PLAN FOR FINISHING REQUIREMENTS.
3. CONSTRUCT ADA COMPLIANT CURB RAMP PER SPPWC STD. PLAN 111-5
4. CONSTRUCT 6" CURB PER SPPWC STD. PLAN 120-2, A1-6.
5. CONSTRUCT 6" CURB & GUTTER PER SPPWC STD. PLAN 120-2, A2-6.
6. CONSTRUCT 4' WIDE VALLEY GUTTER
7. CONSTRUCT TRASH ENCLOSURE PER ARCHITECTURAL PLAN
8. INSTALL TRENCH DRAIN PER STORM DRAIN PLAN
9. CONSTRUCT DRAINAGE INLET PER STORM DRAIN PLAN
10. CONSTRUCT STAIR AND HAND RAILS PER ARCHITECTURAL PLAN
11. CONSTRUCT DECORATIVE PCC CROSSWALK, 6" PCC OVER 12" 95% COMPACTED NATIVE, PER GEOTECHNICAL REQUIREMENTS, SEE LANDSCAPE PLANS FOR FINISHING REQUIREMENTS.
12. CONSTRUCT 24" WIDE CHANNEL U-GUTTER
13. CONSTRUCT PARKWAY DRAIN PER SPPWC STD. PLAN 151-2.
14. CONSTRUCT 8' WIDE VALLEY GUTTER
15. CONSTRUCT UNDERGROUND DETENTION BASIN PER STORM DRAIN PLAN
16. CONSTRUCT MODULAR WETLAND SYSTEM PER STORM DRAIN PLAN

Source(s): TAIT (07-13-2020)

Figure 3-28

Not to Scale

Conceptual Grading Plan – East

Construction activities would generally follow a schedule similar to that listed in Table 3-2 and would generally utilize the typical heavy equipment listed in Table 3-3. Although the exact calendar dates of each construction phase are subject to change and may differ from those listed in Table 3-2, this construction schedule represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[3] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

TABLE 3-2 ESTIMATED CONSTRUCTION SCHEDULE

Phase Name	Start Date	End Date	Days
Demolition	04/02/2021	09/20/2021	122
Crushing/Pulverizing	06/29/2021	09/20/2021	60
Site Preparation	05/11/2021	10/04/2021	105
Grading	05/25/2021	05/04/2022	247
Building Construction	07/02/2021	04/28/2022	215
Paving	10/28/2021	06/30/2022	176
Architectural Coating	11/08/2021	05/19/2022	139

Construction workers would travel to the site by passenger vehicle and construction equipment and building materials deliveries would arrive by medium- and heavy-duty trucks. Trucks would use City-designated truck routes, but would avoid traveling on State College Boulevard. It is anticipated that delivery trucks carrying construction equipment and building materials would be routed from SR-57 (northbound and southbound) to the E. Orangethorpe Avenue exit and would travel west toward the Project site. Detailed construction routes would be determined in coordination with the City and would be outlined in the required Traffic Control Plan. Crushers (needed to crush concrete so that it can be re-used on-site as grading fill material) would be located in the southwest and south portions of the site and equipment and materials staging would occur in the central portion of the Project site (adjacent to Kimberly Avenue). Asphalt concrete (AC) would be pulverized in place.

For purposes of analysis in this EIR, construction equipment is expected to operate on the Project site approximately eight hours per day, six days per week (Monday through Saturday). Even though the Fullerton Municipal Code permits construction to occur up to 13 hours per day (between the hours of 7:00am to 8:00pm), construction equipment is not in continuous use and some pieces of equipment are used only periodically throughout a typical day of construction. Thus, approximately eight hours of daily use per piece of equipment is a reasonable assumption. Should construction activities need to occur at night (such as concrete pouring activities which benefit from reduced transit times and air temperatures that are lower than what occurs during daytime), the Project Applicant would be required to obtain authorization for nighttime work from the City of Fullerton. In the event that Project construction occur during nighttime hours,

[3] As shown in the CalEEMod User's Guide Version 2016.3.2, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

temporary, overhead artificial lighting directed toward the work area would be used to illuminate the work area.

TABLE 3-3 ESTIMATED CONSTRUCTION EQUIPMENT FLEET

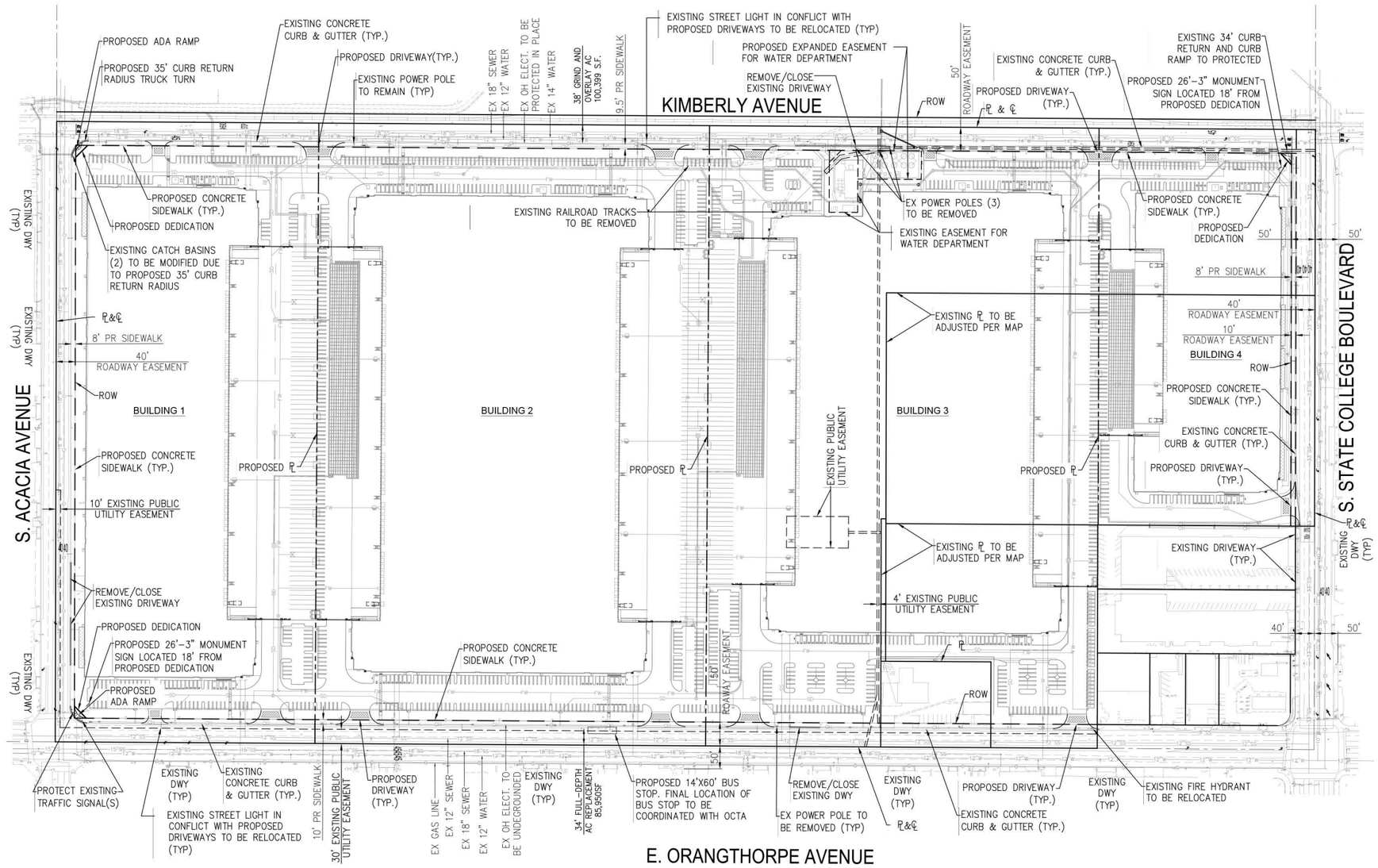
Phase Name	Equipment[a]	Amount	Hours Per
Demolition	Excavators	8	8
	Forklift	1	8
	Rubber Tired Dozers	2	8
	Skid Steer	3	8
	Tractor/Loader/Backhoe	1	8
	Water Trucks	2	8
Crushing/Pulverizing	Generator Sets	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Tractor/Loader/Backhoe	4	8
Grading	Blade	1	8
	Rubber Tired Dozers	1	8
	Scrapers	8	8
	Tractor/Loader/Backhoe	1	8
	Water Pull	1	8
Building Construction	Cranes	1	8
	Forklift	3	8
	Generator Sets	1	8
	Tractor/Loader/Backhoe	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Note: Construction equipment based on information provided by the Project Applicant and CalEEMod defaults.
[a] For purposes of analysis, water trucks and water pull have been modeled in CalEEMod as other construction equipment, and blades as graders. Based on information provided by the Project Applicant, grading activities would require the use of 6 scrapers operating at 457 horsepower (HP) and 2 scrapers operating at 407 HP.

In addition to on-site construction activities, the Project would involve site adjacent roadway and driveway access improvements, as previously described (refer to Figure 3-29, *Preliminary Off-site Improvements Plan*). Additionally, as described above, utility infrastructure would be installed on-site and in the adjacent roadways, as needed. The on-site utility infrastructure would connect to existing utility lines in the adjacent roadways or overhead.

G. Operational Activities

As previously discussed, at the time this EIR was prepared, the future occupants of the proposed buildings were unknown. However, for purposes of analysis in this EIR, it is assumed that up to



Source(s): TAIT (06-10-2020)

Figure 3-29

Not to Scale

Preliminary Off-site Improvements Plan

50 percent of the building square footage would be occupied by high-cube fulfillment center warehouse uses and the remaining 50 percent would be occupied by high-cube cold storage warehouse uses. The Project would be required by law to comply with enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, which includes the California Energy Code and the CalGreen Code). Additionally, operations would be required to comply with Industrial environmental controls outlined in Chapter 15.40.080 of the City's Municipal Code related to noise; smoke, dust, fumes and contaminants; odors; hazardous materials; vibration; and glare.

For purposes of evaluation in this EIR, it is assumed that Project buildings would be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with Fullerton Municipal Code Sections 15.40.080(F) and 15.56.110, which require that exterior lighting be shielded or recessed and directed downward and away from adjoining properties. Depending on the future businesses that occupy the Project's buildings, the Project Applicant anticipates that between 1,500 and 2,000 people would be employed on-site. This represents a net increase of approximately 1,175 to 1,675 employment opportunities in the City compared to employment opportunities when the Kimberly-Clark facility was operational.[4]

The Project's buildings are designed such that business operations would be conducted within the enclosed buildings, with the exception of traffic movement, parking, loading and unloading of tractor trailers and smaller delivery vehicles at designated loading bays. The outdoor cargo handling equipment used during loading and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) is expected to be diesel and/or non-diesel powered per contemporary industry standards. As a practical matter, dock doors on warehouse buildings are not occupied by trucks at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse.

As further discussed in EIR Section 4.11, Transportation, during operation, employees, visitors, and vehicles hauling goods would travel to and from the Project site on a daily basis. Using the trip generation rates in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition), Project operations are expected to generate 2,518 passenger vehicle and 904 truck trips per day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

[4] Based on an average of the number of employees at the existing Kimberly-Clark facility over the five-year period between 2015 and 2019, there was an average of approximately 325 individuals (including on-site contractors) employed at the Project site.

3.3.3 TENTATIVE PARCEL MAP NO. 2019-180

Under existing conditions, the Project site consists of two assessor parcels (APNs 073-120-31 and -33) (four legal parcels). The proposed Tentative Parcel Map No. 2019-180 presented on Figure 3-30, *Proposed Tentative Parcel Map No. 2019-180*, would modify the parcel configuration on-site to include four parcels that facilitate implementation of the Major Site Plan described on the preceding pages. There would also be four parcels with implementation of the Optional Site Plan. As previously identified, CC&Rs would be developed for the Project and would address items related to on-site operations including, but not limited to: reciprocal access, parking, drainage, and common facilities.

3.3.4 VARIANCE

As previously identified, the Project would consist of four large buildings. The likely tenants for the proposed buildings require building interior clear heights of 40-feet, which translates to overall building heights of approximately 50- to 55-feet. Therefore, the Project includes a request for a variance to exceed the maximum 45-foot height limit in the M-P-200-ES zone.

3.3.5 DEVELOPMENT AGREEMENT

The Project Applicant and the City of Fullerton are contemplating entering into a Development Agreement related to the Project. California Government Code Sections 65864-65869.5 authorize the use of development agreements between any city, county, or city and county, with any person having a legal or equitable interest in real property that is subject to a development proposal. The Development Agreement would provide the Project Applicant with assurance that development of the Project may proceed subject to the rules and regulations in effect at the time of Project approval. The Development Agreement also would provide the City of Fullerton with assurance that certain obligations of the Project Applicant will be met, including but not limited to the required timing of public improvements, the Applicant's contribution toward funding community improvements, and other conditions. No physical changes in the environment (beyond those described herein) are assumed in connection with the Development Agreement.

3.4 SUMMARY OF REQUESTED ACTIONS

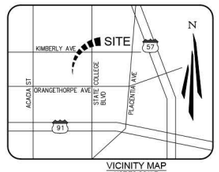
The City of Fullerton has primary approval responsibility for the Project. As such, the City serves as the Lead Agency for this EIR pursuant to CEQA Guidelines Section 15050. The City's Planning Commission will evaluate this EIR and the Project Applicant's requested discretionary applications (Zone Change, Major Site Plan, Tentative Parcel Map, Variance, and Development Agreement) and make a recommendation to the City Council whether the Project's discretionary applications should be approved and the EIR should be certified. The City Council is the decision-making authority for the Project and will consider the Project along with the Planning Commission's recommendations and will make a final decision to approve, approve with changes, or deny the Project. The City will consider the information contained in this EIR and the Project's Administrative Record in its decision-making processes. In the event of approval of the Project and certification of the EIR, the City would conduct administrative reviews and grant ministerial permits and approvals to implement Project requirements and conditions of approval.

TENTATIVE PARCEL MAP NO. 2019-180

IN THE CITY OF FULLERTON,
COUNTY OF ORANGE, STATE OF CALIFORNIA

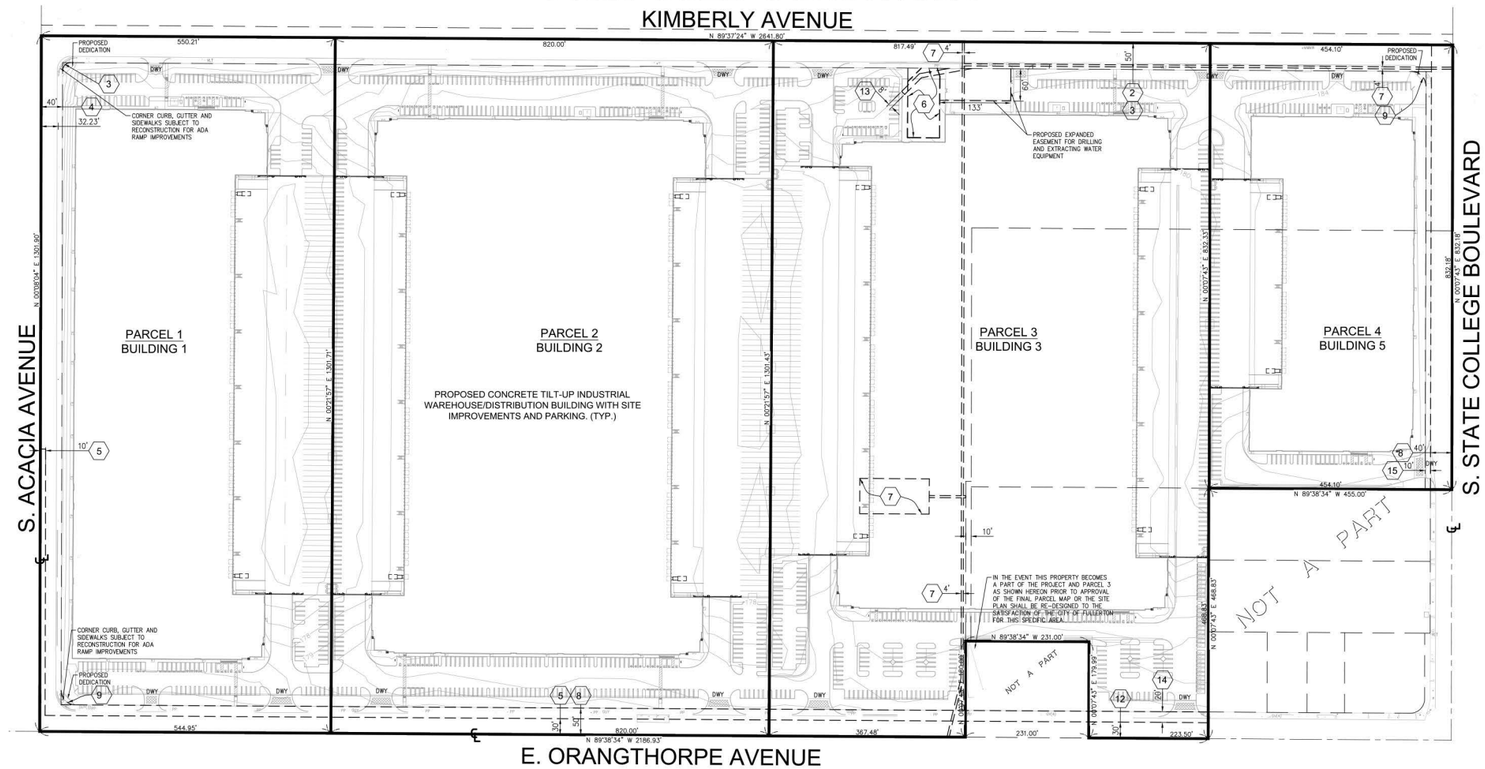
BEING A CONSOLIDATION AND SUBDIVISION OF A PORTION OF THE SOUTH HALF OF THE SOUTHEAST QUARTER OF SECTION 35, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA IN THE CITY OF FULLERTON, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 51, AT PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

TAIT & ASSOCIATES, INC. JUNE, 2020



VICINITY MAP
NOT TO SCALE

PROPOSED CONDITIONS



AREA SUMMARY:

	LAND AREA	BUILDING AREA
PARCEL 1	16.36± ACRES	342,695 SF
PARCEL 2	24.50± ACRES	545,255 SF
PARCEL 3	23.53± ACRES	495,290 SF
PARCEL 4	8.68± ACRES	178,282 SF
TOTAL	73.08± ACRES	1,561,522 SF

LEGEND:

- PROPERTY LINE
- EASEMENT LINE
- CENTER LINE
- RIGHT OF WAY LINE
- PROPOSED PARCEL LINE
- PROPOSED EASEMENT LINE

PROTECTIVE COVENANTS:

1.) ADEQUATE INSTRUMENTS SHALL BE PREPARED TO ADDRESS THE SITE ACCESS, COMMON PARKING, MAINTENANCE, CROSS LOT DRAINAGE, COMMON UTILITIES, CROSS LOT UTILITY LATERALS, SIGNAGE AND WATER QUALITY MAINTENANCE.

PUBLIC STREET IMPROVEMENTS:

ADJACENT STREETS MAY NEED IMPROVEMENTS SUCH AS PAVEMENT RESTORATION, CONSTRUCTION OF ADA ACCESSIBLE SIDEWALK, RAMPS, LANDSCAPING AND STREET LIGHTS. STAFF WILL REVIEW POTENTIAL STREET IMPROVEMENTS ON THE CONDITION OF THE ROADS. ALL STREET ARE AT REQUIRED WIDTH, SO NO DEDICATIONS ARE ANTICIPATED AS PART OF THE PROJECT.

NOTES:

1. ALL BUILDINGS AND SITE IMPROVEMENTS ARE SUBJECT TO SITE PLAN APPROVAL BY THE CITY OF FULLERTON.
2. ALL EASEMENTS SHOWN HEREON INTERFERING WITH PROPOSED IMPROVEMENTS SHALL BE ABANDONED, QUITCLAIMED OR RELOCATED IN CONJUNCTIONS WITH THE FILING OF THE FINAL PARCEL MAP.
3. CONCURRENT APPLICATIONS INCLUDED: SITE PLAN REVIEW, ZONING AMENDMENT, AND VARIANCE.

TITLE EXCEPTIONS:

(1) INDICATES SHOWN HEREON. NUMBERED ACCORDING TO THE ABOVE REFERENCED PRELIMINARY TITLE REPORT.

(2) AN EASEMENT FOR RAILROAD PURPOSES AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

RESERVING UNTO KIMBERLY-CLARK CORPORATION, A CORPORATION, ITS SUCCESSORS AND ASSIGNS, A RIGHT OF WAY AND EASEMENT TO CONSTRUCT, MAINTAIN IN, REPAIR, REPLACE, ENLARGE, RENEW, USE, OPERATE AND REMOVE UNDERGROUND PIPE LINES, UNDERGROUND WIRE LINES, AND PEDESTRIAN AND VEHICULAR SUBWAY CROSSING EXTENDING IN A NORTH-SOUTH DIRECTION ACROSS SAID STRIP OF LAND, PROVIDED THAT THE PLANS AND SPECIFICATIONS FOR ANY SUCH FACILITIES TO BE CONSTRUCTED UNDER OR WITHIN FIFTEEN FEET OF THE CENTER LINE OF ANY RAILROAD TRACK SHALL HAVE BEEN APPROVED BY SANTA FA BEFORE CONSTRUCTION IS COMMENCED, AND PROVIDED FURTHER THAT SUCH FACILITIES SHALL BE OPERATED AND MAINTAINED BY THE FIRST PARTY, ITS SUCCESSOR AND ASSIGNS, IN A MANNER WHICH WILL NOT INTERFERE WITH THE USE OF THE SURFACE OF SAID STRIP OF LAND BY SANTA FE FOR RAILROAD PURPOSES.

AND RESERVING FURTHER UNTO FIRST PARTY, ITS SUCCESSOR AND ASSIGNS, THE RIGHT TO DEDICATE SAID STRIP OF LAND FOR STREET PURPOSES, SUBJECT, HOWEVER, TO THE PRIOR RIGHT OF SANTA FE TO USE SAID STRIP OF LAND FOR RAILROAD PURPOSE A PURSUANT TO THE RIGHTS HEREIN GRANTED, AS GRANTED TO THE ATCHISON, TOPEKA AND SANTA FE RAILWAY COMPANY, A KANSAS CORPORATION, BY DEED RECORDED APRIL 19, 1955 IN BOOK 3035 PAGE 496, OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(3) AN EASEMENT FOR PUBLIC UTILITY PURPOSES AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED MAY 2, 1955 IN BOOK 3051 PAGE 86, OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(4) AN EASEMENT FOR ROAD AND PUBLIC UTILITIES AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED MAY 2, 1955 IN BOOK 3051 PAGE 91, OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(5) AN EASEMENT FOR DITCHES AND PIPE LINES AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT RECORDED JANUARY 13, 1920 AS CERT. TITLE NO: 691 AND RECORDED MARCH 26, 1920 AS CERT TITLE NO: 944. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(6) AN EASEMENT FOR DRILLING AND EXTRACTING WATER AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED OCTOBER 24, 1955 IN BOOK 3256 PAGE 279 OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(7) AN EASEMENT FOR PUBLIC UTILITIES CONDUITS AND INCIDENTAL PURPOSES AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED MARCH 12, 1956 IN BOOK 3434 PAGE 68, OF OFFICIAL RECORDS.

A QUITCLAIM DEED RECORDED JULY 27, 1965 IN BOOK 7608, PAGE 593 OFFICIAL RECORDS WHICH PURPORT TO QUITCLAIM A PORTION OF SAID EASEMENT, SAID PORTION BEING MORE PARTICULARLY DESCRIBED IN SAID QUITCLAIM DEED.

A QUITCLAIM DEED RECORDED DECEMBER 27, 1971 IN BOOK 9940, PAGE 918 OFFICIAL RECORDS WHICH PURPORT TO QUITCLAIM A PORTION OF SAID EASEMENT, SAID PORTION BEING MORE PARTICULARLY DESCRIBED IN SAID QUITCLAIM DEED. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(8) AN EASEMENT FOR RIGHT OF WAY FOR ROAD AND PUBLIC UTILITIES AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT RECORDED DECEMBER 07, 1956 IN BOOK 3736 PAGE 437, OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(9) AN EASEMENT FOR RIGHT OF WAY FOR ROAD AND PUBLIC UTILITIES AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED DECEMBER 16, 1971 IN BOOK 9929 PAGE 115 OF OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(12) RIGHT OF WAY IN FAVOR OF ANAHEIM UNION WATER COMPANY FOR PIPELINE MAINTENANCE PURPOSES AS DISCLOSED BY REGISTRAR'S CERTIFICATES OF TITLE NO. 906 AND 1122, RECORDED APRIL 17, 1920 AND DECEMBER 21, 1920. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(13) AN EASEMENT FOR SANITARY SEWER AND APPURTENANT STRUCTURES AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED AUGUST 22, 1963 IN BOOK 6687, PAGE 301 OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(14) AN EASEMENT FOR ROAD AND PUBLIC UTILITY AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED SEPTEMBER 17, 1964 IN BOOK 7222, PAGE 826, OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

(15) AN EASEMENT FOR ROAD AND PUBLIC UTILITY AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT RECORDED NOVEMBER 23, 1964 IN BOOK 7313, PAGE 91, OFFICIAL RECORDS. *(THIS ITEM IS PLOTTED HEREON AND DOES AFFECT THE SUBJECT PROPERTY.)*

Source(s): TAIT (06-10-2020)

Figure 3-30

Not to Scale

Proposed Tentative Parcel Map No. 2019-180

The Final EIR informs State, regional, and local government approvals needed for construction and/or operation of the Project, whether or not such actions are known or are explicitly listed. A list of the anticipated actions under City of Fullerton jurisdiction is provided in Table 3-4, *Project-Related Approvals/Permits*. In addition, additional discretionary and/or administrative actions may be necessary from other government agencies to fully implement the Project. Table 3-4 lists the government agencies that are expected to use the Project's EIR during their consultation and review of the Project and its implementing actions and provides a summary of the subsequent actions associated with the Project.

TABLE 3-4 PROJECT-RELATED APPROVALS/PERMITS

Public Agency	Approvals and Decisions
City of Fullerton	
Proposed Project – City of Fullerton Discretionary Approvals	
City Council	• Approve, conditionally approve, or deny: o Zone Change, o Major Site Plan; o Tentative Parcel Map, o Variance, and o Development Agreement. • Approval of the Project's Water Supply Assessment • Certify or reject the Project's EIR along with appropriate CEQA Findings (including a Statement of Overriding Considerations).
Subsequent City of Fullerton Discretionary and Ministerial Approvals	
City of Fullerton	• Approve Final Maps, parcel mergers, lot line adjustments, or parcel consolidations, as may be appropriate. • Approve Building plans and issue permits (includes site plan review). • Issue Landscape Permits. • Issue Sign Permits. • Approve Conditional Use Permits, if required. • Approve Grading Plans and issue permits. • Approve Street Improvement Plans and issue permits. • Approve Infrastructure Plans and issue permits. • Accept public right-of-way dedications. • Approve Water Quality Management Plan (WQMP). • Approval of connections to the municipal sewer utility systems.
Other Agencies – Subsequent Approvals and Permits	
Santa Ana Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.

Public Agency	Approvals and Decisions
South Coast Air Quality Management District	• Issuance of permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as HVAC units.
Utility Agencies	• Issuance of permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

SECTION 4.0 ENVIRONMENTAL ANALYSIS

4.0.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

Sections 4.1 through 4.13 of this Draft Environmental Impact Report (EIR) provide analysis of impacts for those environmental topics where it was determined that the proposed Goodman Logistics Center Fullerton Project (Project) could result in "potentially significant impacts", as identified in the Notice of Preparation (NOP) included in Appendix A of this EIR.

When the term "Project" is used in this EIR with the initial letter capitalized, the term shall mean all aspects of the planning, construction, and operation of Goodman Logistics Center Fullerton Project, including all discretionary and administrative approvals and permits required for its implementation. Reference to the "Optional Site Plan" indicates implementation of the Project including the additional potential expansion site. Unless otherwise noted, references to the "Project site" in this EIR collectively refer to the Kimberly-Clark site and proposed expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted. When the term "Project Applicant" is used with the initial letters capitalized, the term shall mean Goodman, which is the entity that submitted applications to the City of Fullerton to entitle the Project site as proposed and as evaluated in this EIR.

Each topical section includes the following information:

- A summary of comments received on the Notice of Preparation (NOP) related to the topical issue.
- A description of the existing setting, including a discussion of the regulatory setting, if applicable.
- Identification of thresholds of significance.
- Identification of applicable Mitigation Measures (MMs) from The Fullerton Plan EIR.
- Analysis of potential Project impacts.
- Identification of Project-specific mitigation measures, if required, to reduce the identified project impacts.
- Identification of the level of significance of impacts before and after mitigation, including unavoidable significant adverse impacts, if applicable.
- Evaluation of potential cumulative impacts.

As discussed in Section 1.0, *Introduction*, analysis in this EIR relies on analysis presented in The Fullerton Plan EIR. The Fullerton Plan EIR provides a broad analysis of the environmental effects of future development in the City, as anticipated under The Fullerton Plan, such as the Project. As described in Section 3.0, *Project Description*, of this EIR, the Project involves demolition of existing Kimberly-Clark buildings (approximately 1,210,720 square feet [s.f.] of building area) and facilities that remain. Kimberly-Clark vacated the Project site in June 2020. The analysis of Project impacts in this EIR takes into consideration Kimberly-Clark operations for the baseline condition, as explained for each topical issue, as applicable.

The Project involves a logistics center with four buildings that would include 1,561,522 s.f. of total building area, as well as associated vehicular and non-vehicular improvements; parking; landscaping, lighting, walls/fences, and signage; utility infrastructure; and construction activities. In the event the Project Applicant is able to acquire an additional adjacent property (potential expansion site), the Project could be expanded to include 1,609,384 s.f. of total building floor area (with Building 3 being expanded by 47,862 s.f.). For each topical issue in this section (Sections 4.1 through 4.13), unless otherwise noted, the analysis of impacts is based on the Optional Site Plan, which results in the greatest level of construction-related and operational impacts.

The Project site encompasses approximately 65.4 net acres[1]; with the inclusion of the approximately 0.7-net-acre potential expansion site, the Project site would encompass 66.1 net acres. With respect to the analysis of Project impacts in this EIR that would occur with implementation of the Project, the entire Project site would be subject to physical impacts. In addition to on-site impacts, off-site impacts would occur in the public right-of-way along Kimberly Avenue, E. Orangethorpe Avenue and Acacia Avenue for various utility infrastructure and access (vehicular and/or non-vehicular) improvements. The roadway surface along the full-width of Kimberly Avenue and Orangethorpe Avenue would also be rehabilitated. Improvements along State College Boulevard, which was recently improved, would be limited to the construction of a new driveway for site access.

4.0.2 MITIGATION MEASURES

Feasible measures to reduce potential project impacts under each topical issue consist of applicable The Fullerton Plan EIR mitigation measures (MMs) and additional Project-specific MMs. These are described below and will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

- **The Fullerton Plan EIR Mitigation Measures.** Development projects in the City of Fullerton are required to comply with applicable MMs from The Fullerton Plan EIR. Applicable MMs from The Fullerton Plan EIR are identified in each section, as applicable.
- **Project-Specific Mitigation Measures.** Where a potentially significant environmental effect has been identified and is not reduced to a level considered less than significant through the application of The Fullerton Plan EIR MMs, Project-specific MMs have been recommended in accordance with CEQA.

4.0.3 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence but not in as great a level of detail as that necessary for the project alone. Section 15355 of the CEQA Guidelines defines cumulative impacts as ". . . two or more individual effects which, when considered together, are considerable or which compound

[1] The Project site encompasses approximately 73.1 gross acres, which includes an easement for City of Fullerton Public Works Department water system facilities, areas to be dedicated for access improvements along the site-adjacent roadways, and public roadway right-of-way. The City easement would be reconfigured with Project, but would remain the same size. The potential expansion site encompasses approximately 1.0 gross acre.

or increase other environmental impacts". Section 15130(a) of the CEQA Guidelines states, "cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable". Section 15355(b) of the CEQA Guidelines states, "cumulative impacts represent the change in the environment caused by the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable probable future projects in the vicinity".

Because the Project is consistent with development and growth assumptions included in The Fullerton Plan and specifically for the Southeast Industrial Focus Area, Section 15130(d) of the CEQA Guidelines is particularly relevant to the analysis of cumulative impacts for the Project and states:

> *Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in the cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.*

Section 15130(b)(1) of the CEQA Guidelines further identifies that the information utilized in an analysis of cumulative impacts should come from one of two sources, either:

1. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
2. A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

As discussed further below, this EIR uses both sources to assess the Project's cumulative impacts.

The Fullerton Plan EIR included an analysis of the potential cumulative impacts resulting from implementation of development and growth allowed by The Fullerton Plan in each of the identified Focus Areas, including growth assumed in the Southeast Industrial Focus Area where the Project site is located. The cumulative impact analysis provided under each topical issue in The Fullerton Plan EIR is hereby incorporated by reference and is available for review as discussed in Section 1.5 of this EIR. Additionally, The Fullerton Plan is available to the public as required by Section 15130(b)(1)(B) of the CEQA Guidelines. The Fullerton Plan EIR primarily utilizes the "summary of projections" approach (see Item No. 2 above) in the cumulative analysis and evaluates the overall (cumulative) effects of development in accordance with the community development types; land use assumptions; and all Goals, Policies, and Actions contained in The Fullerton Plan. Therefore, the environmental analyses in The Fullerton Plan EIR consider impacts from future development within the City of Fullerton in combination with regional impacts, where applicable, that could be expected as other cities within the Orange County subregion approach buildout.

As identified in Table 3-4, *Projected Land Use Change – Focus Areas (Increase Over Existing Condition)*, of The Fullerton Plan EIR, it is assumed that there will be 201 new residential units and 2,654,428 square feet of additional nonresidential development in the Southeast Industrial Focus Area. As further discussed in Section 4.9, Land Use and Planning, of this EIR, the Project implements and is consistent with development and growth assumptions identified in The Fullerton Plan for the Southeast Industrial Focus Area. Therefore, no further cumulative impact analysis is required. Nonetheless, cumulative impacts are addressed for each topic analyzed in Sections 4.1 through 4.13 of this EIR.

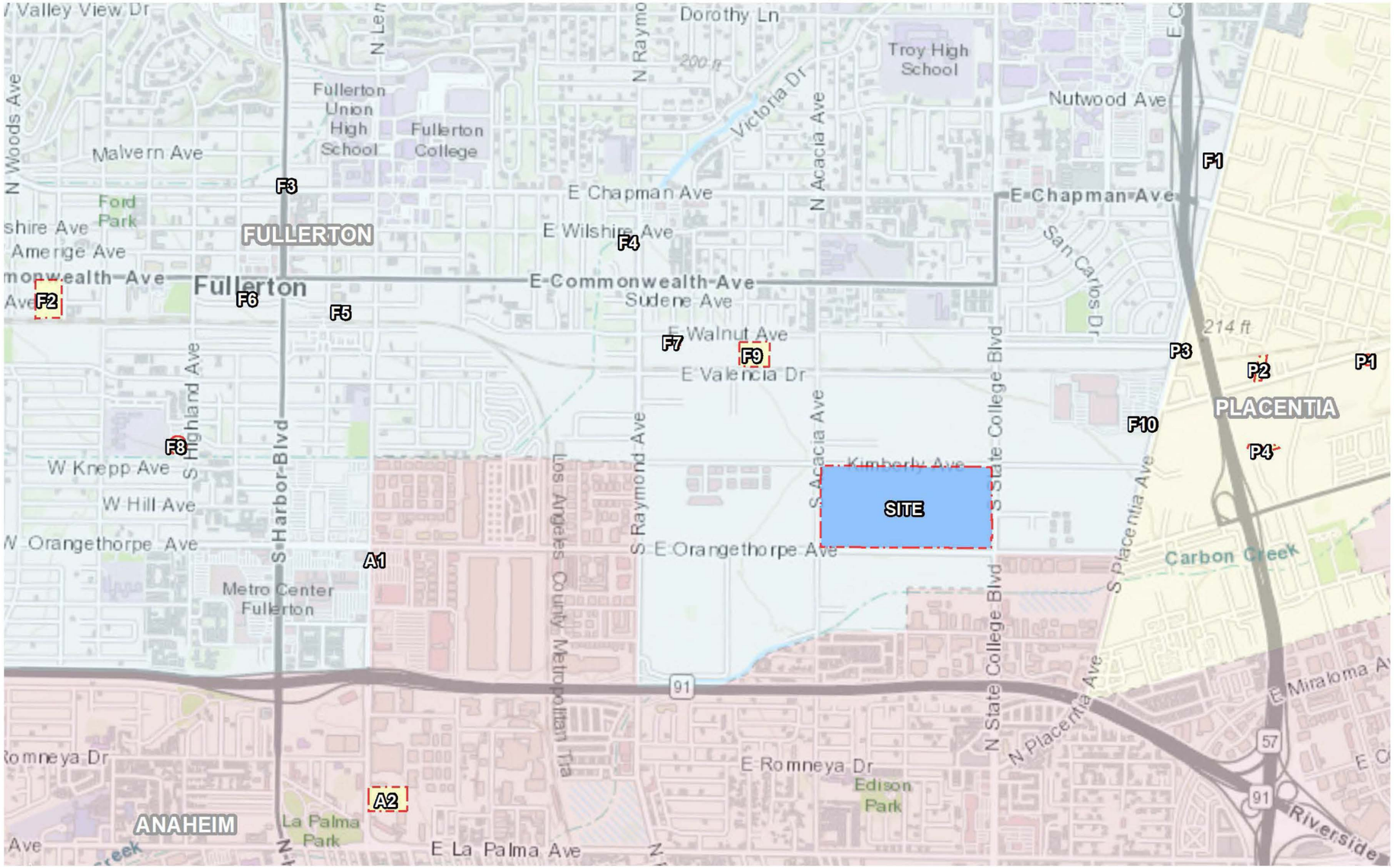
As appropriate, the cumulative impact analyses provided in this EIR use The Fullerton Plan EIR study area, which takes into consideration the demographic projections and land use buildout assumptions outlined in The Fullerton Plan. The individual cumulative areas for the issues addressed in this EIR are provided in the respective impact sections and are consistent with The Fullerton Plan EIR, unless otherwise noted. In addition, the cumulative analysis for individual topical issues may consider specific cumulative study areas designated by respective agencies for regional or areawide conditions. For instance, topic-specific cumulative study areas have been developed (e.g., South Coast Air Basin for air quality and the Santa Ana River Watershed for hydrology and water quality).

In sections where a list of cumulative projects provides a more comprehensive assessment of the Project's cumulative impacts, cumulative impacts are assessed with reference to a list of cumulative projects. A comprehensive cumulative project list was compiled for the CEQA Support Traffic Analysis (included in Appendix K2 of this EIR) based on information provided by the City of Fullerton Community and Economic Development Department and the planning departments in the cities of Anaheim and Placentia. A summary of cumulative development projects and their proposed land uses is provided in Table 4.0-1, *Cumulative Development Land Use Summary*, and Figure 4.0-1,*Cumulative Development Project Location Map*, depicts the location of the cumulative projects.

TABLE 4.0-1 CUMULATIVE DEVELOPMENT LAND USE SUMMARY

#[a]	Project/Location	Land Use	Quantity	Units
City of Fullerton				
F1	Fullerton Crossings: 601-629 S. Placentia Av.	Major Retail & Shops	85.758	TSF
F2	Amplifi Apartments: 600 W. Commonwealth Av.	Multifamily (Mid-Rise) Residential	290	DU
F3	Fox Block Mixed-Use: N Harbor Bl. & W. Chapman Av.	Fox Tea Room Retail, Alley, Mixed-Use (office, residential), Public Parking	4.440	Acres
F4	Convenience Store: 181 N. Raymond Av.	Convenience Store	4.060	TSF
F5	Parkwest Hotel: 212 E. Santa Fe Av.	Hotel	125	Rooms
F6	139-147 W. Santa Fe Av.	Restaurant	20.938	TSF
F7	1250 E. Walnut Av.	Warehouse	36.750	TSF
F8	Melia Homes: 805-807 S. Highland Av.	Multifamily (Low-Rise) Residential	19	DU
F9	1500 E. Walnut Av.	Warehouse	79.800	TSF
		Manufacturing	40.000	TSF
F10	Farmer Boys: 663 S. Placentia Av.	Fast-Food Restaurant w/ Drive-Thru	3.207	TSF
City of Placentia				
P1	VTM 18118: 110-132 E. Crowther Av.	Multifamily (Mid-Rise) Residential	215	DU
P2	DPR 2018-04: 505 W. Crowther Av.	Multifamily (Mid-Rise) Residential	418	DU
P3	DPR 2018-06: 380 S. Placentia Av.	Hotel	116	Rooms
P4	DPR 2019-01: 719 1/2 Monroe Wy.	General Light Industrial	7.600	TSF
City of Anaheim				
A1	7-11 (DEV 2020-00081): 30 E. Orangethorpe Av.	Convenience Store	3.060	TSF
A2	The Renaissance: 1122 N. Anaheim Bl.	Multifamily (Mid-Rise) Residential	269	DU

Note: TSF = Thousand Square Feet; DU = Dwelling Units
a. Cumulative project locations are depicted on Figure 4.0-1.



Source(s): Urban Crossroads (07-16-2020)

Figure 4.0-1

Not to Scale

Cumulative Development Project Location Map

4.1 AESTHETICS

The section describes the existing visual character of the Project site and the surrounding area. This section also addresses the consistency of the Project with applicable regulations addressing scenic quality and potential light and glare impacts. Information presented in this section is primarily based on the analyses of site photographs, site reconnaissance, and Project design information provided for the Project application. Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

There were no comments received on the Notice of Preparation or at the Draft Environmental Impact Report (EIR) public scoping meeting regarding aesthetics.

4.1.1 EXISTING SETTING

Visual Character of Project Site and Surrounding Area

The Project site is in the southeast portion of the City in the Southeast Industrial Focus Area, as identified in The Fullerton Plan (Fullerton, 2012a). The Southeast Industrial Focus Area encompasses the largest concentration of Fullerton's industrial base and the visual character of this area, including the Project site, is urban in nature, composed mainly of large parcels with one- and two-story industrial buildings without a cohesive design theme. The visual character of the area is depicted in the site photographs provided in Figure 4.1-1 through Figure 4.1-3.

Figure 3-3, *USGS Topographic Map*, in EIR Section 3.0, *Project Description*, depicts the existing topographic conditions of the Project site and surrounding areas. The Kimberly-Clark site is relatively flat and gradually slopes from southeast to northwest. The site's high point is approximately 184 feet above mean sea level (amsl) in the northeastern portion of the site and its low point is approximately 174 feet amsl in the northwest portion of the site. The potential expansion site slopes north to south. There is approximate 1-foot drop across the potential expansion site with a maximum elevation of 183 feet amsl. The grades surrounding the potential expansion site range from 183 to 181 feet amsl. The Project site is visible from immediately surrounding land uses, which are not public or otherwise sensitive viewer groups, and from drivers, pedestrians, and bicyclists along adjacent public roadways (including bikeways and sidewalks).

The site photographs provided in Figure 4.1-1 through Figure 4.1-3 were taken from ground level public vantage points adjacent to the Project site and are representative of views from the surrounding roadways (including bikeways and sidewalks, as applicable). As shown, because the topography of the Project site and surrounding area is relatively flat, and the surrounding area is densely developed, views of the Project site from vantage points beyond the adjacent roadways and land uses are obstructed by intervening development and mature trees. However, motorists, bicyclists, and pedestrians traveling north along State College Boulevard and Acacia Avenue, and east along E. Orangethorpe Avenue and Kimberly Avenue, adjacent to the Project site, have views of distant hillsides as they look down the roadway corridors.

View 1A

View 1b

View 1c

View 2a

View 2b

Key Map

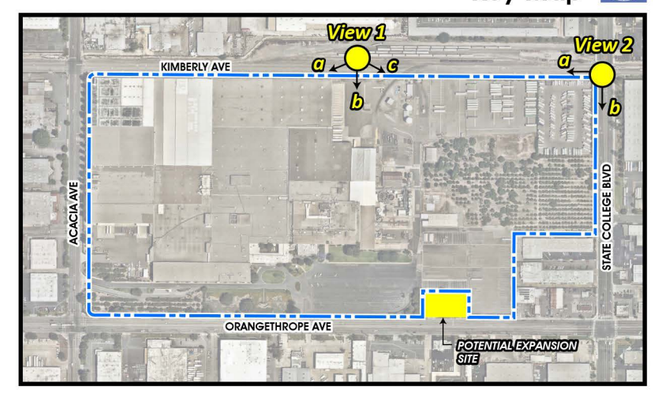
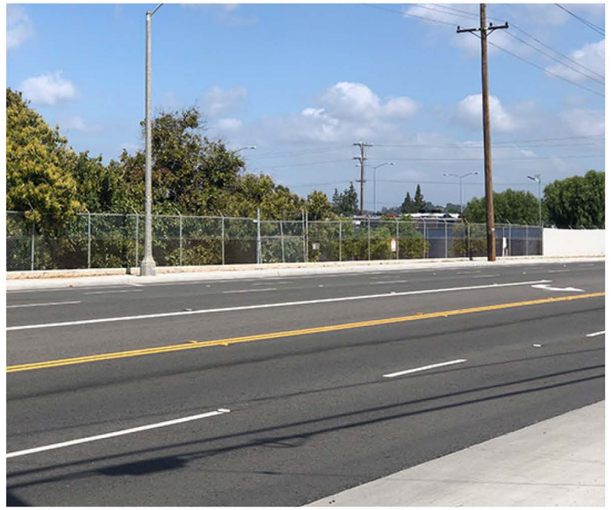


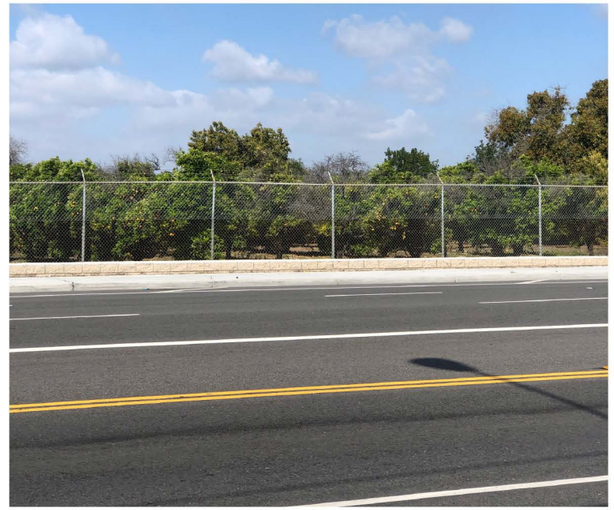
Figure 4.1-1

Not to Scale

Views 1a - 2b



View 3a



View 3b

View 4

View 5

Key Map

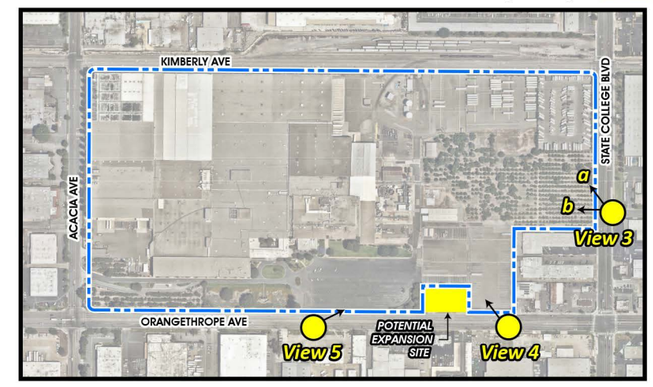


Figure 4.1-2

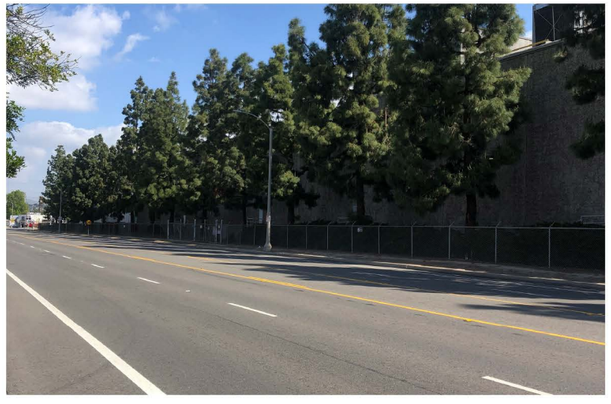
Not to Scale

Views 3a - 5

View 6

View 7

View 8a



View 8b

View 9

Key Map

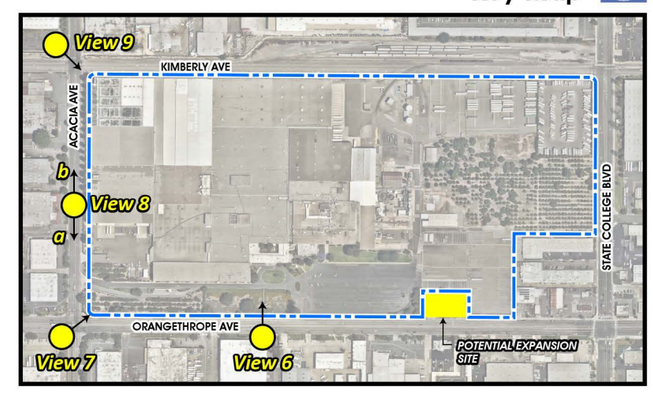


Figure 4.1-3

Not to Scale

Views 6 - 9

Views 1a through 1c in Figure 4.1-1 depict views from vantage points north of the Project site generally looking south, and are representative of existing views experienced by individuals traveling along Kimberly Avenue. As shown in these photographs, the Project site and surrounding area are fully developed with industrial uses, and there are railroad facilities on the north side of Kimberly Avenue (refer to View 1a). Facilities associated with the City's water well are in the foreground of View 1b and would remain with implementation of the Project. There is a row of mature trees and above ground utility lines along the northern perimeter of the Project site (on the south side of Kimberly Avenue).

Views 2a and 2b in Figure 4.1-1 depict views looking west and south toward the site from the corner of State College Boulevard and Kimberly Avenue, and are representative of existing views experienced by individuals traveling along these roadways. The chain-link fencing that screens views of the trailer and RV storage yard, partially obstructed mature ornamental trees, and above ground utility lines are prominent in the views from these vantage points. Views 3a and 3b in Figure 4.1-2 demonstrate views from State College Boulevard looking toward the orange orchard, which are a focal point of this viewshed.

Views 4 and 5 in Figure 4.1-2 and Views 6 and 7 in Figure 4.1-3 depict views from vantage points south of the Project site along E. Orangethorpe Avenue, and are representative of existing views experienced by individuals traveling east and west along this roadway. The on-site truck trailer storage and potential expansion site are visible in View 4, and the large surface parking area and perimeter landscaping/trees are visible in View 5. View 6 depicts the administration building, signage, and surrounding mature vegetation in the southern portion of the site, which obstructs views of other on-site uses. View 7 depicts the landscaped southwest corner of the Project site and signage for the Kimberly-Clark facility; the mature landscaping and trees partially obstruct views of on-site uses. These photographs further demonstrate the industrial nature of the area, and mature trees on-site and overhead utility lines are a focal point from these vantage points.

Views 8a, 8b, and 9 shown in Figure 4.1-3 depict views from vantage points west of the Project site along Acacia Avenue and represent existing views experienced by individual traveling along this roadway. Mature trees that line Acacia Avenue are a focal point from these vantage points and partially obstruct views into the Project site of the existing buildings.

Light and Glare

The Project site is developed with industrial uses and associated facilities with existing sources of lighting, including lighting for parking areas and buildings. Other nearby sources of light include exterior lighting from the surrounding commercial and industrial buildings, street lighting, and vehicle headlights along existing roadways. There are no existing buildings or other man-made features on-site or in proximity to the site that are constructed of materials that cause substantial glare; however, windows and other reflective materials associated with buildings and vehicles are an existing source of potential glare.

4.1.2 EXISTING REGULATORY SETTING

Section 5.3, *Aesthetics and Light/Glare*, of The Fullerton Plan EIR, provides a discussion of regulations relevant to scenic quality and light and glare, including those in the City of Fullerton Municipal Code. Following is a discussion of regulations applicable to the Project, as well as relevant guidance provided in The Fullerton Plan.

A. Local

The Fullerton Plan

Part I: The Fullerton Vision, of The Fullerton Plan, contains planning objectives for each Focus Area. Relevant to the Project is the Southeast Industrial Focus Area objective to "[i]mprove appearance and function through design, including landscaping, pedestrian and transit facilities, and alleyway improvements." Additionally, Goal 2 of the Community Design and Development Element is "[a] positive identity and distinctive image", with the associated policy (P2.7) to: [s]upport projects, programs, policies and regulations to site and design buildings to create a positive, accessible image along the street and reinforce a vibrant and comfortable public realm."

The City has designated several roadways as scenic corridors. As shown in Exhibit 10, *Scenic Corridors*, of The Fullerton Plan, the nearest City designated scenic corridor is the segment of State College Boulevard between the State College Boulevard/Yorba Linda Boulevard intersection and the State College Boulevard/Rolling Hills Drive intersection, approximately 1.7 miles north of the Project site.

City of Fullerton Municipal Code

While the General Plan provides long-range and broad categories of land use, the Municipal Code Title 15 (Zoning Code), provides specific development standards that influence the City's scenic views and visual character, and address lighting requirements. The Zoning Code implements the goals and policies of The Fullerton Plan by classifying and regulating the specific uses of land and structures within the City. The Zoning Code establishes development standards that include, but are not limited to, the following:

- Minimum lot area;
- Building setbacks;
- Lot coverage, building area and floor/area ratio requirements;
- Maximum height requirements;
- Fencing and walls; and
- Landscaping requirements.

Development standards for areas zoned Industrial are discussed under Threshold c in Section 4.1.4, below.

Other sections of the Zoning Code relevant to scenic quality of the Project include:

- **Chapter 15.49 (Sign Standards and Regulation)**, regulates the size, height, design, quality of materials, construction, illumination, location, and maintenance of all signs and sign structures in the City. The provisions apply to all signs on private property either placed in the ground or installed or placed on the outside of a building or structure. The provisions also apply to a sign placed on the inside of a building or structure that can be viewed from the outside.
- **Chapter 15.56 (General Provisions, Conditions and Exceptions)** is applicable to any proposal to develop or use property and includes standards that influence the visual character of a development site for the following issue areas that are applicable to the Project and not covered by a previously discussed regulation:
    - Temporary structures;
    - Illumination of premises; and
    - Trash storage and disposal.

4.1.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project will normally have a significant adverse environmental impact related to aesthetics if it would:

a. Have a substantial adverse effect on a scenic vista.

b. Substantially degrade scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site (Public views are those that are experienced from publicly accessible vantage point). If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.

d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

4.1.4 ENVIRONMENTAL IMPACTS

A. <u>Applicable Mitigation Measure from The Fullerton Plan Environmental Impact Report</u>

The following mitigation measure (MM) from The Fullerton Plan EIR is applicable to the Project and will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

MM AES-2 Construction documents shall include language requiring that construction vehicles be kept clean and free of mud and dust prior to leaving the development site. Streets

surrounding the development site shall be swept daily and maintained free of dirt and debris.

B. Impact Analysis

Threshold a: Would the Project have a substantial adverse effect on a scenic vista?

According to the Fullerton Plan EIR, the City defines a scenic vista as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed. Scenic vistas may also be represented by a distant view that provides visual relief from less attractive views of nearby features. Scenic vistas in the City include views of the West and East Coyote Hills from the southern portion of the City, as well as distant views of the City and surrounding region from within these areas. The Project site is in the southeast portion of the City. This area is developed, disturbed, and void of natural lands and landforms.

The Project site is approximately 3.6 miles southeast of the West Coyote Hills and 1.8 miles south of the East Coyote Hills. There are no views of these scenic vistas from the Project site. Additionally, the Project, which would implement roadway improvements in compliance with the City's standards, would not include any futures that would obstruct distant views of hillsides for motorists, bicyclists, and pedestrians traveling north along Acacia Avenue and State College Boulevard. Implementation of the Project would not have a substantial adverse effect on a scenic vista and no impacts would occur.

Level of Significance Before Mitigation

Implementation of the Project would result in no impacts to a scenic vista.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold b: Would the Project substantially degrade scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

According to the California Department of Transportation (Caltrans) List of Designated and Eligible Scenic Highways, the Project site is not in proximity to a State scenic highway (Caltrans, 2019). The nearest officially designated State scenic highway is a portion of SR-91 from SR-55 to the Anaheim City limit located approximately 3.7 miles east of the Project site. Due to distance, topography, and intervening development, the Project would not be visible from SR-91. Because

the Project is not within a State scenic highway corridor, the Project does not have the potential to degrade scenic resources within a state scenic highway and no impacts would occur.

Level of Significance Before Mitigation

The Project site is not located within a State scenic highway and no impact would occur.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold c:	***Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site (Public views are those that are experienced from publicly accessible vantage point). If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

Implementation of the Project would visually change the Project site. As discussed in Section 3.0, *Project Description*, existing structures and associated facilities and landscaping on-site would be demolished or removed, with the exception of the City's water well facilities. The Project site would be redeveloped with a four-building logistics center. Conceptual architectural elevations for each building and a representative colored elevation are provided in Section 3.0 of this EIR. Landscaping would be planted throughout the Project site, and fences/walls and signage would be installed, as also described in Section 3.0.

Given the urban nature of the Project site and surrounding areas, the analysis for this threshold is appropriately based on review of the potential for the Project to conflict with applicable zoning and other regulations governing scenic quality. As previously identified in Section 4.1.2, *Existing Regulatory Setting*, regulations governing scenic quality are established through the City's Municipal Code (Zoning Code), and The Fullerton Plan includes project-level policies relevant to scenic quality, as discussed below.

Fullerton Zoning Code

As previously shown in Figure 3-4, *Proposed Zone Change,* of this EIR, the majority of the Kimberly-Clark site is zoned M-P-200-ES (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone). The southeast portion of the site is zoned M-G-ES (Manufacturing General in an Emergency Shelter Overlay Zone). The proposed industrial uses are allowed under both zoning classifications; however, a Zone Change is proposed to modify the Project's M-G-ES zone classification to M-P-200-ES to allow for consistent zoning throughout the Project site. The potential expansion site is zoned as M-G-ES. As discussed previously in Section

4.1.2, Chapter 15.40 of the Zoning Code outlines permitted uses and development standards for Industrial zoning classifications, and other chapters/sections of the Zoning Code include regulations relevant to scenic quality. The Project would be consistent with the development standards established in the Industrial Zone. Additionally, consistent with Chapter, 15.47.040, the Project involves a Major Site Plan, and the required site plan review would ensure that the Project would comply with the applicable regulations regarding scenic quality. Table 4.1-1, below, addresses the Project's consistency with applicable Zoning Code requirements.

TABLE 4.1-1 ZONING DEVELOPMENT STANDARDS CONSISTENCY ANALYSIS

APPLICABLE REQUIREMENTS	PROJECT CONSISTENCY
Industrial Zone Classifications Development Standards (Section 15.40.040 of the Zoning Code)	
The exterior design of a building, including paint colors, shall be compatible with surrounding architecture.	**Consistent.** The architecture of buildings surrounding the Project site is varied without a cohesive design theme. It consists of one- and two-story industrial and warehouse buildings constructed between the 1950s and 1970s. As shown in conceptual building elevations presented in Section 3.0 of this EIR (refer to Figures 3-8, 3-10, 3-12 and 3-14), the proposed buildings would be constructed with painted concrete tilt-up panels that feature a modern design. The buildings would have low-reflective, blue/green glass, and the building's exterior color palette would be comprised of various shades of white and gray with green accents. Decorative building elements include panel reveals, metal louvers, parapets, mullions, and canopies at office entries. The Project's high-quality modern design with decorative building elements would be compatible with surrounding architecture. The Project would therefore be consistent with this requirement.
Rooftop equipment shall be screened from public view so as not to be visible from the public right-of-way. Similarly, Section 15.56.120, Location and Screening of Mechanical Equipment, of the Zoning Code, indicates that mechanical equipment such as air conditioning units, condensers or pumps, and hot water heaters shall not be placed on the premises or attached to a structure where it is visible from the public right-of-way. The screening of mechanical equipment from public view shall be required, with the design of the screening device subject to the approval of the Director of Development Services.	**Consistent.** As shown on the conceptual building elevations, each building would include a parapet. This architectural feature would screen views of rooftop equipment from public views (adjacent roadways). Ground level mechanical equipment would be placed out of public view or would also be screened from public view. The Project would therefore be consistent with these requirements.
Minimum Lot Area: 200,000 s.f.	**Consistent.** Proposed Tentative Parcel Map No. 2019-180 (refer to Figure 3-27 in Section 3.0 of this EIR) would modify the parcel configuration on-site to include four parcels that facilitate

APPLICABLE REQUIREMENTS	PROJECT CONSISTENCY
	implementation of the Project. The proposed parcels would range in size between 316,300 net s.f. (Building 4) and 985,420 net s.f. (Building 2). All proposed parcels would exceed the required minimum lot area of 200,000 s.f. Therefore, the Project would be consistent with the minimum lot requirement.
Permitted Building Height: 45 feet	**Consistent with Variance.** The conceptual building elevations for the proposed buildings indicate that the building heights would range from approximately 39- to 50-feet; however, the top of parapet could extend up to 55-feet. Therefore, the proposed maximum building height would exceed the permitted building height by up to 10-feet. The Project would implement architectural features, articulation, and varied rooflines to reduce the proposed buildings' perceived heights. The Project Applicant has requested a variance to allow for the exceedance of the maximum building height limit as allowed by Section 15.68 of the of the Zoning Code. The variance is supported by the fact that the established height limit does not account for recent advances in the way that the warehouse and logistics industry has shifted with capabilities and technology driving the need for more storage capacity. Also, advancement in material handling equipment utilized for warehouses enables use of higher clear ceiling heights in industrial buildings. The Project is in an urban area surrounded by various industrial, manufacturing, office and business park uses. The proposed building height would be consistent with the scale of the existing buildings in the area and would not negatively impact the visual quality of the area.
Minimum Setback from a Property Line along a Public Street: 20 feet	**Consistent.** As shown on the individual building site plans presented in Figures 3-7, 3-10, 3-12, and 3-14, the building setbacks from Acacia Avenue, Kimberly Avenue, State College Boulevard, and E. Orangethorpe Avenue would meet or exceed the minimum 20-foot setback requirement. There is no location where the setback would be less than the minimum 20-foot setback requirement. The Project would therefore be consistent with the setback requirement.
Fences and Walls: 3-feet in a street setback area; the Director may approve non-view obscuring fences taller than three feet. For fences and walls not within a setback area the height limit is subject to applicable height restrictions for buildings (45-feet high)	**Consistent.** The Project includes 14-foot-tall concrete tilt up screen walls along the north and south boundaries of the truck courts for all buildings to screen the truck courts from view along abutting public streets. Access to the truck courts would be controlled by 8-foot-tall rolling metal gates, and 8-foot-tall, black-painted tubular steel fences would

APPLICABLE REQUIREMENTS	PROJECT CONSISTENCY
	be installed along the perimeters of all truck courts not visible from public view. These walls/fences would not occur within street setback area and would be consistent with the City's building height restrictions. The City's well facility south of Kimberly Avenue is currently surrounded by a chain link perimeter fence. The existing fence and new easement area would be replaced with new, non-view obscuring, fencing that could extend up to 8-feet, including in the setback from Kimberly Avenue. The proposed fencing would be consistent with the wall and fence restrictions, but would require approval by the Community and Economic Development Director.
Landscaping: Required in all street setbacks *Open parking areas* - Minimum of 25 s.f. per parking area or 8% of the square footage of the parking area, whichever is greater, and trees with a total shaded area equaling a minimum of 50% of the square footage of the open parking area shall be provided and distributed throughout the open parking area.	**Consistent.** As shown on Figure 3-19 in Section 3.0 of this EIR, the Project includes landscaping along the Project site's frontages with abutting public streets and along the southeast property boundary, as required. Landscaping also would be provided around passenger vehicle parking areas. As shown on the site plans for each individual building the amount of landscaping provided for open parking areas, and for shade meets the required amount. The Project would therefore be consistent with the landscape requirements.

APPLICABLE REQUIREMENTS	PROJECT CONSISTENCY
Other Zoning Code Requirements	
Chapter 15.49.020, Sign Standards and Regulations, Industrial Zone Classifications: *Pole Signs* – (1) one pole sign for every 300 feet of property frontage along an Arterial Highway; (2) 1/2 s.f. of sign area for every lineal foot of property frontage along an Arterial Highway but not to exceed 100 feet of sign area for each sign; (3) no higher than 20 feet at the property line, plus 1/3 lineal foot of height for each lineal foot sign is set back from the property line; and (4) 50 foot minimum distance between signs (pole and monument). *Building Signs* – (1) unlimited number and the sign allowance for each face of the building may be divided into multiple signs; (2) the maximum size/allowance of signs at the main entrance side is 3 s.f. for each lineal foot of building face where the main entrance is located, and 1 s.f. for each lineal foot of building face where sign is located on the other sides; and, (3) the sign cannot extend above the roofline of the building. *On-Site Directional Signs* – (1) unlimited number allowed; (2) maximum size and allowance of sign is 15 s.f.; (3) maximum 10-feet high; and (4) no advertising copy is allowed.	**Consistent.** The proposed signage program is described in Section 3.0 of this EIR. On-site signage would consist of Goodman and customer wall signs on each building, directional signs at the Project driveways, and pole signs at the corners of State College Boulevard and Kimberly Avenue and E. Orangethorpe Avenue and Acacia Avenue. The signage program has been designed in compliance with the City's sign standards and regulations, and would therefore be consistent with Zoning Code relative to placement of signs.
Chapter 15.56, General Provisions, Conditions and Exceptions: Includes standards that influence the visual character of a development site, including: for the following issue areas, potentially applicable to the Project: *Temporary structures* - Must be removed when the designated time period, activity, or use for which the temporary structure was erected has ceased.	**Consistent.** As allowed, temporary structures would be used on-site during construction (such as construction trailers). In compliance with the requirement, the structures would be removed following completing of construction. The Project would therefore be consistent with this requirement.

APPLICABLE REQUIREMENTS	PROJECT CONSISTENCY
Illumination of premises - Lighting provided to illuminate any parking area shall be arranged so as to reflect the light and glare away from adjacent properties.	**Consistent.** New sources of light would be installed on-site and primarily include parking lot lighting, and building-mounted outdoor security lighting for the proposed buildings. Light poles would be 25-feet high and would have LED lights with cut-off fixtures that prevent lighting from being directed into the sky or onto adjacent properties, as required. The lighting plan is provided in Figure 3-20. The Project would therefore be consistent with this requirement.
Trash storage and disposal - Trash enclosures for the storage of containers of solid waste shall be designed in accordance with or similar to an approved detail drawing and finished in a manner that complements the main structure on the property.	**Consistent.** As shown on the individual building site plans provided in Section 3 of this EIR, trash enclosures would be located within the truck court areas. The walls of the enclosures would be constructed of concrete and would complement the main buildings. Further, the trash enclosures would not be visible from the public view. The Project would therefore be consistent with this requirement.

The Fullerton Plan

As previously discussed, Part I: The Fullerton Vision, of The Fullerton Plan, contains planning objectives for each Focus Area. Relevant to the Project is the Southeast Industrial Focus Area objective to "[i]mprove appearance and function through design, including landscaping, pedestrian and transit facilities, and alleyway improvements." Goal 2 of the Community Design and Development Element is "[a] positive identity and distinctive image", with the associated policy (P2.7) to: [s]upport projects, programs, policies and regulations to site and design buildings to create a positive, accessible image along the street and reinforce a vibrant and comfortable public realm." Policy 1.11 is to [s]upport programs, policies and regulations to consider the immediate and surrounding contexts of projects to promote positive design relationships and use compatibility with adjacent built environments and land uses, including the public realm.

During construction activities, there would be temporary views of construction activities, equipment, and stockpiles of building materials and debris on the Project site. This visual change is considered less than significant because of its temporary nature and is typical of construction sites in an urban environment. Further, as required by MM AES-2 from The Fullerton Plan EIR, construction vehicles are required to be kept clean and free of mud and dust prior to leaving the development site, and streets surrounding the development site would be swept daily and maintained free of dirt and debris. These actions would ensure that the visual character along the public streets is not negatively impacted during construction.

Implementation of the Project would alter views of the Project site with the demolition/removal of the existing buildings and facilities and on-site vegetation, and the introduction of four new warehouse buildings. However, the Project, as designed, is consistent with the stated objective, goal, and policies in The Fullerton Plan. As described in Section 3.0, *Project Description,* of this EIR, and discussed in Table 4.1-1, above, the Project site is in an urban industrial area. The

surrounding area includes one- and two-story industrial and warehouse buildings with varying architectural styles and no cohesive design theme. The proposed buildings would be constructed with a consistent contemporary architectural design with decorative building elements. Although existing mature ornamental trees would be removed, landscaping would be installed along Project site's frontages, with abutting public streets and around passenger vehicle parking areas; the amount of landscaping provided would meet the City's requirements. The landscaping is designed to accent the architectural design of the proposed buildings. There are existing sidewalks along the west side of Acacia Avenue, and along both sides of State College Boulevard. The Project includes the construction of sidewalks along roadways adjacent to the Project site where sidewalks do not currently exist (i.e., on the north side of E. Orangethorpe Avenue, the south side of Kimberly Avenue, and the east side of Acacia Avenue); replacement of older sidewalks, as necessary; and, repair of existing sidewalks if damaged during construction. The bus stop along E. Orangethorpe Avenue would also be replaced. These pedestrian improvements along with streetscape improvements would enhance the public realm.

As shown in Exhibit 10, *Scenic Corridors*, of The Fullerton Plan, the nearest City-designated scenic corridor is a portion of State College Boulevard between the State College Boulevard/Rolling Hills Drive intersection and the State College Boulevard/Yorba Linda Boulevard intersection, approximately 1.7 miles north of the Project site. Due to distance, topography, and intervening development, the Project would not be visible from this scenic corridor and the Project would not obstruct any views of this scenic corridor. Therefore, there are no special planning considerations required for the Project relative to proximity to a scenic corridor.

Level of Significance Before Mitigation

The project would not conflict with applicable zoning and other regulations governing scenic quality and no impact would occur.

Project Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold d:	***Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?***

The Project site is in an area of the City that is subject to lighting and glare from existing on-site and surrounding urban land uses. The primary sources of light include building-mounted lighting, parking lot lighting, headlights from automobiles and trucks, and street lights along the surrounding roadways. The primary sources of glare include buildings and vehicles.

Light

It is not anticipated that lighting would be required during most construction activities, as construction typically occurs during the daylight hours. However, nighttime lighting may be required at certain times depending on the time of the year and the stage of construction, and for security. Notably, it is anticipated that concrete pours could occur at night with proper City approvals.

As discussed in Section 3.0, *Project Description*, of this EIR, the Project would include various lighting elements to ensure safety and security of the facilities. The proposed lighting would be in compliance with applicable lighting standards established by the City of Fullerton. The location of on-site lighting is presented Figure 3-20 in Section 3.0 of this EIR, and would primarily include parking lot lighting, and building-mounted outdoor security lighting for the proposed buildings. Light poles would be 25-feet high and would have LED lights with cut-off fixtures that prevent lighting from being directed into the sky or onto adjacent properties, as required. Additionally, existing street lights along the Project frontages would be converted from high voltage to low voltage, and would be upgraded to current City standards including replacement of existing luminaires with City-approved LED luminaries. The lighting would be designed to produce lighting photometric (levels) similar or better than existing conditions.

Section 15.40.080 of the Fullerton Municipal Code states that all lighting must be designed to ensure that it does not spill over onto adjacent residential properties. There are no residential properties adjacent to the site; therefore, these lighting standards are not applicable. Additionally, there are no other light-sensitive uses near the site. Moreover, as noted previously, the on-site lighting would be designed so that it is directed away from adjacent properties and would meet current City standards.

Due to the urban nature of the Project site and surrounding areas and the presence of existing light sources, the Project would not create a new source of substantial light during construction or operation, which would adversely affect nighttime views in the area. This impact would be less than significant.

Glare

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and nuisances for pedestrians and other viewers. The proposed buildings would be constructed with primarily non-reflective materials (such as concrete), with glass limited to the building entrances and windows at office areas. The proposed building elevations show that there would be no expansive glazing materials or other materials on facade areas that would create noticeable glare from sunlight. The Project site is surrounded by existing roadways and vehicle lights. The Project would not pose a hazard to motorists traveling in the project vicinity, nor would it affect surrounding land uses. In addition, the proposed trees along the perimeter of the Project site would further reduce the potential for nominal glare to impact passing motorists and the surrounding land uses. Further,

construction activities, that primarily occur during the day, would not involve use of equipment or materials that would cause substantial glare. The Project would not create a new source of substantial glare during construction or operation, which would adversely affect daytime views in the area. This impact would be less than significant.

Level of Significance Before Mitigation

The Project site is in an urban area and the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. This impact is less than significant.

Project Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

This impact is less than significant.

4.1.5 CUMULATIVE IMPACTS

Section 5.3.6, *Cumulative Impacts (Aesthetics)*, of The Fullerton Plan EIR identifies that cumulative aesthetic impacts are primarily analyzed in terms of impacts within the City of Fullerton, as aesthetic impacts are primarily confined to local areas. The Fullerton Plan anticipates growth within 12 Focus Areas, which would alter the City's existing visual character, including the Southeast Industrial Focus Area. Cities surrounding Fullerton, including Anaheim, which is south of the Project site, are developed and urbanized with similar density and character. As identified in The Fullerton Plan EIR, new development within those cities would contribute to the urban character of the region and would be reviewed on a project-by-project basis, in order to ensure each City's development standards are met and new development is compatible with the existing and desired regional and local urban and natural environment. Additionally, The Fullerton Plan EIR concludes that implementation of The Fullerton Plan goals, policies, and actions would enhance the City's physical setting and reduce the incremental aesthetic impact on the region to a level of insignificance. The Fullerton Plan EIR concludes that implementation of The Fullerton Plan would not result in cumulatively considerable aesthetic impacts.

The Project site is not within a scenic vista, within a State scenic highway, or along a City-designated scenic corridor. Therefore, the Project would not contribute to cumulative impacts related to these aesthetic issues.

The Project site is within the Southeast Industrial Focus Area, and development of this area was anticipated in The Fullerton Plan and evaluated in The Fullerton Plan EIR. As shown on Figure 4.0-1, *Cumulative Development Location Map*, in Section 4.0, *Environmental Impact Evaluation Overview*, there are no cumulative projects in the same viewshed as the Project. As analyzed in this section, the Project would comply with the applicable regulations outlined in the Zoning Code that address scenic quality. Any future development within the same viewshed as the Project site, including in the City of Anaheim, would also be required to comply with applicable municipal

regulations addressing scenic quality. The Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic quality.

As with existing development in the area, light and glare impacts from the Project and future development in the area would be reduced through the adherence to appliable lighting standards established in the City's Zoning Code. Based on the City's cumulative projects list, there are currently no cumulative development projects identified in the vicinity of the Project. The Project's impacts are less than significant and the Project would not result in a cumulatively considerable contribution to a significant cumulative aesthetic impact related to light and glare.

4.1.6 REFERENCES

California Department of Transportation (Caltrans). 2019. *Caltrans Designated and Eligible Scenic Highways*. Web. Accessed May 20, 2020. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

City of Fullerton (Fullerton). 2012a (as amended through May 2020). *The Fullerton Plan*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/the_fullerton_plan.asp

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4.2 AIR QUALITY

This section provides Project-specific analyses of the Project's potential to have adverse effects related to air quality during construction and operation. Information presented in this section is derived primarily from the Project-specific reports identified below. Refer to Section 4.2.6, *References*, for a complete list of references.

- *Goodman Logistics Center Fullerton Air Quality Impact Analysis* (AQIA) dated July 28, 2020, prepared by Urban Crossroads, and included in Appendix B1 of this Environmental Impact Report (EIR) (Urban Crossroads, 2020a)
- *Goodman Logistics Center Fullerton Mobile Source Health Risk Assessment* (HRA) dated July 28, 2020, prepared by Urban Crossroads, and included in Appendix B2 of this EIR (Urban Crossroads, 2020b)
- *Construction Health Risk Assessment Memorandum* (Construction HRA) dated July 28, 2020, prepared by Urban Crossroads, and included in Appendix B3 of this EIR (Urban Crossroads, 2020c)

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

Comments relating to the issue of air quality were raised in response to the Notice of Preparation (NOP) for this EIR. Specifically, in its NOP comment letter, the California Air Resources Board (CARB) indicated a need to evaluate air pollution and health risks associated with the Project, including cumulative health risks to sensitive receptors and construction-related health risks, as well as potential air pollutant emissions and potential cancer risks associated with on-site transport refrigeration units (TRUs). CARB further requested that the EIR evaluate impacts to disadvantaged communities, and recommended the Project include existing and emerging zero-emission technologies to minimize air pollutant emissions. The South Coast Air Quality Management District (SCAQMD) also commented on the Project's NOP, and provided recommendations for the scope of the Project's AQIA and health risk analyses for the Project. SCAQMD also requested that the Project-related air quality impacts be identified and quantified against the SCAQMD regional and localized significance thresholds, provided recommendations for mitigation measures, and requested that cumulative impacts from warehouse projects in communities with existing industrial sources be addressed. There were no additional comments related to air quality raised at the April 20, 2020 publicly-noticed EIR Scoping Meeting.

4.2.1 EXISTING SETTING

The Project site is located in the South Coast Air Basin (SoCAB) within the jurisdiction of SCAQMD. Provided below are descriptions of existing air quality within the SoCAB and a discussion of air pollutant constituents.

A. Air Pollution Constituents

Criteria Pollutants

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO_2) and nitric oxide (NO) (which are collectively known as oxides of nitrogen [NO_X]), sulfur dioxide (SO_2), particulates 10 microns or less in diameter (PM_{10}), particulates 2.5 microns or less in diameter ($PM_{2.5}$), and volatile organic compounds (VOCs). The predominant source of air emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NO_X, and VOCs.

Secondary pollutants are created over time and are formed in the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O_3), which is one of the products formed when NO_X reacts with VOCs in the presence of sunlight. Other secondary pollutants include photochemical aerosols. Secondary pollutants such as O_3 represent major air quality problems in the SoCAB.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Seven “criteria” air pollutants have now been identified using specific medical evidence, and NAAQS have been established for those pollutants. The State of California has adopted standards (known as California Ambient Air Quality Standards [CAAQS]) for the same seven criteria pollutants, but the State has established different and generally more restrictive allowable levels. The criteria pollutants are CO, NO_2, O_3, lead, PM_{10}, $PM_{2.5}$, VOC and SO_2. Further discussion of the criteria pollutants, their sources, and their effects on human health can be found in Table 2-1 of the AQIA included in Appendix B1 of this EIR.

Toxic Air Contaminants

Toxic air contaminants (TACs) are chemicals generally referred to as “non-criteria” air pollutants. They are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. There are hundreds of air toxics, and exposure to these pollutants can cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects may be both chronic (i.e., of long duration) or acute (i.e., severe but of short duration) on human health. Acute health effects are attributable to sudden exposure to high concentrations of air toxics. These effects can include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects usually result from low-dose, long-term exposure to air toxics. The effect of major concern for this type of exposure is cancer, which typically requires a latency period of 10 to 30 years after exposure to develop.

Diesel Emissions

Diesel engines utilize compression to ignite fuel, contrary to standard gasoline engines which use conventional spark plugs. Engines that use compression typically run at higher temperatures than

gasoline engines, thereby causing the formation of substantially more NO_X than in gasoline engines. In 1998, the California Air Resources Board (CARB) designated diesel particulate matter (DPM), which is present in diesel engine exhaust, as a TAC.

B. Monitored Air Quality

The Project site is located within SCAQMD Source Receptor Area (SRA) 16. Within SRA 16, the SCAQMD North Orange County monitoring station is located approximately 5.3 miles northwest of the Project site and is the nearest long-term air quality monitoring site for O_3, CO, and NO_2. The SCAQMD Central Orange County (SRA 17) monitoring station is located approximately 3.0 miles southwest of the Project site and is the next nearest monitoring site and provides data for PM_{10} and $PM_{2.5}$. It should be noted that the Central Orange County monitoring station was utilized in lieu of the North Orange County monitoring stations only in instances where data was not available. The most recent three years of data available are shown in Table 4.2-1, *Project Area Air Quality Monitoring Summary (2016-2018)*, which identifies the number of days ambient air quality standards were exceeded for the study area and is considered to be representative of the local air quality at the Project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for 2016 through 2018 was obtained from the SCAQMD Air Quality Data Tables and CARB's Air Quality Data Statistics (iADAM). Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

Regional air quality is defined in a regulatory sense by whether the area has or has not attained State and/or federal ambient air quality standards, as determined by monitoring data. Areas that are in nonattainment are required to prepare plans and implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance," and there must be a plan and measures established that will keep the region in attainment for the following ten years. Table 4.2-2, *Attainment Status of Criteria Pollutants in the SoCAB*, lists the current attainment designations for the SoCAB.

C. Regional Air Quality Improvement

The SCAQMD is the lead agency charged with regulating air quality emission reductions for the entire SoCAB. SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SoCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform California Environmental Quality Act (CEQA) review throughout the SoCAB. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. SCAQMD created AQMPs which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SoCAB. The 2012 AQMP states, "the remarkable historical improvement in air quality since the 1970's is the direct result of Southern California's comprehensive, multiyear strategy of reducing air pollution from all sources as outlined in its AQMPs." Emissions of O_3, NO_X, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease through 2020. These decreases result primarily from

motor vehicle controls and reductions in evaporative emissions. Refer to Subsection 2.9 of the Project's AQIA (Appendix B1 of this EIR) for a complete description of regional air quality improvement.

TABLE 4.2-1 PROJECT AREA AIR QUALITY MONITORING SUMMARY (2016-2018)

Pollutant	Standard	Year		
		2016	2017	2018
O_3				
Maximum State 1-Hour Concentration (ppm)[1]	> 0.09 ppm	0.103	0.113	0.111
Maximum Federal/State 8-Hour Concentration (ppm)	> 0.07 ppm	0.078	0.086	0.077
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	3	5	3
Number of Days Exceeding Federal/State 8-Hour Standard	> 0.07 ppm	7	12	4
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	3.1	3.8	3.0
Maximum Federal 8-Hour Concentration	> 20 ppm	1.5	1.7	1.4
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.060	0.076	0.067
Annual Average		0.015	0.015	0.013
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	74	128	129
Annual Federal Arithmetic Mean (µg/m^3)		24.4	26.3	27.2
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	3	17	13
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	44.45	53.9	54.10
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	9.47	11.39	11.02
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	1	6	3

ppm = Parts Per Million
µg/m^3 = Microgram per Cubic Meter
Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ were obtained from SCAQMD Air Quality Data Tables.
Source: (Urban Crossroads, 2020a)

TABLE 4.2-2 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

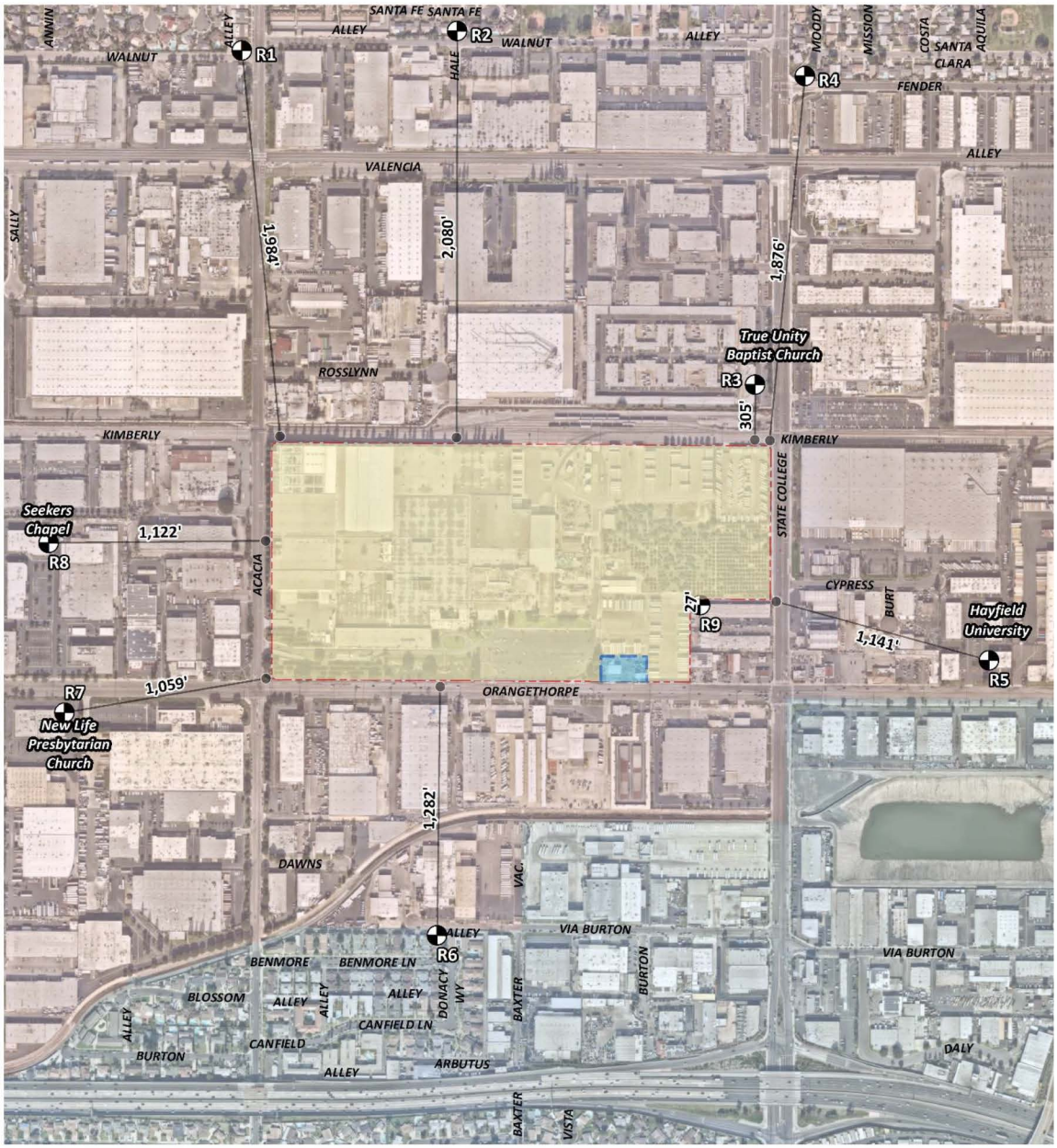
1. The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SoCAB.
Note: See Appendix 2.1 of the Project's AQIA (Appendix B1 of this EIR) for a detailed map of State/National Area Designations within the SCAB
"- "= The national 1-hour O_3 standard was revoked effective June 15, 2005.
Source: (Urban Crossroads, 2020a)

D. Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Receptors in the Project study area are shown on Figure 4.2-1, *Sensitive Receptor Locations*. As shown, the nearest sensitive receptor to the Project area is an existing residence at 1545 East Benmore Lane, in the City of Anaheim, approximately 1,282 feet south of the Project site. Additional residential uses occur to the north, with the nearest residence occurring approximately 1,876 feet north of the Project site. Non-residential sensitive receptor locations include church uses, with the nearest church occurring 305 feet north of the Project site; the Hayfield University, located approximately 1,141 feet east of the Project site; and the State College Business Plaza, located approximately 27 feet south of the Project site.

E. Existing Emissions

The Project site is currently occupied by the Kimberly-Clark manufacturing facility and includes 1,210,720 s.f. of existing manufacturing and warehouse buildings. For purposes of analysis, the emissions associated with architectural coatings, consumer products, and landscape maintenance equipment were calculated based on assumptions provided in CalEEMod Version 2016.3.2 (discussed further under Threshold b). The Kimberly-Clark facility manufacturing involved the operation of a cogeneration turbine which was used as the primary source of energy, and electricity and natural gas from Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). The estimated energy usage for the Kimberly-Clark facility was based on available bills provided from SCE and SoCalGas, and information about the cogeneration



Legend

- Expansion Site
- Site Boundary
- City of Fullerton
- City of Anaheim
- Receptor Locations
- Distance from receptor to Project site boundary (in feet)

Source(s): Urban Crossroads (06-30-2020)

Figure 4.2-1

Not to Scale

Sensitive Receptor Locations

turbine. Existing energy-related emissions are from cogeneration electric and natural gas consumption. Existing mobile emissions are based on trip generation provided by Kimberly-Clark (estimated 730 average daily trips). The estimated operation-source emissions from the existing development are summarized on Table 4.2-3, *Emissions from Existing Development*. Summer, winter, and annual EMFAC2017 emission factors are used in order to derive vehicle emissions associated with Project operational activities, which vary by season due to changes in temperature, consistent with CalEEMod guidance. Detailed operation model outputs are presented in Appendices 3.4 and 3.5 to the Project's AQIA (Appendix B1 of this EIR).

4.2.2 EXISTING REGULATORY SETTING

Section 5.5 of The Fullerton Plan EIR provides a discussion of the regulatory framework for the analysis of air quality impacts. The following discussion summarizes the regulatory information for air quality that is particularly relevant to the Project and information that is new or has been updated since The Fullerton Plan EIR was prepared. Additional information regarding the regulatory background for air quality is presented in Section 2.8 of the Project's AQIA (Appendix B1 of this EIR).

TABLE 4.2-3 EMISSIONS FROM EXISTING DEVELOPMENT

Existing Operational Activities – Summer Scenario	Emissions (pounds/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Source	27.06	1.15E-03	0.12	1.00E-05	4.50E-04	4.50E-04
Energy Source	35.71	324.64	272.70	1.95	24.67	24.67
Mobile Source (Passenger Cars)	1.66	1.55	26.00	0.08	8.24	2.22
Mobile Source (Trucks)	1.08	33.84	7.17	0.10	3.22	1.17
Total Maximum Daily Emissions	**65.51**	**360.04**	**305.99**	**2.12**	**36.13**	**28.06**
Existing Operational Activities – Winter Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	27.06	1.15E-03	0.12	1.00E-05	4.50E-04	4.50E-04
Energy Source	35.71	324.64	272.70	1.95	24.67	24.67
Mobile Source (Passenger Cars)	1.72	1.70	24.12	0.07	8.24	2.22
Mobile Source (Trucks)	1.00	34.36	4.73	0.10	3.20	1.16
Total Maximum Daily Emissions	**65.49**	**360.70**	**301.67**	**2.12**	**36.11**	**28.05**

CalEEMod operational-source emissions for the existing development are presented in Appendices 3.4 and 3.5 to the Project's AQIA (Appendix B1 of this EIR).
Source: (Urban Crossroads, 2020a)

B. Federal

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) regulates emissions sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was

first enacted in 1955 and subsequently amended; the most recent major amendments made by Congress were in 1990. The CAA established NAAQS. These standards identify levels of air quality for criteria pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe (with an adequate margin of safety) to protect the public health and welfare. The NAAQS are shown in Table 4.2-4, *Ambient Air Quality Standards*. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for PM2.5.

C. State

California Environmental Protection Agency

The mission of the California Environmental Protection Agency (CalEPA) is restore, protect and enhance the environment, to ensure public health, environmental quality and economic vitality. This is accomplished by developing, implementing and enforcing environmental laws that regulate air, water and soil quality, pesticide use and waste recycling and reduction. Relevant to air quality, the California Environmental Protection Agency (CalEPA) consists of the Air Resources Board (CARB) and the Office Environmental Health Hazard Assessment (OEHHA).

In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. SB 535 directed that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities. CalEPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEnviroScreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution.

TABLE 4.2-4 AMBIENT AIR QUALITY STANDARDS

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page …

For more information please call ARB-PIO at (916) 322-2990 California Air Resources Board (5/4/16)

Table 4.2-4 Ambient Air Quality Standards (Cont'd)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990 **California Air Resources Board (5/4/16)**

(Urban Crossroads, 2020a)

California Air Resources Board

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for ensuring implementation of the California Clean Air Act (CCAA) (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO_4, visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, at this time, H_2S and C_2H_3Cl are not measured at any monitoring stations in the SoCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (as shown in Table 4.2-4).

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. The AQMPs are then integrated into the State SIP.

Toxic Air Contaminants

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of toxic air contaminant (TAC) emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. The TACs responsible for most of the known cancer risk associated with airborne exposure in California include TACs derived from mobile sources (DPM, benzene [C_6H_6], and 1,3-butadiene [C_4H_6]); those that are derived from stationary sources (perchloroethylene [C_2Cl_4] and hexavalent chromium [Cr(VI)]; and, those derived from photochemical reactions of emitted VOCs (formaldehyde [CH_2O] and acetaldehyde [C_2H_4O]). The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk, as further discussed in Section 2.9.1 of the AQIA included in Appendix B of this EIR.

CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, CARB Drayage Truck Regulation, CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of “clean trucks” into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. Moreover, the average statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to the aforementioned regulatory requirements.

Community Air Protection Program

In response to AB 617 (2017), CARB established the Community Air Protection Program (CAPP). The CAPP's focus is to reduce exposure in communities most impacted by air pollution. This statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance our air quality planning efforts and better integrate community, regional, and State level programs to provide clean air for all Californians.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SoCAB and across the State of California. For example, the 2019 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements.

Because the Project will be constructed after January 1, 2019, the 2019 CALGreen standards are applicable to the Project and require, among other items:

- **Short-term bicycle parking**. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- **Long-term bicycle parking**. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles**. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **Electric vehicle (EV) charging stations**. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3).
- **Outdoor light pollution reduction**. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8)
- **Construction waste management**. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris**. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants**. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings**. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - *Water Closets*. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
    - *Urinals*. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - *Showerheads*. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

- *Faucets and fountains*. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- **Outdoor portable water use in landscaped areas**. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).
- **Water meters**. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- **Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf**. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- **Commissioning**. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

D. Regional

South Coast Air Quality Management District

The Project is in the City of Fullerton, in the SoCAB, where the SCAQMD is the agency principally responsible for comprehensive air pollution control. As a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments, and cooperates actively with all federal and State government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines when necessary. SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. As further discussed below, an AQMP establishes a program of rules and regulations directed at attaining the NAAQS and CAAQS. A detailed discussion or regional air quality improvement in the SoCAB is provided in Section 2.9 of the AQIA included in Appendix B1 of this EIR.

Air Quality Management Plan

The NAAQS and CAAQS presented in Table 4.2-4 establish the context for the local AQMPs and for determining the significance of a project's contribution to local or regional pollutant concentrations. The NAAQS and CAAQS represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise.

The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. Currently, the NAAQS and CAAQS are exceeded in most parts of the SoCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The AQMP control measures and related emission reduction estimates are based on emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections.

In March 2017, the SCAQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) and updated emission inventory methodologies for various source categories.

The 2022 AQMP is currently being developed by SCAQMD to address the EPA's strengthened ozone standard. Development of the 2022 AQMP is in its early stages and no formal timeline for completion and adoption is currently known.

SCAQMD Rules

There are numerous requirements that development projects must comply with by law, and that were put in place by federal, State, and local regulatory agencies for the improvement of air quality. The two most pertinent regulatory requirements that apply to the Project and which are required by SCAQMD Rules that are currently applicable during construction activity for this Project are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). SCAQMD Rule 403 is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of

generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities.

SCAQMD Rule 1113 serves to limit the Volatile Organic Compound (VOC) content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the SCAQMD must comply with the current VOC standards set in this rule.

SCAQMD Rule 201 requires a "Permit to Construct" prior to the installation of any equipment "the use of which may cause the issuance of air contaminants . . .", and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate. Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, identifies "equipment, processes, or operations that emit small amounts of contaminants that shall not require written permits . . .".

SCAQMD Rule 2202 provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state CAA requirements. This Rule applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average, unless otherwise exempt. An employer subject to this Rule is required to annually register with the SCAQMD to implement an emission reduction program, in accordance with subdivisions (f) and (g), that will obtain emission reductions equivalent to a worksite specific emission reduction target (ERT) specified for the compliance year.

E. City of Fullerton

The Fullerton Plan

Air quality and climate change is addressed in Chapter 17 of The Fullerton Plan. The purpose of the Air Quality and Climate Change Element is to protect the health and welfare of the community through policies aimed at improving air quality, reducing greenhouse gas emissions and working toward reducing the potential adverse effects of climate change. The Fullerton Plan includes Project-level policies to support projects, programs, policies and regulations that reduce impacts to air quality caused by private construction projects (Policy P21.6), and reduce impacts to air quality caused by the design or operation of a site or use (Policy P21.7).

Fullerton Municipal Code

Section 15.40.070 of the Fullerton Municipal Code, Transportation Demand Management Strategies to Reduce Single Occupancy Automobiles, is applicable to new industrial/manufacturing development that is estimated to employ 100 or more persons. Section B, Facility Standards, includes the following requirements:

1. A minimum of ten percent of employee parking spaces located as close as is practical to the entrance(s) of the use they are intended to serve, shall be reserved and adequately signed for use by carpool and vanpool vehicles.

2. Secure, adequate and convenient storage shall be provided for bicycles.
3. Bus bays, bus stops and bus shelters shall be provided where appropriate.
4. A commuter information area or multiple areas shall be provided within or near each building; the information area(s) shall be centrally located and accessible to all employees and tenants. The information shall include, but not be limited to, current maps, routes and schedules for public transit.
5. A shower and locker room facility for employees of each sex shall be provided in each building of one hundred thousand or more gross square feet. Any development exceeding 100,000 gross square feet, but that does not contain any single building of 100,000 gross square feet, shall provide shower and locker room facilities unless a finding is made that the provision of such facilities is not practical or efficient.
6. Sidewalks or other paved pathways following direct and safe routes from the external pedestrian circulation system to each building in the development shall be provided.

Section 15.40.080, Industrial Environmental Control, of the Fullerton Municipal Code, addresses controls to minimize environmental pollution by industrial or other activities and includes the following requirements:

B. Smoke, dust, fumes and contaminants: Industrial or manufacturing processes (out of which evolve smoke, dust, fumes, particulate matter, contaminants and specific contaminants) are required to comply with the latest rules and regulations of the South Coast Air Quality Management District.

D. Odors: Odors from gases or other odorous matter shall not be in such quantities as to be offensive beyond the property line of the parcel from which said odors emanate.

4.2.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant adverse environmental impact on air quality if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.
c. Expose sensitive receptors to substantial pollutant concentrations.
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the CEQA Guidelines also indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the significance determinations. The SCAQMD has developed regional significance thresholds for other regulated pollutants, as summarized at Table 4.2-5, *Maximum Daily Regional Emissions Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds

(April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 4.2-5 MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = pounds per day.
Source: (Urban Crossroads, 2020a)

The thresholds used for the construction-source localized significance thresholds (LST) analysis are presented in Table 4.2-6, *Maximum Daily Localized Construction Emissions Thresholds*. Although the total acreage disturbed is more than 5 acres per day for construction activities, the LST Methodology only provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area.

TABLE 4.2-6 MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS THRESHOLDS

Pollutant	Construction Localized Thresholds
NO_X	221 lbs/day
CO	1,311 lbs/day
PM_{10}	133 lbs/day
$PM_{2.5}$	73 lbs/day

lbs/day = pounds per day
Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008.
Source (Urban Crossroads, 2020a)

LSTs for a 5-acre site during operations also were used as a screening tool to determine if further detailed analysis is required. As such, the threshold values presented in Table 4.2-7, *Maximum Daily Localized Operational Emissions Thresholds*, are from the look-up tables at 5 acres and a 391-meter distance for localized PM_{10} and $PM_{2.5}$ evaluation and a 25-meter receptor distance for localized NO_X and CO evaluation.

TABLE 4.2-7 MAXIMUM DAILY LOCALIZED OPERATIONAL EMISSIONS THRESHOLDS

Pollutant	Operational Localized Thresholds
NO_X	221 lbs/day
CO	1,311 lbs/day
PM_{10}	32 lbs/day
$PM_{2.5}$	18 lbs/day

lbs/day = pounds per day
Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008.
Source: (Urban Crossroads, 2020a)

With respect to "cumulatively considerable" increases in emissions, the SCAQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the SCAQMD clearly states (Page D-3):

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts also would not cause a cumulatively considerable increase in emissions for those pollutants for which the SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

With respect to carcinogenic chemical risk, the SCAQMD CEQA Air Quality Handbook (1993) states that emissions of toxic air contaminants (TACs) are considered significant if an HRA shows an increased cancer risk of greater than 10 in one million. Based on guidance from the SCAQMD in the document, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, for purposes of this analysis, 10 in

one million is used as the cancer risk threshold for evaluating the Project's potential TAC impacts associated with cancer risk.

The SCAQMD also has established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less-than-significant.

4.2.4 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report

The Fullerton Plan EIR includes mitigation measures (MMs) that are relevant to this air quality analysis. The Fullerton Plan EIR MM AQ-8 requires that construction-related impacts be analyzed as required by the SCAQMD and MM AQ-11 requires that long-term operational-related impacts be analyzed as required by the SCAQMD. The required analysis has been completed with preparation of the Project-specific AQIA, which is included in Appendix B1 of this EIR and summarized in this section. Therefore, these MMs will not be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

The following mitigation measures (MMs) are applicable to the Project and will be included in the MMRP for the Project.

Construction-Related Measures

MM AQ-1 Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust;
- Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), according to manufacturers' specifications;
- All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- On-site vehicle speed shall be limited to 15 miles per hour;

- All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized;
- Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible;
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site;
- Track-out devices shall be used at all construction site access points;
- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site;
- A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to fugitive dust generation;
- Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway; and
- Replace ground cover in disturbed areas as quickly as possible.

MM AQ-2 All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. Prior to the issuance of grading permits, the Applicant shall demonstrate to the City of Fullerton how the project operations subject to that specification during hauling activities shall comply with the provisions set forth in Sections 23114(b)(F), (e)(4).

MM AQ-3 The following measures shall be implemented to reduce VOC emissions resulting from application of architectural coatings:

- Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent;
- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting; and
- Use pre-painted construction materials.

MM AQ-4 Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans and specifications stipulate that ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Equipment maintenance records and equipment design specifications data sheets shall be kept on site during construction. The City

Inspector shall be responsible for ensuring that contractors comply with this measure during construction.

MM AQ-5 Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval shall be required by the City of Fullerton Building and Safety Division prior to issuance of grading permits.

MM AQ-6 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

MM AQ-7 Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

Operational-Related Measures

MM AQ-9[1] Proposed developments within the City of Fullerton shall include, to the extent feasible, as a part of construction and building management contracts, the following measures:

- All residential and commercial structures shall be required to incorporate high efficiency/low polluting heating, air conditioning, appliances, and water heaters.
- All residential and commercial structures shall be required to incorporate thermal pane windows and weather-stripping.
- All residential, commercial, and industrial structures shall be required to incorporate light colored roofing materials.

MM AQ-10 Future development projects within the City that include employers with 250 employees or more shall comply with SCAQMD Rule 2202, which requires the implementation of employee commute reduction programs.

MM AQ-12 Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

[1] With respect to these measures, the project shall conform to the State Building Code, including the CALGreen Code, or MM AQ-9, whichever is more restrictive.

B. Impact Analysis

Threshold a	***Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

The Fullerton Plan EIR concluded that The Fullerton Plan would be consistent with the 2007 AQMP and acknowledges that future project implementing The Fullerton Plan are required to comply with The Fullerton Plan goals and policies and SCAQMD regulations, and would incorporate mitigation measures, as feasible, to reduce air quality impacts.

As previously discussed, in March 2017, subsequent to preparation of the 2007 AQMP, the SCAQMD adopted the 2012 and 2016 AQMPs; the 2016 AQMP is the current AQMP for the SoCAB. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016-2040 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The Project's consistency with the AQMP is determined using the 2016 AQMP as discussed below.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD 1993 CEQA Handbook. These indicators are discussed below:

Consistency Criterion No. 1: The proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As summarized below under the analysis of Thresholds b and c, when taking into consideration existing emissions from the existing Kimberly-Clark facility, the Project's regional and localized construction-source emissions would not exceed applicable regional significance thresholds or LST thresholds. As such, construction and operational activities associated with the Project would be consistent with Consistency Criterion 1. Therefore, the Project would not conflict with the AQMP according to this criterion.

Consistency Criterion No. 2: The Project would not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans

adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in The Fullerton Plan is considered to be consistent with the AQMP.

Per The Fullerton Plan, the Project site has an “Industrial” community development type within the City’s Southeast Industrial Focus Area. The Industrial designation protects and enhances the City's major employment areas by providing opportunities for manufacturing, product assembly, research and development, warehousing, and supporting uses and amenities. The Project involves the development of four buildings totaling up to 1,609,384 s.f. (804,692 s.f. of high-cube fulfillment center use and 804,692 s.f. of high-cube cold storage warehouse use, inclusive of office space) and is consistent with the Industrial land use designation and the growth assumptions for the Southeast Industrial Focus Area anticipated in The Fullerton Plan. On this basis, Project operations would be consistent with Consistency Criterion 2.

Level of Significance Before Mitigation

The Project would not conflict with or obstruct implementation of the SCAQMD AQMP, and no impact would result.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

Threshold b	***Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?***

On October 17, 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources, and to quantify applicable air quality and GHG reductions achieved from mitigation measures and project design features. Accordingly, the latest version of CalEEMod has been used for the Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendices 3.1 through 3.3 to the Project’s AQIA, which is included in Appendix B1 of this EIR.

On August 19, 2019, the EPA approved the 2017 version of the EMissions FACtor model (EMFAC) web database for use in SIP and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT

from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. The Project's AQIA utilizes summer, winter, and annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. Because the EMFAC2017 emission rates are associated with vehicle fuel types while CalEEMod vehicle emission factors are aggregated to include all fuel types for each individual vehicle class, the EMFAC2017 emission rates for different fuel types of a vehicle class are averaged by activity or by population and activity to derive CalEEMod emission factors. The equations applied to obtain CalEEMod vehicle emission factors for each emission type are detailed in CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod. EMFAC2017 emission rates utilized in the analysis can be found in Appendix 3.6 of the Project's AQIA.

Construction Emissions – Regional Significance

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$ from the following construction activities, which are further described in Section 3.0, Project Description, of this EIR: demolition, concrete crushing/asphalt pulverizing, site preparation, grading[2], building construction, paving, and architectural coating.

CalEEMod calculates maximum daily emissions for summer and winter periods. Project-specific input was based on general information provided in Section 3.0, *Project Description*, of this EIR, and supplemented with default model settings to estimate reasonable worst-case conditions. The details of construction phases, demolition activities, selection of construction equipment, areas to be paved, and other input parameters, including CalEEMod data, are included in the AQIA in Appendix B1 of this EIR.

The estimated maximum daily construction emissions without mitigation are summarized in Table 4.2-8, *Net Construction Emissions Summary – Without Mitigation*. It should be noted that the existing development emissions from operation of the Kimberly-Clark Fullerton Mill (identified previously in Table 4.2-3, *Emissions from Existing* Development) were subtracted from the Project construction emissions to determine the net new emissions from the Project's construction activities. Although the cogeneration equipment is being moved by Kimberly-Clark to Kentucky credit is being taken for the reduction in air quality emissions that would occur within the SoCAB once the cogeneration facility ceases operation because the Fullerton Mill is closing and the cogeneration facility would no longer be operating in the SoCAB. Detailed construction model outputs are presented in Appendix 3.1 to the Project's AQIA (Appendix B1 of this EIR). Under the assumed scenarios, emissions resulting from the Project construction would not exceed thresholds established by the SCAQMD for emissions of any criteria pollutant.

[2] Subsequent to the preparation of the AQIA and estimating construction-related emissions, the Project grading plan was refined resulting in a reduction in the anticipated amount of soil to be transported during construction. It is estimated that that there would be an import of 3,060 CY of soil (with the Optional Site Plan) compared to the previously estimated export of 3,240 CY. Therefore, the construction-related emissions calculations in this EIR are conservative as they overstate the amount of soil transport.

As previously shown in Table 4.2-2, the CAAQS designate the Project area as nonattainment for O_3, PM_{10}, and $PM_{2.5}$, while the NAAQS designates the Project area as nonattainment for O_3 and $PM_{2.5}$. As shown in Table 4.2-8, the Project's net air pollution emission during construction would not exceed the SCAQMD regional thresholds of significant for construction. Therefore, during construction, the Project would not result in a cumulative considerable net increase of a criteria pollutant for which the Project region is in nonattainment under an applicable federal of State ambient air quality standard, resulting in a less than significant impact. No mitigation is required; however, the Project Applicant would nonetheless be required to implement required mitigation measures from The Fullerton Plan EIR previously identified (refer to The Fullerton Plan EIR MM AQ-1 through MM AQ-7).

TABLE 4.2-8 NET CONSTRUCTION EMISSIONS SUMMARY – WITHOUT MITIGATION

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2021 Construction Activity	70.87	290.98	243.01	0.64	60.39	21.60
2022 Construction Activity	69.82	169.07	188.66	0.51	31.66	12.26
Maximum Daily Construction Emissions	70.87	290.98	243.01	0.64	60.39	21.60
Existing Operational Activity	*65.51*	*360.04*	*305.99*	*2.12*	*36.13*	*28.06*
Net Emissions (Construction – Operations)	5.36	-69.06	-62.98	-1.48	24.26	-6.46
Winter						
2021 Construction Activity	71.01	291.15	241.17	0.63	60.39	21.61
2022 Construction Activity	70.57	169.23	186.44	0.50	31.67	12.26
Maximum Daily Construction Emissions	71.01	291.15	241.17	0.63	60.39	21.61
Existing Operational Activity	*65.49*	*360.70*	*301.67*	*2.12*	*36.11*	*28.05*
Net Emissions (Construction – Operations)	5.52	-69.55	-60.50	-1.49	24.28	-6.45
Maximum Daily Emissions	**5.52**	**-69.06**	**-60.50**	**-1.48**	**24.28**	**-6.45**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

lbs/day = pounds per day
CalEEMod construction-source (unmitigated) emissions, which are presented in Appendix 3.1 to the Project's AQIA (Appendix B1 of this EIR).
Source: (Urban Crossroads, 2020a)

Operational Emissions – Regional Significance

Operational emissions are calculated based on land use types, the number of units or building sizes associated with a project, vehicle trip characteristics, and project design features and/or mitigation measures to be implemented. The results are expressed in pounds per day and are compared with the SCAQMD regional thresholds to determine impact significance. The Project's operational emissions were calculated using CalEEMod, described previously. The results of the modeling calculations are presented in Appendix B1 of this EIR.

For purposes of analysis, the following land uses were modeled. The following land uses represent a conservative estimate of emissions that would occur from potential future tenants:

- 804.692 thousand sf (TSF) of Refrigerated Warehouse – No Rail
- 804.692 TSF of Unrefrigerated Warehouse – No Rail
- 1,175 Space Parking Lot
- 800.133 TSF Other Asphalt Surfaces

There are four general sources of long-term operational emissions: area sources, energy sources, mobile sources (i.e., vehicles), and on-site cargo handling equipment, which are described in Section 3.5 of the AQIA included in Appendix B1 of this EIR. The primary source of operational emissions generated by the Project would be from mobile sources, specifically, the trucks that would travel to and from the Project site and operate within the Project site. For mobile source emissions, traffic data was obtained from the CEQA Support Traffic Analysis prepared by Urban Crossroads (see Appendix K2 of this EIR). Two separate model runs were utilized for cars and trucks in order to more accurately model emissions resulting from passenger car and truck operations. The trip length was determined by weighting the default trip length of 16.6 miles for passenger cars and the average truck trip length of 40 miles. Trip generation data for the Project are shown on Table 4.11-2, *Trip Generation Summary*, in Section 4.11, *Transportation*, of this EIR. As shown, the Project is expected to generate a total of approximately 3,422 two-way vehicular trips per day (1,711 inbound and 1,711 outbound). For purposes of analysis, it is assumed that the Project would be operational by 2022, consistent with the traffic data presented in the Traffic Impact Analysis prepared for the Project.

CalEEMod utilizes summer and winter EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized in Table 4.2-9, *Summary of Net Peak Operational* Emissions. It should be noted that the existing emissions from operation of the Kimberly-Clark Fullerton Mill (identified previously in Table 4.2-3, *Emissions from Existing* Development) were subtracted from the Project operational emissions to determine the net new emissions from the proposed Project. Detailed operation model outputs for the Project are presented in Appendices 3.2 through 3.3 to the Project's AQIA (Appendix B1 of this EIR).

As shown on Table 4.2-9, the Project's net daily regional emissions from on-going operations would not exceed any of SCAQMD's regional thresholds for operation. Therefore, during operation, the Project would not result in a cumulative considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal of State ambient air quality standard, resulting in a less than significant impact. No mitigation is required; however, the Project Applicant would nonetheless be required to implement required mitigation measures from The Fullerton Plan EIR previously identified (refer to The Fullerton Plan EIR MM AQ-9, MM AQ-10, and MM AQ -12).

TABLE 4.2-9 SUMMARY OF NET PEAK OPERATIONAL EMISSIONS

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Source	38.69	3.69E-03	0.40	3.00E-05	1.44E-03	1.44E-03
Energy Source	0.08	0.74	0.62	4.45E-03	0.06	0.06
Mobile Source (Passenger Cars)	5.55	4.61	87.17	0.29	32.52	8.73
Mobile Source (Trucks)	5.47	205.85	54.58	0.84	31.74	9.97
On-Site Equipment Source	0.73	7.61	4.55	0.02	0.26	0.24
Total Maximum Daily Emissions	**50.52**	**218.81**	**147.33**	**1.15**	**64.58**	**18.99**
Existing Emissions	*65.51*	*360.04*	*305.99*	*2.12*	*36.13*	*28.06*
Net Emissions (Project – Existing)	**-14.99**	**-141.23**	**-158.67**	**-0.97**	**28.45**	**-9.07**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Operational Activities – Winter Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	38.69	3.69E-03	0.40	3.00E-05	1.44E-03	1.44E-03
Energy Source	0.08	0.74	0.62	4.45E-03	0.06	0.06
Mobile Source (Passenger Cars)	5.75	5.06	80.95	0.27	32.52	8.73
Mobile Source (Trucks)	5.04	209.19	35.60	0.84	31.60	9.91
On-Site Equipment Source	0.73	7.61	4.55	0.02	0.26	0.24
Total Maximum Daily Emissions	**50.28**	**222.60**	**122.13**	**1.14**	**64.44**	**18.94**
Existing Emissions	*65.49*	*360.70*	*301.67*	*2.12*	*36.11*	*28.05*
Net Emissions (Project – Existing)	**-15.21**	**-138.10**	**-179.54**	**-0.98**	**28.33**	**-9.12**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

lbs/day = pounds per day
CalEEMod operational-source emissions are presented in Appendices 3.2 and 3.3 to the Project's AQIA (Appendix B1 of this EIR).
Source: (Urban Crossroads, 2020a)

Potential Overlap of Construction and Operational Activity

Based on the assumed construction and buildout schedule of the Project, there is potential for overlap between construction and operational activity. The preceding analysis of the construction emissions and operational emissions was completed pursuant to the SCAQMD 1993 CEQA Handbook which details parameters to quantify construction and operation emissions separately and compare each to the applicable construction and operational thresholds of significance. SCAQMD has not developed or published a combined construction and operational emission significance threshold.

For purposes of this analysis, it is assumed that half of the Project would undergo construction while the other half would be fully operational. Combining the construction emissions with the operational emissions would present a maximum daily emission representing peak building construction activity and half of the Project site operational activity, a scenario that may not occur.

As such, the emissions for building construction emissions and half of the Project's operational emissions have been estimated to show the theoretical overlap of the construction and operational activities. Existing development emissions were subtracted to determine the net emissions from the Project (construction and operational emissions overlap). As previously stated, the SCAQMD does not have different thresholds for overlapping activities, rather the SCAQMD has separate thresholds for construction activity and operational activity. As such, the potential emissions from overlapping construction and operational activity shown in Table 3-9 of the AQIA are provided for informational purposes only. As shown in Table 3-9, for each air pollutant, with the exception of PM_{10}, there would be a net reduction in emission when taking into consideration the existing emissions associated with operations of the Kimberly-Clark manufacturing facility. PM_{10} emissions are estimated to be 5.01 lbs/day in the summer and 4.96 lbs/day in the winter.

Health Consequences

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

The SCAQMD noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O_3 as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." Second, "it takes a large amount of additional precursor emissions (NO_X and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NO_X by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion."

SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects." The San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) Brief ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NO_X or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that

area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SO_X) and NO_X," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NO_X, SO_X, and VOCs produced by a source.

Most local agencies, including the City of Fullerton, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causes of asthma), the City has determined that existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's AQIA (included as Appendix B1 of this EIR and summarized herein), which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

The LST analysis presented below under the analysis of Threshold c determined that the Project would not result in emissions exceeding SCAQMD's LSTs during either construction or long-term operation. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$.

As the Project's emissions would comply with federal, State, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level, and would not provide a reliable indicator of health effects if modeled.

Level of Significance Before Mitigation

The Project would not result in a cumulatively-considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard, and impacts would therefore be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold c	***Would the Project expose sensitive receptors to substantial pollutant concentrations?***

Localized Impacts from Criteria Pollutants

Localized Significance Thresholds (LSTs) represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor. For evaluating Project-related LST impacts, the analysis in the Project's AQIA makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). Refer to Subsection 3.6 of the Project's AQIA (Appendix B1 of this EIR) for a detailed discussion of the methodology used to evaluate the Project's localized air quality impacts.

Receptor locations are off-site locations where sensitive individuals (defined above) may be exposed to emissions from Project activities. Consistent with the SCAQMD LST Methodology, the nearest land use where an individual could remain for 24 hours to the Project site (in this case the nearest residential land use) has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds, and are based on a 24-hour averaging time. Sensitive receptors at a greater distance from the Project site would be exposed to fewer emissions from Project activities. Therefore, analyzing the closest sensitive receptor provides a conservative analysis of Project impacts.

As per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, LST Methodology explicitly states that "*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours.*" Therefore any adjacent land use where an individual could remain for 1 or 8-hours, that is located at a closer distance to the Project site than the nearest residential use, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of one and eight hours.

<u>Localized Significance – Construction</u>

LST thresholds of significance for construction-related activities were previously presented in Section 4.2.3 and summarized in Table 4.2-6. As described in the Project's AQIA (Appendix B1 of this EIR), as a conservative measure, it is assumed that a maximum of 10 acres per day can be actively disturbed during construction of the Project. Although the total acreage disturbed is more than 5 acres per day for construction activities, the LST Methodology only provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5

acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site construction activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area.

Table 4.2-10, *Localized Significance Summary of Construction Emissions– Without* Mitigation, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. The nearest receptor utilized to evaluate localized construction emissions of PM_{10} and $PM_{2.5}$ is the existing residential home located 391 meters (1,282 feet) from the Project site. For evaluation of localized NO_X and CO impacts, the nearest receptor is State College Business Plaza, located 8 meters (27 feet) south of the Project site. As previously stated, a 25-meter distance is used consistent with the LST Methodology. Without mitigation, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criterial pollutant. As such, the Project's localized emissions impacts during construction would be less than significant. Outputs from the model runs for unmitigated construction LSTs are provided in Appendix 3.1 to the Project's AQIA (Appendix B1 of this EIR).

Localized Significance – Long-Term Operations

LST thresholds of significance for operational-related activities were previously presented in Section 4.2.3 and summarized in Table 4.2-7. The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment, as discussed in Section 3.5 of the Project's AQIA, included as Appendix B1 of this EIR). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table 4.2-11, *Localized Significance Summary of Operational Emissions – Without* Mitigation, represent all on-site Project-related stationary (area) sources and 5% of the Project-related mobile sources. Considering that the trip length used in CalEEMod for the Project is approximately 16.60 miles for passenger cars and 40.00 miles for all trucks, 5% of this total would represent an on-site travel distance of approximately 0.83 miles/4,382.40 feet for passenger cars and 2.00 miles/10,560.00 feet for trucks. The longest on-site distance (length of the Project site from Acacia Avenue to State College Boulevard), is 0.50 mile for both trucks and passenger cars. As such, the 5% assumption is conservative and would tend to overstate the actual impact because it is not likely that a passenger car would drive 0.83 miles on the site or that a truck would drive 2.00 miles on the site.

As shown in Table 4.2-11, operational emissions associated with the Project would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project would have a less than significant localized impact during operational activity.

TABLE 4.2-10 LOCALIZED SIGNIFICANCE SUMMARY OF CONSTRUCTION EMISSIONS–WITHOUT MITIGATION

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition				
Maximum Daily Emissions	**50.67**	**50.56**	**14.65**	**4.14**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Crushing/Pulverizing				
Maximum Daily Emissions	**92.42**	**29.05**	**18.89**	**4.49**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation				
Maximum Daily Emissions	**36.41**	**21.43**	**13.00**	**6.00**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading				
Maximum Daily Emissions	**96.52**	**100.71**	**10.22**	**5.41**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Building Construction				
Maximum Daily Emissions	**18.18**	**17.70**	**0.99**	**0.93**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Paving				
Maximum Daily Emissions	**12.92**	**14.65**	**0.68**	**0.62**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Architectural Coating				
Maximum Daily Emissions	**2.04**	**2.42**	**0.13**	**0.13**
SCAQMD Localized Threshold	221	1,311	133	73
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

lbs/day = pounds per day
CalEEMod localized construction-source emissions are presented in Appendix 3.1 to the Project's AQIA (Appendix B1 of this EIR).
Source: (Urban Crossroads, 2020a)

TABLE 4.2-11 LOCALIZED SIGNIFICANCE SUMMARY OF OPERATIONAL EMISSIONS – WITHOUT MITIGATION

Operational Activity	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**19.06**	**12.67**	**3.53**	**1.23**
SCAQMD Localized Threshold	221	1,311	32	18
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

lbs/day = pounds per day
CalEEMod localized operational-source emissions are presented in Appendices 3.2 and 3.3 to the Project's AQIA (Appendix B1 of this EIR).
Source: (Urban Crossroads, 2020a)

Project Health Risk Assessment

Operational Health Risk Assessment

In order to evaluate the potential significance of the Project's mobile-source DPM emissions, the *Goodman Logistics Center Fullerton Mobile Source Health Risk Assessment* (HRA) has been prepared by Urban Crossroads (July 28, 2020) and is included as Appendix B2 of this EIR (Urban Crossroads, 2020b). The Project's operational HRA is based on SCAQMD guidelines to produce conservative estimates of human health risk posed by exposure to DPM. Vehicle DPM emissions were calculated using emission factors for PM_{10} generated with the 2017 version of the EMFAC model developed by CARB. Emission factors calculated using EMFAC 2017 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The EMFAC model generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. Refer to Subsection 2.2 of the Project's HRA (Appendix B2) for a detailed description of the methodologies used to estimate the Project's DPM emissions.

Calculated emission factors are shown in Table 2-1 of the Project's operational HRA. As a conservative measure, a 2022 EMFAC 2017 run was conducted and a static 2022 emissions factor data set was used for the entire duration of analysis herein (e.g., 30 years). Use of 2022 emission factors would overstate potential impacts since this approach assumes that emission factors remain "static" and do not change over time due to fleet turnover or cleaner technology with lower emissions that would be incorporated into vehicles after 2022. Additionally, based on EMFAC 2017, Light-Heavy-Duty Trucks are comprised of 39.94% diesel, Medium-Heavy-Duty Trucks are comprised of 79.05% diesel, and Heavy-Heavy-Duty Trucks are comprised of 92.16% diesel. Trucks fueled by diesel are accounted for by these percentages accordingly in the emissions factor generation.

Similar to off-site traffic, on-site vehicle running emissions were calculated by applying the running exhaust PM_{10} emission factor (g/VMT) from EMFAC and the total vehicle trip number over the length of the driving path using the same formula utilized for on-site emissions. In addition, on-

site vehicle idling exhaust emissions were calculated by applying the idle exhaust PM_{10} emission factor (g/idle-hr) from EMFAC and the total truck trip over the total assumed idle time (15 minutes).

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Due to the large number of volume sources modeled for the analysis, the corresponding coordinates of each volume source have been included in Appendix 2.1 to the Project's operational HRA. The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment, and dividing the result by the number of volume sources along that roadway, as illustrated on Table 4.2-12, *DPM Emissions from Project Trucks (2022 Analysis Year)*. The modeled emission sources are shown on Figure 4.2-2, *Modeled Emission Sources.* The modeling domain is limited to the Project's primary truck route and includes off-site sources in the study area for approximately ½ mile. This modeling domain is more inclusive and conservative than using only a ¼ mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a ¼ mile of the primary source of emissions (in the case of the Project, the primary source of emissions is the on-site idling and on-site travel).

On-site truck idling was estimated to occur as trucks enter and travel through the Project site. Although the Project's diesel-fueled truck and equipment operators would be required by State law to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling, which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, the analysis calculates truck idling at 15 minutes, consistent with SCAQMD's recommendation.

The HRA evaluates the potential impacts resulting from diesel exhaust from the 904 two-way truck trips generated by the Project, which is conservative since no credit for the daily truck trips associated with the Kimberly-Clark Fullerton Mill were taken in the HRA. In order to account for the possibility of refrigerated uses (cold storage) that would be accommodated by the up to 804,692 sf of High Cube Cold Storage Warehouse proposed, all trucks accessing this land use are presumed to also have TRUs. Therefore, for modeling purposes 299 total daily trucks (one-way) are assumed to be trucks with TRUs. In addition to on-site truck idling, the analysis assumes that each TRU accessing the site will also idle for 30 minutes, even though the CARB's anti-idling rules mandate a 5-minute idling time.

SCAQMD recommends using the USEPA's AERMOD model. For purposes of this analysis, the Lakes AERMOD View (Version 9.9.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View was utilized to incorporate the U.S. EPA's latest AERMOD Version 19191. Based on the USEPA methodology, the Project's modeled sources would result in a release height of 3.49 meters, an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters.

TABLE 4.2-12 DPM EMISSIONS FROM PROJECT TRUCKS (2022 ANALYSIS YEAR)

Truck Emission Rates						
Source	Trucks Per Day	VMT [b] (miles/day)	Truck Emission Rate [c] (grams/mile)	Truck Emission Rate [c] (grams/idle-hour)	Daily Truck Emissions [d] (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling Building 1	83			0.1059	19.11	2.212E-04
On-Site Idling Building 2 (West Side)	83			0.1059	2.19	2.529E-05
On-Site Idling Building 2 (East Side)	83			0.1059	2.19	2.529E-05
On-Site Idling Building 3 (West Side)	83			0.1059	2.19	2.529E-05
On-Site Idling Building 3 (East Side)	83			0.1059	2.19	2.529E-05
On-Site Idling Building 4	39			0.1059	1.03	1.196E-05
On-Site Travel Building 1	166	37.10	0.0367		4.38	5.073E-05
On-Site Travel Building 2 (West Side)	165	38.63	0.0367		4.56	5.283E-05
On-Site Travel Building 2 (East Side)	165	37.32	0.0367		1.37	1.583E-05
On-Site Travel Building 3 (West Side)	165	37.67	0.0367		1.38	1.598E-05
On-Site Travel Building 3 (East Side)	165	38.08	0.0367		1.40	1.615E-05
On-Site Travel Building 4	78	16.41	0.0367		0.60	6.962E-06
Off-Site Travel 10% on Acacia Av. [a]	90	21.22	0.0155		0.68	7.818E-06
Off-Site Travel 30% on Kimberly Av. [a]	271	130.06	0.0155		4.14	4.793E-05
Off-Site Travel 30% on Orangethorpe Av. [a]	271	129.49	0.0155		4.12	4.772E-05
Off-Site Travel 30% on N. State College Blvd. [a]	271	63.95	0.0155		2.04	2.357E-05
Off-Site Travel 55% south on N. State College Blvd. to SR-91	497	182.99	0.0155		5.83	6.743E-05
Off-Site Travel 30% east on Orangethorpe to SR-57	271	185.50	0.0155		5.91	6.836E-05
Off-Site Travel 10% on Orangethorpe to Raymond Av.	90	45.76	0.0155		1.46	1.686E-05
Off-Site Travel 5% on Raymond Av. to SR-91	45	15.67	0.0155		0.50	5.775E-06
Off-Site Travel 5% on Orangethorpe west of Raymond Av.	45	19.79	0.0155		0.63	7.294E-06
Off-Site Travel 5% on N. State College Blvd.	45	33.48	0.0155		1.07	1.234E-05

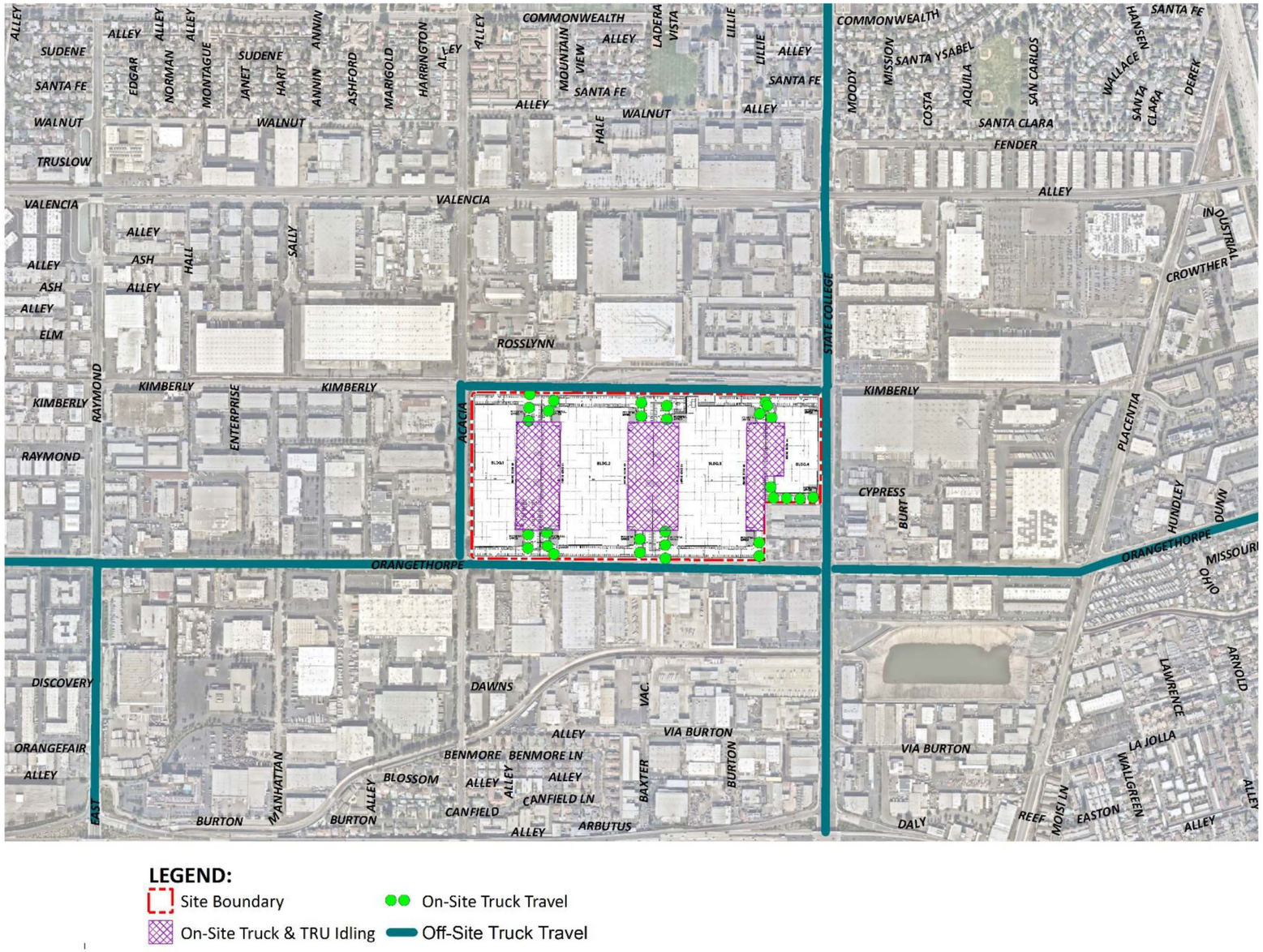
[a] Off-Site Truck Travel along the project frontage routes (Acacia, Kimberly, Orangethorpe, N. State College) is conservative since the percentage identified is presumed to travel the entire distance of the link.

[b] Vehicle miles traveled are for modeled truck route only.

[c] Emission rates determined using EMFAC 2017. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

[d] This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes. Additionally, this colum includes idling from TRUs accessing the Project, it is assumed that TRUs would idle for up to 30 minutes.

Source: (Urban Crossroads, 2020b)



LEGEND:

- Site Boundary
- On-Site Truck & TRU Idling
- On-Site Truck Travel
- Off-Site Truck Travel

Source(s): Urban Crossroads (06-30-2020)

Figure 4.2-2

Not to Scale

Modeled Emission Sources

Receptors may be placed at applicable structure locations for residential and worker property and not necessarily the boundaries of the properties containing these uses because the human receptors (residents and workers) spend a majority of their time at the residence or in the workplace's building, and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the Project's operational HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, respectively. Notwithstanding, as a conservative measure, receptors were placed at either the outdoor living area or the building façade, whichever is closer to the Project site. For purposes of the Project's operational HRA, receptors include both residential and non-residential (worker) land uses in the vicinity of the Project. These receptors are included in the operational HRA since residents and workers may be exposed at these locations over a long-term duration of 30 or 25 years of exposure. This methodology is consistent with SCAQMD and OEHHA recommended guidance. Any impacts to residents or workers located further away from the Project site than the modeled residential and workers would have a lesser impact than what has already been disclosed in the HRA at the MEIR and MEIW because concentrations dissipate with distance.

Tables 2-4 and 2-5 of the Project's operational HRA (Appendix B2 of this EIR) summarize the exposure parameters for residents and workers based on 2015 OEHHA Guidelines, while Appendix 2.2 to the Project's HRA includes the detailed risk calculation.

Based on the analysis presented in the Project's operational HRA, the following provides a summary of potential impacts to residents and workers within the Project's vicinity. The

- **Residential Exposure Scenario.** The residential land use with the greatest potential exposure to Project DPM source emissions is Location R6, which represents the existing sensitive residence at 1545 East Benmore Lane, in the City of Anaheim, approximately 1,282 feet south of the Project site. Since there is no private outdoor living area (back yard) facing the Project site at this location, R6 is placed at the building façade. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 1.36 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.0005, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance than the MEIR analyzed herein, and DPM generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences. The nearest modeled receptors are the same as the sensitive receptors identified in the AQIA and are shown on Figure 4.2-1.
- **Worker Exposure Scenario.** The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R9, which represents the State College Business Plaza at 1201 South State College Boulevard in the City of Fullerton,

approximately 27 feet south of the Project site. R9 is placed at the building façade where a worker could remain for a typical workday. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.83 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.003, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers. The nearest modeled receptors are shown on Figure 4.2-1.

Accordingly, and based on the preceding analysis, the Project's operational DPM emissions would not expose nearby sensitive receptors to a cancer risk impact greater than 10 in one million, and would not result in non-cancer risks exceeding the applicable significance threshold of 1.0. As such, Project-related operational DPM emissions would not expose nearby sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (Urban Crossroads, 2020b)

Construction Health Risk Assessment

As outlined in the *Construction Health Risk Assessment Memorandum* (Construction HRA) prepared by Urban Crossroads (July 28, 2020), and included as Appendix B3 to this EIR (Urban Crossroads, 2020c), the OEHHA Guidance states, "Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the [Maximally Exposed Individual Receptor (MEIR)]. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months)."

Given the OEHHA's Guidance, the determination of whether a construction HRA is warranted is dependent on whether or not early life exposure adjustments apply to DPM emissions resulting from construction activity. The Project's Construction HRA memorandum outlines the substantial evidence to support why early life exposure adjustments are not applicable to construction DPM and therefore a construction health risk assessment is not required due to the short-term duration of construction activity (long-term exposure e.g. 9 or 30 years of activity are typically used to generate a risk estimates).

For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588), OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. Notwithstanding, applicability of AB 2588 is limited to commercial and industrial operations. There are two broad classes of facilities subject to the AB 2588 Program: 1) Core facilities; and 2) facilities identified within discrete industry-wide source categories. Core facilities subject to AB 2588 compliance are sources whose criteria pollutant emissions (particulate matter, oxides of sulfur, oxides of nitrogen and volatile organic compounds) are 25 tons per year or more as well as those facilities whose criteria

pollutant emissions are 10 tons per year or more but less than 25 tons per year. Industry-wide source facilities are classified as smaller operations with relatively similar emission profiles (e.g., auto body shops, gas stations, and dry cleaners using perchloroethylene). The emissions generated from off-road mobile sources are not classified in AB 2588 as core operations nor subject to industry-wide source evaluation.

In comments presented to the SCAQMD Governing Board (June 5, 2015, Agenda No. 28) relating to toxic air contaminant exposures under Rules 1401, 1401.1, 1402 and 212 revisions, use of the OEHHA Guidelines specifically related to the applicability and use of early-life exposure adjustments for projects subject to CEQA, it was reported that:

> *"The Proposed Amended Rules are separate from the CEQA significance thresholds. The SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board. In the interim, staff will continue to use the previous guidelines for CEQA determinations."*

To date, the SCAQMD, as a commenting agency, has not conducted public workshops nor developed policy relating to the application of early-life exposure adjustments utilizing the OEHHA Guidance Manual for projects prepared by other public/lead agencies subject to CEQA. As a result, it is recommended that health risk assessments rely upon U.S. EPA documentation when evaluating the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F), wherein adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds.

In 2006, U.S. EPA published a memorandum which provides guidance regarding the preparation of health risk assessments should carcinogenic compounds elicit a mutagenic mode of action. As presented in the technical memorandum, numerous compounds were identified as having a mutagenic mode of action. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Protection Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action.

Additionally, the California Department of Toxic Substances Control (DTSC), which is charged with protecting individuals and the environment from the effects of toxic substances and responsible for assessing, investigating, and evaluating sensitive receptor populations to ensure that properties are free of contamination or that health protective remediation levels are achieved, has adopted the U.S. EPA's policy in the application of early-life exposure adjustments which is consistent with the methodology considered herein. As such, incorporation of early-life exposure

adjustments for exposures to DPM emissions in the quantification of carcinogenic risk for construction of the proposed are not considered.

Given that there is no available guidance that has been adopted by SCAQMD for CEQA purposes and the fact that the Project does not emit any pollutants that elicit a primary mutagenic mode of action, the use of the OEHHA Guidelines to determine potential construction health risks is not required. Notwithstanding, in the abundance of caution, a focused construction health risk assessment was prepared for the Project to determine the potential construction health risks that could occur if the OEHHA guidelines were utilized. A detailed discussion of the methods used for this analysis is presented in the Construction HRA provided in Appendix B3 of this EIR. The results are summarized below.

- **Individual Exposure Scenario.** The residential land use with the greatest potential exposure to Project DPM source emissions is Location R6, described previously. Since there is no private outdoor living area (back yard) facing the Project site at this location, R6 is placed at the building façade. At the MEIR, the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 1.80 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.003, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance than the MEIR analyzed herein, and DPM generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences during construction.
- **Worker Exposure Scenario.** The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R9, described previously. R9 is placed at the building façade where a worker could remain for a typical workday. At the MEIW, the maximum incremental cancer risk impact is 0.69 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.05, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers.

CO "Hot Spots"

An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that

are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SoCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards, as shown on Table 3-14 of the Project's AQIA (Appendix B1 of this EIR).

Based on the SCAQMD's 2003 AQMP and the *1992 Federal Attainment Plan for Carbon Monoxide* (1992 CO Plan), peak CO concentrations in the SoCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, of the 9.3 ppm 8-hour CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, the ambient 8-hour CO concentration within the Project study area is estimated at 1.4 ppm-1.7 ppm (refer to Table 4.2-1, *Project Area Air Quality Monitoring Summary (2016-2018)*). Therefore, even if the traffic volumes for the Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph) – or 24,000 vph where vertical and/or horizontal air does not mix – in order to generate a significant CO impact.

Traffic volumes generating the CO concentrations for the "hot spot" analysis are shown on Table 3-15 of the Project's AQIA (Appendix B1 of this EIR). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vph and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). As shown in Table 3-16 of the Project's AQIA (Appendix B1 of this EIR), the intersection of State College Boulevard and Chapman Avenue would generate the highest AM/PM traffic volumes of 5,150 vph and 4,963 vph respectively. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP.

Therefore, the Project would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental

impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Disadvantaged Communities

With respect to the Community Air Protection Program (CAPP) (AB 617), each year CARB's governing board (Board) is required to consider selecting communities for participation in the CAPP. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first two years of the CAPP (2018 and 2019), the Board selected 13 communities where these focused actions are underway (CARB, 2019). The City of Fullerton is not one of the selected communities, and to date has not been nominated to participate in the CAPP (CARB, 2020).

CalEnviroScreen is a general mapping tool developed by the OEHHA to help identify California communities that are most affected by sources of pollution. The Project site and its immediately surrounding area are designated by CalEPA as being part of a disadvantaged community for the purpose of SB 535. As previously discussed, SB 535 targets disadvantaged communities in California for investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. The Project entails the development of four industrial logistics center buildings, which would bring jobs and other economic opportunities to the local area without State assistance. The environmental effects of the Project are fully evaluated in this EIR. No significant impacts have been identified and no Project-level mitigation is required. This EIR provides a disclosure of localized impacts which may affect this CalEPA-designated disadvantaged community. As indicated in the preceding analysis, the Project's construction and operational localized emissions would not exceed the SCAQMD LST thresholds, and the Project would not result in significant health impacts due to DPM emissions. The Project also would not cause or contribute to any CO "hot spots."

Level of Significance Before Mitigation

The Project would not expose sensitive receptors to substantial pollutant concentrations, including localized construction emissions, localized construction emissions, diesel mobile health risks, or CO "Hot Spots"; therefore, impacts would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d	***Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

Land uses generally associated with odor complaints include: agricultural uses (livestock and farming); wastewater treatment plants; food processing plants; chemical plants; composting operations; refineries; landfills; dairies; and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses.

Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations.

The Project also would be required to comply with SCAQMD Rule 402 and Fullerton Municipal Code Section 15.40.080, Industrial Environmental Control, which both regulate odors. Notably, the Fullerton Municipal Code indicates that odors from gases or other odorous matter shall not be in such quantities as to be offensive beyond the property line of the parcel from which said odors emanate.

Therefore, odors associated with the proposed Project's construction and operational activities would be less than significant and no mitigation is required.

Level of Significance Before Mitigation

The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

4.2.5 CUMULATIVE IMPACTS

As indicated under the analysis of Threshold a, the Project would not result in a conflict with the SCAQMD 2016 AQMP. As such, cumulatively-considerable impacts due to a conflict with the AQMP would be less than significant.

As previously discussed, the CAAQS designate the Project area as nonattainment for O_3, PM_{10}, and $PM_{2.5}$ while the NAAQS designates the Project area as nonattainment for O_3 and $PM_{2.5}$. The AQMD has published a report on how to address cumulative impacts from air pollution, and projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

As indicated under the analysis of Threshold b, the Project would not exceed the SCAQMD regional thresholds during construction or operation, and the Project would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard. As such, the Project's regional construction and operational emissions would be less than cumulatively considerable.

As discussed under the analysis of Threshold c, the Project would not exceed the SCAQMD LST thresholds during either construction or operation. Additionally, the Project would not cause or contribute to any CO "Hot Spots." As such, impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant on a cumulatively-considerable basis.

With respect to cumulative TAC emissions, as discussed in Section 2.7 of the Project HRA included in Appendix B2 of this EIR, there are no state or federal ambient air quality standards applicable to TAC emissions. Preparing a cumulative assessment for TACs is complicated by the fact that site-specific impacts can be far different from average impacts over a larger geographic area. Impacts from TAC emissions are highest closest to sources of TACs, but the sources are often spread over a large area. For purposes of cumulative TAC assessment, a one-quarter mile radius or 1,320 feet geographic scope is utilized for determining potential cumulative impacts. This radius is more robust than, and provides a more health protective scenario for evaluation than the recommended 1,000-foot impact radius as discussion in Section 2.7.2, Justification of the Geographic Scope of the Analysis, of the HRA included in Appendix B2.

Of the four cumulative projects within a quarter-mile buffer (refer to Exhibit 2-D of the HRA in Appendix B2), only P4: 7,600 sf of General Light Industrial area would have the potential to emit TACs and is located within the quarter-mile buffer of the Project site and primary truck routes. Notwithstanding, a 7,600 sf General Light Industrial use would generate a negligible amount of truck trips (4 truck trips per day) and consequently a negligible amount of DPM which is the primary TAC that would be emitted. Project-source TACs would incrementally increase the

cumulative cancer risk by a maximum of 1.36 incidents per million population. The applicable SCAQMD significance threshold for Project-level TAC-source cancer risk impacts is 10 incidents per million population. Similarly, SCAQMD significance thresholds state that Project contributions to cumulative TAC-source cancer risks would be cumulatively considerable if greater than 10 incidents per million population would occur. The 1.36 incidents per million population increment resulting from the Project is therefore not significant, nor cumulatively considerable. Additionally, although there would be ambient growth in the Project vicinity, any increase in emissions and consequently cancer risk from ambient growth would be offset by the expected decrease in future risk estimates due to the natural turnover of older fleets and equipment being replaced by more efficient, less polluting engines and regulatory actions being phased in.

With respect to odors, the Project does not include any land uses or activities associated with the generation of odors or other emissions that could adversely affect a substantial number of people. Thus, the Project-related odor impacts would be less than cumulatively considerable.

4.2.6 REFERENCES

CARB, 2018. California Air Resources Board. Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater. November 30, 2018. Available at https://ww2.arb.ca.gov/sites/default/files/2018-11/Portable%20Engine%20ATCM.pdf

CARB, 2019. California Air Resources Board. *Community Air Protection Program, 2019 Community Recommendations Staff Report*. November 2019. Available at https://ww2.arb.ca.gov/sites/default/files/2019-12/2019_community_recommendations_staff_report_november_8_acc_3.pdf

CARB, 2020. California Air Resources Board. *Community Air Protection Program, Community Nominations*. Accessed July 8, 2020. Available online: https://ww2.arb.ca.gov/our-work/programs/community-air-protection-program/community-selection/2018-community-selection-and

Urban Crossroads, Inc. 2020a (July 28). *Goodman Logistics Center Fullerton Air Quality Impact Analysis*. Appendix B1 of this EIR.

———. 2020b (July 28). *Goodman Logistics Center Fullerton Mobile Source Health Risk Assessment*. Appendix B2 to this EIR.

———. 2020c (July 28). *Construction Health Risk Assessment Memorandum*. Appendix B3 to this EIR.

4.3 CULTURAL RESOURCES

This section describes existing cultural resources and analyzes the Project's potential impacts to these cultural resources. Information presented in this section is based primarily on the *Cultural Resources Technical Report for the Goodman Logistics Center Fullerton, Orange County, California* (Cultural Resources Report) prepared by ASM Affiliates, Inc. (ASM) (May 2020), which is included in Appendix C of this Environmental Impact Report (EIR).

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

No comments regarding cultural resources were raised during the EIR public scoping meeting. However, as discussed in Section 4.12, Tribal Cultural Resources, of this EIR, in its Notice of Preparation (NOP) comments, the California Native American Heritage Commission (NAHC) provided standard guidance on the scope of the analysis of potential impacts to archaeological resources and tribal cultural resources. In its NOP comment letter, the Juaneño Band of Mission Indians, Acjachemen Nation requested to continue to be consulted and identified that they would reserve comments until the Draft EIR is completed; formal consultation pursuant to Assembly Bill (AB) 52 was not requested.

4.3.1 EXISTING REGULATORY SETTING

Section 5.10, Cultural Resources, of The Fullerton Plan EIR provides a discussion of regulations related to cultural resources (Fullerton, 2012b). The following discussion summarizes the regulatory information for historic resources presented in The Fullerton Plan EIR and information regarding local, State, and federal historic resource eligibility criteria as presented in the Cultural Resources Report prepared for the Project and included in Appendix C of this EIR (ASM, 2020).

A. Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended, promotes the preservation, enhancement, and productive use of historic resources. The NHPA established the Advisory Council on Historic Preservation (ACHP) and provided procedures for the ACHP and federal agencies in promoting historic preservation. Section 106 of the NHPA requires that federal actions and the use of federal funds take into account their potential effects on historic properties or those listed in or eligible for listing in the National Register of Historic Places (NRHP).

National Register of Historic Places

Authorized by the NHPA, the U.S. Department of the Interior National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources. The NRHP is the official list of the

nation's historic places worthy of preservation. National Register listing places no obligations on private property owners. There are no restrictions on the use, treatment, transfer, or disposition of private property. Listing on the NRHP does, however, incentivize preservation. Property owners can become eligible to receive federal preservation grants, federal tax credits, and utilize alternative methods in compliance with building code provisions. For a resource to qualify for listing on the NRHP, the quality of significance in American history, architecture, archaeology, engineering, and culture must be present in districts, sites, buildings, structures, and objects that possess integrity and:

A. are associated with events that have made a significant contribution to the broad patterns of our history; or
B. are associated with the lives of persons significant in our past; or
C. embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded, or
D. may be likely to yield information important in prehistory or history.

In order to be eligible for listing in the NRHP and California Register of Historical Resources (CRHR), a property must retain sufficient integrity to convey its significance. The NRHP publication *How to Apply the National Register Criteria for Evaluation* (National Register Bulletin 15) establishes how to evaluate the integrity of a property: "Integrity is the ability of a property to convey its significance". The evaluation of integrity must be grounded in an understanding of a property's physical features and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, aspects of integrity:

1. **Location** is the place where the historic property was constructed or the place where the historic event occurred.
2. **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
3. **Setting** is the physical environment of a historic property, and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.
4. **Materials** are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.

5. **Workmanship** is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory, and can be applied to the property as a whole, or to individual components.
6. **Feeling** is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property's historic character.
7. **Association** is the direct link between the important historic event or person and a historic property.

B. State

California Register of Historic Resources

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding, and affords certain protections under the California Environmental Quality Act (CEQA). The criteria established for eligibility for the CRHR are directly comparable to the national criteria established for the NRHP. In order to be eligible for listing in the CRHR, a building, object, or structure must satisfy at least one of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Historical resources eligible for listing in the CRHR must also retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. For the purposes of eligibility for the CRHR, integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." This general definition is generally strengthened by the more specific definition offered by the NRHP—the criteria and guidelines on which the CRHR criteria and guidelines are based upon.

California Environmental Quality Act

CEQA requires a lead agency to determine whether a project would have a significant effect on the environment, including historical resources. CEQA Guidelines Section 15064.5, *Determining the Significance of Impacts to Archeological and Historical Resources*, requires that all private and public activities not specifically exempted should be evaluated against the potential for

environmental damage, including effects to historical resources. CEQA defines historical resources as "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California".

Lead agencies have a responsibility to evaluate historical resources against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change to a historical resource. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in or formally determined eligible for listing in, the NRHP, as well as some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Generally, the lead agency shall consider a resource to be a "historical resource" if it:

1. Is listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (California Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
2. Is included in a local register of historical resources or is identified as significant in a historical resource survey meeting the requirements Section 5024.1(g) of the PRC.
3. Is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

C. Local Plans, Policies, and Regulations

The Fullerton Plan

The City has identified historical resources within the City. As shown in Exhibit 3, *Historical Resources – National and Local*, of The Fullerton Plan, the nearest City designated historical resource to the Project site is Chapman Park located approximately 0.4-mile northeast. There are no historical resources identified at the Project site. (Fullerton, 2012a)

City of Fullerton Municipal Code

Section 15.48.60, *Landmarks, Landmark Districts, Residential Preservation Zones, and Significant Properties*, of the City of Fullerton Municipal Code, lists the criteria for determining eligibility in considering a request for a "Historical Landmark" designation as follows:

1. Character, interest, or value as part of the heritage of the City.
2. Location as a site of a historic event.
3. Identification with a person or persons or groups who significantly contributed to the culture and development of the City.
4. Exemplification of a particular architectural style or way of life important to the City.
5. Exemplification of the best remaining architectural types in an area.
6. Identification as the work of a person or persons whose work has influenced the heritage of the City, the state of California, or the United States.
7. Embodiment of elements of outstanding attention to architectural design, detail, materials, or craftsmanship.
8. Relationship to other landmarks, where the preservation of one has a bearing on the preservation of another.
9. A unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood.
10. Integrity as a natural environment that strongly contributes to the well-being of the people of the City.

4.3.2 EXISTING SETTING

Following is a summary of information presented in the Cultural Resources Report regarding the prehistory and ethnography of California and the region, and information about the history of California (including the cultivation of oranges), the City of Fullerton, the Kimberly-Clark Fullerton Mill and the potential expansion site.

D. Prehistory and Ethnography

As further described in the Cultural Resources Report included in Appendix C of this EIR, and summarized in Section 4.12, Tribal Cultural Resources, of this EIR, William J. Wallace developed a prehistoric chronology for the southern California coastal region that is still widely used today. Wallace's prehistoric sequence includes four periods: Horizon I - Early Man (circa 10,000–6000 B.C.), Horizon II - Milling Stone (6000–3000 B.C.), Horizon III – Intermediate (3000 B.C.–A.D. 500), and Horizon IV - Late Prehistoric (A.D. 500–Historic Contact).

The Project site is located in an area historically occupied by the Gabrielino (or Tongva). Their mainland territory was bounded on the west by the Chumash at Topanga Creek, on the north by

the Serrano in the San Gabriel Mountains, on the east by the Cahuilla, and on the south at Aliso Creek by the Juaneño.

E. California

Spanish explorer Juan Rodríguez Cabrillo first encountered California in 1542, claiming it for the King of Spain. More than two centuries later, in 1769, Spain sent Catholic missionaries and Spanish soldiers to colonize California. Don Gaspar de Portolá led the first overland expedition through Orange County that summer. In 1771, Father Junípero Serra founded Mission San Gabriel in what is now Los Angeles County. Five years later, on November 1, 1776, Mission San Juan Capistrano was founded. The two missions laid claim to much of what would become Orange County.

Although all land was considered property of the King of Spain, a few soldiers were granted grazing permits. In 1784, Manuel Nieto was permitted to occupy all the land between the Santa Ana and San Gabriel Rivers. After Mexican independence from Spain in 1821, the process of dismantling of the mission system began to unfold. The 1833 Secularization Act passed by the Mexican Congress ordered half of all mission lands to be transferred to the Native Americans, with the other half to remain in trust and managed by an appointed administrator. These orders were never implemented due to several factors that conspired to prevent the Native Americans from regaining their patrimony. The missions, including the San Gabriel Mission, were secularized by 1835. A Spanish land grant that lay entirely in what is now Orange County, the Rancho Santiago de Santa Ana, was granted to Juan Pacifico Ontiveros in 1837. Consisting of 62,516 acres, the rancho extended along the east bank of the Santa Ana River from the mountains to the sea. Settled early enough to provide homes for the third and fourth generations of the Yorbas and the Peraltas, it was eventually the location of at least 33 historic adobes. The Mexican War of the late 1840s ended with the Treaty of Guadalupe Hidalgo, and in 1850, California became a state. In the mid-1850s, Ontiveros began selling off parcels of the Rancho to American settlers arriving from the east.

As the Spanish arrived in the west, they encountered extensive irrigation systems created by native peoples. These early irrigation systems consisted of hand-dug diversion channels and ditch systems that inundated fields with river water. Spanish monks adopted these methods of irrigation for their mission orchards, using thousands of native peoples to work the land. Mission orchards were composed of various fruits, although seedling oranges were by far the most extensive fruit grown. The Spanish seedling orange became naturalized in California and was an important food source for the next hundred years. In 1874, the United States Department of Agriculture (USDA) imported the navel orange from Brazil to California. The navel is a seedless orange that would become the catalyst for the development of a commercial citrus industry in the United States. The navel orange immediately found favor in Riverside, California, where the first trees were planted. By World War II, California and Florida had become the centers of commercial citrus growing in the United States. After World War II, oranges became the most widely planted orchard fruit in the United States, accounting for 24 percent of the total acreage of fruits grown.

F. City of Fullerton

The Fullerton townsite was founded in 1887 by brothers Edward and George Amerige in what is now central Fullerton; the City was incorporated in 1904. The post-war era of the 1950s resulted in industrial expansion. Parallel with growth throughout southern California, the first major housing boom occurred in the 1920s. Regardless of earlier residential development, Fullerton remained largely an agricultural community until World War II. Revenues from the oil industry had begun to fade around the end of the war, and the City's economy depended heavily on crop production and food canning and preserving, still a multi-million-dollar industry.

A new era, however, began after the war, and during the national flurry of industrial expansion in the postwar era of the 1950s, Fullerton attracted hundreds of new businesses and industries that gradually replaced agriculture. Realizing that the costs of city services for an expanding population associated with the new industries were going to rise faster than tax revenues, the Fullerton City Council adopted a new industrial policy designed to move the still largely rural town toward manufacturing and away from the agricultural economy that had existed since the city was founded. The City Council designated two large areas – one in the southeast part of the City and one in the northwest part of the City – for industrial purposes. While all of Orange County was experiencing unparalleled postwar industrial development, Fullerton led the county in manufacturing gains as one industrial giant after another–Beckman Instruments (1953), Kimberly-Clark Corporation (1956), Hughes Aircraft Company (1957)–moved to Fullerton. The industrial development in the City transformed the landscape from citrus orchards to industrial buildings.

G. Kimberly-Clark Fullerton Mill and Potential Expansion Site

Results of Records Search, Site Survey, and Directory Review

On March 13, 2020, ASM Affiliates, Inc. requested a records search at the South-Central Coastal Information Center (SCCIC), located at California State University, Fullerton, to identify any previously recorded sites located or previous studies conducted within the area including the Project site. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS), one of ten Statewide repositories that house records of archaeological and historic resources in Orange, Los Angeles, and Ventura Counties. The records search encompassed the Project site and a search buffer of one-mile around the Project site, and included a review of all maps and files housed at SCCIC.

The records search conducted by the SCCIC indicated that no prior surveys have been conducted nor have any cultural resources been documented within or near the Project site. A total of 32 prior studies have been conducted and 18 cultural resources have been documented within the one-mile search buffer, all of which are historical buildings or structures.

ASM also conducted an intensive pedestrian survey of the Project site on March 18, 2020, and an additional survey on April 26, 2020. The surveys covered the grounds of the Kimberly-Clark site, including the remnant orange orchards, as well as buildings that are more than 45 years old: the large Kimberly-Clark Corporation's Fullerton Mill building at 2001 E. Orangethorpe Avenue, and two smaller buildings at the potential expansion site (2301 E. Orangethorpe Avenue). During

the pedestrian survey, digital photographs of the exterior were taken. Detailed field notes were recorded addressing features of the building, landscaping, and setting. ASM's architectural historian documented the interior and exterior of the main Kimberly-Clark building, associated landscaping, and grounds. The two buildings at 2301 E. Orangethorpe Avenue were surveyed from the exterior. The Project site is almost entirely developed and covered with buildings, pavements, and landscaping. Some open space remains within the remnant orange orchards but these areas have been significantly modified by the planting and maintenance of the orchard. Within the landscaped areas, any exposed ground surfaces were examined wherever ground visibility was available. No previously undocumented cultural resources were identified as a result of the survey.

ASM also conducted a review of historical aerials and topographical maps to determine previous uses of the Project site, and reviewed historical City directories. Before the 1963 view, the Project site and immediate surroundings were primarily filled with orchards, with a scattering of small residential/agricultural buildings. In the earliest aerials available (1952), the potential expansion site contains two small commercial/warehouse buildings similar in size and location to the current buildings. Although no orchards were present on the potential expansion site, it was surrounded by orchards. By 1963, some land at the northeast side of the Kimberly-Clark site had been cleared, and Kimberly Avenue and a parallel rail yard were under development at the north boundary of the Kimberly-Clark site. Industrial development of the Kimberly-Clark site is first shown in the 1963 view, consisting of the central part of the main Kimberly-Clark Fullerton Mill, with orchards to the west and landscaping and parking to the south. By 1972, the main building was expanded to the west, and an addition is shown to the east "arm" of the building. By 1995, the main building had been built out to the extent of its current configuration.

In 1961 topographic maps, only orchards and a few scattered buildings and structures are shown on the Kimberly-Clark site. In 1967, the first phase of the Kimberly-Clark Fullerton Mill is shown, as well as water tanks on the property. A fire station and other buildings are located to the north across Kimberly Avenue. Two buildings are shown on the potential expansion site. In the 1972 topographic maps, the main Kimberly-Clark Fullerton Mill building is shown extending to the north and west, and a milling unit associated with paper mill is shown to the east, near the tanks. General municipal and industrial/commercial expansion is in evidence in the surrounding area.

Before construction of the Kimberly-Clark paper mill, the site, as well as nearly every parcel within at least two miles of the property, was covered with orange orchards in a patchwork of fields of an acre and more. The remnant orange orchard on the east side of the Kimberly-Clark site adjacent to State College Boulevard comprises portions of three of those small orchards visible on a 1938 historic aerial photograph, all approximately one-acre in size.

Kimberly-Clark Fullerton Mill

History

Kimberly-Clark Corporation (KCC) began in 1872, in Neenah, Wisconsin and a detailed discussion of the history of the company is provided in the Cultural Resources Report included in Appendix C of this EIR. KCC purchased the Fullerton site from Eadington Fruit Co. on January

11, 1955 and broke ground for the approximately 350,000 square foot (sf) paper mill on May 5, 1955; operations at the facility began in 1956. Plans were to construct a modern concrete-and-steel building while retaining parts of the surrounding orange orchards. Just a few years after the Fullerton paper mill was constructed, it was nearly doubled in size in 1959, adding 250,000 sf to the original configuration of the building. This expansion was accomplished primarily by infilling the original building to the east. Trailer-truck parking was added at about the same time, replacing some of the surrounding orange orchards.

Another major expansion of the Fullerton mill was completed in 1971, to further accommodate the company's line of consumer products. The physical size of the building was increased by another nearly 40 percent, consuming a large swath of orange orchards and extending to the west to South Acacia Avenue and north to Kimberly Avenue. Sometime between 1980 and 1995, further alterations took place. The building was extended farther on the west side of the property, replacing most of the remaining orange orchards on that side. The primary facade was changed extensively, with an addition on the south facade that partially replaced the original primary entrance. The entrance was moved to the east, and the flat facade was pushed out in a curved extension. The main entrance driveway connecting to Acacia Avenue was widened to form a two-way approach with a landscaped median, as shown in historic aerials. Figure 4.3-1, Alterations of the Kimberly-Clark Fullerton Mill Building, depicts the alterations of the Kimberly-Clark Fullerton Mill over time.

In January 2018, Kimberly-Clark announced plans to close its Fullerton plant as part of a cost-cutting plan to reduce plants and workforce (Goulding 2018).

Architecture and Setting

Buildings occupy most of the Kimberly-Clark site. Industrial structures such as tanks, paved parking areas, and a remnant orange orchard are located to the east, landscaping and driveways to the south, and a loading area and additional remnants of orange orchards to the southwest. The west and north sides of the building have a slight setback from the traffic corridors of Acacia Avenue on the west and Kimberly Avenue on the north. A narrow band of plantings of regularly spaced primarily pine trees lines both the west and north facades.

A detailed description of the Kimberly-Clark building architecture is provided in the Cultural Resources Report included in Appendix C of this EIR. In summary, Skidmore, Owings & Merrill (SOM), nationally known architects, designed the original Kimberly-Clark Fullerton Mill building and the contractor was Lindgren and Swinerton of Los Angeles. SOM is one of the most important and respected architectural firms in the world. The firm's work represents some of the finest design achievements of the Modern era. In postwar America, SOM was a leader in promoting the International Style, known for creating glass-and-steel skyscrapers that have become veritable icons in Modern architecture.

The Kimberly-Clark Fullerton Mill is a warehouse/manufacturing/administrative building, with several ancillary industrial structures toward the east. The facility is a single-story building

Source(s): ASM affiliates (May 2020)

Figure 4.3-1

Not to Scale

Alterations of the Kimberly-Clark Fullerton Mill Building

composed of several additions of approximately the same height, mostly flat-roofed, abutting each other to create a single building. The minimally adorned facades of the low, flat-roofed building presented a sleek example of modernist industrial design, in a corporate style common to mid-twentieth-century sensibilities.

The flat exterior wall of an addition at the west end of the south facade is composed of aggregate concrete panels with regularly spaced vertical concrete beams of tilt-up concrete construction. The primary entrance and the remainder of the south facade of the building are set back from the aggregate concrete addition. The entrance is bumped out from the flat facade, all clad in rectangular panels with an inset grid pattern. The entrance itself consists of a high central portion of glazing in a two-by-four grid. Flanking the glazed portion are two rectangular inset areas with glazing at the lower parts. The entrance door is recessed beneath the curved wall above. The door is angled to face the recessed area and consists of a pair of glazed doors surrounded by sidelights and a transom. To the west of the door, the lower wall is completely glazed and is recessed at the ground level. Regularly spaced columns appear to support the extended part of the wall above.

The east end of the primary facade is clad in rectangular panels with indentations forming a grid pattern. At regular intervals are recessed vertical features that might be the steel frame of the building. Toward the center of the wall is a recessed glazed entry. At the north facade, where the building extends nearly to Kimberly Avenue, the building is composed of several joined sections. The east end of the north facade appears to be part of the original configuration of the building. It is clad in smooth stucco.

To the west, a very slightly sloped corrugated metal building is joined to the original building. This section of the north facade has regularly spaced single doors accessed by concrete steps with metal rail. There are no windows in this section. Farther west is another section of the building, clad in concrete with an etched grid similar to the design elsewhere on the exterior. It continues around the corner of Acacia Avenue, with a small indentation at the corner to allow for a small utility building. This building joins to another to the south on Acacia. It has regularly spaced doors and no windows. The walls are aggregate concrete.

The administrative part of the interior of the building is located near the primary entrance at the south facade. Reflecting the Mid-Century-Modern features of the original building, sections of the interior corridors are lined with blond wood paneling. The entrances to some of the offices consist of partitions with flat wood doors set into an irregular grid of glazing. The corridor to the west of the main entrance leads to a cafeteria and courtyard on the north and another courtyard on the south. Dropped ceilings are covered in acoustic tile with fluorescent lighting fixtures, and the floors are asphalt tile. The remainder of the massive building is made up of a series of open warehouse/ production spaces. Paper pulping equipment is located in one section, and a rail spur passes into the building from the east.

In addition to the orange orchards lining the main entrance, an orchard at the east side of the Project site consists of parts of three original orchards shown in historic aerials. There are 18 rows of orange trees in the easternmost section of the orchard, with 18 trees in each row. There are a

few areas where the trees are absent, and several much larger avocado trees are interspersed throughout the orchard. The remnant orange orchards do not display physical evidence of the crafts of a particular culture, such as cultivation and care of an orchard (propagation, planting, pruning, fertilizing, irrigating, and harvesting) and protection of an orchard (pest control, animal husbandry, staking, fencing, and windbreaks). The current fencing and irrigation system are not original, and the typical grid configuration of ditches has been abandoned to accommodate new methods of irrigation. No agricultural structures such as sheds or worker housing remain on the property.

Historic Evaluation – Kimberly-Clark Fullerton Mill

As presented in the Cultural Resources Report (ASM, 2020), ASM considered the eligibility of the Kimberly-Clark Fullerton Mill for listing in the CRHR under criteria 1, 2, 3, and 4 and as a potential City of Fullerton Historical Landmark under criteria 1 through 10.

California Register of Historic Resources

- **CRHR Criterion 1.** In consideration of the area of significance of Industrial Development in Fullerton under CRHR Criterion 1, the Kimberly-Clark Fullerton Mill at 2001 E. Orangethorpe Avenue has an important association with Fullerton's postwar industrial development. The Kimberly-Clark Fullerton Mill was one of several major manufacturing companies to locate facilities in an area southeast of central Fullerton zoned to accommodate light-industry. Partially as a result of the City's encouragement, the landscape rapidly transformed from the orange orchards dating from Fullerton's earliest years in the late nineteenth century to a dense environment of industrial activity. With the new manufacturing plants came approximately 5,000 jobs and expansive residential growth. In this way, Kimberly-Clark played an important role in the postwar economic growth and industrial development of Fullerton. As such, the Kimberly-Clark Fullerton Mill meets Criterion 1 for the theme of Industrial Development in Fullerton, with a potential period of significance of 1955 through 1970, beginning with Kimberly-Clark's presence in Fullerton and ending in 1970. The end of the period of significance is 50 years ago, as recommended by the National Park Service when historic activities continue to have importance and no more specific date can be defined to end the historic period. Although it has a significant association with the theme of Industrial Development in Fullerton, the building does not have sufficient integrity to convey that historical association (see Integrity discussion below). Therefore, Kimberly-Clark Fullerton Mill is recommended not eligible for listing in the CRHR under Criterion 1.

- **CRHR Criterion 2.** ASM considered Kimberly-Clark Fullerton Mill for eligibility under Criterion 2 for association with persons important in our history. No notable persons were found to be associated specifically with the Kimberly-Clark Fullerton Mill. Therefore, the property is recommended not eligible for listing in the CRHR under Criterion 2.

- **CRHR Criterion 3.** Under Criterion 3, ASM considered the property under the theme of Mid-Century Modern Industrial Architecture in Fullerton. The original building was

designed by legendary architectural firm SOM, whose designers are inarguably considered master architects. With an international portfolio of award-winning projects, the firm has produced numerous notable designs, but might be best known for its modern corporate towers. In 1960, the Kimberly-Clark Fullerton Mill received the Award of Merit from the American Institute of Architects. As such, ASM considered the Kimberly-Clark Fullerton Mill for eligibility under Criterion 3 as likely the only local example of master architects SOM. As it was originally constructed, the Kimberly-Clark Fullerton Mill was a good, local example of Mid-Century-Modern architecture. In addition to SOM, Modern master architects represented in Fullerton include William Pereira, A. Quincy Jones, Thornton Abell, and others.

However, numerous examples of institutional, residential, and industrial Mid-Century-Modern architecture are extant in Fullerton as comparable properties, including the campus of California State University Fullerton and City Hall. The NRHP-listed Beckman Instruments Administration Building is an excellent example of this style which retains a high degree of integrity. The Kimberly-Clark Fullerton Mill building has been significantly altered and as such lacks sufficient integrity (see Integrity discussion below) to convey its historical association with Mid-Century-Modern Industrial Architecture in Fullerton. The major alterations to the building in 1959 and 1970 are not architecturally significant, and in fact, the additions contribute to the loss of potential significance of the original building as they are not complimentary to the design of the original building. Therefore, the Kimberly-Clark Fullerton Mill is recommended not eligible for listing in the CRHR under Criterion 3.

- **CRHR Criterion 4.** The Kimberly-Clark Fullerton Mill building is recommended not eligible under Criterion 4 because it has not yielded, and is not likely to yield, information important to the prehistory or history of the area.

- **Integrity.** The Kimberly-Clark Fullerton Mill meets CRHR Criterion 1 for its association with the theme of Industrial Development in Fullerton. The Kimberly-Clark Fullerton Mill is also associated with Mid-Century Modern Industrial Architecture in Fullerton. However, it does not retain sufficient integrity to its potential period of significance because it does not retain enough of the seven aspects of integrity to retain overall integrity:
    - *Location* - The Kimberly-Clark Fullerton Mill has not been moved and retains integrity of location.
    - *Design* - The Kimberly-Clark Fullerton Mill has lost its integrity of design through major additions that completely replaced the original west facade, a majority of the east façade, and a significant portion of the south (primary) facade, including the entire original entrance and associated landscaping. Although the original north facade is unaltered, adjacent additions obscure the smaller original wing, which is a secondary facade and not a good representation of the design of the building. As a result, the building does not retain integrity of design.
    - *Setting* - The setting of the building has been altered since the year of construction by additions to the building, which included the loss of a large orange orchard at the

west end of the property and reconfiguration of the landscaping at the primary facade. The remaining landscape is sufficient to convey integrity of the immediate setting of the Kimberly-Clark Fullerton Mill building. However, the adjacent properties have been extensively developed with light industrial buildings, paving, and ancillary structures since the end of the period of significance of the Kimberly-Clark Fullerton Mill. Therefore, the Kimberly-Clark Fullerton Mill has lost some integrity of setting.

- *Materials* - Little of the original distinctive paneled cladding remains. Some of the additions to the building and the alteration of the primary entrance appear to be clad with scored concrete or other replications of the original panels, but these materials are not original. Therefore, the Kimberly-Clark Fullerton Mill does not retain integrity of materials.
- *Workmanship* - The building does not retain any individual components that serve as evidence of a particular period of construction history. Therefore, the Kimberly-Clark Fullerton Mill has lost integrity of workmanship.
- *Feeling* - The building no longer conveys the feeling of the Mid-Century-Modern style due to its significant alterations. There are few character-defining features associated with the style remaining. As such, it no longer conveys the sense of place and time when Kimberly-Clark was an important industry to the City. A historical contemporary, such as a Kimberly-Clark employee from the mid-twentieth century, would not recognize the building today. Therefore, the Kimberly-Clark Fullerton Mill has lost integrity of feeling.
- *Association* - Although the Kimberly-Clark Fullerton Mill is associated with Industrial Development in Fullerton and Mid-Century Modern Industrial Architecture in Fullerton, it is not sufficiently intact to convey that association. As such, it has lost integrity of association.

Therefore, although the Kimberly-Clark Fullerton Mill retains integrity of location and some integrity of setting, all other elements of integrity including design, materials, workmanship, feeling, and association have been lost through substantial alterations. Therefore, the Kimberly-Clark Fullerton Mill lacks sufficient overall integrity to convey its historical significance and it is not eligible for listing in the CRHR.

City of Fullerton Historical Landmarks Criteria

For eligibility as a City of Fullerton Historical Landmark, the City's 10 criteria were considered, for which only one criterion needs to be met for eligibility as a local landmark, as well as a high degree of integrity.

- **Criterion 1.** The Kimberly-Clark Fullerton Mill meets Criterion 1, as representing the "Character, interest, or value as part of the heritage of the City." Specifically, Kimberly-Clark was among the early major manufacturing companies to establish plants in Fullerton as part of the City's postwar industrial development. However, as detailed in the CRHR evaluation above, the building lacks sufficient integrity to convey its historical associations,

and therefore is recommended not eligible as a City of Fullerton Historical Landmark under Criterion 1.

- **Criteria 2 and 3.** The Kimberly-Clark Fullerton Mill is not the location of a site of a historic event (Criterion 2). It is not identified with a person or persons or groups who significantly contributed to the culture and development of the city (Criterion 3).
- **Criteria 4, 5, and 7.** Similar to the analysis for CRHR Criterion 3, due to the extensive alterations and additions to the building, the Kimberly-Clark Fullerton Mill does not exemplify a particular architectural style or way of life important to the City (Criterion 4), it is not an example of the best remaining architectural types (Criterion 5), and it does not embody the elements of outstanding attention to architectural design, detail, materials, or craftsmanship (Criterion 7).
- **Criterion 6.** Similar to the analysis for CRHR Criterion 3, the building has been identified as the work of a person or persons whose work has influenced the heritage of the City, the state of California, or the United States, specifically SOM. However, the building lacks sufficient integrity to convey its historical associations, and therefore is recommended not eligible under Criterion 6
- **Criteria 8, 9, and 10.** The Kimberly-Clark Fullerton Mill does not have a relationship to other landmarks, where the preservation of one has a bearing on the preservation of another (Criterion 8). It does not have a unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood (Criterion 9). Finally, the Kimberly-Clark Fullerton Mill does not display integrity as a natural environment that strongly contributes to the well-being of the people of the City (Criterion 10).

Therefore, the Kimberly-Clark Fullerton Mill is not eligible for designation as a City of Fullerton Historical Landmark.

Historic Evaluation – Orange Orchards

As presented in the Cultural Resources Report (ASM, 2020), ASM considered the eligibility of the remnant orange orchards on the Kimberly-Clark site for listing in the CRHR under criteria 1, 2, 3, and 4 and as a potential City of Fullerton Historical Landmark under criteria 1 through 10.

California Register of Historic Resources

- **CRHR Criterion 1.** The remnant orange orchards appear to be associated with the development of the citrus industry in Fullerton in the early decades of the twentieth century and the City's associated historical settlement. However, as an example of an orchard landscape, these orchards do not represent a good example of the property type within the state of California. Although the remnant orange orchards at the Kimberly-Clark site are among the few remaining, if not the only, examples of remaining orange orchards in the City of Fullerton, where there were once thousands of acres of cultivated orchards, they are not as good representations of this property type as several other orchards from

this period that have been preserved in Orange County. These include (1) the 16-acre Valencia orange grove (Oak Tree Ranch), within the Santiago Oaks Regional Park in the City Orange; (2) the orchard and reproduction of the Irvine family ranch home at the Irvine Ranch Historic Park; (3) the orchard at George Key Ranch Historic Park in Placentia; and (4) the Robert D. Hoyt Municipal Orange Grove in the City of Orange at the southwest corner of Hart Park. A few other orchards still exist nearby, for example, the Pressel Orchard, in the City of Anaheim and Mission Ranch (at the corner of Walnut Avenue and Red Hill Avenue, in the City of Tustin). Most orchards found eligible for listing were elements of a larger agricultural site, including a ranch house and other elements of a working orange production property, rather than individually eligible resources. Research did not reveal that the property reflects the influence of important horticultural innovation, practice, or event, such as the discovery or cultivation of a new variety at the property or an improved method of production. The orchards at the Kimberly-Clark site produced fruit, and were not innovative, and they were not the first or largest in the Fullerton area. They appear to be similar to numerous other orchards, and no distinctive activities occurred there. Therefore, the remnant orange orchards at the Kimberly-Clark site are recommended not eligible for listing in the CRHR under Criterion 1.

- **CRHR Criterion 2.** ASM considered the remnant orange orchards for eligibility under Criterion 2 for association with persons important in our history. No notable persons were found to be associated specifically with the orchards. Therefore, the remnant orange orchards at the Kimberly-Clark site are recommended not eligible for listing in the CRHR under Criterion 2.
- **CRHR Criterion 3.** ASM considered the remnant orange orchards for eligibility under Criterion 3 for architecture and engineering. The orchards do not embody the distinctive characteristics of a type, period, horticultural system, or style, nor do they contain a rare or unusual genotype, such as a variety or strain of a variety. The orchard trees are common Valencia oranges, a type commonly grown in Southern California during the mid-twentieth century. The remnant orange orchards are not part of a historic designed landscape or agricultural site, designed for research, or designed for the demonstration of "good" horticulture. Research has not revealed a master horticulturalist associated with the property. Therefore, the remnant orange orchards at the Kimberly-Clark site are recommended not eligible for listing in the CRHR under Criterion 3.
- **CRHR Criterion 4.** The remnant orange orchards are recommended not eligible under Criterion 4 because they have not yielded, and are not likely to yield, information important to the prehistory or history of the area.

Therefore, the remnant orange orchards are not eligible for listing in the CRHR.

City of Fullerton Historical Landmarks Criteria

For eligibility as a City of Fullerton Historical Landmark, the City's 10 criteria were considered, for which only one criterion needs to be met for eligibility as a local landmark, as well as a high degree of integrity.

Similar to the analysis for CRHR Criterion 1, although the remnant orange orchards at the Kimberly-Clark site may be the only remaining remnants of orchards in Fullerton, they are not a good representation of the character, interest, or value as part of the heritage of the City. They are not part of a larger agricultural site, including a ranch house and other elements of a working orange production property. They do not represent the influence of important horticultural innovation, practice, or event, such as the discovery or cultivation of a new variety at the property or an improved method of production. The orchards at the Kimberly-Clark site were not innovative, and they were not the first or largest in the Fullerton area. They appear to be similar to numerous other orchards, and no distinctive activities occurred there. Therefore, the remnant orange orchards at the Kimberly-Clark site are recommended not eligible for listing in the **City Criterion 1**.

The remnant orange orchards at the Kimberly-Clark site are not the location of a site of a historic event (**Criterion 2**). They are not identified with a person or persons or groups who significantly contributed to the culture and development of the city (**Criterion 3**). **Criteria 4 and 5** are not applicable to the orchards. They have not been identified as the work of a person or persons whose work has influenced the heritage of the City, the state of California, or the United States (**Criterion 6**). They do not embody the elements of outstanding attention to architectural design, detail, materials, or craftsmanship (**Criterion 7**). They do not have a relationship to other landmarks, where the preservation of one has a bearing on the preservation of another (**Criterion 8**). They do not have a unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood (**Criterion 9**). Finally, the remnant orange orchards at the Kimberly-Clark site do not display integrity as a natural environment that strongly contributes to the well-being of the people of the City (**Criterion 10**).

Therefore, the remnant orange orchards on the Kimberly-Clark site are not eligible for designation as a City of Fullerton Historical Landmark.

Potential Expansion Site (2301 E. Orangethorpe Avenue)

History and Architecture

Research revealed little about the history of the two commercial/industrial buildings at 2301 E. Orangethorpe Avenue. Historical City of Fullerton building permits (pre-2002) were not located. The precise date of construction of the buildings could not be determined, but based on visual observation and review of historic aerial photos and maps, both are circa 1950. The two buildings include a 2,904-square-foot, two-story office building and a 2,656-sf workshop/warehouse.

Thompson Transportation was located on the site in the 1970s, according to a search of directories, but no information was found about the company other than that it ran charter and rental buses and also conducted “fishing parties”. Most recently, Chapman Coast Roof Co., Inc. occupied the potential expansion site; however, no information was found about the roofing company.

The existing office building has a flat roof and is entirely clad in stucco. The walls of the building are slightly recessed from a deep extension around the top of the building. There is no fenestration

at the east facade. At the west facade there are two similar square windows with no surrounds at the second level. At the ground level is a set of two identical windows with a wide rectangular surround. The north facade was not accessible at the time of survey. The existing warehouse/workshop is one-and-a-half-story building with a flat metal canopy extending from the north facade. This warehouse/work shop has a slightly sloped side-gabled roof with no overhang on the gable ends and a slight overhang on the other two sides. The building is constructed of corrugated metal panels. At the south facade are sliding corrugated metal doors that extend the full height of the building.

Historic Evaluation

ASM considered the potential eligibility of the two buildings at 2301 E. Orangethorpe Avenue for listing in the CRHR or the City of Fullerton Historical Landmarks register.

California Register of Historic Resource

- **CRHR Criterion 1.** The office building was constructed circa 1950, but it is not a good example of the postwar industrial boom that triggered the establishment of Kimberly-Clark Corporation in the Fullerton area, along with National Cash Register, Sylvania Electric Products, and others. The date of construction of the ancillary warehouse building is also circa 1950. The buildings at 2301 E. Orangethorpe Avenue are not good representations of any particular theme or event in history under Criterion 1.
- **CRHR Criterion 2.** The buildings were not found to be associated with any persons important in history and are therefore not eligible under this criterion.
- **CRHR Criterion 3.** The office building has been significantly altered since it was constructed, and the ancillary utilitarian warehouse building is a common Butler-type building in widespread use for workshops, garages, and warehouses and has no distinguishing architectural features. The buildings at 2301 E. Orangethorpe Avenue are therefore not good representations of any particular architectural style or type and not eligible under Criterion 3.
- **CRHR Criterion 4.** The buildings at 2301 E. Orangethorpe Avenue are recommended not eligible under Criterion 4 because they have not yielded, and are not likely to yield, information important to the prehistory or history of the area.

Therefore, the buildings at the potential expansion site are no eligible for listing in the CRHR.

City of Fullerton Historical Landmarks Criteria

Similarly, the buildings on the potential expansion site do not meet the comparable local Fullerton criteria. The buildings do not meet **Criterion 1**, as representing the “Character, interest, or value as part of the heritage of the City.” The buildings are not the location of a site of a historic event (**Criterion 2**). They are not identified with a person or persons or groups who significantly contributed to the culture and development of the city (**Criterion 3**).

The analysis of City Criteria 4, 5, 6, and 7 is similar to the analysis for CRHR Criterion 3. The office building and warehouse do not exemplify a particular architectural style or way of life important to the City (**Criterion 4**), are not examples of the best remaining architectural types (**Criterion 5**), and do not embody the elements of outstanding attention to architectural design, detail, materials, or craftsmanship (**Criterion 7**). The buildings have not been identified as the work of a person or persons whose work has influenced the heritage of the City, the state of California, or the United States, specifically SOM (**Criterion 6**).

The buildings do not have a relationship to other landmarks, where the preservation of one has a bearing on the preservation of another (**Criterion 8**). They do not have a unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood (**Criterion 9**). Finally, the buildings are not a natural environment that strongly contributes to the well-being of the people of the City (**Criterion 10**).

Therefore, the two buildings on the potential expansion site are not eligible for designation as a City of Fullerton Historical Landmark.

4.3.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project will normally have a significant adverse environmental impact related on cultural resources if it would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5;
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
c. Disturb any human remains, including those interred outside of formal cemeteries.

4.3.4 ENVIRONMENTAL IMPACTS

A. <u>Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report</u>

The Fullerton Plan EIR MM CR-1, which requires that a Phase I Cultural Resources Study be prepared for development projects in the City, was completed with the preparation of the Cultural Resources Report included in Appendix C of this EIR. Because the required study has been completed, this MM will not be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project. Additionally, for purposes of this Project, which is located in a developed urban area, MM CR-2 and MM CR-3 are applicable to tribal cultural resources and are addressed in Section 4.12, Tribal Cultural Resources, of this EIR.

MM CR-4 In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin

and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.

B. Impact Analysis

Threshold a: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?

As described in Section 4.3.2, Existing Setting, the buildings and remnant orange orchards at the Kimberly-Clark site (2001 E. Orangethorpe Avenue), and the two buildings at the potential expansion site (2301 E. Orangethorpe Avenue) are not eligible for listing in the CRHR or as City of Fullerton Landmarks under any of the criteria considered in the evaluation, and are therefore not historical resources in accordance with CEQA (ASM, 2020). Therefore, implementation of the Project would not result in a substantial adverse change to the significance of a historical resource. No impact would result.

Level of Significance Before Mitigation

Implementation of the Project would not impact a historical resource.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

Threshold b: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Based on the pedestrian survey conducted during preparation of the Cultural Resources Report, the Project site is almost entirely developed and covered with buildings, pavements, and landscaping. Some open space remains within the remnant orange orchards but these areas have been significantly modified by the planting and maintenance of the orchard. Within the landscaped areas, any exposed ground surfaces were examined wherever ground visibility was available. No previously undocumented cultural resources were identified as a result of the survey. Further, the records search conducted by SCCIC indicated that no prior surveys have been conducted nor have any cultural resources been documented within or near the Project site. Cultural resources documented within the one-mile search buffer consisted of historical buildings or structures; no archaeological sites were identified. (ASM, 2020)

The anticipated depth of excavation would vary for the Project components, but would likely extend to maximum depths of 20-feet below the ground service (bgs) for removal of existing foundations or other related subterranean features, and 10- to 12-feet bgs for the installation of utility infrastructure, including the subsurface detention chambers. The Project site is developed or otherwise disturbed, and there is a low potential for unidentified archaeological resources to be encountered during ground disturbing activities, resulting in a less than significant impact to archaeological resources. No mitigation is recommended for non-tribal cultural resources.

It should be noted that required mitigation for the potential to encounter tribal cultural resources is appropriately addressed in Section 4.12 of this EIR. In the unlikely event archaeological resources are discovered during construction activities, the actions outlined in The Fullerton Plan EIR MM CR-3 to protect the resources (refer to Section 4.12 of this EIR) would be implemented.

Level of Significance Before Mitigation

Ground disturbing activities have a low potential to encounter unidentified archaeological resources, resulting in a less than significant impact.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold c:	***Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?***

Section 5.10, Cultural Resources, of The Fullerton Plan EIR indicated that no conditions exist that would suggest human remains are likely to be found in the City (Fullerton, 2012b). Due to the level of past ground disturbance at the Project site, it is not anticipated that human remains, including those interred outside formal cemeteries, would be encountered during earthmoving or ground disturbing activities for the Project. As further discussed in Section 4.12, Tribal Cultural Resources, of this EIR, the Native American Heritage Commission Sacred Lands File search for The Fullerton Plan EIR and the Project did not indicate the presence of Native American cultural resources in the City or on the Project site.

If human remains were found, those remains would require proper treatment, in accordance with applicable laws. Sections 7050.5–7055 of the *California Health and Safety Code* describe the general provisions for the handling of human remains. Specifically, Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed if human remains are accidentally discovered during excavation activities. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. If human remains are found during excavation, construction activities must stop in the vicinity of the

find and in any area that is reasonably suspected to overlie adjacent remains until the County Coroner has been notified; the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered (refer to The Fullerton Plan EIR MM CR-4), potential impacts would be less than significant.

Level of Significance Before Mitigation

Implementation of the Project would result in less than significant impacts to human remains with the incorporation of The Fullerton Plan EIR MM CR-4.

Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

4.3.5 CUMULATIVE IMPACTS

Section 5.10.6, Cumulative Impacts (Cultural Resources), of The Fullerton Plan EIR, concludes that it is possible for undiscovered historic and archaeological resources to be impacted with future development. However, these impacts would be site-specific and future projects would be required to comply with applicable regulations concerning the protection of cultural resources. Therefore, with implementation of The Fullerton Plan policies and actions, and The Fullerton Plan EIR mitigation measures, potential impacts to cultural resources would be reduced to less than significant levels, and cumulatively considerable impacts to cultural resource impacts would not result. (Fullerton, 2012b)

As with the Project, cumulative development could include building demolition or rehabilitation, which may affect the significance of historical resources. Due to the site-specific nature of historical resources, it is difficult to determine if significant cumulative impacts to historic resources would occur on individual development sites. However, The Fullerton Plan includes a list of over 100 properties in the City that are considered worthy of community recognition. These historic resources include properties on the NRHP, Local Landmarks, Significant Properties (Potential Local Landmarks), Potential/Possible Significant Properties, and Features of Cultural Importance. The Fullerton Plan also identifies 16 potential Landmark Districts in the City. The Kimberly-Clark Fullerton Mill and the potential expansion site are not identified as a Potential/Possible Significant Property in the City's Local Register of Historical Resources, and based on the results of the historic resources evaluation conducted for the Project, there are no historic resources present (ASM, 2020). Therefore, implementation of the Project would not contribute to a significant cumulative impact to historical sites and/or resources.

Direct impacts to archaeological resources are also site-specific. The Project, in conjunction with cumulative development, including projects implementing The Fullerton Plan, could lead to accelerated degradation of previously unknown archaeological resource sites. However, each development proposal reviewed by the City undergoes environmental review and would be subject to the same resource protection requirements as the Project as outlined in The Fullerton Plan EIR. Due to the developed nature of the Project site, and lack of previously identified archaeological site with the vicinity of the Project site, the Project would have a less than significant impact related to archaeological resources. Therefore, the Project would not result in a cumulatively considerable contribution to a significant impact related to archaeological resources.

Mandatory compliance with the provisions of California Health and Safety Code Section 7050.5 as well as Public Resources Code Section 5097 *et seq.*, would assure that the Project and future development projects treat human remains that may be uncovered during development activities in accordance with prescribed, respectful and appropriate practices, thereby avoiding significant cumulative impacts.

4.3.6 REFERENCES

ASM Affiliates, Inc. (ASM). 2020. *Cultural Resources Technical Report for the Goodman Logistics Center, Fullerton, Orange County California.* May 8, 2020. Included in Appendix C of this EIR.

City of Fullerton (Fullerton). 2012a (as amended through May 2020). *The Fullerton Plan*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/the_fullerton_plan.asp

———. 2012b. *The Fullerton Plan 2030 Final Environmental Impact Report*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/final_program_eir.asp

4.4 ENERGY

This section evaluates the Project's potential impacts to energy. This analysis addresses the Project's energy consumption during construction and operation. Information presented in this Section is primarily based on the *Goodman Logistics Center Fullerton Energy Analysis* (Energy Analysis) prepared by Urban Crossroads (July 28, 2020) and included in Appendix D of this EIR (Urban Crossroads, 2020a). References used in preparation of this section are listed under Section 4.4.6, *References*.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

There were no Notice of Preparation (NOP) comment letters received addressing energy issues. Additionally, at the April 20, 2020 Draft Environmental Impact Report (EIR) public scoping meeting, there were no comments regarding the Project's potential impacts due to energy consumption.

4.4.1 EXISTING SETTING

The most recent data for California's estimated total energy consumption is from 2017 and natural gas consumption is from 2018, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2020 and included:

- Approximately 7,881 trillion British Thermal Unit (BTU) of energy was consumed;
- Approximately 683 million barrels of petroleum;
- Approximately 2,137 billion cubic feet of natural gas;
- Approximately 1 million short tons of coal.

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation energy Demand Forecast 2018-2030 lays out graphs and data supporting their projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included:

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.
    - Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2017.

The most recent data provided by the EIA for energy use in California by demand sector is from 2017 and is reported as follows:

- Approximately 40.3% transportation;
- Approximately 23.1% industrial;
- Approximately 18.0% residential; and
- Approximately 18.7% commercial.

In 2018, total system electric generation for California was 285,488 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 194,842 GWh which accounted for approximately 68% of the electricity it uses; the rest was imported from the Pacific Northwest (14%) and the U.S. Southwest (18%). Natural gas is the main source for electricity generation at 47% of the total in-state electric generation system power as shown in Table 4.4-1, *Total Electricity System Power*.

TABLE 4.4-1 TOTAL ELECTRICITY SYSTEM POWER

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	California Power Mix (GWh)	Percent California Power Mix
Coal	294	0.15%	399	8,740	9,433	3.30%
Large Hydro	22,096	11.34%	7,418	985	30,499	10.68%
Natural Gas	90,691	46.54%	49	8,904	99,644	34.91%
Nuclear	18,268	9.38%	0	7,573	25,841	9.05%
Oil	35	0.02%	0	0	35	0.01%
Other	430	0.22%	0	9	439	0.15%
Renewables	63,028	32.35%	14,074	12,400	89,502	31.36%
Biomass	5,909	3.03%	772	26	6,707	2.35%
Geothermal	11,528	5.92%	171	1,269	12,968	4.54%
Small Hydro	4,248	2.18%	334	1	4,583	1.61%
Solar	27,265	13.99%	174	5,094	32,533	11.40%
Wind	14,078	7.23%	12,623	6,010	32,711	11.46%
Unspecified Sources of Power	N/A	N/A	17,576	12,519	30,095	10.54%
Total	**194,842**	**100%**	**39,517**	**51,130**	**285,488**	**100%**

Source: (Urban Crossroads, 2020a)

An updated summary of, and context for energy consumption and energy demands within the State is presented in “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” excerpted below:

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation’s jet fuel consumption in 2018.

- California's total energy consumption is second highest in the nation, but, in 2018, the state's per capita energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency programs.
- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
- In 2018, large- and small-scale solar photovoltaic (PV) and solar thermal installations provided 19% of California's net electricity generation.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient.

Electricity

The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California ISO studies revealed the extent to which the South California Air Basin and the San Diego Air Basin region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the 2018 and 2019 IEPR's identify broad strategies that are aimed at maintaining electricity system reliability.

Electricity is provided to the Project area by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California Independent Service Operator (ISO) is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities (such as SCE) still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the

lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities.

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, transmission owners (investor-owned utilities such as SCE) file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State.

Table 4.4-2, *SCE 2018 Power Content Mix*, identifies SCE's specific proportional shares of electricity sources in 2018 (the latest available data). As indicated in Table 4.4-2, the 2018 SCE Power Mix has renewable energy at 36% of the overall energy resources. Geothermal resources are at 8%, wind power is at 13%, large hydroelectric sources are at 4%, solar energy is at 13%, and coal is at 0%. Biomass and waste sources have increased by 1% since 2017. Natural gas remains at 17% since 2017.

TABLE 4.4-2 SCE 2018 POWER CONTENT MIX

Energy Resources	2018 SCE Power Mix
Eligible Renewable	**36%**
Biomass & waste	1%
Geothermal	8%
Small Hydroelectric	1%
Solar	13%
Wind	13%
Coal	**0%**
Large Hydroelectric	**4%**
Natural Gas	**17%**
Nuclear	**6%**
Other	**0%**
Unspecified Sources of power*	37%
Total	**100%**

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation
Source: (Urban Crossroads, 2020a)

Natural Gas

The following summary of natural gas customers and volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC).

> The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas

(SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800,000 customers. In 2018, California gas utilities forecasted that they would deliver about 4,740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.

The overwhelming majority of natural gas utility customers in California are residential and small commercials customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

A significant amount of gas (about 19%, or 1,131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields.

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements.

Prior to the late 1980s, California regulated utilities provided virtually all-natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services. The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA).

Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.

Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service.

In a 2006 decision, the Commission adopted a gas transmission framework for Southern California called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.

Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.

In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California."

As indicated in the preceding discussions, natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State.

Transportation Energy Resources

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. In March 2019, the Department of Motor Vehicles (DMV) identified 36.4 million registered vehicles in California, and those vehicles consume an estimated 17.8 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets.

California's on-road transportation system includes 394,383 land miles, more than 27.5 million passenger vehicles and light trucks, and almost 8.1 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008 it is still by far the dominant fuel. Petroleum comprises about 91% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 17.8 billion gallons of on-highway fuel are burned each year, including 14.6 billion gallons of gasoline (including ethanol) and 3.2 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2019, Californians also used 194 million cubic feet of natural gas as a transportation fuel, or the equivalent of 183 billion gallons of gasoline.

4.4.2 EXISTING POLICIES AND REGULATIONS

A. Federal

Intermodal Surface Transportation Efficiency Act Of 1991 (ISTEA)

The ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

The Transportation Equity Act for the 21st Century (Tea-21)

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to

maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

B. State

Integrated Energy Policy Report (IEPR)

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301a]). The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2019 IEPR was adopted January 31, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as including the environmental performance of the electricity generation system, landscape-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, updates on Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and the California Energy Demand Forecast. The 2020 IEPR Update is currently in progress but is not anticipated to be adopted until February 2021.

State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

Title 24, Part 6, Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The 2019 Title are

applicable to building permit applications submitted on or after January 1, 2020. The 2019 Title 24 standards require solar PV systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar PV systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code.

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. Provisions of the CalGreen standards applicable to the Project are outlined in Section 4.2, Air Quality, of this EIR.

AB 1493 Pavley Regulations and Fuel Efficiency Standards

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

California's Renewable Portfolio Standard (RPS)

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent (%) of total retail sales by 2020.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

C. City of Fullerton

Fullerton Municipal Code

Section 15.40.070 of the Fullerton Municipal Code, Transportation Demand Management Strategies to Reduce Single Occupancy Automobiles, is applicable to new industrial/manufacturing development that is estimated to employ 100 or more persons. Section B, Facility Standards, includes the following requirements:

1. A minimum of ten percent of employee parking spaces located as close as is practical to the entrance(s) of the use they are intended to serve, shall be reserved and adequately signed for use by carpool and vanpool vehicles.
2. Secure, adequate and convenient storage shall be provided for bicycles.
3. Bus bays, bus stops and bus shelters shall be provided where appropriate.
4. A commuter information area or multiple areas shall be provided within or near each building; the information area(s) shall be centrally located and accessible to all employees and tenants. The information shall include, but not be limited to, current maps, routes and schedules for public transit.
5. A shower and locker room facility for employees of each sex shall be provided in each building of one hundred thousand or more gross square feet. Any development exceeding 100,000 gross square feet, but that does not contain any single building of 100,000 gross square feet, shall provide shower and locker room facilities unless a finding is made that the provision of such facilities is not practical or efficient.
6. Sidewalks or other paved pathways following direct and safe routes from the external pedestrian circulation system to each building in the development shall be provided.

4.4.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on energy if it will:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation?

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

4.4.4 ENVIRONMENTAL IMPACTS

A. Impact Analysis

Threshold a	***Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation?***

The Project would result in the demand for energy resources during both construction and long-term operation, as discussed below. Information from the California Emissions Estimator Model™ (CalEEMod) Version 2016.3.2 outputs used in the Project's Air Quality Impact Analysis (AQIA) (included as Technical Appendix B1 of this EIR) was utilized in the analysis, detailing Project related construction equipment, transportation energy demands, and facility energy demands. Refer to Section 4.2, Air Quality, of this EIR, for a discussion of modeling inputs used in the analysis; a description of the anticipated construction schedule and a list of expected construction equipment is provided in Section 3.3.2.F, *Construction Activities*, of this EIR.

Construction Energy Demands

Construction Equipment Electricity Usage Estimates

Based on the 2017 National Construction Estimator, the typical power cost per 1,000 square feet of construction per month is estimated to be $2.32. The Project includes the development of four buildings totaling 1,609,384 s.f. (804,692 s.f. of high cube fulfillment center use and 804,692 s.f. of high-cube cold storage warehouse use). Construction activities are anticipated to occur over the course of 14 months. The total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately $52,272.79, as shown in Table 4-3 of the Energy Analysis. As of January 1, 2020, SCE's general service rate is $0.08 per kilowatt hours (kWh) of electricity for industrial services. As shown on Table 4.4-3, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 654,269 kWh.

TABLE 4.4-3 CONSTRUCTION ELECTRICITY USAGE

Land Use	Cost per kWh	Project Construction Electricity Usage (kWh)
High-Cube Fulfillment Center Warehouse	$0.08	327,134
High-Cube Cold Storage Warehouse	$0.08	327,134
Construction Electricity Usage (kWh)		***654,269***

Source: (Urban Crossroads, 2020a)

Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Project construction activity timeline estimates, construction

equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.4-4, *Construction Equipment Fuel Consumption Estimates*. Eight-hour daily use of all equipment is assumed. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of analysis, the calculations are based on all construction equipment being diesel-powered which is consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region.

As presented in Table 4.4-4, Project construction activities would consume an estimated 238,518 gallons of diesel fuel. Project construction would represent a “single-event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

Construction Trips and VMT

Based on the CalEEMod results presented in the Project’s AQIA (Appendix B1 of this EIR), the Trip and VMT are the number and length (in terms VMT) of on-road vehicle trips for workers, vendors, and hauling for each construction phase are presented in Table 4.4-5*, Construction Trips and VMT*. The trips identified in Table 4.4-5 are based on the CalEEMod default parameters, with the exception of trips during demolition which have been adjusted based on information provided by the Project Applicant.

Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips would generate an estimated 5,049,377 VMT during the construction period. Based on CalEEMod methodology, it is assumed that 50% of all vendor trips would be from light-duty-auto vehicles (LDA), 25% would from light-duty-trucks (LDT1)[1], and 25% would be from light-duty-trucks (LDT2)[2]. Data regarding Project-related construction worker trips were based on CalEEMod defaults utilized within the Project’s AQIA (Appendix B1 of this EIR).

Vehicle fuel efficiencies for LDA, LDT1, and LDT2 were estimated using information generated within the 2017 version of the EMFAC developed by CARB. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, and VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. EMFAC2017 was run for the LDA, LDT1, and LDT2 vehicle class within the California sub-area for the 2021 and 2022 calendar year. Data from EMFAC2017 is shown in Appendix 4.4 to the Project’s AQIA (Appendix B1 of this EIR).

[1] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[2] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

TABLE 4.4-4 CONSTRUCTION EQUIPMENT FUEL CONSUMPTION ESTIMATES

Construction Activity	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP-hrs/day	Total Fuel Consumption
Demolition	122	Excavators	158	8	8	0.38	3,843	25,340
		Forklifts	89	1	8	0.20	142	939
		Other Construction Equipment	172	2	8	0.42	1,156	7,622
		Rubber Tired Dozers	247	2	8	0.40	1,581	10,425
		Skid Steer Loaders	65	3	8	0.37	577	3,806
		Tractors/Loaders/Backhoes	97	1	8	0.37	287	1,893
Crushing/Pulverizing	60	Generator Sets	1,050	2	8	0.74	12,432	40,320
Site Preparation	105	Rubber Tired Dozers	247	3	8	0.40	2,371	13,458
		Tractors/Loaders/Backhoes	97	4	8	0.37	1,148	6,518
Grading	240	Excavators	158	2	8	0.38	961	12,826
		Graders	187	1	8	0.41	613	8,189
		Rubber Tired Dozers	247	1	8	0.40	790	10,553
		Scrapers	367	2	8	0.48	2,819	37,632
		Tractors/Loaders/Backhoes	97	2	8	0.37	574	7,667
Building Construction	213	Cranes	231	1	8	0.29	536	6,228
		Forklifts	89	3	8	0.20	427	4,965
		Generator Sets	84	1	8	0.74	497	5,779
		Tractors/Loaders/Backhoes	97	3	8	0.37	861	10,010
		Welders	46	1	8	0.45	166	1,925
Paving	181	Pavers	130	2	8	0.42	874	8,311
		Paving Equipment	132	2	8	0.36	760	7,233
		Rollers	80	2	8	0.38	486	4,627
Architectural Coating	144	Air Compressors	78	1	8	0.48	300	2,250
Construction Fuel Demand (Gallons Diesel Fuel)								***238,518***

Source: (Urban Crossroads, 2020a)

TABLE 4.4-5 CONSTRUCTION TRIPS AND VMT

Construction Activity	Worker Trips / Day	Vendor Trips / Day	Total Hauling Trips	Worker Trip Length	Vendor Trip Length	Hauling Trip Length
Demolition	43	0	1,394	14.7	6.9	26.36[A]
Crushing/Pulverizing	0	0	0	0	0	0
Site Preparation	18	0	0	14.7	6.9	20
Grading	30	0	405	14.7	6.9	20
Building Construction	1,209	472	0	14.7	6.9	20
Paving	15	0	0	14.7	6.9	20
Architectural Coating	242	0	0	14.7	6.9	20

A. The demolished material would be exported to three (3) different sites. The total weighted truck trips were based on the quantity of demolished material anticipated to be exported to each site and the distance of each export site relative to the Project site.

Source: (Urban Crossroads, 2020a)

As generated by EMFAC2017, an aggregated fuel economy of LDAs ranging from model year 1974 to model years 2021 and 2022 are estimated to have fuel efficiencies of 31.62 miles per gallon (mpg) and 32.59 mpg, respectively. Table 4.4-6, *Construction Worker Fuel Consumption Estimates (LDA)*, provides an estimated annual fuel consumption resulting from LDAs related to the Project construction worker trips. Based on Table 4.4-6, it is estimated that 71,277 gallons of fuel would be consumed related to construction worker trips during full construction of the Project.

TABLE 4.4-6 CONSTRUCTION WORKER FUEL CONSUMPTION ESTIMATES (LDA)

Construction Activity	Duration (Days)	Worker Trips/Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Demolition	122	22[A]	14.7	39,455	31.62	1,248
Crushing/Pulverizing	60	0	14.7	0	31.62	0
Site Preparation	105	9	14.7	13,892	31.62	439
Grading	159	15	14.7	35,060	31.62	1,109
Building Construction	143	605	14.7	1,271,771	31.62	40,225
Paving	59	8	14.7	6,938	31.62	219
Architectural Coating	52	121	14.7	92,492	31.62	2,925
2022						
Grading	81	15	14.7	17,861	32.59	548
Building Construction	70	605	14.7	622,545	32.59	19,102
Paving	122	8	14.7	14,347	32.59	440
Architectural Coating	92	121	14.7	163,640	32.59	5,021
Project Construction Worker (LDA) Fuel Consumption						***71,277***

A. Trip has been rounded up.

Source: (Urban Crossroads, 2020a)

The EMFAC2017 aggregated fuel economy of LDT1s ranging from model year 1974 to model years 2021 and 2022 are estimated to have fuel efficiencies of 26.77 miles per gallon (mpg) and 27.49 mpg, respectively. Table 4.4-7, *Construction Worker Fuel Consumption Estimates (LDT1)*, provides an estimated annual fuel consumption resulting from LDT1s related to the Project construction worker trips. Based on Table 4.4-7, it is estimated that 42,341 gallons of fuel will be consumed related to construction worker trips during full construction of the Project.

The EMFAC2017 aggregated fuel economy of LDT2s ranging from model year 1974 to model years 2021 and 2022 are estimated to have fuel efficiencies of 24.58 miles per gallon (mpg) and 25.46 mpg, respectively. Table 4.4-8, *Construction Worker Fuel Consumption Estimates (LDT2)*, provides an estimated annual fuel consumption resulting from LDT2s related to the Project construction worker trips. Based on Table 4.4-8, it is estimated that 45,966 gallons of fuel would be consumed related to construction worker trips during full construction of the Project.
It should be noted that construction worker trips would represent a “single-event” gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose.

TABLE 4.4-7 CONSTRUCTION WORKER FUEL CONSUMPTION ESTIMATES (LDT1)

Construction Activity	Duration (Days)	Worker Trips / Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Demolition	122	11	14.7	19,727	26.77	737
Crushing/Pulverizing	60	0	14.7	0	26.77	0
Site Preparation	105	5	14.7	7,718	26.77	288
Grading	159	8	14.7	18,698	26.77	699
Building Construction	143	303	14.7	636,936	26.77	23,797
Paving	59	4	14.7	3,469	26.77	130
Architectural Coating	52	61	14.7	46,628	26.77	1,742
2022						
Grading	81	8	14.7	9,526	27.49	346
Building Construction	70	303	14.7	311,787	27.49	11,340
Paving	122	4	14.7	7,174	27.49	261
Architectural Coating	92	61	14.7	82,496	27.49	3,000
Project Construction Worker (LDT1) Fuel Consumption						***42,341***

A. Trip has been rounded up.
Source: (Urban Crossroads, 2020a)

TABLE 4.4-8 CONSTRUCTION WORKER FUEL CONSUMPTION ESTIMATES (LDT2)

Construction Activity	Duration (Days)	Worker Trips/Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Demolition	122	11	14.7	19,727	24.58	802
Crushing/Pulverizing	60	0	14.7	0	24.58	0
Site Preparation	105	5	14.7	7,718	24.58	314
Grading	159	8	14.7	18,698	24.58	761
Building Construction	143	303	14.7	636,936	24.58	25,908
Paving	59	4	14.7	3,469	24.58	141
Architectural Coating	52	61	14.7	46,628	24.58	1,897
2022						
Grading	81	8	14.7	9,526	25.46	374
Building Construction	70	303	14.7	311,787	25.46	12,247
Paving	122	4	14.7	7,174	25.46	282
Architectural Coating	92	61	14.7	82,496	25.46	3,240
Project Construction Worker (LDT2) Fuel Consumption						***45,966***

A. Trip has been rounded up.
Source: (Urban Crossroads, 2020a)

Construction Vendor Fuel Estimates

With respect to estimated VMT, the construction vendor trips (vehicles that deliver materials to the site during construction) would generate an estimated 7,120,691 VMT along area roadways for the Project over the duration of construction activity. It is assumed that 50% of all vendor trips would be from medium-heavy duty trucks (MHDT), 50% would be from heavy-heavy duty trucks (HHDT), and 100% of hauling trips would be HHDTs. These assumptions are consistent with the CalEEMod defaults utilized within the within the Project's AQIA (Appendix B1 of this EIR). Vehicle fuel efficiencies for MHDTs and HHDTs were estimated using information generated within EMFAC2017. EMFAC2017 was run for the MHDT and HHDT vehicle classes within the California sub-area for the 2021 and 2022 calendar year. Data from EMFAC2017 is shown in Appendix 4.4 to the Project's Energy Analysis (Appendix D of this EIR).

As generated by EMFAC2017, an aggregated fuel economy of MHDTs ranging from model year 1974 to model years 2021 and 2022 are estimated to have fuel efficiencies of 8.80 mpg and 9.09 mpg, respectively. Based on Table 4.4-9, *Construction Vendor Fuel Consumption Estimates (MHDT)*, it is estimated that 39,014 gallons of fuel would be consumed related to construction vendor trips (MHDTs) during full construction of the Project.

TABLE 4.4-9 CONSTRUCTION VENDOR FUEL CONSUMPTION ESTIMATES (MHDT)

Construction Activity	Duration (Days)	Vendor Trips/Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Building Construction	143	236	6.9	232,861	8.80	26,474
2022						
Building Construction	70	236	6.9	113,988	9.09	12,540
Project Vendor (MHDT) Total						***39,014***

A. Trip has been rounded up.
Source: (Urban Crossroads, 2020a)

Table 4.4-10, *Construction Vendor Fuel Consumption Estimates (HHDT)*, and Table 4.4-11, *Construction Hauling Fuel Consumption Estimates (HHDT)*, show the estimated fuel economy of HHDTs accessing the Project site. As generated by EMFAC2017, an aggregated fuel economy of HHDTs ranging from model year 1974 to model years 2021 and 2022 are estimated to have fuel efficiencies of 6.21 mpg and 6.37 mpg, respectively. Based on Table 4.4-10 and Table 4.4-11, fuel consumption from construction vendor and hauling trips (HHDTs) would total approximately 1,088,437 gallons.

It should be noted that Project construction vendor trips would represent a “single-event” diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

TABLE 4.4-10 CONSTRUCTION VENDOR FUEL CONSUMPTION ESTIMATES (HHDT)

Construction Activity	Duration (Days)	Vendor Trips / Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Building Construction	143	236	6.9	232,861	6.21	37,528
2022						
Building Construction	236	236	6.9	113,988	6.37	17,892
Project Vendor (HHDT) Total						***55,420***

A. Trip has been rounded up.
Source: (Urban Crossroads, 2020a)

TABLE 4.4-11 CONSTRUCTION HAULING FUEL CONSUMPTION ESTIMATES (HHDT)

Construction Activity	Duration (Days)	Hauling Trips / Day [A]	Trip Length (miles)	VMT	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
2021						
Demolition	122	1,394	26.36	4,482,992	6.21	722,475
Grading	159	405	20	1,287,900	6.21	207,557
2022						
Grading	81	405	20	656,100	6.37	102,985
					Project Hauling (HHDT) Total	***1,033,017***

A. Trip has been rounded up.
(Urban Crossroads, 2020a)

Construction Energy Efficiency/Conservation Measures

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that “grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling.” In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to

five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared. However, typical construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by passenger car and truck vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site.

- **Light-Duty Autos (LDAs)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 9,400,696 annual VMT along area roadways for all LDAs with full build-out of the Project. Table 4-13 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated LDAs. It is estimated that 288,450 gallons of fuel would be consumed from Project-generated LDA trips.

- **Light-Duty Trucks (LDTs)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 724,085 annual VMT along area roadways for all LDT1 vehicles with full build-out of the Project. Table 4-14 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated LDT1s. It is estimated that 26,335 gallons of fuel would be consumed from Project-generated LDT1 trips.

  Additionally, the Project would generate an estimated 3,507,236 annual VMT along area roadways for all LDT2 vehicles with full build-out of the Project. Table 4-15 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel

consumption resulting from Project-generated LDT2s. It is estimated that 137,761 gallons of fuel would be consumed from Project-generated LDT2 trips.

- **Medium-Duty Trucks (MDVs)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 1,873,007 annual VMT along area roadways for all Medium-Duty Trucks (MDV) vehicles with full build-out of the Project. Table 4-16 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated MDVs. It is estimated that 90,781 gallons of fuel would be consumed from Project-generated MDV trips.

- **Light-Heavy Duty Trucks (LHDT1s)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 3,268,602 annual VMT along area roadways for all Light-Heavy-Duty Trucks (LHDT1) vehicles with full build-out of the Project. Table 4-17 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated LHDT1s. It is estimated that 240,465 gallons of fuel would be consumed from Project-generated LHDT1 trips.

- **Medium-Heavy Duty Trucks (MHDTs)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 1,346,861 annual VMT along area roadways for all MHDTs with full build-out of the Project. Table 4-18 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated MHDTs. It is estimated that 148,169 gallons of fuel would be consumed from Project-generated MHDT trips.

- **Heavy-Heavy Duty Trucks (HHDTs)**. With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B1 of this EIR), the Project would generate an estimated 7,877,644 annual VMT along area roadways for all HHDTs with full build-out of the Project. Table 4-19 of the Project's Energy Analysis (Appendix D of this EIR) provides an estimated range of annual fuel consumption resulting from Project-generated HHDTs. It is estimated that 1,236,520 gallons of fuel would be consumed from Project-generated HHDT trips.

As summarized on Table 4.4-12, *Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)*, the Project would result in 27,998,131 annual VMT and an estimated annual fuel consumption of 2,168,481 gallons of fuel.

Facility Energy Demands

Project building operations and Project site maintenance activities would result in the consumption of natural gas and electricity. As previously stated, the analysis herein assumes compliance with the 2019 Title 24 Standards. As such, the CalEEMod defaults for "Title 24 – Electricity and

Lighting" Energy were reduced by 30% in order to reflect consistency with the 2019 Title 24 standard. Annual natural gas and electricity demands of the Project are summarized in Table 4.4-13, *Project Annual Operational Energy Demand Summary*, and provided in Appendices 4.2 and 4.3 to the Project's Energy Analysis (Appendix D of this EIR).

TABLE 4.4-12 TOTAL PROJECT-GENERATED TRAFFIC ANNUAL FUEL CONSUMPTION (ALL VEHICLES)

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)
LDA	9,400,696	288,450
LDT1	724,085	26,335
LDT2	3,507,236	137,761
MDV	1,873,007	90,781
LHDT	3,268,602	240,465
MHDT	1,346,861	148,169
HHDT	7,877,644	1,236,520
Total (All Vehicles)	***27,998,131***	***2,168,481***

Source: (Urban Crossroads, 2020a)

TABLE 4.4-13 PROJECT ANNUAL OPERATIONAL ENERGY DEMAND SUMMARY

Natural Gas Demand	kBTU/year
Other Asphalt Surfaces	0
Parking Lot	0
High-Cube Fulfillment Center Warehouse	531,097
High-Cube Cold Storage Warehouse	2,229,000
On-Site Cargo Handling Equipment	4,858
Total Project Natural Gas Demand	***2,764,955***
Electricity Demand	**kWh/year**
Other Asphalt Surfaces	0
Parking Lot	168,700
High-Cube Fulfillment Center Warehouse	17,204,300
High-Cube Cold Storage Warehouse	2,727,910
Total Project Electricity Demand	***20,100,910***

Source: (Urban Crossroads, 2020a)

Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title24, California Green Building Standards Code).

Enhanced Vehicle Fuel Efficiencies

Fuel would be provided by existing commercial vendors. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration. Project annual fuel consumption estimates presented in Table 4.4-12 represent likely potential maximums that would occur for the Project. Under future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. Additionally, facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and City of Fullerton Municipal Code Section 15.40.070 (Transportation Demand Management Ordinance), the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations, on-site bicycle storage facilities, and sidewalks and paved pathways from the external pedestrian circulation system to each building.

As such, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other industrial land uses.

Comparison to Existing Operations

Project facility operational energy demands are estimated at: 2,764,955 kBTU/year of natural gas; and 20,096,710 kWh/year of electricity. Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied by SCE. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project will comply with the applicable Title 24 standards. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial land use projects of similar scale and configuration.

The Project site is currently occupied by the Kimberly-Clark manufacturing facility, which includes 1,210,720 sf of existing manufacturing and warehouse buildings. For purposes of analysis, the energy usage was based on bills provided by the Project Applicant from SCE and the SoCalGas. Comparison of the existing electrical usage to the Project electrical usage indicate that the Project would use an additional 6,403,510 kWh/year. This increase in electricity use is due to the high-cube cold storage warehouse use proposed by the Project. The Project is anticipated to use less natural gas, approximately 1,205,889,903 kBTU/year less, as compared to the existing use.

Although the Project would result in a net increase in electricity usage, the Project would be required to comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Conclusion

As supported by the preceding analyses, the Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation. Impacts would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold b	***Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

As discussed below, the Project would be consistent with or otherwise would not conflict with State or local plans related to energy conservation. Federal plans are also discussed for informational purposes.

- **ISTEA.** Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.
- **TEA-21.** As previously discussed, TEA-21 builds upon the initiatives established in the ISTEA legislation, and authorizes highway, highway safety, transit, and other efficient surface transportation programs. While TEA-21 is not applicable to individual development Project, the Project site is located along major transportation corridors with proximate access to the Interstate freeway system, and the Project's location facilitates access, acts to reduce vehicle miles traveled (VMT), takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project would not interfere with, nor obstruct implementation of TEA-21.
- **IEPR.** Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. The Project's energy demand was compared to the energy usage of the existing Kimberly-Clark manufacturing facility. Although the Project would result in a net increase in electricity usage, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2019 IEPR.

- **State of California Energy Plan**. Based on the findings in the *Goodman Logistics Center – Fullerton Vehicle Miles Traveled (VMT) Memo* (VMT Memo) prepared by Urban Crossroads, Inc. and included in Appendix K1 of this EIR (Urban Crossroads, 2020b), the Project meets the low VMT area screening criteria. Per the *Technical Advisory on Evaluating Transportation Impacts in CEQA* prepared by the Office of Planning and Research, "residential and office/industrial projects that locate in areas with low VMT and that incorporate similar features (density, mixes of uses, and transit accessibility) will tend to exhibit low VMT". The VMT Memo identified the Project to be located within a low VMT area. Additionally, the Project site is located within the Southeast Industrial Focus Area identified in The Fullerton Plan and is designated for Industrial uses. As such, the Project is consistent with the Industrial land use designation. The Project therefore is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.
- **California Code, Title 24, Part 6, Energy Efficiency Standards and California Green Building Standards Code**. The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020. Adherence with the current (2019) Title 24 energy efficiency standards is required and has been assumed in the energy analysis for the Project. In compliance with the CalGreen Code and City of Fullerton Municipal Code Section 15.40.070 (Transportation Demand Management Ordinance), the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations and on-site bicycle storage facilities. The Project would also be implemented in compliance with other provisions of the CalGreen Code, which serve to promote energy efficiency as outlined in Section 4.2, Air Quality, of this EIR.
- **AB 1493 Pavley Regulations and Fuel Efficiency Standards**. AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.
- **California's RPS.** California's RPS is not applicable to the Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS**.**
- **SB 350 – Clean Energy and Pollution Reduction Act of 2015**. This measure is not directly applicable to development projects, but the Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.
- **Section 15.40.070 of the Fullerton Municipal Code.** In compliance with the City of Fullerton Municipal Code Section 15.40 (Transportation Demand Management Ordinance), the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations,

on-site bicycle storage facilities, and sidewalks and paved pathways from the external pedestrian circulation system to each building.

Conclusion

Based on the preceding analysis, the Project would not conflict with any adopted State or local plans for renewable energy or energy efficiency. Therefore, no impact would occur.

Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

4.4.5 CUMULATIVE IMPACTS

Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Other cumulative developments within the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, other cumulative developments would be subject to the same regulatory requirements as the Project, including compliance with the 2019 Title 24 Building and Energy Efficiency Standards, the California Green Building Standards Code, and the City of Fullerton Municipal Code which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. The Project and other cumulative developments also inherently would be consistent with the IEPR, State of California Energy Plan, AB 1493 (Pavley), and SB 350, as discussed herein. As such, the Project would not result in a potentially cumulatively considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Additionally, impacts due to a conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would not be cumulatively considerable.

4.4.6 REFERENCES

Urban Crossroads. 2020a (July 28). *Goodman Logistics Center Fullerton Energy Analysis*. (Appendix D of this EIR).

Urban Crossroads. 2020b (May 5). *Goodman Logistics Center – Fullerton Project Vehicle Miles Travelled (VMT) Assessment.* (Appendix K1 of this EIR).

4.5 GEOLOGY AND SOILS

This section describes existing geology and soils at the Project site, analyzes the potential impacts of existing geotechnical hazards that may adversely affect the Project or may be exacerbated by Project implementation, and analyzes potential impacts to paleontological resources. Information presented in this section is derived primarily from two site-specific reports identified below. Refer to Section 4.5.6, *References*, for a complete list of references.

- *Geotechnical Feasibility Study Proposed Goodman Logistics Center Fullerton* (Geotechnical Study) dated May 20, 2020, prepared by Southern California Geotechnical (SCG), and included in Appendix E of this Environmental Impact Report (EIR) (SCG, 2020)
- *Paleontological Resources Technical Report* (Paleontological Report) dated May 8, 2020, prepared by the Department of PaleoServices at the San Diego Natural History Museum (PaleoServices), and included in Appendix F of this EIR (PaleoServices, 2020)

The conclusions and recommendations in the Geotechnical study are applicable to the Project and the Optional Site Plan (SCG, 2020). Unless otherwise noted, references to “Project” in this section include the proposed Project and the Optional Site Plan, and references to the “Project site” include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

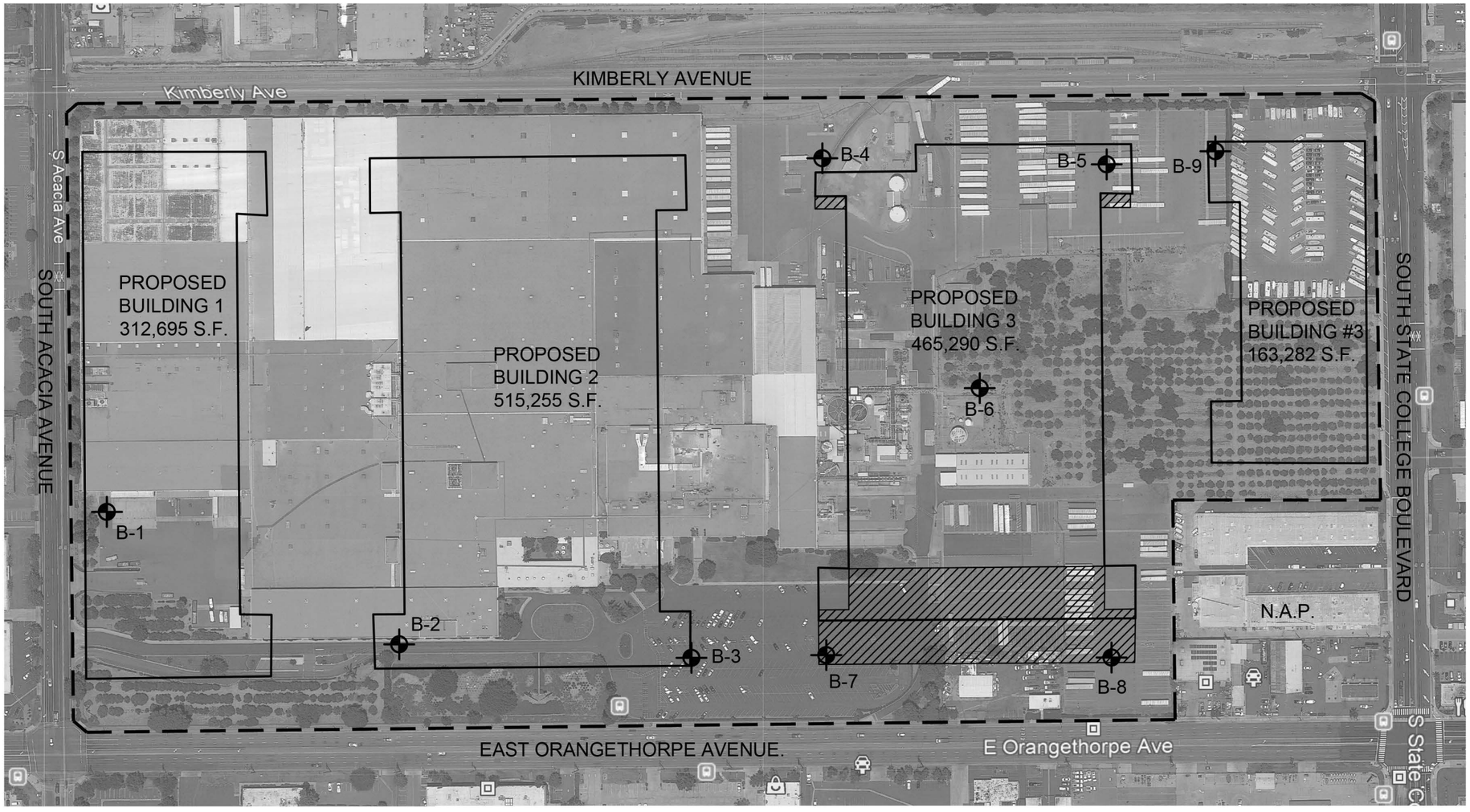
There were no comments received on the Notice of Preparation or at the EIR public scoping meeting regarding geology and soils.

4.5.1 EXISTING SETTING

A. Regional and Local Geology

The City of Fullerton is within the northwest portion of Orange County and is along the fringe of the coastal plain of Los Angeles County and Orange County. The coastal plain of Los Angeles County and Orange County was formed from recent (Holocene) alluvial deposits and is bounded by the Santa Ana Mountains, and the areas of Elysian, Repetto, and Puente Hills to the northeast; the Santa Ana Mountains to the southeast; the San Joaquin Hills to the south; and the Pacific Ocean to the west. The sedimentary deposits of the coastal plain are a hybrid of marine and continental sediment. The City of Fullerton is underlain by three formations: surficial formations, terrace deposits, and alluvium. The surficial and terrace deposits are interspersed in the northern portion of the City and the alluvium underlays the southern portion of the City. (Fullerton, 2012b)

The Geotechnical Study prepared for the Project included visual site reconnaissance, subsurface exploration, field and laboratory testing, and geotechnical engineering analysis to provide criteria for preparing the design of the building foundations, building floor slabs, and parking lot pavements along with site preparation recommendations and construction considerations. The subsurface exploration conducted consisted of nine borings advanced to depths of approximately 15- to 30-feet below existing site grades. Soils boring locations are depicted on Figure 4.5-1, *Boring Location Map*.



GEOTECHNICAL LEGEND

APPROXIMATE BORING LOCATION

OPTIONAL EXTENSION OF BUILDING 3

Source(s): Southern California Geotechnical (05-20-2020)

Figure 4.5-1

Not to Scale

Boring Location Map

Based on the results of the subsurface exploration and testing, asphaltic concrete pavements were encountered at the ground surface at all of the boring locations, except for Boring No. B-6 which was located in the remnant orange orchard in the eastern portion of the Project site. The pavements at these boring locations consist of approximately 3 to 4.5 inches of asphaltic concrete with approximately 0 to 7 inches of underlying aggregate base. Soils underlying the asphaltic concrete pavements at the Project site include the following (SCG, 2020):

- **Artificial Fill.** Artificial soils extend to depths of approximately 2 to 3 feet below the existing site grades. The fill soils generally consist of medium stiff to very stiff fine to coarse sandy clays and loose to medium dense clayey fine sands, fine sandy silts, and silty fine to coarse sands. The fill soils possess a mottled appearance with trace amounts of asphaltic concrete and brick fragments, resulting in their classification as artificial fill. Some soils classified as possible fill were encountered below the artificial fills at Boring Nos. B-2 and B-8, extending to depths of approximately 3 to 4.5 feet. The possible fill soils generally consist of medium dense to very stiff clayey fine sands, fine sandy clays, and silty clays
- **Native Alluvium.** Native alluvium was encountered beneath the fill and possible fill soils at all of the boring locations, and at the ground surface at Boring No. B-6 (at the orchard). Native alluvial soils extend to at least the maximum depth explored of approximately 30-feet below existing site grades. The native alluvial soils within the upper 12 to 17 feet generally consist of loose to medium dense silty sands and fine to coarse sands with variable amounts of fine to coarse gravel, trace clay, occasional fine root fibers, and iron oxide staining. At greater depths, the alluvial soils generally consist of medium dense fine sandy silts and silty fine sands, with occasional fine to coarse sand layers.

B. Faulting and Seismicity

As with all of Southern California, the Project site lies in a seismically active region. There are two faults, Norwalk Fault and Puente Hills Fault, that traverse through the City of Fullerton. The Norwalk Fault traverses the central and southeastern portion of the City. The Whittier-Elsinore Fault is located approximately 1.6 miles north of the City. The Norwalk Fault may be capable of generating a magnitude 6.3 earthquake on the Richter scale. The Puente Hills Blind Thrust Fault[1] underlines the East and West Coyote Hills, located in the northern and western portions of the City. The Puente Hills Fault has a magnitude range of 6.65 to 7.45 earthquake on the Richter scale. The Whittier Fault and Elsinore Fault segments are considered capable of generating earthquakes with a magnitude of 6.0 to 7.2 and 6.5 to 7.5, respectively. (Fullerton, 2012b) The Project site is not within an Alquist-Priolo Earthquake Fault Zone, and evidence of faulting was not identified during the geotechnical investigation (SCG, 2020). Based on review of Exhibit 26, *Earthquake Hazards*, of The Fullerton Plan (Figure 3-9, *Local and Regional Fault Lines*, of the LHMP), no faults are identified within the Project site; however, the Yorba Linda Fault line is located to the southeast) (southeast of the intersection of State College Boulevard and E. Orangethorpe Avenue), and the Puente Hills (Coyote Hills) fault is located approximately 1.3 miles northwest of the Project site at its closest point (Fullerton, 2012a).

[1] The fault is often referred to as a “blind thrust fault” due to lack of superficial ground features normally associated with thrust faults that have recently experienced seismic activity.

C. Topography

The Project site is generally flat and does not contain, nor is it in proximity to any, steep natural or manufactured slopes, and there is no evidence of historical landslides or rockfalls on the site. The Kimberly-Clark site is relatively flat and gradually slopes from southeast to northwest. The site's high point is approximately 184 feet above mean sea level (amsl) in the northeastern portion of the site and its low point is approximately 174 feet amsl in the northwest portion of the site. The potential expansion site slopes north to south. There is approximate 1-foot drop across the potential expansion site with a maximum elevation of 183 feet amsl. The grades surrounding the potential expansion site range from 183 to 181 feet amsl.

D. Groundwater

Free water was not encountered during the drilling of any of the borings during the field investigation. Based on the lack of any water within the borings and the moisture contents of the recovered soil samples, the static groundwater is considered to have existed at a depth of more than 30 feet at the time of the subsurface exploration, which extended up to 30-feet bgs. The nearest monitoring well is in the north-central portion of the site. Previous water level readings within this monitoring well indicated a high groundwater level of 88 feet. (SCG, 2020)

E. Paleontological Setting

According to The Fullerton Plan EIR, Pleistocene shallow marine, lagoonal, floodplain, and terrace deposits, approximately 1.8 million to 40,000 years old generally underlay the City of Fullerton. These stratigraphic units, in ascending order are the San Pedro Formation, the Coyote Hills formation, the La Habra Formation, and old alluvium. The Fullerton Plan identifies the West Coyote Hills Focus Area as an area for future development that has the potential to encounter undiscovered paleontological resources. The Project site is located approximately 3.7 miles southeast of the West Coyote Hills Focus Area. The Project site is located within the Southeast Industrial Focus Area, which is primarily developed and no significant paleontological sites have been documented within this Focus Area. (Fullerton, 2012b)

Consistent with the Geotechnical Study, the Paleontological Report indicates that the Project site is underlain by Quaternary young alluvial fan deposits (Qyf). The alluvial fan deposits are considered to be late Pleistocene to Holocene in age (less than approximately 129,000 years old) at the surface, but such deposits typically transition downward in the subsurface into older, early to middle Pleistocene-age alluvial deposits. There are two documented National History Museum of Los Angeles County (LACM) vertebrate fossil collection localities from similar Quaternary alluvial deposits located approximately 2.4 and 3.8 miles southeast of the Project site (LACM 1652 and LACM 4943, respectively). LACM 1652 is within the City of Anaheim, west of the Santa Ana River, and yielded fossil remains of sheep at an unknown depth below ground surface (bgs). LACM 4943 is within the City of Orange, east of the Santa Ana River, and yielded fossil remains of a horse at a depth of 8 to 10 feet bgs. Additionally, there are five documented San Diego Natural History Museum (SDNHM) fossil collection localities located within the City of Anaheim. The fossil localities were discovered in presumably Pleistocene-age alluvial deposits and yielded shells of a

small assemblage of pulmonated snails, freshwater mussels, and jaws and teeth of rodents. The fossil-bearing horizons were exposed between approximately 20 and 45 feet bgs. (PaleoServices, 2020)

The Holocene-age alluvial deposits underlying the Project site are assigned a low paleontological potential. However, the Holocene-age sediments may transition into older, Pleistocene-age deposits at depths between 8 feet and 16 feet bgs. Potential Pleistocene alluvial deposits located on the Project site between 8 feet and 16 feet bgs are assigned a high paleontological sensitivity based on the occurrence of scientifically significant vertebrate fossils in similar deposits found at several sites within 5 miles of the Project site. Considering that the contact between Holocene-age deposits and older, Pleistocene-age deposits may occur as shallow as 8 feet bgs, all deposits underlying the Project area are specifically assigned a low paleontological potential from 0 to 8 feet bgs, where they are assumed to be Holocene in age, and a high paleontological potential at depths greater than 8 feet bgs, where they may be Pleistocene in age. (PaleoServices, 2020)

4.5.2 Existing Regulatory Setting

Section 5.7, *Geology and Soils*, and Section 5.10, *Cultural Resources*, of The Fullerton Plan EIR, provide a discussion of regulations related to geology and soils and paleontological resources, respectively. Following is a discussion of regulations particularly relevant to the Project. It should be noted that development of the Project is also required to comply with regulations pertaining to erosion from wind and water, which are addressed in Section 4.3, Air Quality, and Section 4.8, Hydrology and Water Quality, respectively, of this EIR (e.g., Federal Clean Water Act, South Coast Air Quality Management District [SCAQMD] Rule 403, etc.). Information on federal actions relative to paleontological resources is presented in the Paleontological Report for informational purposes. However, the Project is not located on federal lands and is not subject to federal approvals; therefore, there are no federal regulations relative to paleontological resources relevant to the Project.

A. State

Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. As identified in the Geotechnical Study, the City of Fullerton, including the Project site, is not within an Alquist-Priolo Earthquake Fault Zone (SCG, 2020).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (*Public Resources Code, Chapter 7.8, § 2690-2699.6*) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. Existing geological, geophysical, and geotechnical data from numerous sources is used to produce the Seismic Hazard Zone Maps, and to designate Zones of Required Investigation (ZORI), which include those areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes.

The Seismic Hazard Evaluation of the Anaheim Quadrangle prepared by the California Geological Survey (CGS) and review of the CGS ZORI indicate that the Project site is not located within a designated liquefaction or a landslide hazard area (SCG, 2020) (CGS, 2019).

California Building Standards Code (Title 24)

The California Building Code (CBC) is promulgated under the California Code of Regulations (CCR) Title 24. Title 24 is reserved for State regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code Section18909). Health and Safety Code (State law) Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC).

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code Sections 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code Sections 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code Sections 17958.7 and 18941.5). The Project would be subject to the 2019 CBC, which became effective on January 1, 2020.

The 2019 CBC defines the method and scope of geotechnical investigations and the content of geotechnical reports; it also requires that the findings of the geotechnical report be included as part of the construction documents to be provided to the building official for approval prior to issuance of a building permit which, in turn, requires full compliance with the 2019 CBC. Specifically, Section 1603A, Construction Documents, of the 2019 CBC defines what must be illustrated on the construction documents, which includes all applicable aspects of Chapter 16 “Structural Design”, including Section 1603A.1.5, Earthquake Design Data, and Section 1603A.1.6, Geotechnical Information. Regarding soil engineering constraints, Section 1705.6, Soils, of the 2019 CBC requires that “Special inspections and text of existing site soil conditions, fill placement and load-bearing requirements shall be as required by this section . . . The approved

geotechnical report, and the construction documents prepared by the registered design professional, shall be used to determine compliance."

California Environmental Quality Act

CEQA (Public Resources Code Section 21000 et seq.) protects paleontological resources on both state and private lands in California. This act requires the identification of environmental impacts of a proposed project, the determination of significance of the impacts, and the identification of alternative and/or mitigation measures to reduce adverse environmental impacts. The Guidelines for the Implementation of CEQA (Title 14, Chapter 3, California Code of Regulations: 15000 et seq.) outlines these necessary procedures for complying with CEQA. Paleontological resources are specifically included as a question in the CEQA Environmental Checklist (refer to Threshold c, below)

Public Resources Code Chapter 1.7, Sections 5097.5 and 30244

California Public Resources Code Chapter 1.7, Section 5097.5 and 30244 prohibit the removal of any paleontological site or feature on public lands without permission of the jurisdictional agency, defines the removal of paleontological sites or features as a misdemeanor, and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state) lands. (PaleoServices, 2020)

B. Local

The Fullerton Plan and Local Hazard Mitigation Plan

The Fullerton Plan Safety Element is divided into two chapters: Public Safety (Chapter 10), and Natural Hazards (Chapter 20). The Fullerton Plan acknowledges that the City is subject to natural hazards, including those associated with seismically induced events, slope instability leading to mudslides and landslides, subsidence, and other known geologic hazards. The Natural Hazards chapter establishes goals and actions to prepare and protect the community from such risks.

Further, the City of Fullerton Local Hazard Mitigation Plan, which was adopted in May 2020 and is included in Appendix I of The Fullerton Plan, addresses safety issues related to natural disaster, provides a comprehensive assessment of the threats that Fullerton faces from natural and human-caused hazard events, and provides a coordinated strategy to reduce these threats (Fullerton, 2020). Among other issues, the LHMP addresses the natural disasters associated with geologic hazards (faulting seismicity, liquefaction/landslide). The LHMP includes a hazard mitigation strategy, which identifies specific policy recommendations for Fullerton to carry out over the next five years. These recommendations will help reduce the threat faced from hazard events.

Exhibit 26, *Earthquake Hazards*, of The Fullerton Plan (Figure 3-9, *Local and Regional Fault Lines*, of the LHMP) identifies faults in the City; no faults are identified within the Project site; however, the Yorba Linda Fault line is located to the southeast (southeast of the intersection of E. Orangethorpe Avenue and State College Boulevard) and the Puente Hills (Coyote Hills) fault is located approximately 1.3 miles northwest of the Project site at its closest point. Exhibit 27,

Liquefaction Hazards, of The Fullerton Plan (Figure 3-10, *Liquefaction Hazards Map,* of the LHMP), identify that the Project site is not within a liquefaction hazard area. Exhibit 27.1, *Landslide Hazards,* of The Fullerton Plan (Figure 3-6, *Landslide Hazards Map,* of the LHMP), identify that the Project site is not within a landslide hazard area. (Fullerton, 2012a)

City of Fullerton Municipal Code

The City of Fullerton Building Code is based on the CBC and is supplemented with local amendments. The Building Code regulates the construction, alteration, repair, moving, demolition, conversion, occupancy, use, and maintenance of all buildings and structures in the City of Fullerton. The Building Code is included in Title 14, *Buildings and Construction*, of the City of Fullerton Municipal Code.

Additionally, Section 16.05.065 of the Municipal Code states, "unless otherwise specified in this title, a preliminary soils report prepared by a civil engineer registered in the state shall be required for every division of land for which a tract map or a parcel map is required." The report is required to recommend corrective actions to be taken and these recommendations are required to be implemented as conditions precedent to the issuance of building permits for dwellings or structures on the lots or parcels involved. These requirements have been completed with preparation of the Project-specific Geotechnical Study included in Appendix E of this EIR.

4.5.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project will normally have a significant adverse environmental impact related to geology and soils if it would:

a. Directly or indirectly cause 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;
    ii. Strong seismic ground shaking;
    iii. Seismic-related ground failure, including liquefaction; or
    iv. Landslides.
b. Result in substantial soil erosion or the loss of topsoil;
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;
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

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; or

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.5.4 ENVIRONMENTAL IMPACTS

A. Impact Analysis

Threshold a:	***Would the project directly or indirectly cause 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.
	ii. Strong seismic shaking?
	iii. Seismic-related ground failure, including liquefaction?
	iv. Landslides?

Rupture of a Known Earthquake Fault

As previously identified, The Fullerton Plan and LHMP do not identify fault zones within the Project site. This is consistent with the Geotechnical Study, which also indicates that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Additionally, evidence of faulting was not identified during their field investigation conducted during preparation of the Geotechnical Study (SCG, 2020). The Project would not directly or indirectly expose people or structures to substantial adverse effects related to ground rupture. No impact would occur.

Strong Seismic Ground Shaking

As discussed previously, the Project site is in a seismically active area of Southern California and is expected to experience ground shaking during the lifetime of the Project. This risk is not substantially different than the risk to other properties throughout the Southern California area.

The Geotechnical Study for the Project provides structural design considerations and recommendations to assist in the design of project plans and specifications, in compliance with Title 14, Buildings and Construction, of the City of Fullerton Municipal Code, which includes the adoption of the 2019 California Building Code (CBC). Further, as required by Section 16.05.065 of the City of Fullerton Municipal Code, grading operations and construction on the Project site are required to be consistent with the recommendations included in the site-specific Geotechnical Study prepared for the Project, which is included in Appendix E of this EIR. These

recommendations address on-site geotechnical conditions and design considerations to be accounted for in the engineering design; recommendations for proper site preparation; and factors to use in the design of building foundations, floor slabs, and pavements. Notably, the Geotechnical Study concludes that the Project site is classified as Site Class D. This classification is used as the basis for soils and seismic design criteria to be implemented for the Project. The Geotechnical Study finds that the use of a spread footing foundations supported in newly placed structural fill soils would provide adequate support for the proposed structures, assuming the recommendations for site preparation identified in the Geotechnical Study are adhered to. The compacted fill would involve the removal of all artificial fill and a portion of the near-surface alluvium. The Geotechnical Study concludes that design and construction of the Project in compliance with 2019 CBC requirements, which is the basis for the City's Building Code, would be adequate to address the seismic conditions present at the Project site.

Compliance with the City's Building Code and CBC and incorporation of recommendations from the Geotechnical Study regarding site-specific seismic and soil conditions would ensure that people and/or structures would not be exposed to potential substantial adverse effects from strong seismic ground shaking. This impact would be less than significant and no mitigation is required.

Seismic-Related Ground Failure, Including Liquefaction

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type, and plasticity characteristics, the relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. As previously identified, the Project site is not within a liquefaction hazard zone, and the groundwater table is in excess of 50 feet. Based on these considerations, liquefaction is not considered to be a design concern for the Project (SCG, 2020). Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. No mitigation is required.

Landslides

The Project site is relatively flat, as is the immediate surrounding area. The Project site and the surrounding area do not contain any hillsides or steep, natural, or man-made, slopes. According to Exhibit 27.1, *Landslide Hazards,* of The Fullerton Plan (Figure 3-6, *Landslide Hazards Map,* of the LHMP), , the Project site is not in an area that is susceptible to landslides (Fullerton, 2012a) (Fullerton, 2020). Accordingly, the Project would not be exposed to landslide risks, and implementation of the Project would not pose a substantial direct or indirect landslide risk to surrounding properties. No impact would result.

Level of Significance Before Mitigation

Project impacts related to seismic shaking would be less than significant with adherence to the City's Building Code and the CBC, and incorporation of recommendations from the Geotechnical Study.

The would be no impacts related to fault rupture, seismic-related ground failure (liquefaction) or landslides.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant related to seismic shaking and there would be no impact for other seismic hazards

Threshold b: Would the project result in substantial soil erosion or the loss of topsoil?

Under existing conditions, the majority of the Project site is developed and covered with impervious surface. Landscaped areas and the remnant orange orchard make up the area that is pervious.

Loss of Topsoil

Previous grading activities and placement of fill have disturbed the topsoil on the majority of the Project site (topsoil is the layer of the soil containing nutrients and is particularly valuable for agricultural operations). Existing topsoil in landscaped areas and the remnant orange orchard, which make up approximately 24 percent of the Project site (TAIT, 2020), would be disturbed with implementation of the Project. However, no commercial agricultural operations currently exist or are planned for the site, and the disturbance would have less than significant effect on the loss of productive topsoil.

Erosion

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Soils with characteristics such as low permeability and/or low cohesive strength are more susceptible to erosion than those soils having higher permeability and cohesive strength. Additionally, the slope gradient on which a given soil is located also contributes to the soil's resistance to erosive forces. Because water is able to flow faster down steeper gradients, the steeper the slope on which a given soil is located, the more readily it will erode. Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever the soil is loose, dry, and finely granulated.

Construction-related Erosion

Grading and construction activities that would occur on the Project site would result in the removal of stabilizing ornamental vegetation and building materials, and would disturb and expose soils. There would be an increased potential for localized soil erosion during rainfall events or high winds compared to existing conditions, as wind and water could carry loose soils off-site. As further discussed in Section 4.8, *Hydrology and Water Quality*, of this EIR, construction activities would be conducted in compliance with the following regulations related to surface water quality during construction and operation of a project: the Clean Water Act; the State Water Resources Control Board and associated National Pollutant Discharge Elimination System (NPDES) permitting requirements; and Chapter 12.18, *Water Quality Ordinance*, and Section 14.03.60, *Stormwater Control Measures*, of the City's Municipal Code.

To control erosion during construction of the Project, the Project would be required to implement erosion-control Best Management Practices (BMPs) outlined in the required Storm Water Pollution Prevention Plan (SWPPP) and in compliance with the NPDES permit. The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one acre of total land area. The SWPPP specifies the BMPs that are required to be implemented by the contractor during construction activities to ensure that waterborne pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated before surface runoff being discharged from the subject property. Applicable requirements of the City's Municipal Code address requirements to control erosion in stormwater runoff during construction. Additionally, as further discussed in Section 4.2, *Air Quality*, of this EIR, the Project would be required to implement an erosion and dust control plan according to South Coast Air Quality Management District (AQMD) Rule 403 to minimize water- and windborne erosion.

Therefore, with adherence to existing regulations and requirements, which would prevent substantial erosion during construction of the Project, there would be a less than significant impact related to erosion during construction of the Project.

Post-Development Erosion Impacts

Once the Project is operational, the potential for soil erosion via wind and water would be minimized through the introduction of development, including roads, buildings, paved areas, and landscaping in accordance with the City's regulations. Stormwater runoff from the Project site would be captured and treated to reduce waterborne pollutants (including sediment) and conveyed off-site via an on-site storm drain system. As such, the amount of erosion that occurs on the Project site would be reduced compared to existing conditions.

As further discussed in Section 4.8, *Hydrology and Water Quality*, of this EIR, to meet the requirements of the Orange County Drainage Area Management Plan (DAMP), the Project Applicant would be required to prepare and implement a Water Quality Management Plan (WQMP), which is a site-specific post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern (POC) for downstream receiving waters, under long-term conditions via BMPs. Minimizing the release of

potential pollutants is accomplished through minimizing erosion and water runoff from the site. With the implementation of the Project-specific WQMP, the Project would comply with Fullerton Municipal Code Chapter 12.18, *Water Quality Ordinance*, and Section 14.03.160, *Stormwater Control Measures*. The Project-specific WQMP is provided in Appendix I1 of this EIR. Because the Project would utilize erosion and sediment control measures to preclude substantial, long-term soil erosion, the Project would result in less than significant impacts during operation.

Level of Significance Before Mitigation

With adherence to City, regional, and State regulations related to management of erosion from stormwater and winds, there would be a less than significant impact related to soil erosion during construction and operation of the Project.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 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?***

Seismic-related ground failure, including landslides and liquefaction, is addressed under Threshold a, above. Lateral spreading is a liquefaction-related phenomenon; as there is no risk of liquefaction, there would be no risk of lateral spreading.

As previously discussed, the Project site is underlain with unsuitable soils that consist of artificial fill. The fill soils possess variable composition and variable densities. Based on the lack of documentation of the placement and compaction of the existing fill soil, these materials are assumed to be undocumented fill and are not considered suitable, in their present condition, to support the foundations and floor slabs of the proposed structures. The on-site native alluvium and possible fill soils possess variable densities and the results of laboratory testing indicate that some of these soils possess a moderate potential for consolidation settlement when loaded. Based on these considerations, remedial grading will be necessary within the proposed building areas in order to remove the existing fill soils, and a portion of the near-surface alluvial soils and possible fill materials, and replace these soils as compacted structural fill. The recommended remedial grading would also remove any soils disturbed during demolition and site stripping (including removal of trees and other vegetation) and replace them as compacted structural fill. (SCG, 2020) Grading of the Project site would be performed in compliance with the City's Building Code and CBC and recommendations from the Geotechnical Study would be incorporated.

Subsidence/shrinkage is the sinking of the ground due to the movement of underground material. Based on the result of laboratory testing conducted during preparation of the Geotechnical Study, removal and recompaction of the loose to medium dense near-surface soils is estimated to result in an average shrinkage of 6 to 12 percent. Minor ground subsidence is expected to occur in soils below the zone of removal, due to settlement and machinery working. This subsidence is estimated to be 0.1 feet (SCG, 2020). Grading of the Project site would be performed in compliance with the City's Building Code and CBC and recommendations from the Geotechnical Study would be incorporated.

Based on recommendations in the Geotechnical Study, measures related to grading would include, but would not be limited to, site stripping and demolition (removal of surficial vegetation and demolition materials not reused, such as pulverized pavements); treatment of existing soils relative to building pads, retaining walls and site walls, parking and drive areas (e.g., remedial grading and overexcavation); fill placement and compaction; use of imported structural fill; and, utility trench backfill. Other recommendations in the Geotechnical Study are related to excavation and slope stability, foundation design and construction, floor slab design and construction, retaining wall design and construction, and pavement design. (SCG, 2020) Compliance with the City's Building Code and CBC and incorporation of recommendations from the Geotechnical Study would ensure that potential impacts related to unstable soils associated with grading and excavation would be less than significant.

Impacts related to instability of the site's geologic materials would be less than significant for the Project with adherence to the City's Building Code and CBC, which include grading standards, and implementation of the recommendations of the Geotechnical Study.

Level of Significance Before Mitigation

Impacts related to instability of the site's geologic materials would be less than significant for the Project with adherence to the City's Building Code and CBC, which include grading standards, and implementation of the recommendations of the Geotechnical Study.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d:	***Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994[2]), creating substantial direct or indirect risks to life or property?***

The near-surface soils within the Project site generally consist of sands, silty sands, and sandy silts. Expansion index testing of the near-surface soils was performed during preparation of the Geotechnical Study, which indicated that these soils possess very low expansion potential. Based on the test results, no design considerations related to expansive soils are warranted for the Project site. Impacts would be less than significant (SCG, 2020).

Level of Significance Before Mitigation

Impacts related to expansive soils would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significant After Mitigation

Impacts would be less than significant.

Threshold e:	***Would the Project 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?***

Consistent with the existing development at the Project site, the Project is designed to connect to the existing City of Fullerton sewer system. The Project does not include the use of septic tanks or alternative wastewater disposal systems. Accordingly, no impacts would occur.

Level of Significance Before Mitigation

No impacts would occur associated with soil compatibility for septic tank and alternative wastewater systems.

Project-Level Mitigation Measures

Mitigation measures are not required.

[2] Threshold d is based on Appendix G of the CEQA Guidelines and references Table 18-1-B of the 1994 Uniform Building Code (UBC) which has been superseded by the 2019 CBC. The 2019 CBC references ASTM D-4829, a standard procedure for testing and evaluating the expansion index (or expansion potential) of soils established by ASTM International, which was formerly known as the American Society for Testing and Materials (ASTM). ASTM D-4829 was used as the standard for evaluating the Project's potential impact related to expansive soils in the above analysis

Level of Significant After Mitigation

No impact would occur.

Threshold f:	***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

There are no unique geologic features at the Project site; therefore, no impact to such resources would occur with implementation of the Project. Direct impacts to paleontological resources occur when earthwork operations cut into the geologic units within which fossils are buried and physically destroy the fossil remains. As such, only those excavations that would disturb potentially fossil-bearing geologic units have the potential to significantly impact paleontological resources. Potentially fossiliferous geologic units are those rated with a high potential. Taking a conservative approach, geologic units with an undetermined potential are also considered to be potentially fossiliferous until proven otherwise.

As previously discussed, a low to high paleontological potential is assigned to the Quaternary young alluvial fan deposits underlying the entire Project site. The Holocene-age alluvial deposits have a low paleontological potential; however, the surficial Holocene-age sediments in the subsurface may transition into older Pleistocene-age deposits, which have a high paleontological potential, at depth as shallow as 8 feet bgs. Considering that the contact between Holocene-age deposits and older, Pleistocene-age deposits may occur as shallow as 8 feet bgs, all deposits underlying the Project site are specifically assigned a low paleontological potential from 0–8 feet bgs, where they are assumed to be Holocene in age, and a high paleontological potential at depths greater than 8 feet bgs, where they may be Pleistocene in age (PaleoServices, 2020).

The Project would include the construction of four single-story buildings that would be supported by conventional slab-on-grade shallow foundation systems. Additionally, there are plans for the construction of parking lots and driveways, and installation of underground wet and dry utilities. The Project's proposed excavation depths are anticipated to extent to maximum depths of 20-feet below the ground service (bgs) for removal of existing foundations or other related subterranean features and extend between 10 to 12 feet bgs for installation of utility infrastructure. It is likely that over-excavation and recompaction of surficial fill and loose alluvial sediments for the slab-on-grade building foundations and superficial grading for the parking lots and driveways would be shallower than the estimated 8-foot depth transition between low and high paleontological sensitivity. Additionally, the surficial phase of mass grading would be shallower than the estimated 8-foot depth transition. However, earthwork associated with the installation of deep utilities and storm water drains will extend to or beyond the 8-foot depth threshold and have the potential to directly impact paleontological resources absent mitigation, resulting in a potentially significant impact. (PaleoServices, 2020)

Project-specific mitigation measures (MM) 5-1 through MM 5-7 are required to be implemented during construction and require that the Project Applicant retain a qualified paleontologist to oversee a paleontological monitoring program and retain a paleontological monitor to oversee on-

site earthwork activities to ensure that paleontological resources are identified, recovered, recorded, and curated into a professional repository. With the implementation of MM 5-1 through MM 5-7, the potential to destroy a paleontological resource or site is low because if any paleontological resources are identified during construction, they would be recovered, recorded, and curated. With mitigation, the Project's potentially significant impacts to paleontological resources would be reduced to a level considered less than significant.

Level of Significance Before Mitigation

The Project site is underlain by Holocene-age alluvial deposits, which have a low paleontological potential; however, the Holocene-age sediments may transition into older Pleistocene-age deposits, which have a high paleontological potential, at depth as shallow as 8 feet bgs. Proposed excavation activities have the potential to encounter unique paleontological features, resulting in a potentially significant impact.

Project-level Mitigation Measures

MM 5-1 Prior to the start of earthwork, a qualified Project Paleontologist shall be retained to oversee the paleontological monitoring program and shall attend the pre-construction meeting to consult with Project contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, the Project Paleontologist shall identify a professional repository to receive any discovered fossils.

A qualified Project Paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology that is experienced with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Orange County, and who has worked as a paleontological mitigation project supervisor for at least one year.

A professional repository is defined as a recognized paleontological specimen repository (e.g., an American Alliance of Museums [AAM]-accredited museum or university) with a permanent curator capable of storing fossils in a facility with adequate security against theft, loss, damage, fire, pests, and adverse climate conditions.

MM 5-2 A paleontological monitor shall be on-site during all earthwork operations at or exceeding 8 feet below the ground surface (bgs) (i.e., trenching for deep utilities and storm water drains) that directly impact Quaternary young alluvial fan deposits. The paleontological monitor shall be equipped to salvage fossils as they are unearthed (including bulk matrix samples containing microvertebrate fossils). Paleontological monitoring may be reduced (e.g., part-time monitoring or spot-checking) or eliminated, at the discretion of the Project Paleontologist and with approval from the City of Fullerton if the Project Paleontologist determines there is a low risk of encountering paleontological resources. Changes to the

paleontological monitoring schedule shall be based on the results of the mitigation program as it unfolds during site development, and current and anticipated conditions in the field.

A paleontological monitor is defined as an individual with a college degree in paleontology or geology who has experience in the recognition and salvage of fossil materials. The paleontological monitor shall work under the direction of the Project Paleontologist.

MM 5-3 If fossils are discovered, the Project Paleontologist or paleontological monitor shall make an initial assessment to determine their significance. All identifiable vertebrate fossils (large or small) and uncommon invertebrate, plant, and trace fossils are considered to be significant and shall be recovered. Representative samples of common invertebrate, plant, and trace fossils shall also be recovered. Although fossil salvage can often be completed in a relatively short period of time, the Project Paleontologist or paleontological monitor shall be allowed to temporarily direct, divert, or halt earthwork in his or her discretion during the initial assessment phase if additional time is required to salvage fossils. If it is determined by the Project Paleontologist that the fossil(s) are to be recovered, the recovery shall be completed in a timely manner. Some fossil specimens (e.g., a large mammal skeleton) may require an extended salvage period. Because of the potential for the recovery of small fossil remains (e.g., isolated teeth of small vertebrates), it may be necessary to collect bulk-matrix samples for screen washing.

MM 5-4 In the event that fossils are discovered during a period when a paleontological monitor is not on site (i.e., an inadvertent discovery), earthwork within the vicinity of the discovery site shall temporarily halt, and the Project Paleontologist shall be contacted to evaluate the significance of the discovery. If the Project Paleontologist determines that the inadvertent discovery is significant, the fossils shall be recovered, as outlined in MM 5-3.

MM 5-5 Fossil remains that are collected shall be cleaned, repaired, sorted, taxonomically identified, and cataloged. Fossil preparation may also include screen-washing of bulk matrix samples for microfossils or other laboratory analyses (e.g., radiometric carbon dating), if warranted in the discretion of the Project Paleontologist. Fossil preparation and curation activities may be conducted at the laboratory of the contracted Project Paleontologist, at an appropriate outside agency, and/or at the designated repository, and shall follow the standards of the designated repository.

MM 5-6 Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be curated at a professional repository. The Project Paleontologist shall have a written repository agreement with the professional repository prior to the start of earthwork operations at or exceeding 8 feet bgs.

MM 5-7 A final summary report shall be completed at the conclusion of ground disturbing activities that outlines the results of the mitigation program. The report and inventory, if applicable, shall be submitted to the City of Fullerton, along with confirmation of the curation of recovered specimens into a professional repository, if applicable.

Level of Significance After Mitigation

Impacts would be less than significant with mitigation measures incorporated.

4.5.5 CUMULATIVE IMPACTS

Section 5.7.6, *Cumulative Impacts, (Geology and Soils),* of The Fullerton Plan EIR, concludes that seismic, geologic, and soil conditions in the region would vary by location and their suitability for development would not be uniform. As identified in The Fullerton Plan EIR, future development sites may exhibit constraints to development that would be addressed at the site-specific geotechnical engineering level. Implementation of The Fullerton Plan combined with cumulative development projects would incrementally increase the number of people and/or structures potentially subject to a seismic or geologic hazard. Mitigation would be incorporated on a project-by-project basis to reduce cumulative seismic, geologic, and soil impacts to a less than significant level. These processes, along with compliance with Public Safety Element goals and policies, federal and State laws, local building codes, and public safety standards would result in less than significant cumulative impacts related to potential seismic, geologic, and soil hazards. Therefore, The Fullerton Plan EIR concludes that these impacts would not be cumulatively considerable and cumulative impacts associated with geology and soils within the region would be less than significant. (Fullerton, 2012b)

The cumulative study area for purposes of this analysis is the City of Fullerton. Geology and soils impacts related to seismic activity (Threshold a), unstable soils (Threshold c), and expansive soils (Threshold d) are generally site-specific based on soils conditions, and there is typically little, if any, cumulative relationship between the development of a project and development within a larger cumulative area (e.g., city-wide development). For example, development at the Project site would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or settlement) at other locations; therefore, the Project would not directly affect the level of intensity at which a seismic event or geologic hazard on an adjacent site is experienced. However, development of the Project and future development in the City may expose more persons to seismic hazards, as identified in The Fullerton Plan EIR. As required, a Project-specific Geotechnical Study has been conducted for the Project and is provided in Appendix E of this EIR. Consistent with the conclusion of The Fullerton Plan EIR, and as identified in the foregoing analysis, potential Project direct and indirect impacts related to seismic activity and soil conditions would be precluded through mandatory conformance with the CBC, City of Fullerton Municipal Code, other standard regulatory requirements, and site-specific geotechnical recommendations contained in the Geotechnical Study. As with the Project, future development would be required to have site-specific geotechnical investigations prepared to identify the geologic and seismic characteristics on a site and to provide recommendations for engineering design and construction to ensure the structural integrity of proposed development; these recommendations would be incorporated into project design. Compliance of individual projects

with the recommendations of the applicable geotechnical investigation would prevent hazards associated with unstable soils, landslide potential, lateral spreading, liquefaction, soil collapse, expansive soil, soil erosion, and other geologic issues. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to seismicity or soil conditions.

Implementation of the Project would increase the impervious surface coverage; thereby reducing the Project's potential to result in the erosion of topsoil. Additionally, the Project site is within an urbanized area of the City that does not contain substantial amounts of pervious surfaces. Consistent with the conclusions of The Fullerton Plan EIR, the Project and any future development projects would be required to comply with applicable State and local requirements, such as the City's Building Code and the 2019 CBC, and requirements for erosion control (refer to the discussion in Section 4.8, *Hydrology and Water Quality*, of this EIR). Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to erosion.

The Project would not involve use of septic tanks or alternative waste water disposal systems and would not result in a cumulatively considerable contribution to a significant cumulative impact related to the presence of soils incapable of adequately supporting these uses (Threshold e).

With respect to paleontological resources (Threshold f), consistent with the conclusion presented in Section 5.10.6, *Cumulative Impacts, Cultural Resources)*, of The Fullerton Plan EIR, the Project, in conjunction with cumulative development, including projects implementing The Fullerton Plan, could lead to the accelerated degradation of undiscovered paleontological resources. However, each development proposal the City receives undergoes environmental review and would be subject to the same resource protection requirements as the Project. If there is a potential for significant impacts to occur to paleontological resources, an investigation would be required to determine the nature and extent of the resources and to identify appropriate mitigation measures, including requirements such as those identified in this section (refer to MM 5-1 through MM 5-7). The Project includes measures to identify, recover, record, and curate any paleontological resources that may occur within the Project's limits, resulting in less than significant impacts. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to impacts to paleontological resources.

4.5.6 REFERENCES

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4.6 GREENHOUSE GAS EMISSIONS

This section evaluates the Project's potential to have adverse effects related to greenhouse gas (GHG) emissions during construction and operation. The analysis in this section is based on Project-specific *Goodman Logistics Center Fullerton Greenhouse Gas Analysis, City of Fullerton* (GHG Analysis), prepared by Urban Crossroads (July 2020) (Urban Crossroads, 2020), and included in Appendix G of this EIR.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

Comments relating to the issue of GHG emissions were raised in response to the Project's Notice of Preparation (NOP) for this Draft Environmental Impact Report (EIR). Specifically, in its NOP comment letter, the California Air Resources Board (CARB) requested that an analysis of GHG emissions be conducted. Although not directly related to the issue of GHGs, the South Coast Air Quality Management District (SCAQMD) also commented on the Project's NOP, and recommended an analysis of potential air quality emissions (including GHGs). There were no additional comments related to GHG emissions raised at the April 20, 2020 publicly-noticed EIR Scoping Meeting.

4.6.1 EXISTING SETTING

A. Global Climate Change and Greenhouse Gases

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

The effects of climate change in California related to public health, water resources, agriculture, forests and landscapes, rising sea levels, and human health are described in Section 2.6 of the GHG Analysis included in Appendix G of this EIR.

Greenhouse Gases

Many gases demonstrate these properties and as discussed in Table 4.6-1, Greenhouse Gases. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

TABLE 4.6-1 GREENHOUSE GASES

GHGs	Description	Sources	Health Effects
Water	Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

GHGs	Description	Sources	Health Effects
	storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up).		
CO_2	CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration	CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas,	Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO_2 can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or

GHGs	Description	Sources	Health Effects
	of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.	and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks.	convulsions. It should be noted that current concentrations of CO_2 in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period.
CH_4	CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropocentric sources include fossil-fuel combustion and biomass burning.	CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH_4 can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.

GHGs	Description	Sources	Health Effects
N_2O	N_2O, also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction.	N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage).
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

GHGs	Description	Sources	Health Effects
	(the level of air at the earth's surface).	solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.	
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.

GHGs	Description	Sources	Health Effects
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.
Nitrogen Trifluoride (NF_3)	NF_3 is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200.	NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis.

Source: (Urban Crossroads, 2020)

GHGs have varying Global Warming Potential (GWP) values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a

GWP of 1. CO_2 equivalent (CO_2e) is a term used for describing the difference GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP. The atmospheric lifetime and GWP of selected GHGs are summarized at Table 4.6-2, GWP and Atmospheric Lifetime of Select GHGs. As shown in Table 4.6-2, GWP for the 2nd Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 23,900 for SF_6 and GWP for the IPCC's 5th Assessment Report range from 1 for CO_2 to 23,500 for SF_6.

TABLE 4.6-2 GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment	5th Assessment Report
CO_2	See[a]	1	1
CH_4	12 .4	21	28
N_2O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF_6	3,200	23,900	23,500

a. As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Source: (Urban Crossroads, 2020)

B. Global, National, State, and Regional Contributions to Greenhouse Gas Emissions

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2017. Based on the latest available data, the sum of these emissions totaled approximately 29,216,501 gigagram (Gg) CO_2e as summarized on Table 4.6-3, Top GHG Producing Countries and the European Union. As shown, the United States (U.S), as a single country, was the number two producer of GHG emissions in 2017.

TABLE 4.6-3 TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION

Emitting Countries	GHG Emissions (Gg CO_2e)
China	11,911,710
United States	6,456,718
European Union (28-member countries)	4,323,163
India	3,079,810
Russian Federation	2,155,470
Japan	1,289,630
Total	**29,216,501**

Source: (Urban Crossroads, 2020)

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the U.S. emissions inventory total. CARB compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons of CO_2e per year ($MMTCO_2e/yr$).

C. Kimberly-Clark Fullerton Mill GHG Emissions

The Kimberly-Clark site is currently occupied by the Kimberly-Clark Fullerton Mill manufacturing facility, which includes 1,210,720 sf of existing manufacturing and warehouse buildings. For purposes of analysis in this EIR, the existing GHG emissions from operations at the Kimberly-Clark site have been calculated. The existing facility included the operation of a cogeneration turbine which was used as the primary source of energy, and which will be relocated to Kimberly-Clark's new facility site in Kentucky. As such, for purposes of this GHG analysis, existing energy usage from the turbine was calculated based on the assumption that the cogeneration turbine produced approximately 5 megawatts (MW) of electricity, and would offset an equivalent amount of electricity from the grid at the Kentucky facility. Water usage for the existing use was based on information from the City of Fullerton (water provided). Lastly, mobile source emissions were based on trip generation information provided in the Project-specific TIA (refer to Section 4.11, Transportation, of this EIR). For purposes of the Project's GHG analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. The estimated GHG emissions from the existing Kimberly-Clark Fullerton Mill are summarized in Table 4.6-4, Estimated Existing Kimberly-Clark Facility GHG Emissions.

TABLE 4.6-4 ESTIMATED EXISTING KIMBERLY-CLARK FACILITY GHG EMISSIONS

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Area Source	0.03	8.00E-05	0.00	0.03
Energy Source (Cogeneration)	-	-	-	13,550.63
Mobile Source (Passenger Car)	1,246.22	0.03	0.00	1,247.00
Mobile Source (Truck)	1,831.97	0.17	0.00	1,836.10
Waste	231.02	13.65	0.00	572.34
Water Usage	1,629.86	11.95	0.29	2,016.26
Total CO_2e (All Sources)	**19,222.36**			

Source: (Urban Crossroads, 2020)

4.6.2 Existing Policies and Regulations

Section 5.21.2 of The Fullerton Plan EIR provides a discussion of the existing regulatory setting related to GHG impacts (Fullerton, 2012b). Additional information regarding GHG regulations, and related energy regulations is presented in Section 2.7, Regulatory Setting, of the GHG

Analysis included in Appendix G of this EIR, and in Section 4.4, Energy. Following is a discussion of the regulations particularly relevant to the Project.

A. Federal

Greenhouse Gases Endangerment

In *Massachusetts v. Environmental Protection Agency* (EPA) 549 U.S. 497 (2007), decided on April 2, 2007, the U.S. Supreme Court (Supreme Court) found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Federal Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6— in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings.

Light-Duty Vehicle Greenhouse Gas Emission and Corporate Average Fuel Economy Standards

Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO_2 level solely through fuel economy improvements. Together, these standards would cut CO_2 emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles

sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO_2 in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO_2 emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and CO_2 emissions from the 2014 to 2018 model years.

On August 2,2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend exiting Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5% each year through model year 2026.

SmartWay Program

The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components: transport partnership, technology program, vehicles, and international interests. SmartWay effectively refers to requirements geared towards reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs will have to comply with CARB GHG Regulation that is designed with the SmartWay Program in mind, to reduce GHG emissions by making them more fuel-efficient. For instance, in 2015, 53 foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified low-rolling resistance tires and SmartWay-verified aerodynamic devices obtained a total of 10% or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the EPA has evaluated the fuel saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications, and has verified certain products: idle reduction technologies, aerodynamic technologies, low rolling resistance tires, retrofit technologies, and federal excise tax exemptions.

B. State

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs in California. The California Global Warming Solutions Act (commonly referred to as Assembly Bill [AB] 32), Senate Bill (SB) 32, and other State policies, regulations, and laws addressing GHG emissions are discussed in Section 4.21, *Greenhouse Gas Emissions*, of the Fullerton Plan EIR, and in Section 2.7, Regulatory Setting, of the GHG Analysis included in Appendix G of this EIR. The following regulations are particularly relevant to the Project.

Title 24 California Code of Regulations

CCR Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020.

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction waste and demolition ordinances and defers to them as the ruling guidance provided they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction waste and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official.

The 2019 Title 24 standards will result in less energy use, thereby reducing GHG emissions associated with energy consumption in the South Coast Air Basin (SoCAB) and across the State of California. For example, the 2019 Title 24 standards will require solar photovoltaic systems for

new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements. 2019 CALGreen standards that are applicable to the Project as further described in the GHG Analysis include:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3).
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8)
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor portable water use in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 s.f. or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- **Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 s.f.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 s.f. requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 s.f. and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Executive Order S-3-05

Former California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

AB 32

The California State Legislature enacted AB 32, required that GHGs emitted in California be reduced to 1990 levels by the year 2020. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. CARB approved the 1990 GHG emissions level of 427 $MMTCO_2e$ on December 6, 2007. Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 $MMTCO_2e$. Emissions in 2020 in a “business as usual” (BAU) scenario were estimated to be 596 $MMTCO_2e$, which do not account for reductions from AB 32 regulations. At that level, a 28.4% reduction was required to achieve the 427 $MMTCO_2e$ 1990 inventory. In October 2010, CARB prepared an updated 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 $MMTCO_2e$. Therefore, under the updated forecast, a 21.7% reduction from BAU is required to achieve 1990 levels.

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05; the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels has been achieved. CARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. As described above, CARB revised the 2020 BAU inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base.

AB 1493

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. The second phase of the implementation for the Pavley bill is currently in effect and was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles (EV) and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

Senate Bill 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)." Section 21097 was also added to the Public Resources Code.

On December 28, 2018, the Natural Resources Agency announced the Office of Administrative Law (OAL) approved the amendments to the CEQA Guidelines for implementing the CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing CEQA Guidelines to reference climate change.

Section 15064.4 was amended to state that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Executive Order S-01-01 – Low Carbon Fuel Standard

The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. In particular, the Executive Order established a low carbon fuel standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. This analysis supporting development of the protocols was included in the State Implementation Plan for alternative fuels (State Alternative Fuels Plan adopted by CEC on December 24, 2007) and was submitted to CARB for consideration as an "early action" item under AB 32. CARB adopted the LCFS on April 23, 2009.

The Board approved the LCFS regulation in 2009 and began implementation on January 1, 2011. CARB approved some amendments to the LCFS in December 2011, which were implemented on

January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

Senate Bill 375

Passing the Senate on August 30, 2008, SB 375 was signed by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.” SB 375 does the following: it (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

- Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.
- Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
- Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1881 – Water Conservation Act

The Model Water Efficient Landscape Ordinance (MWELO) was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least

as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20% consistent with (SBX-7-7) 2020 mandate are expected upon compliance with the ordinance. Governor Brown's Drought Executive Order of April 1, 2015 (Executive Order B-29-15) directed Department of Water Resources (DWR) to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance on July 15, 2015 effective December 15, 2015. New development projects that include landscape areas of 500 sf or more are subject to the Ordinance. The update requires: more efficient irrigation systems; incentives for graywater usage; improvements in on-site stormwater capture; limiting the portion of landscapes that can be planted with high water use plants; and, reporting requirements for local agencies.

Senate Bill 32

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

CARB Climate Change Scoping Plan and 2017 Scoping Plan Update

CARB's Climate Change Scoping Plan (Scoping Plan) contained measures designed to reduce the State's emissions to 1990 levels by the year 2020 to comply with AB 32. The Scoping Plan identified recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures targeted the transportation and electricity sectors. CARB approved the First Scoping Plan Update on May 22, 2014. The First Scoping Plan Update identified the next steps for California's climate change strategy. The First Scoping Plan Update showed how California continued on its path to meet the near-term 2020 GHG limit, but also set a path toward long-term, deep GHG emission reductions. The First Scoping Plan Update did not set new targets for the State but described a path that would achieve the long-term goal of Executive Order S-3-05 for emissions to decline to 80% below 1990 levels by 2050.

In compliance with AB 32 and the 2008 Scoping Plan, the target year 2020 has been fulfilled. In November 2017, CARB released the 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes. The 2017 Scoping Plan Update establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the Final 2017 Scoping Plan Update framework are addressed under the analysis presented under Threshold b in Section 4.6.4, Environmental Impacts, of this EIR. Note, however, that the 2017 Scoping Plan acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

In addition to the statewide strategies listed above, the 2017 Scoping Plan Update also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. CALGAPS showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$/yr, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

Tractor-Trailer GHG Regulation

The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

Phase I and 2 Heavy-Duty Vehicle GHG Standards

CARB has adopted a regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing heavy-duty vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HDT vehicles, including trailers. But the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

In February 2019, the OAL approved the Phase 2 Heavy-Duty Vehicle GHG Standards and became effective April 1, 2019. The Phase 2 GHG standards are needed to offset projected VMT growth and keep heavy-duty truck CO_2 emissions declining. The federal Phase 2 standards

establish for the first time, federal emissions requirements for trailers hauled by heavy-duty tractors. The federal Phase 2 standards are more technology-forcing than the federal Phase 1 standards, requiring manufacturers to improve existing technologies or develop new technologies to meet the standards. The federal Phase 2 standards for tractors, vocational vehicles, and heavy-duty pick-up trucks and vans (PUVs) will be phased-in from 2021-2027, additionally for trailers, the standards are phased-in from 2018 (2020 in California) through 2027.

C. Regional

South Coast Air Quality Management District

SCAQMD is the agency responsible for air quality planning and regulation in the SoCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SoCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim threshold of 10,000 MTCO2e/yr for industrial projects where the SCAQMD is the lead agency.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate. SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the Project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.

- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

D. Local

City of Fullerton Climate Action Plan

The Fullerton Plan CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP recommends GHG emissions targets that are consistent with the reduction targets of the State of California, including AB 32, and presents strategies for each category of GHG emissions (e.g., transportation, emergency consumption, water consumption and waste disposal) that will make it possible for the City to meet the recommended targets.

As identified previously, under AB 32, the State has committed to reducing GHG emissions to 1990 levels by 2020. Therefore, consistent with the CARB Scoping Plan, the City of Fullerton has chosen a reduction target of 15% below 2009 baseline emissions levels by 2020. This reduction trend would continue through The Fullerton Plan buildout year. The 15% below current emissions reduction target will contribute to the stabilization of global GHG emission concentrations and achievement of AB 32 goals.

The CAP also suggests best practices for implementation and makes recommendations for measuring progress.

The Fullerton Plan CAP states the following:

> *One of the primary uses for a CAP is to establish significance thresholds for reviewing projects under CEQA. CEQA requires the City to identify the significant environmental impacts of its discretionary actions and to avoid or mitigate those impacts if feasible. The CEQA Guidelines, as updated pursuant to SB 97, acknowledges that climate change is an environmental issue that requires analysis under CEQA and encourages the use of a plan consistency threshold for cumulative impacts on climate change. Projects that demonstrate consistency with the strategies, actions, and emission reduction targets contained in the CAP would have a less than significant impact on climate change.*
>
> *When the City undertakes a discretionary action, such as approval of a proposed development project, plan, policy, or code change, the City will evaluate whether that action would result in a significant climate change impact.*

A discussion of the project's consistency is provided in Table 4.6-7, City of Fullerton CAP Consistency Summary.

4.6.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on greenhouse gas emissions if it would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.6.4 ENVIRONMENTAL IMPACTS

A. Impact Analysis

Threshold a	***Would the project generate greenhouse gas emission, either directly or indirectly, that may have a significant impact on the environment?***

Please refer to Section 4.2, Air Quality, of this EIR, and the Project's Air Quality Impact Analysis (AQIA) included in Appendix B1 of this EIR, for a discussion of the models used to estimate the Project's GHG emissions, and a description of construction and operational modeling assumptions. Modeling and Project-related input assumptions used to evaluate the Project's GHG impacts are based on the same modeling methodology conducted to assess the Project's air quality impacts.

An individual project like the Project cannot generate enough GHG emissions to affect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC.

Construction Activities

Project construction activities (i.e., demolition, concrete crushing/asphalt pulverizing, site preparation, grading, building construction, paving, and architectural coating) would generate CO_2 and CH_4 emissions. For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.6-5, Amortized Annual Construction Emissions. As shown, construction of the Project would result in GHG emissions of approximately 5,195.47 CO_2e, or annual GHG emissions of 173.18 $MTCO_2e$ when amortized over 30 years in accordance with the SCAQMD-recommended methodology. Because construction emissions are amortized over a 30-year

project lifetime and are included in the evaluation of operational emissions, there is no significance finding for construction emissions.

TABLE 4.6-5 AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e[a]
2021[b]	3,514.19	0.50	0.00	3,526.78
2022	1,663.65	0.20	0.00	1,668.69
Total	5,177.84	0.71	0.00	5,195.47
Amortized Construction Emissions ($MTCO_2e$)	**172.59**	**0.02**	**0.00**	**173.18**

a. CalEEMod reports the most common GHGs emitted which include CO2, CH4, and N2O. These GHGs are then converted into the CO2e by multiplying the individual GHG by the GWP.
b. Emissions for the 2021 year are inclusive of crushing emissions
CalEEMod annual construction-source emissions are presented in Appendix 3.1 of the Project's GHG Analysis (Appendix G of this EIR).
Source: (Urban Crossroads, 2020)

Operational Activities

Project GHG emissions during long-term operation would result from area source emissions (landscape maintenance equipment); energy source emissions (natural gas[1] and electricity consumption); mobile source emissions (vehicle and truck trips generated by the Project); on-site cargo handling equipment emissions; water supply, treatment, and distribution; and, solid waste. A detailed description of the operational emissions sources is presented in Section 3.6 of the GHG Analysis included in Appendix G of this EIR.

The City of Fullerton does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The City has selected the SCAQMD's screening threshold of 10,000 $MTCO_2e$ per year for industrial land uses as the significance criterion.

The annual GHG emissions associated with the operation of the Project are summarized in Table 4.6-6, Estimated Project GHG Emissions. The existing development emissions (previously presented in Table 4.6-4, Estimated Existing Kimberly-Clark Facility GHG Emissions) were subtracted from the Project GHG emissions to determine the new emissions from the Project. As previously discussed, existing energy usage from the turbine was calculated based on the assumption that the cogeneration turbine produced approximately 5 MW of electricity, and would offset an equivalent amount of electricity from the grid at the Kentucky facility. Taking credit in this manner from the energy-related cogeneration portion of the Project is conservative, since the cogeneration plant when it was operating at the Project site generated substantially more GHGs as a result of natural gas usage. The annual net GHG emissions associated with the operation of

[1] The Project is not anticipated to require natural gas use for operations; therefore, the GHG Analysis conservatively includes GHG emission from use of natural gas.

the Project, inclusive of the Project's amortized construction emissions, are estimated to be 8,675.29 $MTCO_2e$ per year, which would not exceed the screening threshold of 10,000 $MTCO_2e$ per year. As such, the Project would not have the potential to result in a cumulatively considerable impact with respect to GHG emissions. As such, the Project's impact is less than significant.

Level of Significance Before Mitigation

The Project would not exceed the screening threshold for GHG emissions and would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

TABLE 4.6-6 ESTIMATED PROJECT GHG EMISSIONS

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	172.59	0.02	0.00	173.18
Area Source	0.09	2.30E-04	0.00	0.09
Energy Source	6,550.53	0.27	0.06	6,574.32
Mobile Source (Passenger Car)	4,609.47	0.10	0.00	4,611.95
Mobile Source (Truck)	15,357.98	1.16	0.00	15,386.97
On-Site Equipment	304.75	0.10	0.00	307.22
Waste	307.09	18.15	0.00	760.80
Water Usage	69.02	0.44	0.01	83.12
Total CO_2e (All Sources)	**27,897.66**			
Existing Emissions	***19,222.36***			
Net Emissions (Project – Existing)	**8,675.29**			
Screening Threshold (CO_2e)	**10,000**			
Threshold Exceeded?	**NO**			

See Appendices 3.1 through 3.3 of the Project's GHG Analysis (Appendix G of this EIR) for detailed CalEEMod outputs.
Source: (Urban Crossroads, 2020)

Threshold b Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Project's consistency with the City of Fullerton CAP and SB 32 (CARB 2017 Scoping Plan) and is discussed below. Consistency with AB 32 and the 2008 Scoping Plan is not necessary,

since the target year for AB 32 and the 2008 Scoping Plan was 2020, and the Project's buildout year is 2022. As such the 2008 Scoping Plan does not apply and consistency with the 2017 Scoping Plan is relevant.

City of Fullerton Climate Action Plan Consistency

As previously discussed, the City of Fullerton CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. As identified in the CAP, when determining whether a proposed project is consistent with the CAP, the following should be considered:

> *Step 1: Consider the consistency of the discretionary project (magnitude and location of growth) with The Fullerton Plan's year 2030 growth projections, which are the basis of the GHG emissions inventory projects. If the project is consistent with The Fullerton Plan projections, the project is consistent with the CAP.*

The CAP then states:

> *"If the discretionary project is not consistent with The Fullerton Plan's year 2030 growth projections, the project is not necessarily inconsistent with the CAP"*

The following analyzes Project consistency in accordance with Step 1.

The Project would be located in the Southeast Industrial Focus Area of The Fullerton Plan and is consistent with the growth projections for this Focus Area. As indicated in Table 3-4, Projected Land Use Change—Focus Areas, of The Fullerton Plan EIR, the land use buildout assumptions for this Focus Area forecast over 2.65 million s.f. of additional nonresidential uses. As indicated in Table 5.2-10, Forecast Employment Growth—Focus Area, The Fullerton Plan assumes 2,775 new employees in the Southeast Industrial Focus Area (11.5% of the total employment growth in the City). It is expected that the Project would create between 1,500 and 2,000 employment opportunities during long-term operations. For comparison, based on employment generation factors presented in The Fullerton Plan, the Project's estimated up to 1,609,384 s.f. of industrial uses in the Southeast Industrial Focus Area would generate approximately 1,620 employees (based on the average space utilization of 1,145 s.f. of industrial space per employee and 343 s.f. of office space per employee). Based on an average of the number of employees at the existing Kimberly-Clark facility over the five-year period between 2015 and 2019, there was an average of approximately 325 individuals (including on-site contractors) employed. Accordingly, based on the Project Applicant's employment estimates there would be a net increase of up to 1,675 employment opportunities in the City with implementation of the Project. This is within the anticipated employment growth in the Southeast Industrial Focus Area (approximately 2,546 jobs associated with light industrial uses). The Project would result in development and employment that has been anticipated and planned for by the City for the Southeast Industrial Focus Area. The Project's employment would not exceed and would be consistent with The Fullerton Plan's year 2030 population and employment growth projections. Therefore, the employment growth resulting from the project would be consistent with the CAP, resulting in a less than significant

impact related to GHG emissions. The Project is consistent with the CAP based on the Step 1 analysis.

The CAP recommends GHG emissions targets that are consistent with the reduction targets of the State of California and presents a number of strategies that will make it possible for the City to meet the recommended targets. The CAP includes the following four strategies:

- **Transportation and Mobility Strategy.** Promote a balanced transportation system that promotes the use of public transportation and bicycles, reduces congestion, and helps encourage residents to engage in healthy and active lifestyles.
- **Energy Use and Conservation Strategy.** Reduce the carbon footprint of municipal operations to serve as a leader for the community and support the construction of buildings that are energy efficient and incorporate clean, renewable energy sources.
- **Water Use and Efficiency Strategy.** Conserve and protect water resources and promote efficiency through public education.
- **Solid Waste Reduction and Recycling Strategy.** Manage solid waste generation and diversion in order to achieve a zero-waste future.

The strategies contain emission reduction measures that are consistent and build upon the Goals and Policies within The Fullerton Plan. It should be noted that the CAP reductions strategies were set to comply with the AB 32 benchmark for the Year 2020.

The Project's consistency with the CAP measures is discussed below in Table 4.6-7, City of Fullerton CAP Consistency Summary. As outlined in Table 4.6-7, the Project would be consistent with, or otherwise would not conflict with, the CAP's strategies, goals, and measures to reduce GHG within the City of Fullerton. No impact would occur.

TABLE 4.6-7 CITY OF FULLERTON CAP CONSISTENCY SUMMARY

CAP Measures	Analysis of Project Consistency
Transportation and Mobility Strategy	
T-1: Reduction of Single Occupant Vehicle Trips Support regional and sub-regional efforts to increase alternatives to an infrastructure supporting a reduction of single occupant vehicle trips.	**Consistent.** The Property Owner/Developer would comply with the City's Transportation Demand Management Ordinance, which includes the provision of on-site bicycle storage facilities and sidewalks and paved pathways from the external pedestrian circulation system to each building. Building occupants would also have to comply with SCAQMD Rule 2202 for an employee commute reduction program (The Fullerton Plan EIR MM AQ-10 included in Section 4.2, Air Quality, of this EIR), which would implement employee commute reduction programs. Consistency with MM AQ-1 of the Fullerton Plan EIR may lead to the provision of bicycle racks, preferential parking spaces, shower facilities, bus transit information, electric charging

CAP Measures	Analysis of Project Consistency
	stations and incentives to reduce employee vehicle trips.
T-2: Inter-Jurisdiction Connections Supports efforts to maintain, expand and create new connections between the Fullerton bicycle network and the bicycle networks of adjacent cities, Orange County, and the region. T-3: Bicycle Transportation Plan Support projects, programs, and policies to maintain and update as necessary a Bicycle Transportation Plan prepared and approved pursuant to the California Streets and Highways Code to maintain eligibility for funding for State Bicycle Transportation Account funds.	**Consistent.** There are Class II bike lanes currently along Acacia Avenue, E. Orangethorpe Avenue (west of North State College Boulevard), and Commonwealth Avenue (between Raymond Avenue and North State College Boulevard) within the study area. Commonwealth Avenue currently has Class III route between Acacia Avenue and N. State College Boulevard (signed, but unstriped, on-road bike route). Class II bike lanes are proposed along E. Orangethorpe Avenue west of Raymond Avenue and east of North State College Boulevard. Class II bike lanes are proposed along E. Orangethorpe Avenue. Additionally, a planned Class I (off-road bike path) runs south of and parallel to E. Orangethorpe Avenue. In the City of Anaheim, Class II bike lanes are proposed along E. Orangethorpe Avenue west of Raymond Avenue and east of State College Boulevard. In the City of Placentia, Class II bicycle lanes are proposed along E. Orangethorpe Avenue, and there is a planned Class I (off-road bike path) that runs south of and parallel to E. Orangethorpe Avenue. The Project would maintain existing bikeways adjacent to the Project site and would not preclude implementation of planned bikeways, which would expand the available routes for bicycle travel between Fullerton and adjacent cities.
T4: Bicycle Use on All Streets Support projects, programs, policies and regulations to recognize that every street in Fullerton is a street that a bicyclist can use.	**Consistent.** The Project would maintain the bicycle lanes on E. Orangethorpe Avenue and Acacia Avenue adjacent to the Project site. Additionally, proposed improvements to the site-adjacent roadways would be in accordance with City standards, including the provision of sidewalks. The sidewalks and crosswalks at signalized intersection would be available for bicycle use.
T5: Bicycling Safety and Convenience Support projects, programs, policies, and regulations that make bicycling safer and more convenient for all types of bicyclists.	**Consistent.** The Property Owner/Developer would comply with the CalGreen Code requirements for provision of bicycle parking spaces, and the City's transportation demand management strategies in Section 15.40.070 of the City's Municipal Code, which includes the provision of on-site bicycle storage facilities and sidewalks and paved

CAP Measures	Analysis of Project Consistency
	pathways from the external pedestrian circulation system to each building.
T6: Circulation Between Cities Support regional and sub-regional efforts to implement programs that coordinate the multi-modal transportation needs and requirements across jurisdictions, including but not limited to the Master Plan of Arterial Highways, the Commuter Bikeways Strategic Plan, the Signal Synchronization Master Plan, the Orange County Congestion Management Plan, and the Growth Management Plan.	The Project site is located within the City of Fullerton. The roadway classifications and planned (ultimate) roadway cross-sections of the major roadways within the study area, are identified in the Mobility Element of The Fullerton Plan (Chapter 4). State College Boulevard, E. Orangethorpe Avenue, and Chapman Avenue (east of State College Boulevard) are classified as a Major Arterial Highway. Raymond Avenue, Placentia Avenue, Commonwealth Avenue, and Chapman Avenue (west of State College Boulevard) are classified as Primary Arterial Highways. Lastly, Acacia Avenue is classified as a Secondary Arterial Street within the study area. The Circulation and Parking description provided in Section 3.0, Project Description, of this EIR, identifies required vehicular and non-vehicular circulation improvements in the public right-of-way that would be implemented as part of the Project, per the preliminary Project conditions of approval. As described in Section 3.0, Project Description, of this EIR, circulation improvements required to be implemented with the Project include rehabilitation of pavement over Kimberly Avenue and E. Orangethorpe Avenue; modified turning radii and roadway geometrics, as needed, and as feasible, to accommodate truck turning movements; and, improvements to substandard curb ramps, as needed. These improvements would be in place prior to Project building occupancy. The development of the Project would not require the construction of any additional roadway improvements beyond the roadways fronting the Project site. The Project, including associated vehicular and non-vehicular circulation improvements and utility connections, would not conflict with the Commuter Bikeways Strategic Plan since existing bikeways would be maintained. Also, no conflict with the Master Plan of Arterial Highways (MPAH) would occur since the proposed street improvements would not change the roadway configurations, as identified in the MPAH. No conflict with the Signal Synchronization Master Plan would occur since there are no changes to existing signals required by the Project. Any signals installed in the future would be synchronized, as necessary, to

CAP Measures	Analysis of Project Consistency
	coordinate with other signals in the area. Further, as identified in Section 4.11, Transportation, of this EIR, the Project would not conflict with the Orange County CMP based on CMP performance standards. No conflict with the Growth Management Plan is anticipated since employment growth from the Project would be within The Fullerton Plan and SCAG forecasts.
T-7: Infrastructure for Low and Zero Emission Vehicles Support projects, programs, policies, and regulations to encourage the development of private and/or public infrastructure facilitating the use of alternative fuel vehicles.	**Consistent.** The Property Owner/Developer would comply with the CALGreen requirements which requires that construction facilitate the future installation of EV supply equipment.
T8: Rail and Rapid Transit Participate in the planning efforts for regional and inter-state rail and rapid transit projects to represent the interests of the City.	**Not applicable.** The Project would not preclude future use of the BNSF tracks, north of the site.
T-9: Car Sharing Pilot Program Explore the potential for a car sharing pilot program to be implement in one or more of the City's Focus Areas.	**Consistent.** The Project would comply with the City's transportation demand management strategies in Section 15.40.070 of the City's Municipal Code and Cal Green requirements through the provision of parking spaces near the building entrances for carpool and vanpool vehicles and transit/commuter information areas.
Energy Use and Conservation Strategy	
E-1: GHG Emissions from Electrical Generation Support regional and sub-regional efforts to reduce GHG emissions associates with electrical generation through energy conservation strategies and alternative/renewable energy programs.	**Consistent.** The Project would be required to comply with Title 24 California Code of Regulations (California Building Code) and CALGreen, which establishes stringent energy efficiency requirements for new development. Additionally, as discussed under Threshold a, the Project would result in a decrease in GHG emissions from energy use compared to the existing conditions, due to the reduction in energy demand.
E-2: Energy- and Resource-Efficient Design Support projects, programs, policies and regulations to encourage energy and resource efficient practices in site and building design for private and public projects.	
E-3: Energy Efficient Retrofits Prepare guidance to homeowners on energy efficient retrofits of existing dwellings.	**Not applicable.** The Project does not propose residential uses.

CAP Measures	Analysis of Project Consistency
E-4: Efficient Use of Energy Resources in Residential Development The City shall encourage housing developers to maximize energy conservation through proactive site, building and building systems design, materials, and equipment. The City's goal is to provide the development community the opportunity to exceed the provisions of Title 24 of the California Building Code. The City shall continue to support energy conservation through encouraging the use of Energy Star-rated appliances, other energy-saving technologies and conservation. To enhance the efficient use of energy resources, the City shall review the potential of offering incentives or other strategies that encourage energy conservation.	**Not applicable.** The Project does not propose residential uses.
E-5: Sustainable Regional Revitalization Efforts Support regional and sub-regional efforts pertaining to community revitalization that are rooted in sustainable development principles.	**Consistent.** The Project would be required to comply with Title 24 California Code of Regulations (California Building Code) and CALGreen, which establishes stringent energy efficiency requirements for new development. Additionally, as discussed under Threshold a, the Project would result in a decrease in GHG emissions from energy use compared to the existing conditions, due to the reduction in energy demand.
Water Use and Efficiency Strategy	
W-1: Conservation Efforts Support regional and sub-regional efforts to promote water efficiency and conservation.	**Consistent.** The Project would be required to comply with Title 24 CCR and CALGreen which would reduce the Project's energy demand associated with landscaping and water use. Additionally, as discussed under Threshold a, the Project would result in a decrease in GHG emission from water use to the existing Kimberly-Clark manufacturing operations, due to the reduction in water demand.
W-2: Sustainable Water Practices in New Development Support projects, programs, policies, and regulations to encourage water efficient practices in site and building design for private and public projects.	**Consistent.** The Project would be required to comply with the current CALGreen requirements which would reduce the Project's energy demand associated with landscaping and water use. Additionally, the City's Landscape Ordinance, as contained in Section 15.50 of the Fullerton Municipal Code, requires the use of water efficient irrigation systems. The proposed project would be designed to reduce the water consumption through efficient irrigation systems and the use of water-efficient fixtures within individual buildings.

CAP Measures	Analysis of Project Consistency
	Additionally, as discussed under Threshold a, the Project would result in a decrease in GHG emissions from water use compared to the existing Kimberly-Clark manufacturing operations, due to the reduction in water demand.
W-3: GHG Emissions from Water Conveyance Support regional and sub-regional efforts to reduce GHG emissions associated with water conveyance through water conservation strategies and alternative supply programs.	**Not applicable.** While this measure is not applicable at a Project-level, the Project would result in a decrease in water use compared to the existing Kimberly-Clark manufacturing operations.
Solid Waste Reduction and Recycling Strategy	
SW-1: Regional Waste Management Support Regional and sub-regional efforts on recycling, waste reduction, and product reuse.	**Consistent.** The Project would comply with waste reduction measures required by the City, CALGreen during construction and operation, and mandates of SB 341 for on-site recycling containers. Compliance with solid waste reduction requirements is further addressed in Section 4.13, Utilities and Service Systems, of this EIR.
SW-2: Waste Reduction and Diversion Support projects, programs, policies, and regulations to promote practices to reduce the amount of waste disposed in landfills.	**Not applicable.** This measure is not within the purview of this Project; however, this issue is further addressed in Section 4.13, Utilities and Service Systems, of this EIR.
SW-3: Waste Stream Separation and Recycling Supports projects, programs, policies and regulations to expand source separation and recycling opportunities to all households (including multi-family housing), businesses, and City operations.	**Not applicable.** This measure is not within the purview of this Project; however, this issue is further addressed in Section 4.13, Utilities and Service Systems, of this EIR.
SW-4: Food-Waste Processing Facility Explore the feasibility of a food-waste processing facility to serve the City's food-service and food-processing businesses and large institutions.	**Not applicable**. The Project does not propose a food waste processing facility or other waste treatment and disposal facility uses.
SW-5: Reduce GHG Emissions from Solid Waste Support projects, programs, policies, and regulations to reduce GHG emissions from waste through improved management of waste handling and reductions in waste generation.	**Consistent.** The Project would comply with waste reduction measures required by the City, CALGreen, and mandates of SB 341 for on-site recycling containers.

Source: (Urban Crossroads, 2020)

2017 CARB Scoping Plan Consistency

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 4.6-8, 2017 Scoping Plan

Consistency Summary, summarizes the Project's consistency with the 2017 Scoping Plan. As shown, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. As such, Project impacts would have no impact due to a conflict with the 2017 CARB Scoping Plan.

TABLE 4.6-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	**Consistent.** The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**Consistent.** The Project would replace existing manufacturing and associated industrial buildings and facilities that were constructed as early as the 1950s and that do not meet current energy efficiency standards. The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements. The Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.

Action	Responsible Parties	Consistency
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.	Transportation (Caltrans), CEC, OPR, Local Agencies	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		**Not applicable.** This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**Not applicable.** This Project is not responsible for implementation of SB 375 and would therefore not conflict with these measures.

Action	Responsible Parties	Consistency
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**Not applicable**. Although this is directed towards CARB and Caltrans, the Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The Project includes the construction of sidewalks and incorporates bicycle facilities that would facilitate pedestrian and bicycle travel. Additionally, there are OCTA bus routes along E. Orangethorpe Avenue and State College Boulevard adjacent to the project site that would be easily accessible from the project. The existing bus stop along E. Orangethorpe Avenue would also be replaced as part of the Project to further facilitate use of transit.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	**Not applicable.** This measure is not within the purview of this Project.

Action	Responsible Parties	Consistency
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	**Consistent.** This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. Access to the Project site would be provided from each of the four roadways adjacent to the Project site, which are all designated truck routes in the City of Fullerton. The roadways provide efficient access to SR-57 approximately 0.7 mile east of the project site, SR-91 approximately 0.4 mile south of the project site, and I-5 approximately 4.6 miles west of the project site. As previously, described, the Project includes various circulation improvements in the public right-of-way that would be implemented as part of the Project, per the preliminary Project conditions of approval. Circulation improvements required to be implemented with the Project include rehabilitation of pavement over Kimberly Avenue and E. Orangethorpe Avenue; modified turning radii and roadway geometrics, as needed, and as feasible, to accommodate truck turning movements.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**Consistent.** When adopted, this measure will apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.

Action	Responsible Parties	Consistency
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	**Consistent.** The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		**Not applicable**. This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	**Not applicable**. This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Consistent.** The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable.** This measure is not within the purview of this Project. However, the Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		**Not applicable.** This measure is not within the purview of this Project. The majority of the site is already currently developed.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		**Consistent.** To the extent appropriate for the proposed industrial buildings, wood products would be used in construction, including for the roof structure. Additionally, the proposed project includes landscaping, including.
Establish scenario projections to serve as the foundation for the Implementation Plan		**Not applicable.** This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA,	**Not applicable.** This measure is not within the purview of this Project.

Action	Responsible Parties	Consistency
	California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is not within the purview of this Project.

Source: (Urban Crossroads, 2020)

Level of Significance Before Mitigation

The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact would result.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

4.6.5 CUMULATIVE IMPACTS

As discussed above, the assessment of GHG emissions is inherently cumulative because climate change is a global phenomenon. Because the Project's GHG emissions would be below the SCAQMD's recommended 10,000 $MTCO_2e$/yr screening threshold, the cumulative impact of the Project on GHG emissions would be less than significant. Additionally, Project impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (i.e., SB 32) also would be less than significant on a cumulatively-considerable basis.

4.6.6 REFERENCES

City of Fullerton (Fullerton). 2012a (as amended through May 2020). *The Fullerton Plan*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/the_fullerton_plan.asp

———. 2012b. *The Fullerton Plan 2030 Final Environmental Impact Report*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/final_program_eir.asp

Urban Crossroads. 2020 (July 28). *Goodman Logistics Center Fullerton – Greenhouse Gas Analysis*. (Appendix G of this EIR).

4.7 HAZARDS AND HAZARDOUS MATERIALS

This section addresses the potential for the Project to cause or exacerbate impacts to the environment associated with existing hazards, or to create hazards by construction and operation of the Project. Information presented in this section is primarily based on information presented in The Fullerton Plan Environmental Impact Report (EIR) and the site-specific studies listed below. Refer to Section 4.7.6, *References*, of this section for a complete list of references.

- *Phase I Environmental Site Assessment, Kimberly-Clark Fullerton Mill* (Phase I ESA), dated August 19, 2019, prepared by Stantec Consulting Services, Inc. (Stantec), and included in Appendix H1 of this EIR (Stantec, 2019a)
- *Phase II Environmental Site Assessment Report, Kimberly Clark Facility* (Phase II ESA), dated August 22, 2019, prepared by Stantec, and included in Appendix H2 of this EIR (Stantec, 2019b)
- *Asbestos & XRF Lead Survey*, dated December 12, 2018, prepared by H2 Environmental Consulting Services, Inc. (H2), and included in Appendix H3 of this EIR. (H2, 2018)

Unless otherwise noted, references to “Project” in this section include the proposed Project and the Optional Site Plan, and references to the “Project site” include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

For the purposes of this EIR, the term “toxic substance” is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances. The term “hazardous material” is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, Section 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the United States Environmental Protection Agency (USEPA) as capable of inducing systemic damage to humans or animals). Certain wastes are called “Listed Wastes” and are found in the California Code of Regulations, Title 22, Sections 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

In its response to the Notice of Preparation, the Orange County Water District (OCWD) indicated that the Project site is located within the North Basin Groundwater Protection Project (NBGPP) plume protection boundary. Groundwater in this area has been contaminated with industrial degreasing chemicals referred to as volatile organic compounds (VOCs), and infiltration of runoff in these areas generally is prohibited.

4.7.1 EXISTING SETTING

The site-specific Phase I ESA was prepared in general conformance with the requirements of American Society for Testing and Materials (ASTM) Designation E 1527-13 and All Appropriate Inquiries (AAI) Final Rule 40 CFR Part 312. The objective of a Phase I ESA is to identify recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) that may be associated with the Project site.[1] As further outlined in the Phase I ESA, which is included in Appendix H1 of this EIR, the scope of the Phase I ESA included reconnaissance of the site and immediate vicinity; Environmental Data Resources (EDR) review of the data available from various regulatory agencies; interviews with key individuals; and review of historical aerial photographs, building records, city directory information, and Sanborn Fire Insurance Maps.

Based on the recommendations of the Phase I ESA, a Phase II ESA was prepared to further review identified RECS, the Phase II ESA consisted of soil sampling and analysis at specified locations, and collection and analysis of soil vapor. The results of these reports outline existing conditions related to presence of RECs and are summarized below.

A. Pre-Kimberly-Clark Conditions

Based on historical aerial imagery, prior to 1955, the Project site and immediate surrounding area were primarily filled with orchards, with a scattering of small residential/agricultural buildings. The Project's Phase I ESA identified the historical agricultural use, including the on-site remnant orange orchard as a REC because it is a possible source of organochlorine pesticides and herbicides containing arsenic and lead. However, based on the results of the Project's Phase II ESA and associated analysis of soil samples, on-site soils were found to have concentrations of lead and arsenic that are consistent with expected background levels for the southern California region, and were at levels below the California Department of Toxic Substances Control (DTSC) and United States Environmental Protection Agency (EPA) Region 9 screening levels. Similarly, the testing of on-site soil samples also demonstrated that the site contains only trace concentrations of pesticides (4,4-DDE and 4,4-DDT), and the reported concentrations were found to be well below the DTSC and EPA Region 9 Regional Screening Levels (RSLs). (Stantec, 2019b)

[1] A REC is defined as the presence or likely presence of any hazardous substance or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. An HREC is a REC that has occurred in connection with the property, but has been addressed to the satisfaction of the applicable regulatory authority and meets unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A "CREC" is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), but with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

B. Kimberly-Clark Manufacturing Facility (Kimberly-Clark Paper Mill)

Environmental Database Review

An environmental database review was conducted to support the Phase I ESA and is included in its entirety in the Phase I ESA provided in Appendix H1 of this EIR. The Kimberly-Clark facility (2001 E. Orangethorpe Avenue) is listed on various environmental databases due to operational permits that have been issued over the years, the presence of underground storage tanks (USTs), and the generation and disposal of various hazardous wastes associated with operations. Additionally, the Kimberly-Clark facility is identified on various databases due to the release of hazardous materials, as summarized below:

- The California Hazardous Materials Information Reporting System (CHMIRS) database reports that on February 14, 2002 a release of an estimated 55 gallons fuel oil was encountered during construction excavation work at former fuel UST locations at the Kimberly-Clark facility. A separate release occurred on August 5, 1997 that included a release of an estimated 100 pounds of sodium hypochlorite (bleach) from a 7,150-gallon above ground storage tank (AST). The spill was contained in the secondary containment berm and cleaned up. A release of sodium hypochlorite also occurred on August 5, 1997 that was contained in an earthen berm and subsequently cleaned up. A release of an unknown volume of diesel fuel occurred onto Kimberly Avenue near the north entrance of the Property during a traffic collision on November 3, 2003. The portion of the diesel fuel that was released onto the pavement flowed into the storm drain.
- The Leaking Underground Storage Tank (LUST) database reports that on May 27, 1986, the Property reported a release of diesel fuel from a UST that affected the underlying soil. Excavation and disposal of the diesel impacted soil was performed under the oversight of the Fullerton Fire Department and closure was provided, with concurrence from the Regional Water Quality Control Board (RWQCB), Santa Ana Region (case no. 083001032T) on January 22, 1992.
- The Emergency Response Notification System (ERNS) database reports that separate releases of sodium hypochlorite occurred at the Property in 1990 and 1992. The sodium hypochlorite flowed into a sump and affected soil in the area. In both instances the liquid was pumped from the sump and impacted soil was excavated and disposed.

Recognized Environmental Concerns – Potential Soil Contamination

The Kimberly-Clark Paper Mill was constructed in 1955 and originally included six buildings; subsequently additional buildings were added to the facility to support product demand. Former and current manufacturing operations have been supported by numerous processes and chemicals that could potentially result in an environmental impact on the site (e.g., underground fuel storage tanks, above ground tanks, piping, clarifiers, drains, process areas, drum storage areas, etc.). Chemicals of potential concern include solvents, VOCs, petroleum hydrocarbons, metals, polychlorinated biphenyls (PCBs), phthalates, and polycyclic hydrocarbons. Bleaching of wood-pulp has also been linked to the formation of dioxins under certain processing conditions; however, Kimberly-Clark does not believe that wood-pulp bleaching was conducted at this facility.

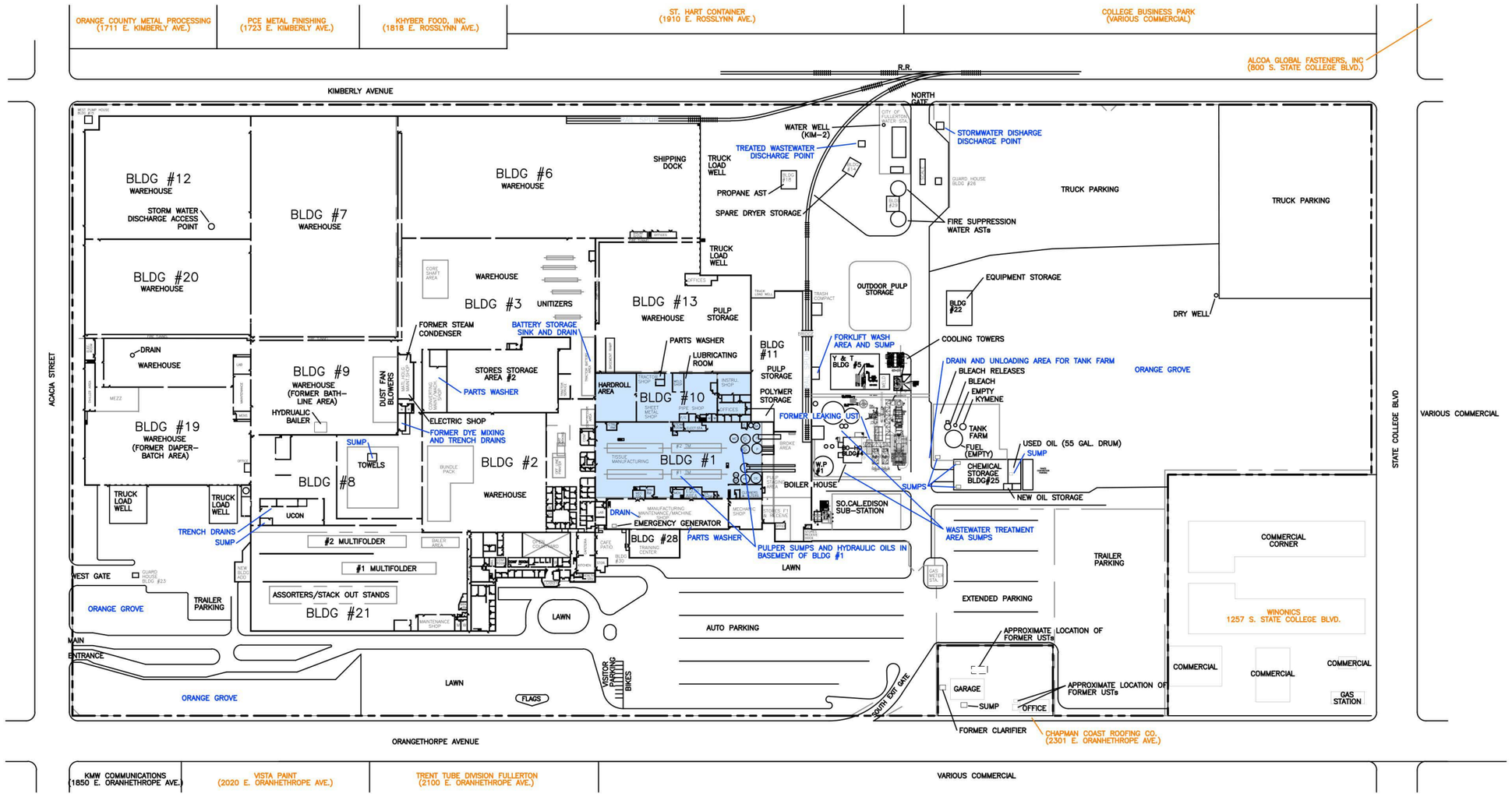
Chemical storage areas are located throughout the Kimberly-Clark facility, but were primarily located in pulp processing areas of existing Building 1, maintenance, and machine shops (existing buildings 1, 3, 9, 10, and 21), and water treatment areas east of existing buildings 11 and 25 (the chemical storage building). The chemicals were stored in various size drums, totes, or aboveground storage tanks (ASTs) of mineral oil, gear/lube oils, compressor oils, diesel fuel, hydraulic oil, and used oils. During the on-site investigation conducted for the Phase I ESA, chemicals were observed within secondary containment or located within the building's interior walls. An AST farm is present to the east of the water treatment and cogeneration plant.

Kimberly-Clark historically used USTs (six or seven USTs have been reported), and all of these USTs were reportedly located near the Boiler House (Building 4). Two sets of USTs were removed in 1985 or 1986 under the oversight of the Orange County Health Care Agency (OCHCA) and there are no other known USTs present. A review of records indicates that four 10,000-gallon USTs were removed from an unknown location near Building 4. No contamination was reported; however, there also were no details as to the specific location of these tanks and the results of sampling were not available in the records. Two former 10,000-gallon fuel oil USTs were also removed in 1986. Release of petroleum hydrocarbons was discovered following the removal of these two USTs. The contaminated soils were excavated to the extent feasible in multiple excavations in 1985, 1986, 1992, and 2002. As previously discussed, Fullerton Fire District provided closure on this case, with concurrence from the RWQCB. (Stantec, 2019a)

In addition to the historic agricultural use discussed above, the Phase I ESA identified the following RECs associated with exterior areas of the Kimberly-Clark facility; these RECs are shown in Figure 4.7-1, Recognized Environmental Concerns:

- Railroad spurs – possible source of herbicides, metals, petroleum hydrocarbons, pesticides, and PCBs;
- Industrial wastewater discharge point – potential source of VOCs, metals, petroleum hydrocarbons and other contaminants;
- Forklift wash area and sump – potential releases related to past cleaning operations;
- Tank farm unloading area, diesel USTs, and sump – potential source of VOCs, petroleum hydrocarbons and other contaminants;
- Stormwater discharge point – potential source of VOCs, petroleum hydrocarbons and other contaminants; and,
- Four former USTs adjacent to a non-specific "loading dock" as indicated in OCHCA records. The USTs are reported to have contained mineral spirits, dioctyl phthalate and vinyl acetate – potential source of VOCs, petroleum hydrocarbons, phthalates, and other contaminants.

RECs associated with the general interior of buildings 1, 3, 4, 8, 10 and 25 were also identified in the Phase I ESA due to equipment or operations being a potential source of VOCs, petroleum hydrocarbons, PCBs, acids, metals, and/or other contaminants.



Legend

BASEMENT BELOW BUILDINGS 1 AND 10

Notes

BLUE TEXT INDICATES LISTED ONSITE FEATURE IS A RECOGNIZED ENVIRONMENTAL CONDITION (REC). ORANGE TEXT INDICATES LISTED OFF-STE FACILTY IS A (REC)

Source(s): Stantec (07-24-2019)

Figure 4.7-1

Not to Scale

Recognized Environmental Concerns

As previously identified, due to presence of RECs associated with the past uses on site, including agricultural uses, a Phase II ESA investigation was conducted that included soil sampling; detailed discussion of the sampling and testing program is provided in the Phase II ESA included in Appendix H2 of this EIR. Based on the testing of soil samples collected at the Project site, the Project's Phase II ESA concluded the following with respect to on-site soils (Stantec, 2019b):

- Low concentrations of Total Petroleum Hydrocarbons (TPH) in the diesel range (DRO) were reported in two samples at concentrations of 14 and 13 milligrams per kilogram (mg/Kg), respectively. TPH was not reported above laboratory reporting limits in any other analyzed sample.
- A trace detection of chloroform was reported in one soil sample at a concentration of 0.0064 mg/Kg. The reported concentration of chloroform is well below commercial DTSC and EPA RSLs. Chloroform may be a by-product of treated water. No other VOCs were reported above laboratory reporting limits.
- Title 22 metals concentrations were reported at various levels in all analyzed samples. All reported concentrations were reported at levels consistent with background and/or below regulatory screening levels.
- Selected soil samples analyzed for pH reported pH at levels ranging from 7.5 up 9.1.
- PCBs were not reported above laboratory reporting limits in any analyzed sample.
- Dioxins/Furans were not reported above laboratory reporting limits in the two analyzed samples. The 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) toxicity equivalent factor (TEF) calculated using one-half the reporting limit indicating TCDD TEFs between 4.84E-07 and 6.29E-07, well below the EPA RSLs and the DTSC soil remediation goals.

Asbestos, Lead, and PCBs

Asbestos and Lead

Asbestos, a naturally occurring fibrous material, was used for years in many building materials for its fire-proofing and insulating properties. While the use of asbestos in the manufacture of most building materials has not been fully prohibited by law, the use of asbestos, for the most part, has voluntarily been discontinued since the late 1970s. Loose insulation, ceiling panels, and brittle plaster are potential sources of friable (easily crumbled) asbestos. Non-friable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves the relocation of underground utilities, could release friable asbestos fibers, if present, unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, which makes friable materials the greatest potential health risk.

Asbestos is a known human carcinogen, and there is no known threshold level of exposure at which adverse health effects are not anticipated. Given this, the U.S. Environmental Protection Agency (USEPA) and California Environmental Protection Agency (CalEPA) have identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. Further,

the California Air Resources Board (CARB) has identified asbestos as a toxic air contaminant (TAC) pursuant to the California Health and Safety Code (Section 39650 et seq.). Because it is a hazardous air pollutant, asbestos is subject to regulation by the South Coast Air Quality Management District (South Coast AQMD) under Rule 1403. The Occupational Safety and Health Administration (OSHA) also regulates asbestos as a potential worker safety hazard.

Lead is a naturally occurring metallic element. Among its numerous uses and sources, lead can be found in paint; water pipes, solder in plumbing systems; soils around buildings; and structures painted with lead-based paint (LBP). In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials containing lead. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. Lead may pose a hazard if it is disturbed during demolition or other construction activities and not properly contained or removed.

Given the age of the existing buildings on the Project site, and the likely presence of asbestos containing materials (ACMs) and lead materials (primarily lead-based paint [LBP]), the Phase I ESA recommended that a pre-demolition survey be conducted. H2 Environmental conducted the recommended survey in 2018 and concluded that ACMs and lead materials are present in certain on-site buildings. The primary buildings materials testing positive for ACMs include: white joint compound, mastic, HVAC gasket, pipe wrap, panels, and linoleum flooring. (H2, 2018)

In California, lead and asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services (DHS). Also, the California Occupational Health and Safety Administration (CalOSHA) has regulations to protect worker safety during potential exposure to lead and asbestos under Title 8 of the California Code of Regulations (Section 1529, Asbestos, and Section 1532.1, Lead). Demolition that could result in the release of asbestos and lead must be conducted according to CalOSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials. Young children, the elderly, and people in poor health may be more susceptible to adverse health effects from exposure to asbestos released to the environment.

PCBs and Universal Wastes

PCBs are a class of organic compounds known as chlorinated hydrocarbons and were widely used for many applications, especially as dielectric fluids in transformers and capacitors and coolants from the 1920s to the 1970s. PCBs were also used as plasticizers and additives in lubricating and cutting fluids. Due to PCBs' toxicity and classification as persistent organic pollutants, the United States Congress banned PCB production in 1976. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices (PCBs were used as a coolant in electrical equipment); PCB capacitors; and old microscope and hydraulic oils. PCBs are no longer commercially made in the United States, but many electric transformers and capacitors once filled with PCBs are still in service. Structures on site appear to contain fluorescent light ballasts, which may contain PCBs. Southern California Edison (SCE) operates a substation on-site and SCE reported to Kimberly-Clark that the substation does not

contain PCBs; no staining was observed during the survey conducted as part of the Phase I ESA. Further, no surface staining or evidence of a release of PCBs was observed on the ground below the pole-mounted electrical transformers located in the north-central portion of the site near the north entrance along Kimberly Avenue. (Stantec, 2019a)

Universal and electronic wastes consist of items such as fluorescent light tubes, mercury ampoules in pneumatic controls, switchboards, gauges, batteries, and thermostats; electronic waste (e.g., cathode ray tube [CRT] devices such as televisions and computer monitors). Fluorescent light ballasts, mercury switches and other common building components were observed in existing Kimberly-Clark buildings (Stantec, 2019a).

Vapor Encroachment

A qualitative vapor encroachment evaluation was conducted as part of the Phase I ESA based on evidence of use and documented presence of VOCs from both potential on-site and/or off-site sources, including the Orange County Groundwater Basin (North Basin) beneath the site, which is impacted with various VOCs (see discussion below). Operations at the Kimberly-Clark site used chemicals of concern for the Orange County North Basin. While there is currently little evidence that the Kimberly-Clark facility is a significant source to the regional plume, potential releases may affect the potential for vapor encroachment to on-site structures (Stantec, 2019a).

C. Potential Expansion Site - 2301 E. Orangethorpe Avenue

The potential expansion site was formerly occupied by the Chapman Coast Roofing Company located at 2301 E. Orangethorpe Avenue, and the Phase I ESA concludes that this use contributed or may have contributed VOCs and other contaminants to soil, groundwater, and soil vapor in the local area. The potential expansion site contained two generations of USTs. Based on the Project's Phase I ESA, no documentation regarding soil contamination sampling or regulatory-driven environmental investigations were performed following the removal of the USTs. (Stantec, 2019a) Given the age of the existing buildings it is also anticipated that ACMs and LBP are present in the building materials.

D. Groundwater

The Project site is within the Orange County Groundwater Basin. As identified by OCWD in its NOP comment letter, the Project site is located within the North Basin Groundwater Protection Project (NBGPP) plume protection boundary. The groundwater beneath the Project site is impacted with various VOCs, including chlorinated solvents, at concentrations more than the allowable maximum contaminant levels (MCLs). From the early-1960s through the mid-1980s, manufacturing facilities, auto shops, dry cleaners, metal-plating, and circuit board manufacturers, and other businesses used VOCs for removing oil and grease from metal parts or as part of their process. Spills and leaks of these cleaning solutions traveled through approximately 100 feet of soil and into the groundwater. (EPA, 2020)

In 2014 and 2015 OCWD and State agencies requested the United States Environmental Protection Agency (U.S. EPA) assist in the cleanup of groundwater contamination within the

portion of the basin that underlies the City of Fullerton (including the Project site), Anaheim, and Placentia (designated as the "North Basin"). According to the U.S. EPA, the North Basin was proposed to be listed on the National Priorities List (NPL) on January 18, 2018; as of February 5, 2020, the Orange County North Basin has not been officially listed. (EPA, 2020; Stantec, 2019a).

OCWD has installed and sampled groundwater monitoring wells and collected other data to help determine the nature and extent of contamination and to provide EPA with information needed to develop an initial cleanup plan. Two of these wells are installed immediately north of the Project site along Kimberly Avenue. According to OCWD's January 2020 North and South Basin Groundwater Cleanup Update, the OCWD's draft remedial investigation (RI) was scheduled to be reviewed by regulatory agencies by the end of February 2020. Additionally, OCWD began the feasibility study (FS) for an interim remedy, which includes identifying and screening remedial technologies as well as developing, screening, and evaluating cost-effective alternatives to remediate the groundwater contamination. Moreover, the North Basin site is anticipated to be listed, by the U.S. EPA, on the National Priorities List (NPL or Superfund) in Spring 2020. (OCWD, 2020)

Due to the potential for VOC-related vapor encroachment to occur at the Project site, Stantec conducted an analysis of potential soil vapor that could affect future uses on site. Based on the results of the analysis, Tetrachloroethene (PCE) was reported in soil vapor samples analyzed from borings SV-3 and SV-12 at concentrations ranging from 20J[2] micrograms per cubic meter (ug/m^3) up to 30 ug/m^3. The reported concentrations are well below the DTSC Human and Ecological Risk Office (HERO) Note 3 commercial modified indoor air screening level (MIASL) of 66.7 ug/m^3 based on an attenuation factor of 0.03. No other VOCs were reported above the method detection limit (MDL) in any other analyzed soil samples. (Stantec, 2019b)

E. Adjacent Land Uses

The Project site is surrounded by a mix of industrial and commercial land uses and is bounded to the north by Kimberly Avenue and the BNSF railroad tracks; State College Boulevard, tire shops, electronic stores, an ARCO, upholstery shop, and an HVAC contractor to the east; E. Orangethorpe Avenue and a roofing company to the south; and Acacia Avenue to the west. According to the Project's Phase I ESA, in addition to the potential expansion site, discussed above, the following off-site facilities have or may have contributed VOCs and other contaminants to the soil, groundwater, and soil vapor that may potentially impact the Project site. These facilities include the following: (Stantec, 2019a)

- Trent Tube Division at 2100 E. Orangethorpe Avenue
- Orange County Metal Processing at 1711 E. Kimberly Avenue
- PCA Metal Finishing, Inc. at 1723 E. Kimberly Avenue

[2] "J" indicates the reported value is an estimated concentration above the method detection limit (MDL) and below the laboratory reporting limit (RL).

- Khyber Food, Inc. at 181 E. Rosslynn Avenue
- Alcoa Global Fasteners, Inc. at 800 S. State College Boulevard
- Winonics, Inc. at 1257 S. State College Boulevard
- Vista Paint at 2020 E. Orangethorpe Avenue
- St Hart Container MMP Fullerton, 1901 E. Rosslyn Avenue
- Golden West Towing Equipment, 1850 E. Orangethorpe Avenue

PCA Metal Finishing, Inc. is listed on the DTSC's EnviroStor Database as being a State Response/NPL Site. Other commercial/industrial facilities located up, cross, and downgradient of the Project site are also listed as State Response/NPL Sites or as tiered permit facilities that use chlorinated solvents. These sites have the potential to contribute to vapor encroachment condition (pVEC) at the Project site; however, as noted above, no VOC-related vapor in excess of the MDL were detected at the Project site. (Stantec, 2019a)

4.7.2 EXISTING REGULATORY SETTING

Section 5.9, Hazards and Hazardous Materials, of The Fullerton Plan EIR, provides a summary of relevant federal, State, and local regulations related to hazard mitigation and planning and the use of hazardous materials. Following is a discussion of regulations relevant to the Project.

A. Federal

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act administered by the U.S. Department of Transportation governs the transport of hazardous materials. The California Department of Transportation (Caltrans) implements the federal regulations published as Title 49 of the *Code of Federal Regulations* (CFR), which is also known as the Hazardous Materials Transportation Act. The main purpose of this Act is to provide adequate protection against risks to life and property inherent in the transport of hazardous materials by improving the regulatory and enforcement authority of the Secretary of Transportation.

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

Occupational and Safety Health Act

Congress passed the Occupational and Safety Health Act to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for the Occupational Safety and Health Administration (OSHA). OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states.

Resource Conservation and Recovery Act

The RCRA serves as the basis for the proper management of hazardous and non-hazardous solid wastes. The RCRA amended the Solid Waste Disposal Act of 1965 and is implemented through the following programs:

- The Solid Waste Program encourages States to develop comprehensive plans to manage non-hazardous industrial solid wastes and municipal solid wastes; sets criteria for municipal solid waste landfills and other solid waste disposal facilities; and prohibits the open dumping of solid wastes.
- The Hazardous Waste Program establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal, in effect from “cradle to grave.”
- The Underground Storage Tank Program regulates USTs containing hazardous substances and petroleum products.

In November 1984, the RCRA was amended with the passing of the Federal Hazardous and Solid Waste Amendments (HSWA) to phase out the land disposal of hazardous wastes; to increase the USEPA’s enforcement authority; to set more stringent hazardous waste management standards; and to develop a comprehensive UST program. The RCRA has been further amended by the Federal Facility Compliance Act of 1992 (which strengthened the enforcement of RCRA at federal facilities) and the Land Disposal Program Flexibility Act of 1996 (which provided regulatory flexibility for land disposal of certain wastes).

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and lead-based paint. Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture

- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons.

B. State

Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) merged the Federal Accidental Release Prevention Program and California Risk Management and Prevention Program to eliminate the need for two separate programs addressing the prevention of accidental releases of regulated toxic and flammable substances. Businesses using regulated substances exceeding a threshold quantity are evaluated under this program to determine the potential for and impacts of accidental releases. Depending on the potential hazards, business owners may be required to develop and submit a risk management plan.

Cal/OSHA and the California State Plan

Since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace.

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the State, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the State authorized to adopt, amend, or repeal occupational safety and health standards or orders. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries, or illnesses.

Cal/OSHA has regulations to protect worker safety during potential exposure to lead and asbestos under Title 8 of the California Code of Regulations (Section 1529, Asbestos and Section 1532.1, Lead). Demolition that could result in the release of asbestos and lead must be conducted according to Cal/OSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials.

California Hazardous Waste Control Act

The responsibility for implementing the RCRA was given to CalEPA's DTSC in August 1992. The DTSC is also responsible for implementing and enforcing California's own hazardous waste laws, which are known collectively as the Hazardous Waste Control Act (HWCA). Although similar to the RCRA, the HWCA and its associated regulations define hazardous waste more broadly and so regulate a larger number of chemicals. Hazardous wastes regulated by California but not by the USEPA are called "non-RCRA hazardous wastes."

The HWCA, as contained in Section 25100 et seq. of the *California Health and Safety Code,* authorizes the DTSC and Certified Unified Program Agencies (CUPAs) to regulate facilities that generate or treat hazardous wastes. The HWCA authorizes the DTSC and CUPAs to perform the following actions:

- Conduct inspections of any factory, plant, construction site, waste disposal site, transfer station, establishment, or any other place or environment where hazardous wastes are stored, handled, processed, disposed of, or being treated to recover resources.
- Maintain records for compliance with the HWCA.
- Require hazardous waste generators to pay inspection and administration fees to cover the costs of administering the provisions in the HWCA. Fees may include, but shall not be limited to, the costs of inspection, document development and processing, record keeping, enforcement activities, and informational materials development and distribution.
- Issue authorization for on-site treatment of hazardous wastes to persons eligible to operate pursuant to permit-by-rule, conditional authorization, or conditional exemption.
- Enforce against violations of the HWCA.

California Code of Regulations, Titles 5, 17, 22, and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements related to hazardous materials and hazardous waste. Title 5 contains the California Plumbing Code which, in Appendix H, establishes detailed standards for the capping, removal, fill, and disposal of cesspools, septic tanks, and seepage pits (see H 1101.0). CCR Title 17, Division 1, Chapter 8, defines and regulates handling and disposal of lead-based paint. Any detectable amount of lead is regulated.

Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the EPA, the integration of State and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22.”

California’s Universal Waste Rule (CCR Title 22, Section 66273 et. seq.) allows individuals and businesses to transport, handle, and recycle seven categories of hazardous wastes (called universal wastes) in a manner that differs from the requirements for most hazardous wastes. Universal wastes include, but are not limited to, televisions; computers and other electronic devices; and batteries, fluorescent lamps, mercury thermostats, and other mercury-containing equipment. The more relaxed and simplified requirements for managing universal wastes were adopted to ensure they are safely managed and not disposed of in the trash

Transportation of hazardous materials/wastes is regulated by Title 26 of the CCR. The California Highway Patrol (CHP) and Caltrans enforce federal and State regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary between federal, State, and local governmental authorities and private persons through a State mandated Emergency Response Plan.

Certified Unified Program

In 1993, Senate Bill 1082 set up a program to foster effective partnerships between federal, State, and local agencies through designated CUPAs. The Certified Unified Program consolidated the administrative, permitting, inspection, and enforcement activities of the various environmental and emergency management programs and is implemented at the local level by government agencies certified by the Secretary of CalEPA. The CUPA for the City of Fullerton is the OCHCA, Environmental Health Division (EHD).

The EHD coordinates the regulation of hazardous materials and hazardous wastes in the County. The City Fire Agencies within Orange County and the County Fire Agency have joined in

partnership with the CUPA as Participating Agencies (PAs). In Fullerton, the EHD administers the Hazardous Waste and Aboveground Petroleum Storage Tank Programs, while the City of Fullerton Fire Department (FFD) administers the Underground Storage Tank, Hazardous Materials Disclosure, Business Emergency Plan, and California Accidental Release Prevention Programs. The EHD also implements the Hazardous Waste Inspection Program throughout Orange County. This program ensures that all hazardous wastes generated by Orange County businesses are properly handled, recycled, treated, stored, and disposed of in accordance with applicable regulations through inspections, evaluations, and investigations of hazardous materials generation and disposal, including emergency response to hazardous chemical spills and public education programs.

C. Regional and Local

South Coast AQMD Rule 1403

South Coast Air Quality Management District (AQMD) Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. South Coast AQMD Rule 1403 is applicable to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos-containing material, any asbestos storage facility, or any active waste disposal site.

City of Fullerton Municipal Code

The City of Fullerton Municipal Code Section 5.25.010, Hazardous Materials Cleanup, authorizes the City's Fire Chief to clean up or abate the effects of any hazardous substance or waste unlawfully released, discharged, or deposited upon or into any property or facilities within the City. In the event that any person undertakes to clean up or abate the effects of any hazardous substance or waste unlawfully released, discharged, or deposited upon or into any property or facilities within the City, the Fire Chief may take such action as necessary to supervise or verify the adequacy of the cleanup or abatement.

Section 15.40.080, Industrial Environmental Control, of the Fullerton Municipal Code establishes controls to minimize environmental pollution by industrial or other activities. This section identifies that industrial or manufacturing processes that generate smoke, dust, fumes, particulate matter, and specific contaminants are required to comply with the latest rules and regulations of the South Coast AQMD (also refer to Section 4.2, Air Quality, of this EIR). Hazardous materials shall not be emitted into the air or ground that can cause damage to health, animals or vegetation, or other forms of property or that can cause any excessive staining beyond the property line of the lot on which the use is located. Permits for the storage of hazardous materials are required from the Fullerton Fire Department (FFD).

City of Fullerton Draft Local Hazard Mitigation Plan

The City of Fullerton's Local Hazard Mitigation Plan (LHMP), adopted in May 2020, is Appendix I of The Fullerton Plan, and provides a comprehensive assessment of the threats that Fullerton faces from natural and human-caused hazard events, and provides a coordinated strategy to reduce these threats. Among other issues, the LHMP addresses fire hazards (urban and wildland). The LHMP includes a hazard mitigation strategy, which identifies specific policy recommendations for Fullerton to carry out over the next five years. These recommendations will help reduce the threat faced from hazard events. Figure 3-4, Fire Hazard Zones, of the LHMP, identifies that the Project site is not within or near a fire hazard zone. (Fullerton, 2020)

4.7.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact related to hazards and hazardous materials if it would:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

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;

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1-quarter-mile of an existing or proposed school;

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;

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 or excessive noise for people residing or working in the project area;

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

4.7.4 ENVIRONMENTAL IMPACTS

A. <u>Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report</u>

The Fullerton Plan EIR includes Mitigation Measures (MMs) that are relevant to hazards and hazardous materials and are applicable to any new development throughout the City, including on the Project site. MM HAZ-1 calls for a Phase 1 ESA to be completed; as previously discussed, this requirement has been completed with preparation of a Phase 1 ESA and Phase II ESA for

the Project site. MM HAZ-3 requires that the presence or absence of ACMs and LBP be determined; this investigation has also been completed, as discussed above. Because the required analysis has been completed, MM HAZ-1 and MM HAZ-2 are not listed below and will not be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

The following MMs from The Fullerton Plan EIR, are applicable to the Project's construction activities and have not been completed; therefore, they will be included in the MMRP for the Project.

MM HAZ-2 Prior to potential remedial excavation and grading activities, impacted areas shall be cleared of all maintenance equipment and materials (e.g., solvents, grease, waste oil), construction materials, miscellaneous stockpiled debris (e.g., scrap metal, pallets, storage bins, construction parts), above-ground storage tanks, surface trash, piping, excess vegetation, and other deleterious materials. These materials shall be removed off-site and properly disposed of at an approved disposal facility. Once removed, a visual inspection of the areas beneath the removed materials shall be performed. Any stained soils observed underneath the removed materials shall be sampled. In the event concentrations of materials are detected above regulatory cleanup levels during demolition or construction activities, the Project Applicant shall comply with the following measures in accordance with Federal, State, and local requirements:

- Excavation and disposal at a permitted, off-site facility;
- On-site remediation, if necessary; or
- Other measures as deemed appropriate by the City of Fullerton Fire Department.

MM HAZ-5 Prior to construction, future developers shall prepare a Traffic Control Plan for implementation during the construction phase, as deemed necessary by the City Traffic Engineer. The Plan may include the following provisions, among others:

- At least one unobstructed lane shall be maintained in both directions on surrounding roadways.
- At any time only a single lane is available, the developed shall provide a temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls to allow travel in both directions.
- If construction activities require the complete closure of a roadway segment, the developer shall provide appropriate signage indicating detours/alternative routes.

B. Impact Analysis

Threshold a:	***Would the Project create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?***
Threshold b:	***Would the Project 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?***

Implementation of the Project would involve the demolition and removal of existing structures and associated improvements from the Project site and would result in the construction and long-term operation of four high cube warehouse buildings on the Project site. Were any hazards or hazardous materials to be present on the Project site or any hazardous materials transported to/from, used, or stored on the Project site during construction or long-term operation, the Project would have the potential to expose workers on-site, the public, and/or the environment to a substantial hazard, as discussed below.

Construction-Related Hazards

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, DTSC, and the Santa Ana RWQCB.

Handling and transport of contaminated or otherwise hazardous materials can result in potential accidental exposure of the public or construction workers. Therefore, the transportation of hazardous materials is strictly managed pursuant to the Hazardous Materials Transportation Act administered by the U.S. Department of Transportation, and implemented in California by Caltrans. If contaminated materials are removed from the site during construction, the contractor would be required to use only Licensed Hazardous Waste Haulers who operate in compliance with all applicable regulations. With mandatory compliance with applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. A less than significant impact would occur.

Additionally, construction activities would be completed in compliance with applicable regulatory requirements, including the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity (Construction General Permit). As required, best management practices (BMPs) identified in the Project's Storm Water Pollution Prevention Plan (SWPPP) to control potential construction-related pollutants would be implemented, as further discussed in Section 4.9, Hydrology and Water Quality, of this EIR.

Contaminated Soil

As identified in the Phase II ESA, the results of the completed investigations for identified RECs did not report the presence of constituents of potential concern (COPCs) above regulatory screening levels at the locations tested. Based on these results, the RECs subject to the Phase II ESA investigation would not create a significant hazard to the public, resulting in a less than significant impact.

However, as previously identified, USTs that were formerly present at the Project site were removed in 1986 with regulatory agency oversight. Contaminated soils associated with releases from two USTs near Building 4 were removed to the extent feasible during multiple excavations that took place in 1986, 1992, and 2002. Soil borings were drilled to the north and south of Building 4 to evaluate the limits of residual impacts beneath the building. The results of the analyzed samples did not report the presence of any COPCs, suggesting that the residual impacts are limited to areas beneath the footprint of Building 4, where additional investigations could not be completed because of the existing building. Additionally, the actual location of the four USTs also removed in 1986 is unknown and there are no records of the soil sampling that was conducted. (Stantec, 2019b) Therefore, there is a potential for construction workers to be exposed to soil contaminants remaining under Building 4, and in other areas within the Kimberly-Clark site where unknown contamination may be present. Additionally, there is a potential for contaminated soils to occur on the potential expansion site, and if developed as part of the Project, there is a potential for health hazards to construction workers from exposure to unknown contamination that may be present. This is a potentially significant impact.

The Fullerton Plan EIR MM HAZ-2 includes measures to be implemented during construction if any stained soils are observed. In addition, in light of the above outstanding UST issues, and given the potential for unknown areas of impact associated with historical industrial site operations, the Phase II ESA recommends a Soil Management Plan (SMP) be developed. Therefore, MM 7-1 requires that a SMP be prepared to address the requirements for any soil disturbance activities on the site, including, but not limited to, preparation of a Health and Safety Plan for the construction crew, dust monitoring, vapor monitoring, and worker training. Thus, during demolition or construction activities, any discovered stained, discolored, and/or odorous soils would have to be sampled and, in the event concentrations of hazardous materials are detected above regulatory cleanup levels, the Project Applicant would be required to remove, handle, stockpile, and/or dispose of the impacted soils in accordance with applicable requirements, with oversight by the appropriate regulatory agency. Further, the Fullerton Plan EIR MM AQ-1 (discussed in Section 4.2, Air Quality, of this EIR) also requires the implementation of

dust control measures in accordance with South Coast AQMD Rule 403 and 402, which would effectively reduce health hazards to construction workers from dust emissions. With implementation of The Fullerton Plan EIR MM HAZ-2 and MM AQ-1, and Project-specific MM 7-1, the potential hazard to construction workers would be reduced to a less than significant level.

Building Materials

Based on the Project-specific studies, ACMs and LBPs are present within the existing Kimberly-Clark structures (H2, 2018). Further, it is likely that ACMs and LBPs are also present in the existing buildings that occupy the potential expansion site as these building were also constructed in the 1950s. Demolition of the buildings and building materials containing ACMs and/or LBP can expose construction personnel to ACMs and lead released into the air unless proper precautions are taken to minimize exposure. Activities that involve cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities where these materials are present could release friable asbestos fibers or lead dust and expose construction personnel unless proper precautions are taken. Because exposure to such materials can result in adverse health effects in uncontrolled situations, several regulations pertaining to abatement, handling, and disposal of ACMs/asbestos-containing construction materials and lead have been developed and would apply to the Project's demolition phase. Notably, to reduce asbestos-related health risks, demolition activities are required to be conducted in accordance with the remediation and mitigation procedures established by federal, State, and local standards including, but not limited to OSHA and CalOSHA, and South Coast AQMD regulations for the excavation, removal, and proper disposal of the asbestos containing materials (Rule 1403).

Any damaged ACM would be removed, repaired, encapsulated, or enclosed. The EPA recommends that ACM be removed prior to any demolition or renovation activities that may impact the material. Removal of materials reported to contain detectable amounts of asbestos would be performed by a licensed asbestos abatement contractor prior to demolition activities. In addition, asbestos-containing waste would be disposed of by a licensed asbestos abatement contractor and manifested as hazardous waste. Dry sawing, sanding, and drilling of ACM would be avoided to minimize airborne asbestos exposure.

With respect to LBP, workers would comply with the requirements of Title 8 of the California Code of Regulations 1532.1, which provides exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. LBP debris and other waste shall be managed and disposed of in accordance with the applicable provision of the *California Health and Safety Code.*

As previously identified, existing on-site structures contain fluorescent light ballasts, that have the potential to contain PCBs. Additionally, universal wastes on-site include fluorescent light ballasts, mercury switches and other common building components. During demolition activities, the contractor would dismantle fluorescent light fixtures by removing the tubes and then the ballasts and packaging them for recycling and disposal, regardless of the ballast labeling (i.e., whether or not PCBs are known to be present). The recommended disposal method for ballasts is recycling/incarceration, whereby the PCB-containing components are removed and incinerated

and the metal carcasses are cleaned to be sent to a metal recycler. The contractor would be required to manage all universal wastes identified in the buildings in compliance with the California Universal Waste Rule, discussed previously.

Compliance with federal and State health and safety laws and regulations would ensure a less-than-significant impact associated with the potential release of hazardous building materials during construction and demolition activities.

Contaminated Groundwater

The Project's excavation activities would not reach groundwater level depths, which are estimated to occur approximately 80 to 120 feet below the ground surface (bgs). Previous water level readings in 2010 at the monitoring well on-site (City of Fullerton Kimberly Well No. 2), indicate a high ground water level of approximately 88-feet bgs (SCG, 2020). Further, per OCWD requirements, the Project would not use infiltration as a method of water quality treatment (for storm water runoff). As such, Project construction activities would not cause or exacerbate impacts associated with groundwater contamination beneath the Project site, and no impact would occur.

As previously discussed, VOCs impacted the groundwater beneath the Project site. The contaminated groundwater has resulted in soil vapor. According to the Project's Phase II ESA, the soil vapor analytical test results indicated PCE in the soil vapor sampling borings SV-3 and SV-12 at concentrations well below the DTSC Human and Ecological Risk Office (HERO) Note 3 commercial modified indoor air screening level. Additionally, no other VOCs were reported above laboratory MDLs in any other analyzed samples. (Stantec, 2019b) As such, soil vapor concentration levels due to groundwater contamination would be less than significant and would not pose a hazard to construction workers or future occupants of the proposed buildings at the Project site. Vapor barriers are not required.

Operational-Related Impacts

Exposure of people or the environment to hazardous materials during operation may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individuals or environment affected.

Operation of the proposed warehouses would involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). In addition, there is the potential for routine use, storage, or transport of other hazardous materials associated with industrial activities; however, the precise materials are not known, as the tenants of the proposed warehouses are not yet defined. In the event that hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the building sites. Manufacturing and other chemical processing would not occur within the proposed warehouse uses.

Federal and State Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals that may be used by businesses on the Project site. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the Project site and that handles/stores substantial quantities hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would require a permit from the appropriate regulatory agency (e.g., the Fullerton Fire Department) in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting of any release or threatened release of a hazardous material, regardless of the amount handled by the business, and prepare a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material.

A number of existing regulations ensure that hazardous materials/waste users, generators, and transporters provide operational safety and emergency response measures so that no significant threats to public health and safety are created. These include the Hazardous Material Transportation Act, the RCRA, the California Hazardous Waste Control Act, and the California Accidental Release Prevention Program, as previously discussed in Section 4.7.2, above.

With mandatory regulatory compliance, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Based on the foregoing information, potential hazardous materials impacts associated with construction and operation of the Project would be less than significant and no mitigation is required.

Level of Significance Before Mitigation

Construction of the Project would potentially involve exposure of the public to hazardous materials associated with potential RECs (including residual contaminated soils), ACMs, LBP, and universal wastes. Construction and operation of the Project would also involve handling of hazardous materials in limited quantities and typical to urban environments. Through compliance with existing regulations applicable to the Project, implementation of The Fullerton Plan EIR MM HAZ-2, and Project-level MM 7-1, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Impacts would be less than significant with mitigation.

Project-level Mitigation Measures

MM 7-1 Prior to the issuance of a grading permit, a Soil Management Plan (SMP) shall be developed and submitted to the City of Fullerton. The SMP shall be implemented under applicable requirements of the regulatory oversight agency to ensure worker protection during construction activities that might encounter and disturb impacted soil (e.g., excavation, backfilling, and grading activities). The SMP shall include guidelines for managing soil suspected to be impacted and shall also set forth

appropriate response actions in the event that previously unknown impacted soils are encountered, including at the potential expansion site (2301 E. Orangethorpe Avenue). The following items shall be addressed in the SMP:

- Site-Specific Health and Safety for Construction Personnel
- Working Training
- Field Screening
- Air Monitoring
- Impacted Soil Excavation and Segregation
- Confirmation Sampling
- Stockpile Management and Sampling
- Impacted Soil Disposal
- Backfill
- Import Soil Sampling and Tracking

In accordance with the SMP, if potentially contaminated soils are identified during soil-disturbing activities on site, the soil shall be analyzed for the presence of contamination. If the results of the testing show that chemical levels exceed potential risk criteria for commercial/industrial land use, the soil management procedures in the SMP shall be followed for the removal, handling, stockpiling, and disposal of the impacted soils in accordance with applicable requirements, with oversight by the regulatory oversight agency.

Level of Significance After Mitigation

Project impacts would be less than significant after mitigation.

Threshold c:	***Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

According to Exhibit 24, *Educational Institutions*, in Chapter 14, Education, of The Fullerton Plan, the Project site is not located within 0.25 mile of an existing or proposed school. The nearest school to the Project site is Commonwealth Elementary School located approximately 0.4 mile north at 2200 East Commonwealth Avenue. This school is not along a designated truck route that would be used by the Project. Further, the Project would be required to comply with federal, State, and local regulations related to the transport of hazardous substances or materials to- and from-the Project site during construction and long-term operation. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. No impacts would occur.

Level of Significance Before Mitigation

The Project site is not within 0.25 mile of an existing or proposed school. The Project would not have the potential to emit hazardous emission or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Therefore, no impacts would occur.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold d:	***Would the Project 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?***

As identified in the Phase I ESA, the potential expansion site (2301 E. Orangethorpe Avenue), is not identified on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. However, the Kimberly-Clark facility is included on the list of hazardous material sites due to the previous LUST. Although the case was closed in 1992, as identified under the discussion of Thresholds a and b, there is a potential for residual contaminated soil from the LUST to be present beneath the footprint of Building 4, resulting in a potentially significant impact. With incorporation of The Fullerton Plan EIR MM HAZ-2 and Project-specific MM 7-1, potential hazards to the public and the environment would be reduced to a less than significant level.

Level of Significance Before Mitigation

The Kimberly-Clark facility is on a hazardous materials site and the potential presence of residual contaminated soil from a LUST is a potentially significant impact.

Project-level Mitigation Measures

Refer to The Fullerton Plan EIR MM HAZ-2 and Project-specific MM 7-1, above.

Level of Significance After Mitigation

The impact would be less than significant.

Threshold 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 or excessive noise for people residing or working in the Project area?***

The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport to the Project site is the Fullerton Municipal Airport located approximately 4.4 miles to the west-northwest. Additionally, as shown in Exhibit 18, *Part 77 Airspace Plan*, in Chapter 10, Public Safety, of The Fullerton Plan, the Project site is not within the airspace for the Fullerton Municipal Airport. Therefore, implementation of the Project would not result in a safety hazard or excessive noise related to airport operations for people residing or working in the Project area. No impacts would occur.

Level of Significance Before Mitigation

The Project site is not within an airport land use plan and is not within two miles of a public airport or public use airport. Therefore, no impacts would occur.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold f:	***Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

The Project site does not contain any emergency facilities; the nearest emergency facility to the Project site is Fullerton Fire Station 3 located approximately 400 feet to the north at 700 S. Acacia Avenue. The City of Fullerton adopted its current Emergency Operations Plan (EOP) in 2019. The EOP is intended to guide the City's planned response to extraordinary emergencies, associated with natural disasters, terrorism, technological incidents, and nuclear defense operations. The City's EOP anticipates that major streets within the City would serve as evacuation routes, and City highways and arterial streets that connect to SR-91 and SR-57 would serve as potential evacuation routes in the event of an extraordinary emergency. With respect to the Project this includes State College Boulevard, which intersects with SR-91 south of the Project site, and E. Orangethorpe Avenue, which intersects with SR-57 east of the Project site.

The Project Applicant proposes to redevelop the Project site with four warehouse buildings. Access to the Project site during construction would primarily be provided via the existing driveways along Acacia Avenue and Kimberly Avenue. There would be temporary and limited partial lane closures to accommodate utility system connections, undergrounding of existing

utilities along E. Orangethorpe Avenue, construction of driveways, and construction of site-adjacent roadway improvements. The lane closures would be temporary and would not block all travel lanes. Additionally, the Project would implement The Fullerton Plan EIR mitigation measure MM HAZ-5, which requires a Traffic Control Plan to be prepared and implemented during the Project's construction phase. The Traffic Control Plan requirement outlined in MM HAZ-5 is similar to the requirement for a Traffic Control Plan in MM AQ-6 in Section 4.2, Air Quality, of this EIR. Further, the requirements in MM HAZ-5 and MM AQ-6 have been consolidated in a comprehensive Project-specific Traffic Control Plan measure (MM 11-1) included in Section 4.11, Transportation, of this EIR. The Project-specific Traffic Control Plan(s) would ensure that at least one unobstructed lane is maintained in both directions and that temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls be implemented, if needed.

During operation, access to the Project site would be provided via new driveways along Kimberly Avenue, State College Boulevard, and E. Orangethorpe Avenue. The internal roads and driveways would be required to meet the City of Fullerton's width and turnaround requirements to ensure adequate fire and emergency access. Additionally, the required right-of-way widths for site-adjacent roadways would be maintained. The Project does not include any features that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan and impacts would be less than significant.

Level of Significance Before Mitigation

During the Project's construction, there would be temporary and limited partial lane closures during construction. The Project would implement The Fullerton Plan EIR Mitigation Measure MM-HAZ-5, which requires preparation of a Traffic Control Plan, to ensure the Project's construction-related impacts would not interfere with the flow of traffic. The Project does not include any features that would impair or physically interfere with the implementation of an emergency response or emergency evacuation plan. Impacts would be less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold g:	***Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

According to Exhibit 28, *Wildfire Risks*, in Chapter 20, Natural Hazards, of The Fullerton Plan (Figure 3-4, Fire Hazard Zones, of the Local Hazard Mitigation Plan), the Project site is not within a wildfire risk area (Fullerton, 2012a). The Project site is in the southeast portion of the City that is characterized as urban and industrial development. This portion of the City is devoid of any wildlands. Additionally, according to the California Department of Forestry and Fire Protection

(CalFire), the Project site is not within a very high fire hazard severity zone (VHFHSZ) (CalFire, 2011). Implementation of the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impacts would occur.

Level of Significance Before Mitigation

The Project site is within an urbanized area of the City that is devoid of any wildlands. Additionally, according to CalFire and the City, the Project site is not within a VHFHSZ. Therefore, no impacts would occur.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

4.7.5 CUMULATIVE IMPACTS

Section 5.9.6, Cumulative Impacts (Hazards and Hazardous Materials) concludes that new non-residential development in the City may consist of additional facilities that use, store, produce or transport hazardous wastes. However, projects resulting from buildout of The Fullerton Plan and regional projects would be required to evaluate their respective public health and safety impacts on a project-by-project basis. Development occurring within the region would be required to comply with the Federal, State, and local regulatory framework regarding the use, disposal, and transport of hazardous materials. The additional contribution of development pursuant to The Fullerton Plan would be less than significant regarding public health and safety impacts at a cumulative level. Thus, The Fullerton Plan EIR concludes that implementation of The Fullerton Plan would not result in cumulatively considerable public health or safety impacts with implementation of recommended mitigation measures (Fullerton, 2012b).

The Project Applicant proposes to redevelop the Project site with four warehouse buildings. Construction activities associated with the Project would be conducted in accordance with applicable regulations related to the proper use, storage, and disposal of hazardous substances. Although the Project's impact is less than significant with adherence to applicable regulations and incorporation of mitigation measures (as discussed under Thresholds a and b), the potential for exposure of people to existing on-site hazards (e.g., soil contamination, ACMs, lead materials, PCBs and universal wastes) is site specific and would not result in cumulatively considerable impacts. Additionally, cumulative development project would also be required to comply with applicable regulations related to the use, storage, handling, transport, and disposal of hazardous substances during construction. Accordingly, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials during construction.

As discussed under Thresholds a and b, although the future occupants of the Project's proposed buildings are not presently known, if businesses that use or store hazardous materials occupy the Project site, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, and disposal of hazardous substances. Such uses also would be subject to review and permitting requirements by the City of Fullerton or other oversight agencies, as appropriate. Similarly, cumulative development proposing the construction of uses with the potential for use, storage, or transport of hazardous materials also would be required to comply with applicable federal, state, and local regulations, and such uses would also be subject to review and permitting requirements by the City of Fullerton, City of Anaheim, or other oversight agencies, as appropriate. Accordingly, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials during operation.

The Project site is not located within one-quarter mile of any existing or proposed schools and therefore would not have a cumulatively considerable effect associated with the emission or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school.

While the Kimberly-Clark facility is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, this is a site-specific issue that would not result in cumulative impacts. Further, the listing is associated with a previous LUST, and the case has been closed by the appropriate regulatory authorities. Further, MM 7-1 requires that a SMP be prepared, which would outline actions to be taken in the event contaminated soils are encountered during construction. The Project would not affect any surrounding areas for purposes of being listed on a hazardous materials site, and hazardous materials sites at other locations would not cumulatively impact the public. Therefore, no cumulatively considerable impacts would occur.

The Project site is not within an airport land use plan and is not within two miles of a public airport or public use airport. Thus, the Project would not create a cumulatively considerable impact associated with airport safety.

The Project would not interfere with or impair the implementation of any adopted emergency response plans or emergency evacuation plans. While there are no cumulative projects identified in the vicinity of the Project site, any future development projects in the surrounding area would be subject to review by applicable governing agencies, which would ensure the adequate provision of emergency response. Further, as required by MM HAZ-5 from The Fullerton Plan EIR, preparation of a Traffic Control Plan is required for development projects in the City, including the Project and cumulative development project. Implementation of the Traffic Control Plan would ensure that emergency access is maintained. Thus, the Project would not result in a cumulatively considerable impact related to conflict with adopted emergency response or evacuation plans.
The Project site is not located within or in close proximity to areas identified as being subject to wildland fire hazards and would have no potential to contribute to cumulative wildland fire hazards.

4.7.6 REFERENCES

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4.8 HYDROLOGY AND WATER QUALITY

This section identifies and evaluates the Project's potential to have adverse hydrology/drainage and water quality effects during construction and operation. Information presented in this section is primarily based on the following technical reports. Refer to Section 4.8.6, *References*, of this EIR for a complete list of references.

- *Preliminary Water Quality Management Plan Goodman Logistics Center Fullerton* (Preliminary WQMP), dated June 10, 2020, prepared Tait & Associates, Inc (TAIT), and include in Appendix I1 of this EIR (TAIT, 2020a)
- *Preliminary Hydrology Report Goodman Logistics Center Fullerton* (Hydrology Report), dated July 16, 2020, prepared by TAIT, and included in Appendix I2 of this EIR (TAIT, 2020b)

As required, the Preliminary WQMP is specific to the Kimberly-Clark site, which is currently owned by the Project Applicant; however, the water quality issues and treatment requirements would be the same for the potential expansion site. The Drainage Report addresses development of the Kimberly-Clark-site and the potential expansion site. Therefore, unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

In its response to the Notice of Preparation (NOP), the Orange County Water District indicates that the Project site is located within the North Basin Groundwater Protection Project plume protection boundary. Groundwater in this area has been contaminated with industrial degreasing chemicals referred to as volatile organic compounds (VOCs) and infiltration is not allowed if it will impact groundwater conditions.

The owner of the property at 1201 State College Boulevard, which shares a property line with the Project site (south of proposed Building 4), also provided a response to the NOP and requested that potential drainage impacts associated with implementation of the Project, if any, be addressed. The Project Engineer reviewed the relationship of the drainage conditions for the adjacent property and the Project site. The adjacent site is higher than the Project site with retaining walls, fence, curb, and gutter along the perimeter of the site. The curb and gutter along the north site of the adjacent property convey runoff to State College Boulevard; runoff is not discharged to the Project site. There is also a v-gutter and shallow pipe that discharge remaining flows from this property to State College Boulevard. The Project would not alter the existing drainage conditions for the adjacent property and no further discussion of this issue is required.

4.8.1 EXISTING SETTING

Section 5.8, Hydrology and Water Quality, of The Fullerton Plan Environmental Impact Report (EIR) includes a detailed discussion of the environmental setting for the following hydrology and water quality issues in the City: existing setting, surface water resources, groundwater resources,

and storm drain facilities. The following discussion focuses on information that is particularly relevant to the Project, information that is new or updated since The Fullerton Plan EIR was prepared, or information that is Project-site specific.

A. Regional Watershed

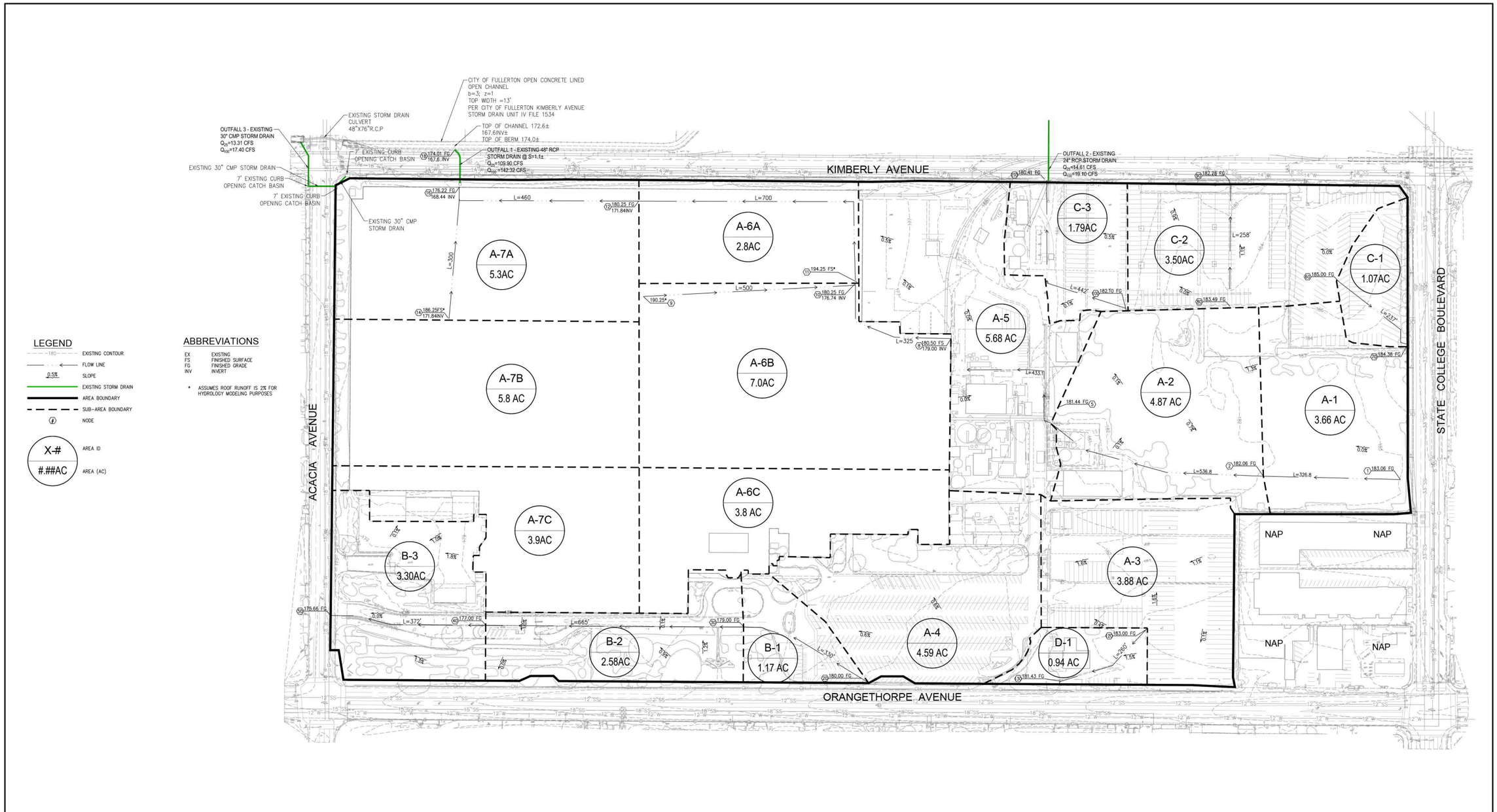
The City of Fullerton, which includes the Project site, is in the San Gabriel River-Coyote Creek Watershed, which is part of the larger San Gabriel River Watershed. The main tributary of this watershed, Coyote Creek, flows from Riverside County and empties into the San Gabriel River just north of Interstate (I)-405. The San Gabriel River ultimately drains into the Pacific Ocean at Alamitos Bay in Seal Beach. Coyote Creek drains a watershed of 165 square miles in Orange and Los Angeles counties, 85.5 square miles of which lie in north Orange County, and include portions of the Cities of Anaheim, Brea, Cypress, Fullerton, La Habra, and La Palma. The receiving waters for runoff from the Project site and their associated 303(d) impairments are discussed in Section 4.8.2, *Existing Regulatory Setting*, below.

B. Project Site and Local Drainage

Under existing conditions, the Project site consists of approximately 76 percent impervious surfaces associated with the existing manufacturing and industrial uses; the remainder of the site includes pervious area consisting of a remnant orange orchard (approximately 10 acres) and landscaping. As show in Figure 4.8-1, *Existing Hydrology Map*, the Project site consists of four drainage management areas (DMAs – A, B, C and D). DMA-A (Outfall 1) comprises most of the site and drains from the southeast to the northwest, ultimately discharging to the public 48-inch reinforced concrete pipe (RCP) storm drain line at Kimberly Avenue/Acacia Avenue intersection. From the Kimberly Avenue/Acacia Avenue storm drain line, stormwater runoff is diverted into two reinforced concrete box (RCB) culvert barrels, which then discharges stormwater runoff into a lined storm drainage pipe managed by the City of Fullerton. Total existing peak flows originating from DMA-A consist of 109.9 cubic feet per second (cfs) for the 25-year storm and 142.32 cfs for the 100-year storm.

DMA-B (Outfall 3) is located at the southwest corner of the site and drains to the west, ultimately discharging to a curb gutter along Acacia Avenue. The curb and gutter flows in a northerly direction to a catch basin at the intersection with Kimberly Avenue. The catch basin is connected to an existing 30-inch corrugated metal pipe (CMP) public storm drain line that conveys runoff to the Kimberly Channel northwest of the project from two catch basins located at the intersection of Acacia Avenue and Kimberly Avenue. Total existing peak flows originating from DMA-B consist of 13.31 cfs for the 25-year storm and 17.4 cfs for the 100-year storm.

DMA-C (Outfall 2) is located at the northeast corner of the site and drains to the north, where runoff sheet flows towards valley gutters to a grated inlet that is connected to a 24-inch storm drain line along Kimberly Avenue. Total existing peak flows originating from DMA-C consist of 14.61 cfs for the 25-year storm and 19.10 cfs for the 100-year storm.



Source(s): TAIT (06-10-2020)

Figure 4.8-1

Not to Scale

Existing Hydrology Map

DMA-D (specifically D-1) includes the potential expansion site and discharges via sheet flow to the curb and gutter along Orangethorpe Avenue, which is tributary to DMA-B, described above.

The existing peak flows originating from DMA-D-1 consist of 3.15 cfs for the 25-year storm and 4.03 cfs for the 100-year storm.

Under existing conditions, the Project site contributes 140.97 cubic feet per second (cfs) for the 25-year storm and 182.85 cfs for the 100-year storm to the existing Kimberly Channel. The Kimberly Channel is a reinforced concrete channel that connects to the Fullerton Creek Channel, which flows to the west. The Fullerton Creek Channel joins the Coyote Creek, as discussed above.

C. Groundwater

The Project site is located within the Lower Santa Ana River Groundwater Basin, also known as the Orange County Groundwater Basin (Basin). As further discussed in Section 4.13, Utilities and Service Systems, of this EIR, the Basin is managed by the Orange County Water District (OCWD) for the benefit of municipal, agricultural, and private groundwater producers. Even with the accumulated overdraft in the Basin, since 2012-2013 the Basin Production Percentage (BPP) has been above the conservative 70 percent used in the 2015 Urban Water Management Plan (UWMP) and seven of the past nine years, including the current and upcoming year, it has been at 75 percent or above (Psomas, 2020).

Free water was not encountered during the drilling of any of the borings for the Project's Geotechnical Investigation. Based on the lack of any water within the borings and the moisture contents of the recovered soil samples, the static groundwater is considered to have existed at a depth of more than 30 feet at the time of the subsurface exploration. The nearest City-owned monitoring well is in the north-central portion of the Kimberly-Clark site. Water level readings within this monitoring well indicated a high groundwater level of 88 feet. (SCG, 2020)

D. Water Quality

Under existing conditions, the Project site has little exposed soils, except for the site's eastern portion that contains a remnant orange orchard, and other landscaped areas throughout the site. Stormwater runoff from the Project site is not subject to water quality treatment required by current regulations.

As identified by OCWD in its NOP comment letter, the Project site is located within the North Basin Groundwater Protection Project (NBGPP) plume protection boundary. The groundwater beneath the Project site is impacted with various VOCs, including chlorinated solvents, at concentrations more than the allowable maximum contaminant levels (MCLs). From the early-1960s through the mid-1980s, manufacturing facilities, auto shops, dry cleaners, metal-plating, and circuit board manufacturers, and other businesses used VOCs for removing oil and grease from metal parts or as part of their process. Spills and leaks of these cleaning solutions traveled through approximately 100 feet of soil and into the groundwater. (EPA, 2020)

In 2014 and 2015 OCWD and State agencies requested the United States Environmental Protection Agency (U.S. EPA) assist in the cleanup of groundwater contamination within the portion of the basin that underlies the City of Fullerton (including the Project site), Anaheim, and Placentia (designated as the "North Basin"). According to the U.S. EPA, the North Basin was proposed to be listed on the National Priorities List (NPL) on January 18, 2018; as of February 5, 2020, the Orange County North Basin has not been officially listed. (EPA, 2020; Stantec, 2019a).

OCWD has installed and sampled groundwater monitoring wells and collected other data to help determine the nature and extent of contamination and to provide EPA with information needed to develop an initial cleanup plan. Two of these wells are installed immediately north of the Project site along Kimberly Avenue. According to OCWD's January 2020 North and South Basin Groundwater Cleanup Update, the OCWD's draft remedial investigation (RI) was scheduled to be reviewed by regulatory agencies by the end of February 2020. Additionally, OCWD began the feasibility study (FS) for an interim remedy, which includes identifying and screening remedial technologies as well as developing, screening, and evaluating cost-effective alternatives to remediate the groundwater contamination. Moreover, the North Basin site is anticipated to be listed, by the U.S. EPA, on the National Priorities List (NPL or Superfund) in Spring 2020. (OCWD, 2020)

4.8.2 Existing Regulatory Setting

Section 5.8 of The Fullerton Plan EIR provides a comprehensive discussion of the regulatory framework for the analysis of hydrology and water quality impacts, as identified below. Following is a discussion of the regulatory framework related to hydrology/drainage that is particularly relevant to the Project and the analysis presented below, including information that is new or has been updated since The Fullerton Plan EIR was prepared.

A. Federal

Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for the industry and has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

B. State

Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and groundwater and both point and nonpoint sources of pollution. The Porter-Cologne Act established nine Regional Water Quality Control Boards (RWQCB) (based on hydrogeologic barriers) and the State Water Resources Control Board (SWRCB), which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of the nine hydrologic regions. Under the Porter-Cologne Act, the SWRCB and the RWQCBs (1) adopt plans and policies for water quality control; (2) regulate discharges to surface water and groundwater; (3) regulate waste disposal sites; and (4) require the cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, and oil or petroleum products.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through the issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. Each RWQCB has adopted a water quality control plan for its region (known as a Basin Plan) to reflect the policies in the Porter-Cologne Act and other State policies for water quality control. The Basin Plan must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State Water Policy. The Basin Plan establishes beneficial uses for surface and groundwater in the region and sets forth narrative and numeric water quality standards to protect those beneficial uses.

The Basin Plans also include water discharge prohibitions applicable to particular conditions, areas, or types of wastes within the region. The RWQCBs implement the plans by (1) enforcing set discharge limitations; (2) preventing violations of the limitations; and (3) conducting investigations to determine the quality of any “waters of the State”. Civil and criminal penalties are imposed on persons who violate the requirements of the Porter-Cologne Act or any SWRCB/RWQCB order. The Project site is in the Santa Ana River Basin, which is within the purview of Santa Ana Regional Water Quality Control Board (RWQCB).[1] Santa Ana’s RWQCB’s *Santa Ana River Basin Water Quality Control Plan* is the governing water quality plan for the region, and is further discussed below.

[1] Although the San Gabriel Creek Watershed, which includes Coyote Creek, is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), the LARWQCB has no jurisdiction over the Orange County portion of the Coyote Creek watershed.

California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills gaps in California's water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability.

C. Regional

National Pollutant Discharge Elimination System Program

As discussed above, the NPDES permit program stems from the federal Clean Water Act. In the State of California, this program is administered by the nine RWQCBs, which have the mandate to develop and enforce water quality objectives and implementation plans within their regions. If discharges from industrial, municipal, and other facilities go directly to surface waters, those project applicants must obtain permits from the applicable RWQCB. An individual NPDES permit is specifically tailored to a facility. A general NPDES permit covers multiple facilities within a specific activity category such as construction activities. As previously identified, the City of Fullerton, including the Project site, is located within the jurisdiction of the Santa Ana RWQCB (Region 8).

Municipal Separate Storm Sewer System Permit

In 2002, the Santa Ana RWQCB issued NPDES Permit Order No. R8-2002-0010 for discharges of urban runoff from public storm drains in northern Orange County. The Permittees are the County of Orange; the Orange County Flood Control District (OCFCD); and the northern Orange

County cities, including the City of Fullerton (collectively "the Co-Permittees"). To implement the requirements of the MS4 Permit, the Co-Permittees developed the 2003 Drainage Area Management Plan (DAMP). The DAMP provides a framework and a process for following the Areawide MS4 Permit requirements and incorporates watershed protection/stormwater quality management principles into the Co-Permittees' General Plan process, the environmental review process, and the development permit approval process. Among others, the DAMP includes a program to ensure that construction sites implement practices that address control of construction-related pollutant discharges, including erosion and sediment control and on-site hazardous materials and waste management. The DAMP also includes a Model WQMP that defines requirements and provides guidance for complying with the Areawide MS4 Permit regulations for project-specific planning, selection, and design of BMPs in a new development or significant redevelopment projects.

A revised Orange County MS4 Permit was adopted on May 22, 2009 (Permit No. CAS618030, Order No. R8 2009-0030). The revised permit included several provisions for new development and redevelopment, including a requirement to revise the DAMP and Model Water Quality Management Plan (WQMP) by May 2010. The MS4 Permit was subsequently reopened and revised for the limited purpose of extending deadlines for the preparation of the WQMP and related documents (Permit Order No. R8-2015-0004).

In compliance with the Areawide MS4 Permit (Order No. R8-2009-0030, as amended), the Co-Permittees prepared and submitted a revised model WQMP, Technical Guidance Document (TGD), and supporting documents (collectively referred to as the "revised documents"), which were approved by the RWQCB on May 19, 2011, and became effective on August 17, 2011. The revised documents have been developed to aid the County of Orange, the OCFCD, and the Co Permittees and project proponents with addressing post-construction urban runoff and stormwater pollution from new development and significant redevelopment projects that qualify as Priority Projects. The revised documents include guidance for the preparation of conceptual or preliminary WQMPs to more effectively ensure that water quality protection, including low impact development (LID) principles, is considered in the earliest phases of a project. The revised documents also incorporate the latest information on Best Management Practices (BMPs) and provide additional clarification regarding their effectiveness and applicability.

The MS4 Permit also requires priority projects to identify Hydrologic Conditions of Concern (HCOCs) associated with a Project. Kimberly Storm Channel Creek, Fullerton Creek Channel, Coyote Creek, and the San Gabriel River are stabilized. Therefore, there are no HCOCs for the Project (TAIT, 2020a).

Stormwater Quality Requirements

The revised Model WQMP requires that each priority development project infiltrate, harvest and reuse, evapotranspire, or biotreat the 85th percentile storm event ("design capture volume"). The Project qualifies as a Priority Project for new development per Section 7.0 of the 2003 DAMP (OC Public Works, 2003). Biotreatment may be considered only if infiltration, harvesting and reuse, and evapotranspiration cannot be feasibly implemented at a project site. Any portion of the design

capture volume that is not infiltrated, harvested and reused, evapotranspired, or biotreated on the project site by LID BMPs must be treated and discharged per specific conditions of the permit. The revised MS4 Permit allows for alternatives and in-lieu programs for LID BMPs. If LID BMPS cannot be implemented to address the full design capture volume, in-lieu programs must be considered. Waivers may be granted only where the cost of BMPs "greatly outweighs" benefits.

Construction General Permit

Pursuant to CWA Section 402(p), which requires regulations for permitting of certain stormwater discharges, the SWRCB issued a statewide general NPDES Permit for stormwater discharges from construction sites[2], herein referred to as the "Construction General Permit". Under the Construction General Permit, stormwater discharges from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or to be covered by the Construction General Permit.

Coverage under the Construction General Permit is accomplished by filing the Permit Registration Documents, which include a Notice of Intent (NOI), Stormwater Pollution Prevention Plan (SWPPP), and other compliance-related documents required by the General Permit. All these documents must be electronically submitted to the SWRCB for General Permit coverage. The primary objectives of the SWPPP are (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site. The SWPPP also outlines the monitoring and sampling program required for the construction site to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

Industrial General Permit

The Industrial General Permit (Order No. 2014-0057 DWQ) became effective on July 1, 2015, and is an NPDES permit regulating discharges of stormwater associated with industrial activities, including those generated by the following:

- Facilities subject to stormwater effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards
- Manufacturing facilities
- Oil and gas/mining facilities
- Landfills and open dumps that receive industrial waste and land application sites
- Hazardous waste treatment, storage, or disposal facilities

[2] NPDES No. CAS000002, Water Quality Order 2009-0009-DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. In accordance with the language set forth in Order No. 2009-0009-DWQ, this permit has been administratively extended indefinitely.

- Recycling facilities
- Steam electric generating facilities
- Transportation facilities
- Sewage or wastewater treatment works

This permit does not cover discharges from construction activities (which are covered under the Construction General Permit) but includes authorized non-stormwater discharges, such as fire hydrant and fire prevention or response system flushing; potable water sources (including potable water related to the operation, maintenance, or testing of potable water systems); drinking fountain water (including atmospheric condensates such as refrigeration, air conditioning, and compressor condensate); irrigation drainage and landscape watering; uncontaminated natural springs; seawater infiltration where the sea waters are discharged back into the seawater source; and incidental windblown mist from cooling towers. Other industrial discharges that are not covered by separate NPDES permits require individual NPDES permits or Waste Discharge Requirements (WDRs); WDRs are discussed below.

To obtain coverage under the Industrial General Permit, the facility operator must submit an NOI for each industrial facility, along with a site-specific SWPPP that identifies BMPs to reduce pollutants in the stormwater per the provisions of the General Industrial Permit. The permit identifies conditional exclusions for certain facilities that may obtain No Exposure Certification (NEC) coverage; requires electronic reporting via the Stormwater Multiple Application and Report Tracking System (SMARTS); sets training qualifications for dischargers; includes requirements for the design storm standards for treatment-control BMPs, and establishes stormwater monitoring and sampling protocols. Also, it requires compliance with NAL; preparation of Exceedance Response Actions when a NAL is exceeded; and monitoring for 303(d) impairments when the facility contributes runoff to the impaired water body. Annual evaluation of the facility and regular monitoring of BMPs are also required and must be submitted/reported to the SWRCB.

On November 6, 2018 the State Water Board amended the Industrial General Permit Order 2014-0057-DWQ (as amended by Order 2015-0122-DWQ) to incorporate the following requirements: (1) federal sufficiently sensitive test method ruling; TMDL implementation requirements; and, Statewide compliance options incentivizing on-site or regional storm water capture and use. The new requirements became effective on July 1, 2020.

Basin Plans

As previously identified, stormwater runoff from the Project site would enter Kimberly Storm Channel Creek, and then flow to Fullerton Creek Channel, and Coyote Creek in Orange County and then the San Gabriel River and ultimately the Pacific Ocean in Los Angeles County. The *Water Quality Control Plan for the Santa Ana River Basin* (Santa Ana Basin Plan), and *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (LARWQCB Basin Plan) identify the beneficial uses and water quality objectives for the Project site's receiving water bodies. Water bodies that do not meet established water quality standards are considered "impaired" under Section 303(d) of the federal Clean Water Act, and responsible RWQCBs are

required to develop Total Maximum Daily Loads (TMDLs) for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (with a "factor of safety"). Once established, the TMDL is allocated among current and future pollutant sources that discharge to the water body. TMDLs must consider and include allocations to both point sources and nonpoint sources of listed pollutants.

The receiving waters for runoff from the Project site and their associated beneficial uses and 303(d) impairments are identified in in Table 4.8-1, *Receiving Water for Urban Runoff from the Project Site*. As shown, Coyote Creek, San Gabriel River Reach 1, and the San Gabriel River Estuary are impaired for a number of pollutants.

The definitions of the beneficial uses applicable to the receiving water bodies identified in Table 4.8-1 are as follows:

- **Commercial and Sport Fishing (COMM):** Uses of water for commercial or recreational collection of fish, shellfish, or other organisms, including, but not limited to, uses involving organisms intended for human consumption or bait purposes.
- **Estuarine Habitat (EST):** Uses of water that support estuarine ecosystems, including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).
- **Industrial Service Supply (IND):** Uses of water for industrial activities that do not depend primarily on water quality, including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well repressurization.

TABLE 4.8-1 RECEIVING WATER FOR URBAN RUNOFF FROM THE PROJECT SITE

Receiving Water	Beneficial Uses[1,2]	303(d) Impairments	Applicable Total Maximum Daily Load (TMDLs)
Kimberly Storm Channel	None	No Impairments	No TMDLs
Fullerton Creek Channel	None	No Impairments	No TMDLs
Coyote Creek	LARWQCB: MUN, IND, PROC, WARM, WILD, RARE SARWQCB: MUN, REC1, REC2, WARM, WILD, RARE	Ammonia, Copper Dissolved, Diazinon, Indicator Bacteria, Lead, Toxicity, pH	Ammonia, Copper Dissolved, Diazinon, Indicator Bacteria, Lead, Toxicity, pH
San Gabriel River Reach 1	MUN, WARM, WILD	Coliform Bacteria, pH	Coliform Bacteria, pH
San Gabriel River Estuary	IND, NAV, COMM, EST, MAR, WILD, RARE, MIGR, SPWN, SHELL	Copper, Dioxin, Nickel, Oxygen, Dissolved	Copper, Dioxin, Nickle, Oxygen, Dissolved

[1] Water Quality Control Plan for the Santa Ana River Basin (SARWCQB, 2019)
[2] Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (LARWQCB, 2019)
Source: (TAIT, 2020a)

- **Marine Habitat (MAR):** Uses of water that support marine ecosystems, including, but not limited to, preservation or enhancement of marine habitats and vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
- **Migration of Aquatic Organisms (MIGR):** Uses of water that support habitats necessary for migration; acclimatization between fresh and salt water; or other temporary activities by aquatic organisms, such as anadromous fish.
- **Municipal and Domestic Supply (MUN):** Uses of water for community, military, or individual water supply systems, including, but not limited to, drinking water supply.
- **Navigation (NAV):** Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.
- **Industrial Process Supply (PROC):** Uses of water for industrial activities that depend primarily on water quality.
- **Rare, Threatened, or Endangered Species (RARE):** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under State or federal law as Rare, Threatened, or Endangered.
- **Water Contact Recreation (REC1):** Uses of water for recreational activities involving body contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.
- **Non-Contact Water Recreation (REC2):** Uses of water for recreational activities involving proximity to water but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Shellfish Harvesting (SHELL):** Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.
- **Spawning, Reproduction, and/or Early Development (SPWN):** Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.
- **Warm Freshwater Habitat (WARM):** Uses of water that support warm water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- **Wildlife Habitat (WILD):** Uses of water that support terrestrial ecosystems, including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

D. City of Fullerton

The Fullerton Plan and Local Hazard Mitigation Plan

The purpose of the Natural Hazards Element of The Fullerton Plan (Chapter 20) is to protect life, prevent human injury and reduce the potential for property damage throughout Fullerton, including from flooding. The City's Local Hazard Mitigation Plan (LHMP) provides a comprehensive assessment of the threats that Fullerton faces from natural and human-caused hazard events and a coordinated strategy to reduce these threats. It identifies resources and information that can help community members, City staff, and local officials understand local threats and make informed decisions. The LHMP can also support increased coordination and collaboration between the City, other public agencies, local employers, service providers, community members, and other key stakeholders.

As shown on Exhibit 29, *Dam Inundation Risk*, of The Fullerton Plan (which is Figure 3-1, *Dam Failure Inundation Zones,* of the City LHMP)) the Project site is in an area that is in the inundation zone for the Carbon Canyon Dam and Prado Dam.

As shown on Exhibit 30, *Flood Risks*, of The Fullerton Plan (which is Figure 3-5, *FEMA Flood Zones*, of the Local Hazard Mitigation Plan), the Project site is not within the 100-year flood zone; it is within the 500-year flood zone.

Municipal Code

In compliance with the NPDES MS4 Permit and the DAMP, the City of Fullerton adopted a Water Quality Ordinance (Chapter 12.18 of the Fullerton Municipal Code [FMC]). This ordinance prohibits illicit connections and discharges to the City's storm drain system and requires all new development and significant redevelopment to prepare a WQMP that identifies long-term BMPs that would be implemented as part of the project. Prior to land use approval; recordation of a subdivision map; or the issuance of a grading permit, building permit, or nonresidential plumbing permit for any new development or significant redevelopment, the City would review the project plans and impose terms, conditions, and requirements on the project in accordance with the Water Quality Ordinance.

Chapter 16.05 (Public Improvements, Dedications, Performance Agreements, and Improvement Securities) of the FMC establishes requirements for the design of public improvements, including drainage improvements. Drainage facilities are required to be provided and installed as necessary to protect the lots, parcels, buildings, or structures from flooding and to prevent excessive flooding of the public streets. The facilities are required to be designed to prevent flooding of the first-floor level, as defined by the Federal Insurance Administration from storm water runoff emanating from a 100-year frequency storm. Public streets are required to be protected from flooding as a result of runoff from a ten-year frequency storm, in accordance with policies and criteria determined by the City Engineer. Protection to higher levels may be required by the City Engineer, dependent on the degree of flood risk involved; the topography, location, and local drainage patterns; and the requirements of the OCFCD. Hydrologic and hydraulic calculations and studies for all such facilities are subject to the review and approval of the City Engineer.

4.8.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact related to hydrology and water quality if a project would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- Result in substantial erosion or siltation on- or off-site;
- Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- 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; or
- Impede or redirect flood flows.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.8.4 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report

The Fullerton Plan EIR includes mitigation measures (MMs) that are relevant to hydrology and water quality. The following MMs identified in The Fullerton Plan EIR are incorporated as part of the Project. These MMs will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

It should be noted that MM HYD-3 requires the completion of drainage studies to address potential Project impacts and identify necessary mitigation. MM HYD-3 has been completed as part of the site plan review process; therefore, MM HYD-3 will not be included in the MMRP for the Project.

MM HYD-1 Prior to issuance of any Grading or Building Permit, and as part of the future development's compliance with the National Pollutant Discharge Elimination System (NPDES) requirements, a Notice of Intent shall be prepared and submitted

to the Santa Ana Regional Water Quality Control Board (RWQCB) providing notification and intent to comply with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Engineering for water quality construction activities on site. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source-control and/or treatment-control Best Management Practices (BMPs) to avoid or mitigate runoff pollutants at the construction site to the "maximum extent practicable." All recommendations in the Plan shall be implemented during area preparation, grading, and construction. The Project Applicant shall comply with each of the recommendations detailed in the study and other such measure(s) as the City deems necessary to mitigate potential stormwater runoff impacts.

MM HYD-2 Prior to issuance of any Grading Permit, future development projects shall prepare, to the satisfaction of the Director of Engineering, a Water Quality Management Plan or Stormwater Mitigation Plan, which includes BMPs, in accordance with the Orange County Drainage Area Management Plan (DAMP). All recommendations in the Plan shall be implemented during the post-construction/operation phase. The Project Applicant shall comply with each of the recommendations detailed in the study and other such measure(s) as the City deems necessary to mitigate potential water quality impacts.

B. Impact Analysis

Threshold a:	***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?***

Construction-Related Water Quality Impacts

Surface Water Quality

Construction of the Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which have the potential to generate sediment/silt, debris, organic waste, chemicals, paints, and other solvents. As such, short-term water quality impacts have the potential to occur during Project construction in the absence of any protective or avoidance measures.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements.

The Project could also result in temporary construction-related impacts to surface water quality from other construction-related activities (e.g., erosion, spills, and leaks due to construction equipment). Spills or leaks from heavy equipment and machinery, construction staging areas, or

building sites can enter the runoff and typically include petroleum products such as fuel, oil and grease, and heavy metals. In addition, pollutants that are also of concern during construction relate to construction materials and non-storm water flows and generally include construction materials (e.g., paint and stucco); chemicals and other liquid products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues. As shown in Table 4.8-1, Coyote Creek is impaired by metals and bacteria, the San Gabriel River Reach 1 is impaired by coliform bacteria and pH, and the San Gabriel Estuary is impaired by copper, dioxin, nickel, and dissolved oxygen. Pollutants of concern from the construction site could impact these downstream water bodies, and would have the potential to contribute to the existing impairments for Coyote Creek, San Gabriel River Reach 1, and the San Gabriel River Estuary.

Without appropriate stormwater management, construction site runoff would enter adjacent storm drain lines and would contribute to pollutants in the stormwater. The CWA establishes a framework for regulating potential water quality impacts from construction activities through the NPDES program. The Fullerton Plan EIR MM HYD-1 is incorporated into the Project and requires compliance with requirements and water quality standards outlined in the Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with different requirements based upon the determined risk level for sediment transport and receiving water risk) and to prepare and implement an SWPPP, which must include erosion-control and sediment control BMPs, wind and water tracking controls, hazardous material management practices, and other site-management BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit. The BMPs that are most often used during construction include watering exposed soils; covering soil stockpiles; stabilizing construction entrances; installing sandbag or gravel bag berms to minimize off-site runoff; creating temporary desilting basins, and timing grading to avoid the rainy season. A Construction Site Monitoring Program that identifies monitoring and sampling requirements implemented by a Qualified SWPPP Practitioner during construction is also a required component of the SWPPP, for applicable projects, including the currently proposed Project.

Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap or filter sediment once it has been mobilized. In addition to erosion- and sediment-control BMPs, the types of BMPs that would be implemented during construction of the Project included, but are not limited to: waste and materials management, non-stormwater management, training and education, inspections, maintenance, and visual monitoring and reporting. The BMPs would be implemented in compliance with the Construction General Permit Risk Level 1 requirements.

The construction-phase BMPs would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides, including legacy pesticides). Also, compliance with Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology (BAT/BCT) requires that BMPs used to control construction water quality impacts are updated over time as new water quality control technologies are developed and become available for use. Therefore, compliance with the BAT/BCT performance standard ensures mitigation of construction water quality impacts over time.

In summary, compliance with the Construction General Permit, including filing an NOI, which includes preparation of an SWPPP (The Fullerton Plan EIR MM HYD-1) by a Qualified SWPPP Developer, would ensure impacts to receiving waters from non-stormwater flows during construction are less than significant.

Groundwater Quality

As identified in OCWD's NOP comment letter, the Project site is within the North Basin Groundwater Protection Project (NBGPP) plume protection boundary. In 2014 and 2015, OCWD requested the U.S. EPA to assist with the clean up the North Basin. The US EPA is in the process of identifying Possible Responsible Parties (PRPs) for groundwater clean-up. At the time this EIR was prepared a RI and FS were not completed. As of January 2020, OCWD drafted a Remedial Investigation (RI) and began a Feasibility Study (FS) for interim remedy (OCWD, 2020). As such groundwater contamination beneath the site will remain above maximum contaminant levels (MCLs) for several years, which would characterize groundwater quality.

As part of the agreement between the US EPA and OCWD, OCWD installed and sampled groundwater monitoring wells; two of the North Basin's groundwater monitoring wells are located immediately north of the Project site along Kimberly Avenue (WM25 and MW26). As of March 2015, groundwater levels at these two monitoring locations were measured to be at 68 feet below ground surface (bgs) at MW25 and 63 feet bgs at MW26 (Stantec, 2019a). An existing City-owned groundwater well is in the north-central portion of the site, and as of June 2010, the on-site groundwater well measured groundwater levels to be at 88 bgs (SCG, 2020).

Construction of the Project may include excavation depths of up to 20-feet below the ground service (bgs) for removal of existing foundations or other related subterranean features, and 10- to 12-feet bgs for the installation of utility infrastructure, including the subsurface detention chambers. As such, excavation activities associated with the Project would not extend to depths where groundwater could be encountered and would not impact groundwater quality.

Post-Development Water Quality Impacts

Surface Water Quality

As previously discussed, under existing conditions the Project site consists of approximately 76 percent impervious surfaces associated with the existing manufacturing and industrial uses. The Project would entail redevelopment of the site with a four-building logistics center, and the amount of impervious surface would be increased to approximately 93 percent (TAIT, 2020a). The Project would include impervious surfaces associated with buildings, parking areas, trash collection areas, and loading docks, and would have outdoor activities associated with operations that may lead to pollutants (e.g., heavy metals, pesticides, oil and grease, toxic organic compounds, and trash and debris and potentially pathogens [bacteria/viruses]) entering the storm water. In addition, landscaped areas may potentially contribute to suspended solids and sediments, pesticides (including fertilizers and herbicides), and nutrients that may enter the storm water. These pollutants may lead to the degradation of storm water quality in downstream water bodies.

Pollutant concentrations in urban runoff are extremely variable and are dependent on storm intensity, land use, elapsed time since previous storms, and the volume of runoff generated in an area that reaches receiving waters. As such, potential water quality impacts are related to the increase in the peak runoff, new urban uses, and the sensitivity of the receiving water. The primary receiving waters for runoff from the Project site are identified in Table 4.8-1. As shown, Coyote Creek is impaired for ammonia, copper dissolved, diazinon, indicator bacteria, lead, toxicity, pH; the San Gabriel Reach 1 is impaired for coliform bacteria and pH; and San Gabriel Estuary is impaired for copper, dioxin, nickel, oxygen, dissolved. Stormwater runoff from the Project has the potential to add to these impairments. The Pollutants of Concern (POCs) for the Project include suspended-solid/sediment, nutrients, heavy metals, pathogens (bacteria/virus), pesticides, oil and grease, toxic organic compounds (TOCs), trash, and debris (TAIT, 2020a).

The Project would be required to comply with the Areawide MS4 Permit and DAMP to reduce pollutants in the stormwater and urban runoff that is discharged into the public storm drain systems owned and operated by northern Orange County Cities, including the City of Fullerton. This permit specifies requirements for managing runoff water quality from new development and significant redevelopment projects, including specific sizing criteria for treatment BMPs through the preparation of a Project-specific WQMP per the Model WQMP and TGD.

The Project qualifies as a Priority Project under a number of categories identified in Exhibit 7.II of the 2011 Model WQMP. The Project would incorporate The Fullerton Plan EIR MM HYD-2 to ensure impacts to water quality and waste discharge would be reduced. The Fullerton Plan EIR MM HYD-2 requires that a Project-specific WQMP or Stormwater Mitigation Plan be prepared. In compliance with MM HYD-2, a Preliminary WQMP has been prepared for the Project and is included in Appendix I1 of this EIR. This WQMP would be finalized based on the final design, before approval of future grading permits.

As described in Section 3.0, Project Description, and shown on the conceptual WQMP plan provided on Figure 3-24, the Preliminary WQMP identifies that storm water would be conveyed to bio-filtration planters for treatment or to subsurface detention chambers. The subsurface detention basins would release captured stormwater flows, and discharged stormwater would flow to modular wetland units for treatment to reduce pollutants entering the stormwater during the long-term operation of the Project. Infiltration BMPs are not considered feasible due to the site being in a contamination plume (North Basin Groundwater Protection Project), and are not proposed. (TAIT, 2020a)

Additionally, non-structural BMPs that would be implemented as part of the Project include, but are not limited to, education for property owners, tenants, and employees; activity restrictions; common area landscape management; BMP maintenance; spill contingency plan; common area litter control; housekeeping of loading docks; catch basin inspection, and street sweeping of private streets and parking lots. Structural source-control BMPs would include storm drain system stenciling and signage; design and construction of trash and waste storage to reduce pollution; use of efficient irrigation; and design of loading docks (TAIT, 2020a).

With the implementation of structural and non-structural BMPs identified in the Preliminary WQMP for the Project (refer to The Fullerton Plan EIR MM HYD-2), pollutants in storm water runoff would be treated and removed prior to entering the City's storm drainage system. Therefore, potential impacts on water quality from storm water runoff would be less than significant.

While the future tenants of the Project are unknown at this time, individual facilities that would result in non-stormwater discharges would have to comply with the NPDES Industrial General Permit, including obtaining coverage under the permit; preparing a SWPPP and implementing the BMPs outlined in the SWPPP; and annual evaluation and regular monitoring (e.g., visual observation and sampling and analysis) to prevent or reduce pollutants that enter the stormwater or that are discharged into the storm drainage system and to determine if the BMPs are adequate and properly implemented. If the facility is not covered under the Industrial General Permit, it would have to obtain an individual NPDES permit or WDR from the SWRCB.

The minimum BMPs that must be included in the SWPPP include good housekeeping practices, preventative maintenance, spill and leak prevention and response, material handling and waste management, erosion and sediment controls, an employee training program, and quality assurance and record keeping. Also, advanced BMPs must be implemented to the extent feasible and include exposure minimization of industrial materials, stormwater containment and discharge reduction, treatment control, and other BMPs that are necessary to meet the effluent limitations of the Industrial General Permit. Implementation of these BMPs by individual tenants of the project would avoid adverse impacts on stormwater quality during the long-term operations of the project. Impacts would be less than significant and no additional mitigation is required.

Groundwater Quality

The Project would not impact groundwater quality since no groundwater extraction activities are proposed. The Project also would implement structural and non-structural BMPs that would prevent pollutants from adversely impacting groundwater resources, as runoff from the site would be conveyed to existing drainage facilities following treatment by the proposed BMPs. Therefore, impacts to groundwater quality during operations would be less than significant.

Level of Significance Before Mitigation

Construction and operation of the Project would generate pollutants that may enter the stormwater and affect surface water; however, compliance with existing regulations and implementation of The Fullerton Plan EIR MM HYD-1 and MM HYD-2, which require implementation of BMPs outlined in the SWPPP, would prevent the violation of water quality standards and waste discharge requirements during construction and operation. No degradation of water quality would occur and impacts would be less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b:	***Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?***

The Project would not involve direct or indirect withdrawals of groundwater and as previously discussed, excavations at the site would not encounter underlying groundwater resources. The City of Fullerton would supply the Project with potable water services. The City receives over 70 percent of its water from groundwater managed by OCWD, with the remainder coming from imported water supplies. The Project's demand for water has been analyzed in a Project-specific Water Supply Assessment (WSA) included in Appendix L1 of this EIR. As further discussed in Section 4.13, Utilities and Service Systems, of this EIR, there would be an overall reduction in water demand generated at the Project site with implementation of the Project, compared to the water demand associated with the previous Kimberly-Clark manufacturing operations (a reduction of approximately. The net decrease in water demand for the site would be approximately 1,659.8 acre-feet per year. Therefore, the Project would not deplete groundwater supplies. It should also be noted that the Project would maintain the City-owned well in the north-central portion of the Project site.

The Project site lays atop a groundwater contamination plume area and as such, infiltration is not permitted within this area. Moreover, OCWD recharge basins are located within the City of Anaheim and the City of Orange. Therefore, implementation of the Project would not interfere with groundwater recharge.

Based on the foregoing analysis, the Project would not substantially decrease groundwater supplies nor would the Project interfere with groundwater recharge such that the Project would impede sustainable groundwater management in the basin. Impacts would be less than significant.

Level of Significance Before Mitigation

The Project would result in a net reduction in water demand as compared to existing conditions, and the Project site is not in an OCWD groundwater recharge area; therefore, implementation of the Project would not interfere with groundwater recharge. Impacts would be less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

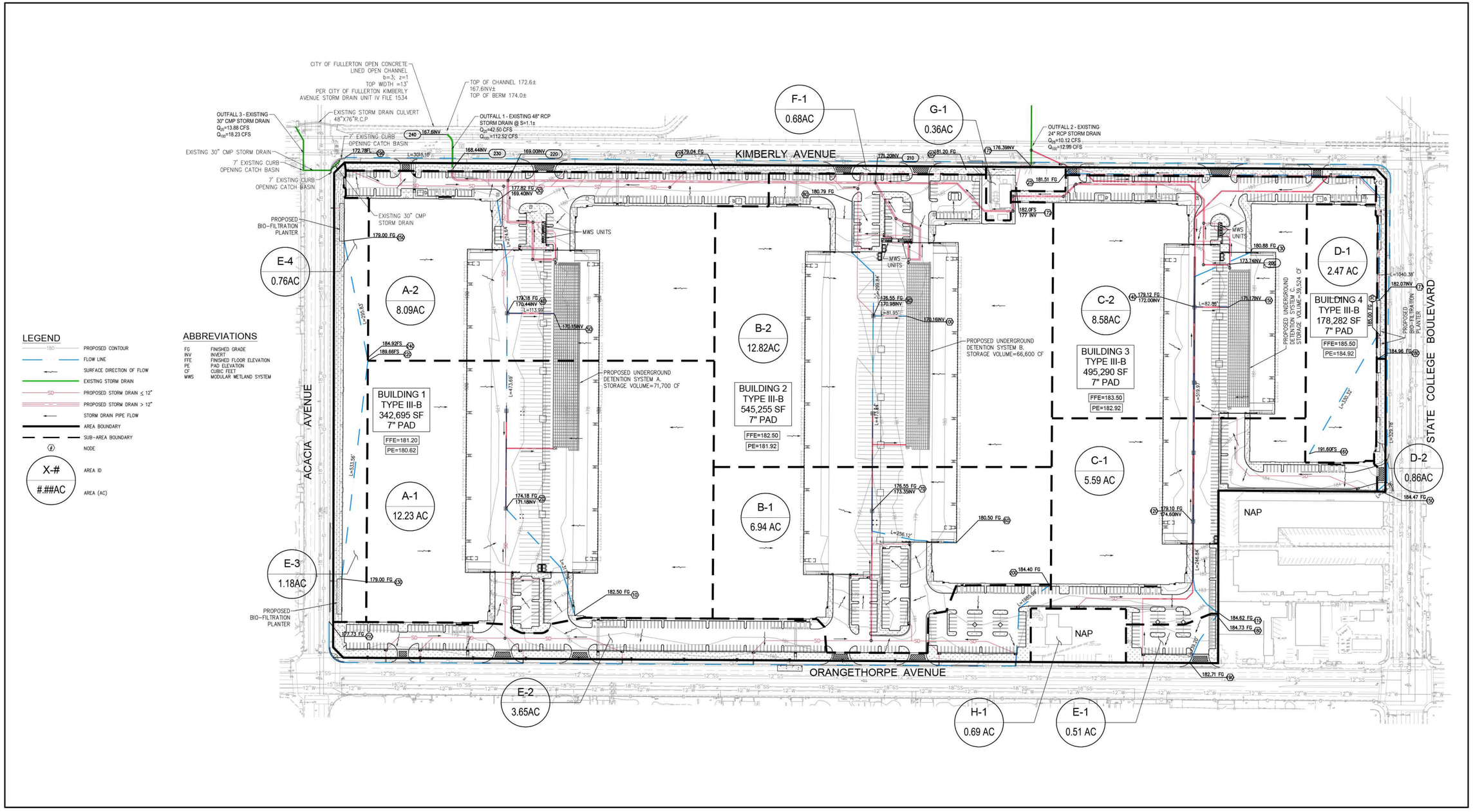
Threshold c:	***Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
	i. Result in substantial erosion or siltation on- or off-site?
	ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
	iii. 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?
	iv. Impede or redirect flood flows?

Overview of Proposed Drainage Pattern Changes

As previously discussed, under existing conditions, approximately 76 percent of the Project site consists of impervious surfaces, and the remaining 24 percent consists of pervious surfaces associated with the remnant orange orchard and other landscaped area. The Project would entail redevelopment of the Project site with 4 warehouse buildings and associated improvements. With implementation of the Project, the site would contain approximately 93 percent of impervious surfaces and approximately with remaining 7 percent containing pervious surfaces associated with landscape areas. As described below, with implementation of the Project the DMAs would be modified; however, there would still be three outfall locations (Outfall 1 through 3). Figure 4.8-2 depicts the proposed Hydrology Map. (TAIT, 2020b)

Consistent with existing conditions, stormwater runoff from the Project site would flow through an on-site private storm drain system to existing public storm drain facilities and ultimately to the Fullerton Channel. On-site storm drain facilities would include, but not be limited to, roof drains, downspouts, catch basins/grated inlets, bio-filtration planters, detention basins, and underground storm drains. New and reconstructed curbs and gutter would be constructed in compliance with City standards.

This Hydrology Report included in Appendix I2 of this EIR addresses runoff from the Kimberly-Clark site and the potential expansion site and its impact to the existing downstream storm drainage system, and was prepared in accordance with the requirements of the Orange County Hydrology Manual. The Hydrology Report includes calculations for the 25-year and 100-year storm event for both the existing and proposed condition, and identifies the general project characteristics, design, criteria and methodology applied to the analysis of the Project. The Hydrology Report provides a design analysis for the drainage facilities proposed as part of the Project, with the drainage improvements being designed to for the 25-year storm event and proposed buildings being protected from the 100-year storm.



Source(s): TAIT (06-10-2020)

Figure 4.8-2

Not to Scale

Proposed Hydrology Map

As summarized in Table 4.8-2, *Peak flows Under Existing and Proposed Conditions*, with development of the Project on the Kimberly-Clark site, and with the installation of the proposed on-site drainage system, which includes detention basins to meet water quality regulations for treatment as well as mitigate peak flows for the Project, the peak flows would decrease from 137.82 cfs during the 25-year storm event and 178.82 cfs during the 100-year storm event to 66.50 cfs during the 25-year storm event and 143.74 cfs for the 100-year storm event.

TABLE 4.8-2 PEAK FLOWS UNDER EXISTING AND PROPOSED CONDITIONS

Outfall No.	Existing Conditions		Proposed Conditions			
	25-year	100-year	25-year	25-year Mitigated	100-year	100-year Mitigated
1	109.90 cfs	142.32 cfs	188.60 cfs	42.50 cfs	242.94 cfs	112.52 cfs
2	14.61 cfs	19.10 cfs	10.12 cfs	10.12 cfs	12.99 cfs	12.99 cfs
3	13.31 cfs	17.40 cfs	13.88 cfs	13.88 cfs	18.23 cfs	18.23 cfs
Total	**137.82 cfs**	**178.82 cfs**	**212.60 cfs**	**66.50 cfs**	**274.16 cfs**	**143.74 cfs**

cfs: cubic feet per section
Outfall 1 - Existing 48-inch reinforced concrete pipe (RCP) in Kimberly Avenue
Outfall 2 - Existing 24-inch RCP in Kimberly Avenue
Outfall 3 - Existing 30-inch corrugated metal pipe (CMP (two catch basins at the corner of Kimberly Avenue and Acacia Avenue)
(TAIT, 2020b)

With respect to the potential expansion site, proposed catch basins would be located at the most southern curb of the parking area, and would convey low flows to a detention basin. High flows would be discharged to E. Orangethorpe via parkway drain. Due to the similar conditions of the proposed improvements for land use and length of flow, the proposed flows generated from the potential expansion site would be the same as in the existing condition. The main difference with the Optional Site Plan development is that a portion of drainage area E-1 (southeast corner of the Kimberly-Clark site at E. Orangethorpe Avenue, would no longer drain be conveyed to Orangethorpe Avenue. This area would consist of approximately 0.15 acres that would be contributing to DMA C and ultimately to Outfall 1. The approximate peak flows increase to Outfall 1 would be 0.77 cfs for the 100-year storm and 0.68 cfs for the 25-year storm. The total proposed peak flow to Outfall 3 would be slightly reduced compared to development of just the Kimberly-Clark site with approximate total flows of 13.2 cfs for the 25 year and 17.46 cfs for the 100-year. These flows are similar to the existing condition of 13.31 cfs and 17.4 cfs.

In summary, with buildout of the Kimberly-Clark site and the potential expansion site, stormwater runoff entering the Kimberly Clark Channel would decrease for Outfalls 1 and 2 and would slightly increase for Outfall 3. However, the overall Project peak flows are reduced.

Erosion and Siltation Impacts

As described above, implementation of the Project would not result in a substantial change to the site's existing drainage patterns. Under the existing condition, the majority of the Project site is developed and minimal erosion occurs on-site under existing conditions. Implementation of the Project has the potential to result in erosion and siltation impacts during the construction phase. The site's existing structures would be demolished as part of the Project, except for the City's well

facility, and the Project would expose soils to potential water- and wind-related erosion. As discussed under the analysis of Threshold a, the Project would incorporate The Fullerton Plan EIR MM HYD-1, which requires the Project to prepare and implement a SWPPP during construction activities to mitigate potential water quality impacts due to erosion and siltation. Impacts would be less than significant.

Implementation of the Project would result in an increase in impervious surfaces at the site, primarily associated with the development of the existing 10-acre remnant orange orchard. The post-development total suspended solids (TSS) concentrations are anticipated to be lower than existing conditions due to the reduction in exposed soils, and installation of BMPs, which would reduce suspended sediment in runoff. Furthermore, the peak rate of runoff from the Project site would decrease as compared to the existing condition, thereby ensuring the Project does not cause or contribute to increased erosion hazards downstream. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on or off site, and impacts would be less than significant.

Flooding Hazards On- and Off-Site

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06059C0132J (dated December 13, 2009), the Project is within FEMA Zone X (Shaded), which is identified as an area with a 0.2 percent (500-year) chance flood hazard area (FEMA, 2009). The Project site is not within a 100-year flood hazard area; therefore, implementation of the Project would not have the potential to impede or redirect flood flows. Storm flows discharging from the site would continue to flow to the Kimberly Storm Drain. As such, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would impede or redirect flood flows, and impacts would be less than significant.

As previously stated, the Project would increase the overall impervious surface coverage contained within the Project site; however, implementation of the Project and associated storm drain facilities would reduce flows to the Kimberly Storm Channel compared to existing conditions. would reduce peak flows originating from the Project site as compared to existing conditions. Based on the hydraulic design analysis included in the Hydrology Report, the proposed private storm drain has been designed to handle the 25-year conditions without pressure flows. The results for the 100-year model results in a pressured flow; however, the 100-year hydraulic grade line (HGL) is contained below the proposed finished surface for the entire line except when the finished elevations drop at the dock loading level. The finished floor of the proposed buildings is set 4-feet above the loading level and therefore the buildings are protected from flooding in the 100-year storm event. In the event that the storm drain system fails due to clogging or any other unforeseen situation, the project grading design allows for the project runoff to pond a maximum of 2.5-feet at the loading docks before flows are conveyed to Kimberly Avenue via sheet flow through the project driveways.

Because peak runoff from the site would be reduced as compared to existing conditions, and because runoff would be conveyed to existing drainage facilities, implementation of the Project would not result in flooding on- or off-site and impacts would be less than significant.

Stormwater Drainage Capacity

Under existing and proposed conditions, runoff from the Project site would be conveyed to the existing Kimberly Avenue storm drain system north of the Project site. As discussed above, with implementation of the Project, stormwater runoff would decrease to 66.5 cfs during the 25-year storm event and 143.74 cfs during the 100-year storm event, which represents an overall decrease of 71.32 cfs during the 25-year storm event and 35.08 cfs during the 100-year storm event. Because the Kimberly Avenue storm drainage system has adequate capacity to convey flows from the Project site under existing conditions, and because the peak rate of runoff would decrease with implementation of the Project, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, and impacts would therefore be less than significant.

Water Quality

As discussed in detail under the analysis of Threshold a, the Project would provide biotreatment and source-control BMPs to reduce pollutants entering the stormwater during operation of the Project. With compliance with existing regulation and implementation of The Fullerton Plan EIR MM HYD-2, which ensures implementation of the Project's proposed BMPs, pollutants in storm water runoff would be treated and removed prior to entering the City's storm drainage system. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would produce substantial additional sources of polluted runoff, and potential impacts on water quality would be less than significant.

Level of Significance Before Mitigation

With implementation of The Fullerton Plan EIR MM HYD-2, which requires preparation of a WQMP and implementation of identified BMPs, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, 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, or impede or redirect flood flows. Impacts would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d: Would the project, in flood hazard, tsunami, or seiche zones, rick release of pollutants due to project inundation?

As discussed under Threshold c, the Project site is not within a 100-year flood zone, and, as such, the Project's potential risk of release of pollutants due to site inundation from flooding would be less than significant. The Project site is located approximately 14.3 miles northeast of the Pacific Ocean; therefore, the Project is not within a tsunami zone and no impacts would occur. Additionally, the Project site is not within proximity to an enclosed body of water that has the potential to cause a seiche (a standing wave in an enclosed or partially enclosed body of water). Due to distance and topography, the Project site would not be subjected to seiches and no impacts would occur.

According to Exhibit 29, *Dam Inundation* Risks, of The Fullerton Plan (Figure 3-1, *Dam Failure Inundation Zones,* of the City LHMP), the Project site is in an area that is in the inundation zone for the Carbon Canyon Dam and Prado Dam. According to the City's LHMP, the Prado Dam has a Dam Safety Action Classification (DSAC)-III rating (high priority-conditionally unsafe), and the Carbon Canyon Dam has a DSAC-II rating (urgent-unsafe or potentially unsafe) (Fullerton, 2020). Although the Project site is within the inundation zones for these dams, as discussed in Section 4.7, *Hazards and Hazardous Materials,* of this EIR, operation of the proposed warehouses would involve the use of materials common to all urban development that are labeled hazardous. Manufacturing and other chemical processing would not occur within the proposed warehouse uses, and operations would be conducted in compliance with applicable regulations. Therefore, the Project would have a less than significant impact related to the risk of release of pollutants due to inundation from dam failure.

Level of Significance Before Mitigation

The Project site is not within a 100-year flood zone, is not within a tsunami zone, and is not within proximity to an enclosed or partially enclosed body of water that is capable of producing seiches. Therefore, there would be no impact related to risk of release of pollutants due to project inundation from a flood, tsunami or seiche. The Project site is within a dam inundation; however, the potential for risk of release of pollutants due to inundation from dam failure would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold e: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under Threshold a, the Project site is within the Santa Ana River Basin; therefore, Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* (Santa Ana Basin Plan). Although the San Gabriel Creek Watershed, which includes Coyote Creek, is under the jurisdiction of the LARWQCB, the LARWQCB has no jurisdiction over the Orange County portion of the Coyote Creek watershed. The Santa Ana Basin Plan describes actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Santa Basin Plan through its issuance of NPDES Permits, issuance of Waste Discharge Requirements (WDR), and Water Quality Certifications pursuant to Section 401 of the CWA.

As discussed under Threshold a, with adherence to the Construction General Permit and Fullerton Municipal Code, and implementation of The Fullerton Plan EIR MM HYD-1 and MM HYD-2, which require preparation of a SWPPP during construction, and a WQMP for operation, the potential for the Project to generate pollutants and impact water quality during construction and operation would be less than significant. The Project would not degrade water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the Project would not result in water quality impacts that would conflict with the Santa Ana Basin Plan.

The Project site is within the Coastal Plain of Orange County Basin (Basin 8-1). The California Department of Water Resources (DWR), classifies this basin as a medium-priority basin. According to the 2014 Sustainable Groundwater Management Act (SGMA), local public agencies and Groundwater Sustainability Agencies (GSAs) in "high"- and "medium"-priority basins are required to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs (DWR, 2020). GSPs are detailed road maps for how groundwater basins will reach long term sustainability. The GSA for Basin 8-1 is comprised of the OCWD, City of La Habra, and Irvine Ranch Water District (IRWD). These agencies collaborated and submitted an Alternative to a GSP titled *Basin 8-1 Alternative* on January 1, 2017, to the DWR. This Alternative to a GSP documents the basin conditions, and basin management pursuant to the Alternative is to be based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts on the sustainability indicators defined in the Alternative. As previously discussed, the Project would not entail the extraction of groundwater located beneath the site during Project operation, and would not impact groundwater quality, and the Project site is not within a groundwater recharge area. Further, due the presence of the Project site within the North Basin Groundwater Protection Project plume protection boundary, no infiltration is allowed, or proposed. Therefore, the Project would not obstruct with or conflict with a sustainable groundwater management plan.

Level of Significance Before Mitigation

The Project would not conflict with the Santa Ana Basin Plan or the *Basin 8-1 Alternative*. No impact would result.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

4.8.5 CUMULATIVE IMPACTS

Section 5.8.6, Cumulative Impacts (Hydrology and Water Quality), of The Fullerton Plan EIR concludes that future development projects would be required to mitigate specific hydrologic impacts on a project-by-project basis. Additionally, the City's Municipal Code incorporates Federal and State regulations and guidelines pertaining to storm water runoff to reduce or eliminate regional water quality impacts. Impacts associated with future development in the City and the region would be addressed at a site-specific level to ensure their cumulative impact would be less than significant. Further, The Fullerton Plan EIR concludes that during the development approval process, developers would "conditioned" to construct necessary storm drain facilities, and may be conditioned to contribute a fair-share cost towards the design and construction of regional drainage facilities. Thus, it is concluded that implementation of The Fullerton Plan would not result in cumulatively considerable hydrology, drainage, or water quality impacts.

The Project cumulative impact analysis considers the construction and operation of the Project in conjunction with other development projects in the vicinity of the Project site and other developments within the Santa Ana River Basin and Coastal Plain of Orange County Basin. This area was selected for analysis because it encompasses the Project's watershed, and because the Project does not have the potential to result in hydrology or water quality impacts outside of the Project's watershed.

Project construction and the construction of cumulative development would have the potential to contribute to waterborne pollution, including erosion and siltation, to the Santa Ana River Watershed. Pursuant to the requirements of the State Water Resources Control Board and the Santa Ana RWQCB, all construction projects that disturb one (1) or more acres of land area are required to obtain coverage for construction activities under the State's General Construction NPDES Permit. To obtain coverage, an effective site-specific SWPPP is required to be developed and implemented. The SWPPP must identify potential on-site pollutants and identify an effective combination of erosion control and sediment control measures to reduce or eliminate the discharge of pollutants to surface waters. Also, the Project Applicant and all cumulative developments in the Santa Ana River Basin would be required to comply with the Santa Ana Basin, which establishes water quality standards for ground and surface waters of the region. As concluded in The Fullerton Plan EIR, compliance with these mandatory regulatory requirements

would ensure that development projects within the Santa Ana River watershed, including the Project, would not contribute to cumulative water quality impairments during construction.

Operational activities on the Project site would be required to comply with the Project's approved WQMP to minimize the amount of waterborne pollution, including erosion and sediment, discharged from the site. Other development projects within the watershed would similarly be required by law to prepare and implement site-specific WQMPs to ensure that runoff does not substantially contribute to water quality violations. Accordingly, the operation of the Project would not contribute to cumulatively considerable water quality effects, and cumulative impacts would be less than significant.

The City provides potable water services to an approximately 22.3 square-mile service area the majority of the City's water comes from groundwater resources. Groundwater recharge for the Lower Santa Ana River Groundwater Basin occurs in the Cities of Anaheim and Orange. The Project would not physically impact groundwater recharge. Infiltration is prohibited because the Project site is located within the North Basin Groundwater Protection Project plume protection boundary. Other development projects in the cumulative study area similarly would not be permitted to allow infiltration on their sites. No component of the Project would obstruct or prevent implementation of the *Basin 8-1 Alternative,* and other development projects within the Basin would similarly be prohibited from any activity that would endanger the health and sustainability of the groundwater basin. Based on the lack of impacts on groundwater recharge facilities, the provision of design measures that would facilitate percolation, and compliance with the basin's groundwater management plan, cumulative development would not result in a considerable, adverse effect on local groundwater supplies.

Construction of the Project and other development projects within the Santa Ana River Basin would be required to comply with federal, State, and local regulations and applicable regional and local master drainage plans to mitigate flood hazards both on- and off-site. Compliance with federal, State, and local regulations and applicable drainage plans would require development sites to be protected from flooding during peak storm events (i.e., 100-year storm) and would not allow development projects to expose downstream properties to increased flooding risks during peak storm events. Also, future development proposals within the Santa Ana River Basin would be required to prepare hydrologic and hydraulic calculations, subject to review and approval by the City, to demonstrate that substantial on- and/or off-site flood hazards would not occur. As discussed under the response to Threshold c, the Project is designed to ensure that runoff from the Project site during peak storm events is reduced compared to existing conditions. Because the Project and all other developments throughout the Santa Ana River Basin, would need to comply with federal, State, and local regulations to ensure that stormwater discharges do not substantially exceed existing volumes or exceed the volume of available conveyance infrastructure, a cumulative impact related to flood hazards would not occur.

Additionally, the Project's would not result in a risk for release of pollutants from flooding, seiche or a tsunami, and would have a less than significant impact related to release of pollutants due to inundation from dam failure. Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with inundation.

4.8.6 REFERENCES

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4.9 LAND USE AND PLANNING

This section describes the Project site and surrounding land uses, and evaluates the Project's consistency with applicable planning programs and land use regulations. Information presented in this section is based on a review of relevant regional and local planning programs, including The Fullerton Plan, information presented in The Fullerton Plan Environmental Impact Report (EIR) and site reconnaissance. Refer to Section 4.9.6, *References*, for a complete list of references.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

A Notice of Preparation (NOP) comment letter was received from the Southern California Association of Governments (SCAG). SCAG's NOP comment letter requested that the consistency of the Project with the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) be addressed. SCAG identifies that RTP/SCS strategies provide guidance for considering the project in the context of these goals, outlines demographic and growth forecasts, and recommends that the 2016 RTP/SCS Final Program EIR mitigation measures be used for guidance, as appropriate. SCAG further identifies in its NOP comment letter that the Draft 2020 RTP/SCS (Connect SoCal) was scheduled for approval in May 2020; however, as discussed under Section 4.9.2, below, SCAG's Regional Council adopted Connect SoCal and its associated Program EIR on May 7, 2020 for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020 (September 2020).

Additionally, a NOP comment letter was received from an individual, Julia Roper. Ms. Roper's NOP comment letter requested that the Project's compatibility with her adjoining property to the south, be addressed. The NOP comment specifically addresses drainage issues and the potential for driveway conflicts. These issues are addressed in Section 4.8, Hydrology and Water Quality, and Section 4.11, Transportation, of this EIR, respectively.

4.9.1 EXISTING SETTING

A. Project Site

The approximately 65.4-net-acre[1] Kimberly-Clark site located at 2001 E. Orangethorpe Avenue, is bounded to the north by Kimberly Avenue and BNSF railroad tracks, to the east by State College Boulevard, to the south by E. Orangethorpe Avenue, and to the west by Acacia Avenue. The Project Applicant may pursue the acquisition of the approximately 0.7-acre property (potential expansion site) located at 2301 E. Orangethorpe Avenue, immediately south of proposed Building

[1] The Kimberly-Clark site encompasses approximately 73.1 gross acres, which includes an easement for City of Fullerton water facilities, areas to be dedicated for access improvements along the site-adjacent roadways, and public roadway right-of-way.

3 and north of E. Orangethorpe Avenue. In the event the Project Applicant acquires this property, the Project site could be expanded, resulting in a 66.1-net-acre (74.0-gross-acre Project site).

The Kimberly-Clark Fullerton Mill, which was used for the manufacturing of paper products, was initially constructed in 1955 and was subsequently expanded multiple times; information about the history of the Kimberly-Clark Fullerton Mill is provided in Section 4.3, Cultural Resources, of this EIR. As previously shown on the aerial photograph provided in Figure 2-1 in Section 2.0, Environmental Setting, the on-site uses include 1,210,720 square feet (s.f.) of existing manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.), associated facilities, surface parking, and landscaped areas, including a remnant orange orchard in the eastern portion of the Kimberly-Clark site. The Kimberly-Clark Fullerton Mill ceased operations in June 2020. The City of Fullerton Public Works Department maintains a water well facility in the north-central portion of the site west of the Kimberly Avenue access driveway, and there is a Southern California Edison (SCE) substation generally in the center of the site. A storage lot for recreational vehicles was previously located in the northeast corner of the site; this use operated under a lease agreement with Kimberly-Clark. An on-site cogeneration facility was used to provide energy for Mill operations.

The potential expansion site is currently developed with two structures also built in the 1950s (a 2,904 s.f., two-story office building and a 2,656 s.f. workshop/warehouse), which were most recently occupied by Chapman Coast Roof Company, Inc. The potential expansion site is also a developed surface parking area and has perimeter landscaping.

B. Surrounding Land uses

Based on field reconnaissance and review of aerial images, existing land uses in the area surrounding the Project site are described below.

- **North.** Kimberly Avenue and the BNSF railroad tracks are immediately north of the Project site. The BNSF railroad tracks are actively used for freight operations. To the north, northeast and northwest, there are various industrial uses within the City of Fullerton, primarily consisting of warehouse, manufacturing, and business park/commercial uses. Fullerton Fire Department Station No. 3 is located north of Kimberly Avenue and east of Acacia Avenue. Residential uses are located further to the north, beyond the industrial uses.
- **East**. The property adjacent to and southeast of the Project site (northwest of the intersection of E. Orangethorpe Avenue and State College Boulevard) is developed with non-residential uses, including commercial (automotive service centers and a gas station) and industrial uses. The properties located east of the Project site (east of State College Boulevard) are also developed with commercial (restaurant, veterinarian services, a liquor store) and industrial uses (warehouse and manufacturing) in the City of Fullerton.
- **South.** The properties south of the Project site (south of E. Orangethorpe Avenue) are developed with various industrial, commercial and office uses in the City of Fullerton. Residential uses in the City of Anaheim are located further to the south. There are

commercial uses located at the southeast corner of E. Orangethorpe Avenue and State College Boulevard in the City of Anaheim. Industrial uses and an Orange County Flood Control District facility (Placentia Basin) are located southeast of the Project site (south of E. Orangethorpe Avenue).

- **West.** The properties west of the Project site (west of Acacia Avenue) in the City of Fullerton are also developed with various industrial uses, including warehouses and manufacturing facilities.

C. General Plan and Zoning Designation

The City of Fullerton's prevailing planning document is *The Fullerton Plan*, which serves as the City's General Plan. As previously shown on Figure 2-2, Existing Community Development Types, the Kimberly-Clark site, potential expansion site, and surrounding areas have an "Industrial" community development type (i.e., land use designation)[2]. The "Industrial" community development type is intended to protect and enhance the City's major employment areas by accommodating manufacturing activities, wholesale operations, storage, and warehousing facilities, research and development uses, and various activities normally not permitted in other designations (Fullerton, 2012a). The Project does not involve a change to the community development type designation.

As previously discussed in Section 3.3.1 of this EIR, and shown on Figure 3-4, Proposed Zone Change, most of the Kimberly-Clark site is currently zoned M-P-200-ES (Manufacturing Park, 200,000 s.f. minimum lot size, in an Emergency Shelter Overlay Zone), and the southeast portion of the Kimberly-Clark site, and the entirety of the potential expansion site, are zoned M-G ES (Manufacturing General in an Emergency Shelter Overlay Zone). According to Chapter 15.40, Industrial Zone Classifications, of the Fullerton Municipal Code, the M-P and M-G zones are established to allow compatible industrial uses in proximity to each other while protecting the public health, safety, and welfare through development standards and site plan review process. The M-P zone is intended for a wide range of light industrial activities, often based on a multiple-tenant development type. The M-G zone is intended for more intensive uses. Both zones focus on minimizing impacts on any nearby residential use. In addition, as identified in Chapter 15.42, Emergency Shelter Overlay Zone, of the Fullerton Municipal Code, the intent and purpose of the ES Overlay is to identify areas within the City in which emergency shelters for homeless and multi-service centers for homeless may be established. The requirements imposed by the ES zone are intended to supplement the requirements contained in the base zone and allow, but do not require, emergency shelters, in the zone. The Project Applicant has requested a Zone Change for the southeast corner of the Kimberly-Clark site to M-P-200ES to provide a single, consistent zoning designation across the entire Kimberly-Clark site.

The areas in the City of Fullerton surrounding the Kimberly-Clark site also have various M-P zoning designations, with the exception of the area northeast, northwest, and southwest of the State College Boulevard/E. Orangethorpe Avenue intersection, which is also zoned M-G ES. The

[2] In The Fullerton Plan, "land use designations" have been renamed "community development types" to reflect the addition of descriptions of the intended form and character that provide guidance on creating a sense of place. The community development types function as land use designations under General Plan law, as codified in the California Government Code.

area southeast of the State College Boulevard/E. Orangethorpe Avenue intersection is in the City of Anaheim and is zoned Industrial (I). The intent of the Industrial zone in the City of Anaheim is to provide for and encourage the development of industrial uses and their related facilities, recognize the unique and valuable existing industrial land resources, and encourage industrial employment opportunities within the City. This zone implements the Industrial land use designation in the City of Anaheim General Plan (Anaheim, 2019).

4.9.2 EXISTING REGULATORY SETTING

Section 5.1, *Land Use and Planning*, of The Fullerton Plan EIR, addresses land use issues associated with implementation of The Fullerton Plan. Section 5.1.2 of The Fullerton Plan EIR provides a discussion of the existing regulatory setting related to Land Use and Planning, including regional plans, The Fullerton Plan, and Fullerton Zoning Code, which regulate land uses in the City. Following is a discussion of the regulations particularly relevant to the Project.

A. Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. As the designated MPO, the federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans (SCAG, 2020). As identified in Section 15206 of the CEQA Guidelines, regionally significant industrial projects include “A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.” Therefore, this Project is considered regionally significant and subject to review by SCAG.

SCAG adopted the 2016 RTP/SCS and certified the associated Program EIR in April 2016 to address the region’s future needs for “mobility, economy, and sustainability”. The 2016 RTP/SCS combines the need for mobility with a “sustainable future” through a reduction in the amount of emissions produced from transportation sources. This would be made through the operation of low or no emission transportation systems by 2040. The RTP/SCS also focuses on the economy, with expectations of shortening the gap between the regional transportation system and economic vitality. To address the mobility challenge of the region’s continuing roadway congestion, the RTP/SCS proposes transportation investments in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways, arterials, and goods movement; aviation and airport ground access; and operations and maintenance projects. These are expected to indirectly create investment opportunities in the

region. The 2016 RTP/SCS includes population, household, and employment projections for individual cities and counties, and identifies the regional housing needs allocations for the region. Further, the 2016 RTP/SCS provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. (SCAG, 2016)

The 2016 RTP/SCS also includes an appendix titled "Goods Movement" that is applicable to the Project because the Project entails the development of a logistics center in the SCAG region that could support a variety of light industrial, warehousing, and logistics users. In April 2018, SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason the region is a critical mode in the global supply chain. (SCAG, 2018)

The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods. SCAG's Regional Council adopted the 2020-2045 RTP/SCS (referred to as "Connect SoCal") and its associated Program EIR on May 7, 2020 for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020 (September 2020). Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Because Connect SoCal is not entirely adopted, the 2016 RTP/SCS goals and 2016 Program EIR are still valid until the full adoption of Connect SoCal and recertification of the associated Program EIR. Because the goals of the 2016 RTP/SCS are still valid at the time this EIR is being prepared, SCAG recommends completing a Project consistency analysis for goals outlined in the 2016 RTP/SCS and Connect SoCal (Au, 2020).

B. Local

The Fullerton Plan

State law requires that General Plans address the seven topics (referred to as "Elements") of land use, circulation, housing, open space, conservation, safety and noise (California Government Code Section 65302). A General Plan may also include other topics of local interest, as chosen by the local jurisdiction (California Government Code Section 65303). As previously discussed,

The Fullerton Plan serves as the City's General Plan. The City adopted The Fullerton Plan and certified the associated Final EIR on May 1, 2012. The Fullerton Plan is organized into four Master Elements: The Fullerton Built Environment, The Fullerton Economy, The Fullerton Community, and The Fullerton Natural Environment. Within each Element are individual chapters that meet the State's requirements for General Plan Elements. Information presented in The Fullerton Plan chapters relevant to the Project has been discussed in the respective sections of this EIR.

The Fullerton Plan also identifies 12 Focus Areas that present opportunities where land use and design change can help fully implement the City's vision. The Fullerton Plan identifies recommended densities and intensities and potential development types for each Focus Area. For parcels within a Focus Area, the underlying community development type applies until a specific plan, master plan, or other implementing document is prepared through a community-based planning process, at which point a General Plan Amendment may be required to redesignate the land, if necessary.

The Kimberly-Clark site and the potential expansion site are within Focus Area K: Southeast Industrial, which encompasses the largest concentration of Fullerton's industrial base, accessible from SR-91, SR-57, and the railroad. The Southeast Industrial Focus Area is envisioned as one of the City's primary employment-generating areas. The "Industrial" designation accommodates manufacturing activities, wholesale operations, storage and warehousing facilities, research and testing laboratories, and various activities not permitted in other designations. The Fullerton Plan anticipates an increase of approximately 2.65 million square feet (msf) of development in the Southeast Industrial Focus Area. (Fullerton, 2012a) Goals and policies outlined in The Fullerton Plan that are particularly relevant to the Project are discussed in the respective sections of this EIR, and under Threshold b, of this section.

City of Fullerton Zoning Code Title 15

The Fullerton Zoning Code (Municipal Code, Title 15) contains the regulatory framework that specifies allowable uses for real property by zone and includes the development standards such as building intensity/density, site layout, building setbacks, heights, lot coverage, parking, landscaping, signs, and other standards to implement the General Plan; it also includes the procedures for complying with the zoning regulations. The Zoning Code is the City's official land use plan. The purpose of the Zoning Code is to serve the public health, safety, and general welfare and to provide the economic and social advantages resulting from any orderly planned use of land resources. The Zoning Code specifies area where specific land uses may be located and sets standards for their development. The Zoning Code establishes 26 zone classifications and three overlay zones. (Fullerton, 2012a)

As previously discussed, the Project site is currently zoned M-P-200-ES and M-G ES. Chapter 15.40, Industrial Zone Classifications, outlines the permitted uses, site plan review process, site development standards, parking standards, access and circulation standards, transportation demand management strategies to reduce single occupancy automobiles, and industrial environmental controls applicable to this zone. Further, Chapter 15.68 of the Zoning Code outlines the circumstances under which a variance to zoning requirements can be granted by the City.

4.9.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on land use and planning if it would:

a. Physically divide an established community.
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.9.4 ENVIRONMENTAL IMPACTS

A. Impact Analysis

Threshold a Would the project physically divide an established community?

The Project site is occupied by the Kimberly-Clark manufacturing facility and the potential expansion site is developed with two industrial structures that were formerly occupied by the Chapman Coast Roof Company, Inc. The Project would involve development where development already currently exists. It would not separate any established communities or land uses. The Project site is surrounded by non-residential development. The nearest residential neighborhood to the Project site is located approximately 0.25-mile south in the City of Anaheim. The Project involves the redevelopment of the Project site with non-residential uses, consistent with existing conditions and with the surrounding neighborhood, and would not disrupt the physical arrangement of an established community. No impacts would occur.

Level of Significance Before Mitigation

The Project would not disrupt the physical arrangement of an established community and no impact would occur.

Additional Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

Threshold b	***Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

The Fullerton Plan

Activities undertaken by a planning agency must be consistent with the goals and policies of the agency's general plan. The Fullerton Plan serves as the main land use policy document for the City. Therefore, future development in the City must comply with The Fullerton Plan's goals and policies. The State's general rule for a General Plan consistency determination is that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment" (OPR, 2017).

The Project, which involves redevelopment of the Project site with a logistics center, is consistent with the "Industrial" community development type, which allows among other uses, storage and warehousing facilities. Further, the Project site is within the Southeast Industrial Focus Area, which is composed mainly of large parcels with one- and two-story buildings. The Project would include the development of four new buildings with a building area of up to 1,609,384 s.f., a net increase of 393,104 s.f. when taking into consideration existing development on the Project site. This represents an approximately 0.15 percent of the increase in non-residential building area anticipated in The Fullerton Plan and evaluated in The Fullerton Plan EIR.

The Southeast Industrial Focus Area is envisioned as one of the City's primary employment-generating areas. It is anticipated that this Focus Area will be characterized by preserved industrial uses and physical enhancements such as landscaping, which would contribute to a feeling of vitality, help provide a desirable working environment, and promote walking and transit use. The planning objectives for the Southeast Industrial Focus Area include the following, and the Project's ability to achieve these objectives is discussed below:

1. Retain industrial and employment-generating uses while providing amenities and services that will support the work force, such as recreation, retail, and limited housing opportunities.
2. Provide for large parcels and flexible spaces to accommodate a variety of industries over the long-term while supporting incubator spaces for new and emerging technologies.
3. Encourage new businesses and compatible new uses, while discouraging those that are in conflict. Specifically seek to expand and attract industrial users that would benefit from freeway access, technology clusters, and industrial infrastructure.
4. Improve appearance and function through design, including landscaping, pedestrian and transit facilities, and alleyway improvements.

With Kimberly-Clark's departure from the City, the Project would ensure continued use of the Kimberly-Clark site with industrial and employment-generating uses as anticipated by The Fullerton Plan, and would also allow for an expanded development area should the potential

expansion site be acquired by the Project Applicant. The Project involves a Tentative Parcel Map (presented on Figure 3-27 in Section 3.0, Project Description, of this EIR), that would modify the parcel configuration on-site to accommodate four large parcels that facilitate implementation of the proposed Major Site Plan, described in Section 3.0. The Project involves redevelopment of the Project site with four Class A speculative industrial buildings that are designed to meet contemporary industry standards and operational characteristics, that can accommodate a wide variety of users, and are economically competitive with similar industrial buildings in the local area and region. As shown on the conceptual building elevations and building rendering provided in Section 3.0, the buildings would have a consistent contemporary architectural design that would complement other existing buildings in the immediate vicinity and minimize conflicts with other nearby land uses. The Project would also involve landscaping throughout the site, and notably along the perimeter roadways. As further discussed in Section 4.11, Transportation, of this EIR, sidewalks would be constructed along E. Orangethorpe Avenue, Kimberly Avenue, Acacia Avenue adjacent to the Project site, where sidewalks are not currently provided. Additionally, a new concrete bus pad would be installed at the bus stop along the north side of E. Orangethorpe Avenue per OCTA standards and requirements, and interior and exterior bicycle facilities would be provided as part of the Project. These Project components would facilitate and encourage the use of transit and non-vehicular modes of transportation.

The Fullerton Plan includes various goals and associated policies. The policies are categorized for consideration at the following geographic levels: Region/Subregion, City, Neighborhood/District, and Project. Relevant to the Project, The Fullerton Plan includes policies associated with mobility/accessibility, bicycle systems, noise, public safety, public health, water, air quality and climate change, waste management, and natural hazards. The Project's potential impacts relative to these issues are addressed in the respective sections of this EIR. Relevant to land use and planning, the Project is consistent with the following policies applicable to the proposed industrial redevelopment Project in the Southeast Industrial Focus Area of the City, and that may serve to avoid or mitigate environmental impacts.

- **Community Design and Development**
  - **P1.11** - Support programs, policies and regulations to consider the immediate and surrounding contexts of projects to promote positive design relationships and use compatibility with adjacent built environments and land uses, including the public realm.
  - **P2.7** - Support projects, programs, policies and regulations to site and design buildings to create a positive, accessible image along the street and reinforce a vibrant and comfortable public realm.

    Consistent (P1.11 and P2.7): As discussed above, and further described in Section 3.0, Project Description, and Section 4.1, Aesthetics, the Project would have a consistent contemporary architectural design that would complement other existing buildings in the immediate vicinity and minimize conflicts with other nearby land uses. The public realm would be activated with landscape streetscapes and pedestrian facilities adjacent to the Project site. Therefore, the Project is consistent with P1.11 and P2.7.

- **P1.12** - Support projects, programs, policies and regulations to encourage energy and resource efficient practices in site and building design for private and public projects.

  Consistent: As described in Section 4.4, Energy, and Section 4.6, Greenhouse Gas Emissions, the Project would replace existing manufacturing and associated industrial buildings and facilities that were constructed as early as the 1950s and that do not meet current energy efficiency standards. The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements.

- **Growth Management**
  - **P7.5** - Support projects, programs, policies and regulations to ensure that development is appropriate in scale to current and planned infrastructure capabilities.

    Consistent: As discussed in Section 4.13, Utilities and Service Systems, the redevelopment Project does not require the expansion of existing infrastructure that serves the Project site. With respect to water and sewer lines, the Project would substantially reduce the amount of water demand and wastewater generation compared to the previous Kimberly-Clark manufacturing operations. The Project would install the infrastructure needed to serve the Project with connections to existing facilities. Similarly, as discussed in Section 4.11, Transportation, the Project would improve site-adjacent roadways, which have sufficient capacity to accommodate the Project.

- **Revitalization**
  - **P11.12** - Support policies, projects and programs that facilitate partnerships with property owners and developers to achieve revitalization results that contribute to clean, safe and attractive neighborhoods and districts.

    Consistent: Refer to the consistency analysis for policies under Community Design and Development, above. The Project would contribute to a clean, safe, and attractive neighborhood through its design and project features, in addition to compliance with the City's Code, which requires development sites to be maintained in a clean and safe manner.

The Project would not conflict with The Fullerton Plan and would also help to meet the City's economic goal for fiscal strength and stability through business investment and employment generation.

City of Fullerton Zoning Code

As previously identified, the Project involves a Zone Change to change the zoning in the southeast portion of the Project site from M-G ES (Manufacturing General in an Emergency Shelter Overlay Zone) to M-P-200-ES (Manufacturing Park, 200,000 s.f. minimum lot size, in an Emergency Shelter Overlay Zone) for consistent zoning across the Project site and a uniform set of development standards to follow. The proposed Zone Change would not alter the type of land uses allowed. The City allows zoning amendments if they are consistent with the objectives of the Zoning Code and the General Plan and if they promote the public health, safety, and welfare of the community. The Project would retain the current zoning for most of the site and the proposed Zone Change would not create public health or safety hazards on the site, as further discussed in Section 4.7, Hazards and Hazardous Materials, of this EIR.

As part of the Major Site Plan approval, the site, architectural and landscape plans for the Project are subject to review by the City for compliance with applicable development standards in the Zoning Code. As assessment of the Project's consistency with established development standards for industrial land uses is presented in Table 4.1-1, Zoning Development Standards Consistency Analysis, in Section 4.1, Aesthetics, of this EIR. As identified, the Project would not conflict with the established development standards. However, the Project Applicant has requested a variance to allow for the exceedance of the maximum building height limit as allowed by Section 15.68 of the of the Zoning Code. A height variance is required because the Project's proposed buildings could be built to a maximum height of 55 feet at the top of parapet, and the maximum allowable height within the Industrial zone is 45 feet. The Project would implement architectural features, articulation, and varied rooflines to reduce the proposed buildings' perceived heights. The variance is supported by the fact that the established height limit does not account for recent advances in the way that the warehouse and logistics industry has shifted with capabilities and technology driving the need for more storage capacity. Also, advancement in material handling equipment utilized for warehouses enables use of higher clear ceiling heights in industrial buildings.

With approval of the proposed Zone Change and variance, the Project would not conflict with the Fullerton Zoning Code.

SCAG 2016-2040 RTP/SCS and Connect SoCal

SCAG's 2016 RTP/SCS and Connect SoCal seek to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. These long-range visioning plans balance future mobility and housing needs with economic, environmental and public health goals. Table 4.9-1, SCAG RTP/SCS Policy Consistency Analysis, presents the Project's consistency with the 2016-2040 RTP/SCS and Connect SoCal. As demonstrated through this analysis, implementation of the Project would not conflict with the goals and policies of SCAG's regional planning programs.

TABLE 4.9-1 SCAG RTP/SCS POLICY CONSISTENCY ANALYSIS

RTP/ SCS Goal	Goal Statement	Project Consistency Discussion
2016 RTP/SCS		
G1	Align the plan investments and policies with improving regional economic development and competitiveness.	**No Conflict.** This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project implements development anticipated in the Southeast Industrial Focus Area of The Fullerton Plan, and specifically includes redevelopment of the Project site with four Class A speculative industrial buildings that are designed to meet contemporary industry standards and operational characteristics, that can accommodate a wide variety of users, and are economically competitive with similar industrial buildings in the local area and region. The Project would assist the City to meet its economic goal for fiscal strength and stability through business investment and employment generation. Accordingly, the Project would not impede the economic development in the City of Fullerton or the Region.
G2	Maximize mobility and accessibility for all people and goods in the region.	**No Conflict.** Access to the Project site would be provided from each of the four roadways adjacent to the Project site, which are all designated truck routes in the City of Fullerton. The roadways provide efficient access to SR-57 approximately 0.7 mile east of the Project site, and SR-91 approximately 0.4 mile south of the Project site. SR-91 provides access to Interstate 5 (I-5) (located approximately 4.7 miles west of the site). The Circulation and Parking description provided in Section 3.0, Project Description, of this EIR identifies required vehicular and non-vehicular circulation improvements in the public right-of-way that would be implemented as part of the Project, per the preliminary Project conditions of approval. Additionally, the Project would include installation of access driveways and an internal network of drive aisles to serve each building, which would meet City of Fullerton Fire Department standards for access, width, and turning radii. As described in Section 3.0, Project Description, circulation improvements required to be implemented with the Project include rehabilitation of pavement over Kimberly Avenue and E. Orangethorpe Avenue; modified turning radii and roadway geometrics, as needed, and as feasible, to accommodate truck turning movements. These improvements would comply with City standards for public roadways and would benefit

RTP/ SCS Goal	Goal Statement	Project Consistency Discussion
		persons of all social and economic groups who utilize these roadways.
G3	Ensure travel safety and reliability for all people and goods in the region.	**No Conflict.** As discussed in Section 4.11, Transportation, of this EIR, the Project would not result in a substantial safety hazard to motorists. Additionally, the proposed buildings would accommodate the movement of goods throughout the region, which would shorten the length of vehicular trips and increase the reliability of the movement of goods throughout the region.
G4	Preserve and ensure a sustainable regional transportation system.	**No Conflict.** The Project contributes to and would be consistent with planned land use and growth assumptions in the City of Fullerton, as anticipated by The Fullerton Plan. In addition to the construction of roadway improvements, the Project developers would pay applicable traffic mitigation fees that would fund additional traffic improvements in the study area and maintenance of roadway infrastructure in the Project area. The Project also includes the construction of sidewalks along roadways adjacent to the Project site where sidewalks do not currently exist; replacement of older sidewalks, as necessary; and, repair of existing sidewalks if damaged during construction.
G5	Maximize the productivity of our transportation system.	
G6	Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**No Conflict.** An analysis of the Project's environmental impacts is provided throughout this EIR. Notably, air quality is addressed in Section 4.2, and the Project's impacts would be less than significant. There are Class II (on-street, striped) bicycle lanes adjacent to the Project site along Acacia Avenue and E. Orangethorpe Avenue. In compliance with Section 15.40.070 of the City's Municipal Code, which identifies required transportation demand strategies to reduce dependency on single occupancy vehicles, and the CALGreen Code, interior bicycle storage would be provided within the proposed buildings, and short- and long-term exterior bicycle parking spaces would be provided at each building. The Project also includes the construction of sidewalks adjacent to the Project site where sidewalks do not currently exist; replacement of older sidewalks, as necessary; and, repair of existing sidewalks if damaged during construction. Sidewalks would be constructed to the City's full-width standards.
G7	Actively encourage and create incentives for energy efficiency, where possible.	**No Conflict.** This policy provides guidance to City staff to establish local incentive programs to encourage and promote energy efficient development. As described in Section 4.4, Energy, and Section 4.6, Greenhouse Gas

RTP/ SCS Goal	Goal Statement	Project Consistency Discussion
		Emissions, of this EIR, the Project would replace existing manufacturing and associated industrial buildings and facilities that were constructed as early as the 1950s and that do not meet current energy efficiency standards. The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements.
G8	Encourage land use and growth patterns that facilitate transit and active transportation.	**No Conflict.** This policy provides guidance to establish a local land use plan that facilitates the use of transit and active (non-motorized) forms of transportation. The Project involves development of the Project site with a contemporary logistics center in an area designated for industrial development by The Fullerton Plan, and would increase local employment opportunities, thereby increasing opportunities for employees to walk or bike to work. As discussed under the consistency analysis for the 2016 RTP/SCS Goal G6, the Project includes the construction of sidewalks and incorporates bicycle facilities that would facilitate pedestrian and bicycle travel. Additionally, there are OCTA bus routes along E. Orangethorpe Avenue and State College Boulevard adjacent to the Project site that would be easily accessible from the Project. A new concrete bus pad would be installed at the bus stop along E, Orangethorpe Avenue as part of the Project to further facilitate use of transit. Therefore, the Project would provide local job opportunities for existing and future residents of the City that would be accessible by transit and active transportation.
G9	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**No Conflict.** This policy provides guidance to the City of Fullerton to monitor the transportation network and to coordinate with other agencies as appropriate. The Project would not conflict with the City's transportation network or the City's coordination with other agencies.
Connect SoCal		
1	Encourage regional economic prosperity and global competitiveness.	**No Conflict.** Refer to the consistency analysis for Goal G1 of the 2016 RTP/SCS.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** Refer to the consistency analysis for Goals G2 and G3 of the 2016 RTP/SCS.

RTP/ SCS Goal	Goal Statement	Project Consistency Discussion
3	Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** Refer to the consistency analysis for Goals G4 and G9 of the 2016 RPT/SCS.
4	Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project involves development of a contemporary logistics center within an already-established industrial area, along designated truck routes, and in close proximity to the State highway system, which would avoid or shorten truck-trip lengths on other roadways. Also, refer to the consistency analysis for Goals G6 and G8 of the 2016 RTP/SCS, which addresses accommodations for alternative modes of transportation (e.g., transit, bicycle and walking).
5	Reduce greenhouse gas emission and improve air quality.	**No Conflict.** Refer to the consistency analysis for goals G6 and G7 of the 2016 RTP/SCS.
6	Support healthy and equitable communities.	**No Conflict.** This policy pertains to health and equitable communities, and these issues area addressed through goals and policies outlined in The Fullerton Plan. Relevant to the Project, the proposed building design would support the health of occupants and users by using non-toxic building materials and finishes, and by using windows and design features to maximize natural light and ventilation. It would also provide employment opportunities close to existing residences, which would allow members of the community to walk or bike to work.
7	Adapt to a changing climate and support an integrated regional development.	**No Conflict.** Connect SoCal indicates that since the adoption of the 2016 RTP/SCS, there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. E-commerce continues to be one of the most influential factors shaping goods movement. As previously identified, the Project involves the redevelopment of a Project site, historically used for manufacturing and industrial uses, with a logistics center consisting of four Class A warehouse buildings that are designed to meet contemporary industry standards and operational characteristics. The Project would accommodate a wide variety of users, and would be economically competitive with similar industrial buildings in the local area and region. Further, the Project is located in an area designated for industrial development in the City of Fullerton, in north Orange County, which benefits from its close proximity to the Los Angeles and Long Beach Ports, and key freeway infrastructure (e.g., SR-57, SR-

RTP/ SCS Goal	Goal Statement	Project Consistency Discussion
		91, I-5, etc.). The Project is in north Orange County, which also has a low-vacancy infill logistics market. The Project would improve "last mile" transit times (the movement of goods from a transportation hub or warehouse to its final delivery destination).
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** Connect SoCal indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouses, such as those proposed with the Project, are increasingly integrating automation to improve operational efficiencies in response to the surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety. The Project would meet contemporary industry standards and operational characteristics relative to transportation technologies and data-driven solutions.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** The Project is located in an area designated for industrial uses and would not interfere with the City's ability to encourage the development of diverse housing types that are supported by multiple transportation options in other parts of the City, as appropriate.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** The Project site is located in a highly urbanized and developed area, and does not contain any natural lands, nor does the Project site contain suitable habitat for native wildlife or plant species. Implementation of the Project would not interfere with the City's ability to promote the conservation of natural and agricultural lands and the restoration of habitats. Additionally, the Project site does not include any land designated for agricultural uses. The remnant orange orchards onsite are ornamental and the site is not zoned for agriculture; therefore, removal of the remnant orange orchards does not conflict with this policy.

Level of Significance Before Mitigation

Implementation of the Project would not result in conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would result.

Additional Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

4.9.5 CUMULATIVE IMPACTS

Section 5.1.6, Cumulative Impacts (Land Use and Planning), of The Fullerton Plan EIR concludes that future projects under The Fullerton Plan would be required to mitigate land use impacts on a project-by-project basis. Therefore, the incremental impact of The Fullerton Plan, when considered in combination with development within the subregion, would not result in cumulatively considerable land use impacts. In addition, it concludes that the land use changes anticipated under The Fullerton Plan would not conflict with SCAG's growth projections; thus, cumulative land use impacts are not anticipated to be significant. Additionally, projects within the SCAG region that are regionally significant, as determined by SCAG, would be reviewed for conformity with regional goals, further reducing potential cumulative impacts to a less than significant level. (Fullerton, 2012b)

Consistent with this conclusion and as discussed in this section, the Project would not conflict with local or regional land use plans, policies and regulations, and would not result in a significant impact on land use and planning. The land use character and overall intensity of the Project are consistent with that anticipated by The Fullerton Plan in the Southeast Industrial Focus Area, and would be compatible with surrounding industrial uses. Cumulative development projects will be reviewed for consistency with adopted land use plans, policies and regulations by the City of Fullerton (including The Fullerton Plan policies and City zoning requirements), in accordance with the requirements of CEQA, the state Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development.

Through these requirements, future development would be consistent with adopted goals and polices, would be in compliance with applicable regulations, and would compatible with existing land uses. Even if the cumulative impact of these projects would be significant, the Project's contribution to such cumulative land use impacts is less than significant and is thus not cumulatively considerable because (1) the proposed development would not change the type or amount of development anticipated by The Fullerton Plan; and, (2) the Project does not conflict with adopted goals and policies as identified through the analysis presented in this section.

4.9.6 REFERENCES

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4.10 NOISE

In compliance with the requirements of The Fullerton Plan Environmental Impact Report (EIR), this section provides project-specific analyses of the proposed project's potential to have adverse effects related to noise during construction and operation. The analysis in this section is based primarily on the Project-specific *Goodman Logistics Center Fullerton Noise Impact Analysis, City of Fullerton* (Noise Analysis), prepared by Urban Crossroads (July 2020) (Urban Crossroads, 2020), and included in Appendix J of this EIR.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

There were no comments regarding noise received by the City in response to the Notice of Preparation or during the Draft EIR public scoping meeting held on April 20, 2020 publicly-noticed EIR scoping meeting

4.10.1 NOISE AND VIBRATION FUNDAMENTALS AND TERMINOLOGY

Detailed information about the fundamentals of noise and vibration, and associated terminology is presented in Section 2 of the Noise Analysis included in Appendix J of this EIR; this information is summarized herein.

A. Noise

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear.

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort.

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most used figure is the equivalent level (L_{eq}). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in dBA. The L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period (typically one hour) and is commonly used to describe the

"average" noise levels within the environment. The City of Fullerton relies on the percentile noise levels[1] to describe the stationary source noise level limits with respect to residentially zoned properties and sensitive uses (collectively termed sensitive receivers).

Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City of Fullerton relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources.

The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source, and at a rate of 3 dB for each doubling of distance from a line source. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source.

To account for the ground-effect attenuation (absorption), two types of site conditions are commonly used in noise prediction: soft-site and hard-site conditions. Hard sites (i.e., sites with a reflective surface between the source and the receiver, such as parking lots or smooth bodies of water) receive no excess ground attenuation, and the changes in noise levels with distance (drop-off rate) are simply the geometric spreading of the source. Soft sites are sites that have an absorptive ground surface (e.g., soft dirt, grass, or scattered bushes and trees) and receive an excess ground attenuation value of 1.5 dBA per doubling of distance.

Community responses to noise vary depending upon everyone's susceptibility to noise and personal attitudes about noise. Despite this variability in behavior on an individual level, a change of 1 dBA is considered just perceptible, a change of 3 dBA is considered barely perceptible, a change of 5 dBA is considered readily perceptible, and a change of 10 dBA is considered twice as loud.

B. Vibration

The California Building Code, The Fullerton Plan, and The Fullerton Municipal Code do not have guidance for assessing vibration levels. Therefore, consistent with The Fullerton Plan EIR, the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*, which provides technical guidance for predicting and assessing noise and vibration impacts is used for purposes of this analysis. According to the FTA, vibration is the periodic oscillation of a medium or object.

[1] The percentile noise descriptors are the noise levels equaled or exceeded during 50 percent, 25 percent, 8 percent, and 2 percent of a stated time. Sound levels associated with the L2 and L8 typically describe transient or short-term events, while levels associated with the L50 describe the steady state (or median) noise conditions.

The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Decibel notation (VdB) is commonly used to measure root mean square (RMS)[2].

Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

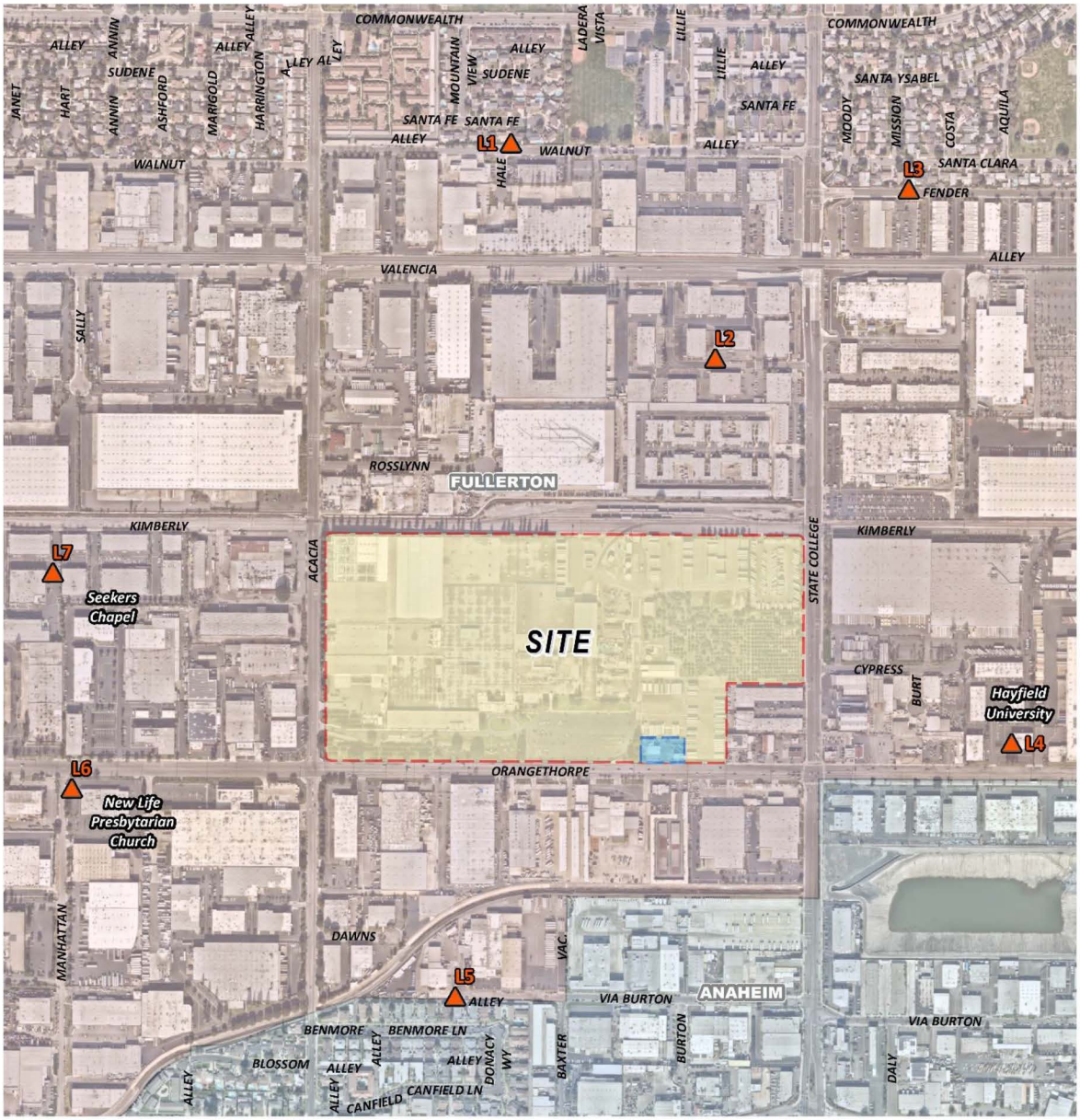
4.10.2 Existing Setting

A. Noise Levels

To assess the existing noise level environment, 24-hour noise level measurements were taken at seven locations on Wednesday, April 29, 2020. The receiver locations were selected to describe and document the existing noise environment within the noise study area. Figure 4.10-1, *Noise Measurement Locations*, depicts the noise level measurement locations. Table 4.10-1, *24-Hour Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. The noise measurements represent background ambient noise conditions during the mandatory State of California stay at home order due to the Covid-19 pandemic. Based on a comparison of existing noise level measurements taken in December 2019, there was an estimated 2.5 dBA L_{eq} reduction in noise levels due to the stay at home order. Therefore, the noise levels presented in Table 4.10-1 conservatively overstate the relative project noise level increases to compensate for the lower ambient noise level measurements. As shown in Table 4.10-1, average daytime noise levels in the study area range from 54.8 dBA L_{eq} to 65.4 dBA L_{eq}, while average nighttime noise levels in the study area range from 50.6 dBA L_{eq} to 62.2 dBA L_{eq}.

Noise contours also were developed to assess existing noise levels along roadways that would be used by Project-generated traffic. Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise

[2] The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS).



Source(s): Urban Crossroads (07-13-2020)

Figure 4.10-1

Not to Scale

Noise Measurement Locations

TABLE 4.10-1 24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]		CNEL
		Daytime	Nighttime	
L1	Located north of the Project site on Walnut Avenue near existing single-family residential home at 2016 E Santa Fe Avenue.	64.9	57.5	66.2
L2	Located northeast of the Project site near 637 South State College Boulevard.	63.0	56.2	64.7
L3	Located northeast of the Project site on Fender avenue near existing single-family residential home at 2400 Santa Clara Avenue.	65.4	59.8	67.9
L4	Located east of the Project site near Hayfield University.	62.5	59.0	66.4
L5	Located south of the Project site near existing single-family residential homes at 1545 E Benmore Lane.	63.0	62.2	68.9
L6	Located southwest of the Project site near the New Life Presbyterian Church.	61.4	58.3	65.5
L7	Located east of the Project site near Seekers Chapel.	54.8	50.6	58.1

[1] See Figure 4.10-1 for the noise level measurement locations.
[2] Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of the Project's Noise Analysis (Appendix J of this EIR).
Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2020)

levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources. Estimated existing traffic noise levels on roads that would be used by Project-generated traffic are shown in Table 4.10-2, *Existing Roadway Noise Contours*.

B. Sensitive Receptors

To assess the potential for short-term construction and long-term operational noise impacts, eight residentially zoned properties and sensitive uses (collectively termed sensitive receivers for purposes of this analysis), as shown on Figure 4.10-2, *Sensitive Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. In addition to noise sensitive residential noise zones, the City of Fullerton Municipal Code Section 15.90.030(B)(1) defines sensitive use as any private or public school, hospital, residential care facility for the elderly, and religious institution. Land uses less sensitive to noise are business, commercial, and professional developments. Land uses that are the least sensitive to noise include, but are not limited to: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

TABLE 4.10-2 EXISTING ROADWAY NOISE CONTOURS

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Raymond Av.	n/o Kimberly Av.	I	72.2	59	127	274
2	Raymond Av.	s/o Kimberly Av.	I	72.3	60	129	278
3	Raymond Av.	s/o Orangethorpe Av.	I	73.3	70	151	325
4	Raymond Av.	s/o SR-91 Westbound Ramps	I	74.3	87	188	406
5	Raymond Av.	s/o SR-91 Eastbound Ramps	EDR/MDR/GC/NCR	74.4	89	191	411
6	Acacia Av.	n/o Kimberly Av.	I	67.4	RW	58	125
7	Acacia Av.	s/o Kimberly Av.	I	67.3	RW	57	122
8	N. State College Bl.	n/o Chapman Av.	C/LDR/HDR	76.3	131	282	608
9	N. State College Bl.	s/o Chapman Av.	C/LMDR/LDR	73.3	84	180	388
10	N. State College Bl.	s/o Commonwealth Av.	MDR/LDR/I	74.3	96	208	448
11	N. State College Bl.	s/o Kimberly Av.	I	74.2	96	207	445
12	N. State College Bl.	s/o Dwy. 16	I	74.3	96	208	447
13	N. State College Bl.	s/o Orangethorpe Av.	I/GC/I/WU	75.0	108	232	500
14	N. State College Bl.	s/o SR-91 Westbound Ramps	I/LDR/MDR	75.6	125	270	582
15	N. State College Bl.	s/o SR-91 Eastbound Ramps	LDR/MDR	74.8	111	240	517
16	S. Placentia Av.	n/o Kimberly Av.	I	71.8	56	120	258
17	S. Placentia Av.	s/o Kimberly Av.	I	71.8	55	119	257
18	Kimberly Av.	e/o Raymond Av.	I	63.7	RW	RW	53
19	Kimberly Av.	e/o Dwy. 5	I	63.8	RW	RW	54
20	Kimberly Av.	e/o Dwy. 11	I	63.6	RW	RW	52
21	Orangethorpe Av.	w/o Raymond Av.	GC/OL/I	76.0	125	269	580
22	Orangethorpe Av.	e/o Raymond Av.	I	77.0	147	316	681
23	Orangethorpe Av.	e/o Acacia Av.	I	76.9	145	311	671
24	Orangethorpe Av.	e/o Dwy. 6	I	76.9	145	311	671
25	Orangethorpe Av.	e/o Dwy. 10	I	76.9	144	310	667
26	Orangethorpe Av.	w/o N. State College Bl.	I	76.9	144	310	667
27	Orangethorpe Av.	e/o N. State College Bl.	I	76.7	141	303	653
28	Orangethorpe Av.	w/o S. Placentia Av.	I	76.5	136	294	633
29	Orangethorpe Av.	e/o S. Placentia Av.	LDR/I/C	74.4	118	255	550
30	Orangethorpe Av.	e/o SR-57 Southbound Ramps	LDR/C	74.9	127	274	591
31	Orangethorpe Av.	e/o SR-57 Northbound Ramps	LDR/C/I/CM	75.1	131	283	610

[1] The Fullerton Plan Community Development Plan, City of Anaheim General Plan Land Use Plan, City of Placentia General Plan Land Use Map.
[2] The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use.
RW = Location of the respective noise contour falls within the right-of-way of the road; I = Industrial; EDR = Estate Density Residential; NCR = Neighborhood Center Commercial; C = Commercial; LDR = Low Density Residential; HDR = High Density Residential; LMDR = Low-Medium Density Residential; MDR = Medium Density Residential; WU = Water Uses; GC = General Commercial; OL = Office Low; CM = Commercial-Manufacturing.
Source: (Urban Crossroads, 2020)

The distances to sensitive receivers shown on Figure 4.10-2 are measured from the Project site boundary to the outdoor living areas (e.g., private backyards) or the building facade, whichever is closer to the Project site. Other sensitive land uses in the Project study area that are located at greater distances than those identified on Figure 4.10-2 would experience lower noise levels from Project-related construction and operational activities due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location. Following is a description of the eight sensitive receivers:

R1: Location R1 represents the existing noise sensitive residence at 231 South Acacia Avenue in the City of Fullerton, approximately 1,984 feet northwest of the Project site. This location describes the closest residential neighborhoods at the transition from industrial to residential to the northwest. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the residential building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

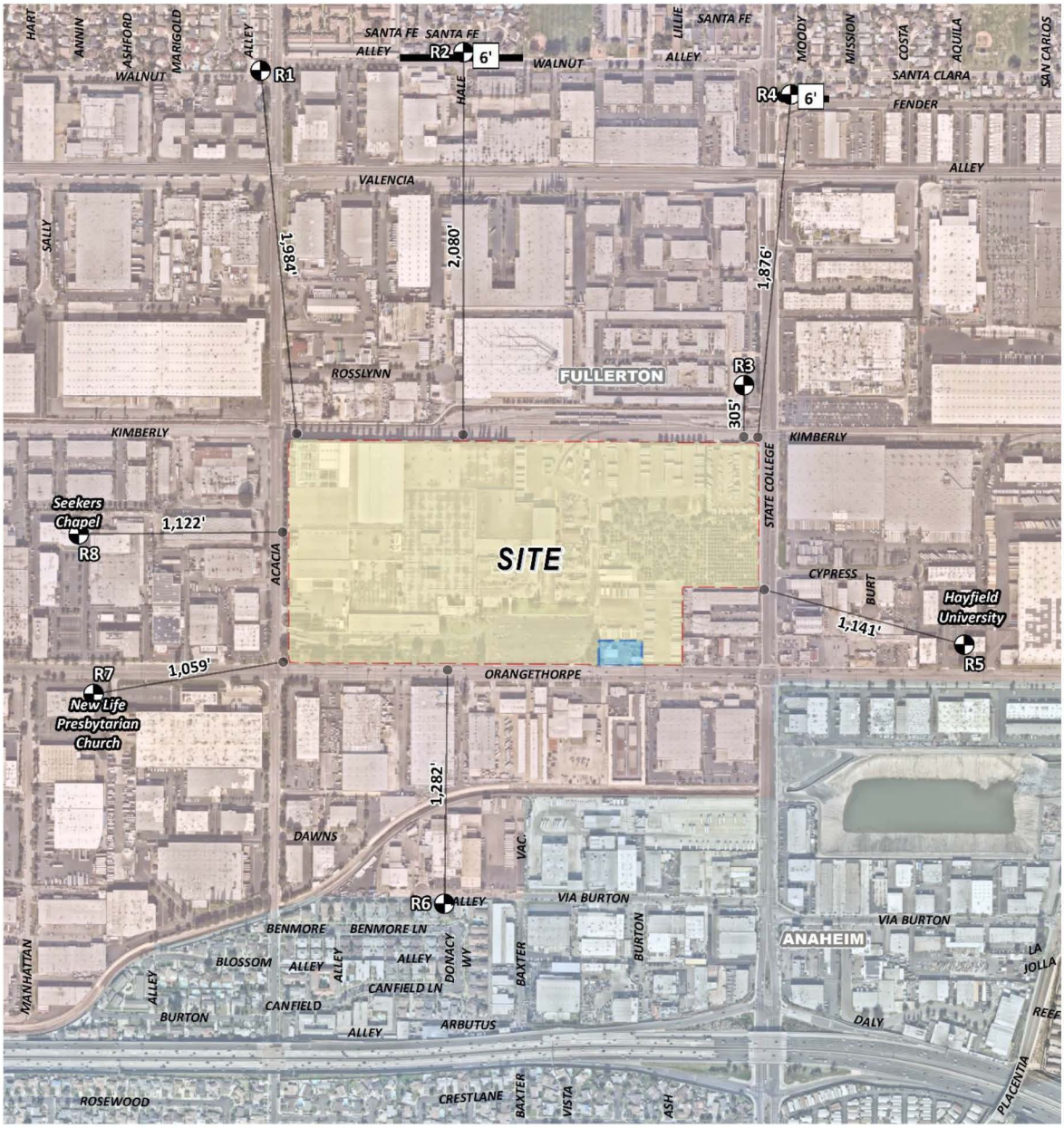
R2: Location R2 represents the existing noise sensitive residence at 2016 East Santa Fe Avenue in the City of Fullerton, approximately 2,080 feet north of the Project site. This location describes the closest residential neighborhoods at the transition from industrial to residential to the north. R2 is placed in the private outdoor living area (backyard) facing the Project site behind the existing 6' foot high barrier. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.

R3: Location R3 represents the True Unity Baptist Church at 765 South State College Boulevard in the City of Fullerton, approximately 305 feet north of the Project site. Receiver R3 is placed at the building façade. A 24-hour noise measurement near this location, L2, is used to describe the existing ambient noise environment.

R4: Location R4 represents the existing noise sensitive residence at 2400 Santa Clara Avenue in the City of Fullerton, approximately 1,876 feet northeast of the Project site. This location describes the closest residential neighborhoods at the transition from industrial to residential to the northeast. R4 is placed in the private outdoor living area (backyard) facing the Project site behind the existing 6' foot high barrier. A 24-hour noise measurement near this location, L3, is used to describe the existing ambient noise environment.

R5: Location R5 represents Hayfield University at 2495 E. Orangethorpe Avenue in the City of Fullerton approximately 1,141 feet east of the Project site. Receiver R5 is placed at the building façade. A 24-hour noise measurement near this location, L4, is used to describe the existing ambient noise environment.

R6: Location R6 represents the existing noise sensitive residence at 1545 East Benmore Lane, in the City of Anaheim, approximately 1,282 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the



LEGEND:

- Site Boundary
- Potential Expansion Site
- City of Fullerton
- City of Anaheim
- 6' Existing Barrier Height (in feet)
- Existing Barrier
- Receiver Locations
- Distance from receiver to Project site boundary (in feet)

Source(s): Urban Crossroads (07-13-2020)

Figure 4.10-2

Not to Scale

Sensitive Receiver Locations

Project site, receiver R6 is placed at the residential building façade. A 24-hour noise measurement near this location, L5, is used to describe the existing ambient noise environment.

R7: Location R7 represents the New Life Presbyterian Church at 1430 E. Orangethorpe Avenue in the City of Fullerton, approximately 1,059 feet southwest of the Project site. Receiver R7 is placed at the building façade. A 24-hour noise measurement near this location, L6, is used to describe the existing ambient noise environment.

R8: Location R8 represents Seekers Chapel at 1521 E. Orangethorpe Avenue in the City of Fullerton, approximately 1,122 feet west of the Project site. Receiver R8 is placed at the building façade. A 24-hour noise measurement near this location, L7, is used to describe the existing ambient noise environment.

4.10.3 EXISTING REGULATORY SETTING

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, State, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

Section 5.6 of The Fullerton Plan EIR provides a discussion of the regulatory framework for the analysis of noise impacts. Noise regulations are further discussed in the Noise Analysis included in Appendix J of this EIR. The following discussion summarizes the regulatory information for noise that is particularly relevant to the Project.

A. State

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research (OPR). The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

State of California Green Building Standards Code

The State of California's Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA Leq for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1).

B. Local

City of Fullerton General Plan

The City of Fullerton has adopted Chapter 7, Noise, of The Fullerton Plan to identify the potential for noise conflicts and identify ways of reducing potential noise impacts. The policies provided below are identified by The Fullerton Plan for potential noise issues:

P8.2 Mobile Sources: Support projects, programs, policies and regulations to control and abate noise generated by mobile sources.

P8.3 Consideration of Noise in Land Use Decisions: Support projects, programs, policies and regulations which ensure noise-compatible land use planning recognizing the relative importance of noise sources in order of community impact, the local attitudes towards these sources, and the suburban or urban characteristics of the environment, while identifying noise sensitive uses.

P8.4 Noise Reduction Measures: Support projects, programs, policies and regulations to control and abate noise generated by stationary sources.

P8.5 Focus Area Planning: Support projects, programs, policies and regulations to evaluate ways to ensure noise compatible land use planning as part of community-based planning of Focus Areas.

P8.6 Noise Receptors: Support projects, programs, policies and regulations to permit uses where the noise level of the surroundings—after taking into account noise insulation features and other control techniques of the use—is not detrimental to the use.

P8.7 Noise Generators: Support projects, programs, policies and regulations to permit uses and/or activities where the noise generated by the use and/or activity is not detrimental or otherwise a nuisance to the surroundings.

The noise criteria identified in Table 8 of The Fullerton Plan, which is provided in Exhibit 3-A, Land Use Compatibility for Community Noise Environments, of the Noise Analysis, provides the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Land Use Compatibility for Community Noise Environments matrix indicates that the industrial land uses proposed as part of the Project are considered normally acceptable with exterior noise levels between 50 and 75 CNEL, and conditionally acceptable with noise levels between 70 and 80 dBA CNEL. For conditionally acceptable land uses, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

City of Fullerton Standards

Noise

To minimize the operational (stationary-source) noise activity from industrial land use, the City of Fullerton Municipal Code, Section 15.40.080, requires that sound related to industrial or manufacturing processes shall comply with the Noise Standards and Regulations outlined in Chapter 15.90. This chapter outlines noise standards for sensitive receivers that includes all property within the residential noise zone (Section 15.90.030(A)) and any private or public school, hospital, residential care facility for the elderly, and religious institutions (Section 15.90.30(B)(1)). For sensitive receivers, the City of Fullerton Municipal Code, Section 15.90.030, identifies operational noise level limits using the percentile noise descriptors. The L_{50} percentile noise descriptor identifies the noise levels occurring 50 percent of the time. These standards shall not exceed:

- The noise standard for a cumulative period of more than 30 minutes in any hour (L_{50})
- The noise standard plus 5 dB(A) for a cumulative period of more than 15 minutes but less than 30 minutes in any hour (L_{25})
- The noise standard plus 10 dB(A) for a cumulative period of more than 5 minutes but less than 15 minutes in any hour (L_8)
- The noise standard plus 15 dB(A) for a cumulative period of more than one minute but less than five minutes in any hour (L_2)
- The noise standard plus 20 dB(A) for a cumulative period of less than one minute in an hour (L_{max}).

Section 15.90.030(D)sate that “[i]n the event the ambient noise level exceeds any of the five noise limit categories listed above, the cumulative period applicable to the category shall be increased to reflect the ambient noise level.” The City does not have specific noise level limits for commercial or industrial zones. Rather, the Municipal Code regulates the noise caused by any use on a sensitive receiver. The exterior noise level standards of the City of Fullerton Municipal Code applicable to the sensitive receivers are shown on Table 4.10-3, *City of Fullerton Operational Noise Level Standards*.

TABLE 4.10-3 CITY OF FULLERTON OPERATIONAL NOISE LEVEL STANDARDS

Time Period	Exterior Noise Level Standards (dBA)[1]				
	L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (Anytime)
Daytime (7:00 a.m. to 10:00 p.m.)	55	60	65	70	75
Nighttime (10:00 p.m. to 7:00 a.m.)	50	55	60	65	70

[1] The percent noise level is the level exceeded "n" percent of the time during the measurement period. L_{50} is the noise level exceeded 50% of the time. (City of Fullerton Municipal Code, Section 15.90.030 included in Appendix 3.1 of the Noise Analysis).
Source: (Urban Crossroads, 2020)

Noise sources associated with construction, repair, remodeling, or grading of any real property are exempt from noise level standards provide they take place between the hours of 7:00 a.m. and 8:00 p.m. on any day except Sunday or a City-recognized holiday.

Vibration

Section 15.40.080, Industrial Environmental Controls, of the Fullerton Municipal Code addresses controls to minimize environmental pollution by industrial or other activities and includes the following requirements: vibration from any machine, operation or process that can cause noticeable displacement as measured at the property line of the parcel on which the use is located shall be prohibited (Section 15.40.080(E)).

City of Anaheim Noise Standards

Although the Project site is located within the City of Fullerton, noise-sensitive receivers potentially impacted by operational noise activities are also located in the City of Anaheim. The City of Anaheim Municipal Code, Chapter 6.70, Sound Pressure Levels, limits sound levels for stationary sources of noise radiated for extended periods from any premises in excess of 60 decibels at the property line. Sound created by construction or building repair of any premises within the City of Anaheim is exempt from the application of the Municipal Code standards during the hours of 7:00 a.m. and 7:00 p.m.

4.10.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a Project would normally have a significant adverse environmental impact related to noise if it would:

a. Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

b. Result in the generation of excessive groundborne vibration or groundborne noise levels.

c. For a project located within the vicinity of a private airship or 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, expose people residing or working in the project area to excessive noise levels.

Provided below is a summary of the significance criteria used to evaluate Project-related noise impacts, which is based on the noise standards utilized in the City of Fullerton and City of Anaheim.

Off-Site Traffic Noise Thresholds of Significance

Table 5.6-7 of The Fullerton Plan Final Program EIR noise section presents the thresholds of "Significance of Changes in Cumulative Noise Exposure" and is used to describe the amount to which a given exterior noise level increase is considered acceptable. An increase in ambient noise levels is assumed to be a significant noise impact if a project causes ambient noise levels to exceed the following at noise sensitive locations:

- Where the existing ambient noise level is less than 60 dBA, a Project-related permanent increase in ambient noise levels of 5 dBA CNEL or greater.
- Where the existing ambient noise level is greater than 60 dBA, a Project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater.

Long-Term Operational Noise and Vibration Thresholds of Significance

For purposes of evaluating the Project's long-term operational noise and vibration impacts, the following thresholds of significance are utilized.

- If Project-related operational (stationary-source) noise levels:
    - exceed the exterior 55 dBA L50 daytime or 50 dBA L50 nighttime noise level standards for sensitive receivers. These standards shall not be exceeded plus 5 dBA for a cumulative period of more than 15 minutes but less than 30 minutes in any hour (L25), or plus 10 dB(A) for a cumulative period of more than 5 minutes but less than 15 minutes in any hour (L8), or plus 15 dB(A) for a cumulative period of more than one minute but less than five minutes in any hour (L2), or plus 20 dB(A) for a cumulative period of less than one minute in an hour (Lmax). In the event the ambient noise level exceeds any of the five noise limit categories listed above, the cumulative period applicable to the category shall be increased to reflect the ambient noise level. (City of Fullerton Municipal Code, Section 15.90.030).
    - exceed the 60 dBA Leq anytime noise level standard at the property line (City of Anaheim Municipal Code Section 6.70)
- If the existing ambient noise levels at the noise-sensitive receivers near the Project site:
    - are less than 60 dBA Leq and the Project creates a 5 dBA Leq or greater Project-related noise level increase; or
    - are greater than 60 Leq and the Project creates a 3 dBA Leq or greater Project-related noise level increase; or

- If Project generated operational vibration levels exceed the FTA's acceptable vibration thresholds of 78 VdB for daytime residential use and 72 VdB for nighttime uses in buildings where people normally sleep.

Short-Term Construction Noise and Vibration Thresholds of Significance

The City of Fullerton and City of Anaheim both exempt noise from construction from compliance with Noise Standards within identified hours. However, for purposes of performing a conservative analysis however, the following criteria are applied to daytime and night-time construction-related noise:

- If Project-related construction noise levels:
    - exceed the exterior 55 dBA L_{50} daytime or 50 dBA L_{50} nighttime noise level standards for sensitive receivers. These standards shall not be exceeded plus 5 dBA for a cumulative period of more than 15 minutes but less than 30 minutes in any hour (L_{25}), or plus 10 dB(A) for a cumulative period of more than 5 minutes but less than 15 minutes in any hour (L_8), or plus 15 dB(A) for a cumulative period of more than one minute but less than five minutes in any hour (L_2), or plus 20 dB(A) for a cumulative period of less than one minute in an hour (L_{max}). In the event the ambient noise level exceeds any of the five noise limit categories listed above, the cumulative period applicable to the category shall be increased to reflect the ambient noise level. (City of Fullerton Municipal Code, Section 15.90.030).
    - exceed the 60 dBA Leq anytime noise level standard at the property line (City of Anaheim Municipal Code Section 6.70)
- If Project generated construction vibration levels exceed the FTA's acceptable vibration thresholds of 78 VdB for daytime residential use and 72 VdB for nighttime uses in buildings where people normally sleep. (FTA Transit Noise and Vibration Impact Assessment).

4.10.5 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measures from the Fullerton Plan Environmental Impact Report

The Fullerton Plan EIR mitigation measure (MM) N-4 applies to pile driving activities, which are not proposed as part of the Project's construction phase; thus, MM N-4 is not applicable to the Project. The Fullerton Plan EIR MM N-5 applies to residential development within the 65 dBA CNEL contour for the Fullerton Municipal Airport. The Project does not include any residential components and is not located within the 65 dBA CNEL contour; thus, MM N-5 is not applicable to the Project. MM N-4 and MM N-5 will not be included in the Mitigation Monitoring and Reporting (MMRP) for the Project.

The Fullerton Plan EIR includes the following MMs that are applicable to the Project and will be included in the MMRP for the Project.

MM N-1 Project applicants shall ensure through contract specifications that construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading or building permit (whichever is issued first). The construction BMPs shall include the following:

- Ensure that construction equipment is properly muffled according to industry standards and be in good working condition.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Schedule high noise-producing activities between the hours of 7:00 AM and 8:00 PM on any day except Sunday or a City-recognized holiday to minimize disruption on sensitive uses.
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party.

MM N-2 Project applicants shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.

MM N-3 Project applicants shall ensure by contract specifications that construction staging areas along with the operation of earthmoving equipment within the City would be located as far away from vibration and noise sensitive sites as possible. Should construction activities take place within 25 feet of an occupied structure, a project specific vibration impact analysis shall be conducted to determine the specific vibration control mechanisms that would be incorporated into the project's construction bid documents, if necessary. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.

MM N-6 The City shall require mechanical equipment from future development to be placed as far practicable from sensitive receptors. Additionally, the following shall be considered

prior to HVAC installation: proper selection and sizing of equipment, installation of equipment with proper acoustical shielding, and incorporating the use of parapets into the building design.

B. Impact Analysis

Threshold a.	***Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

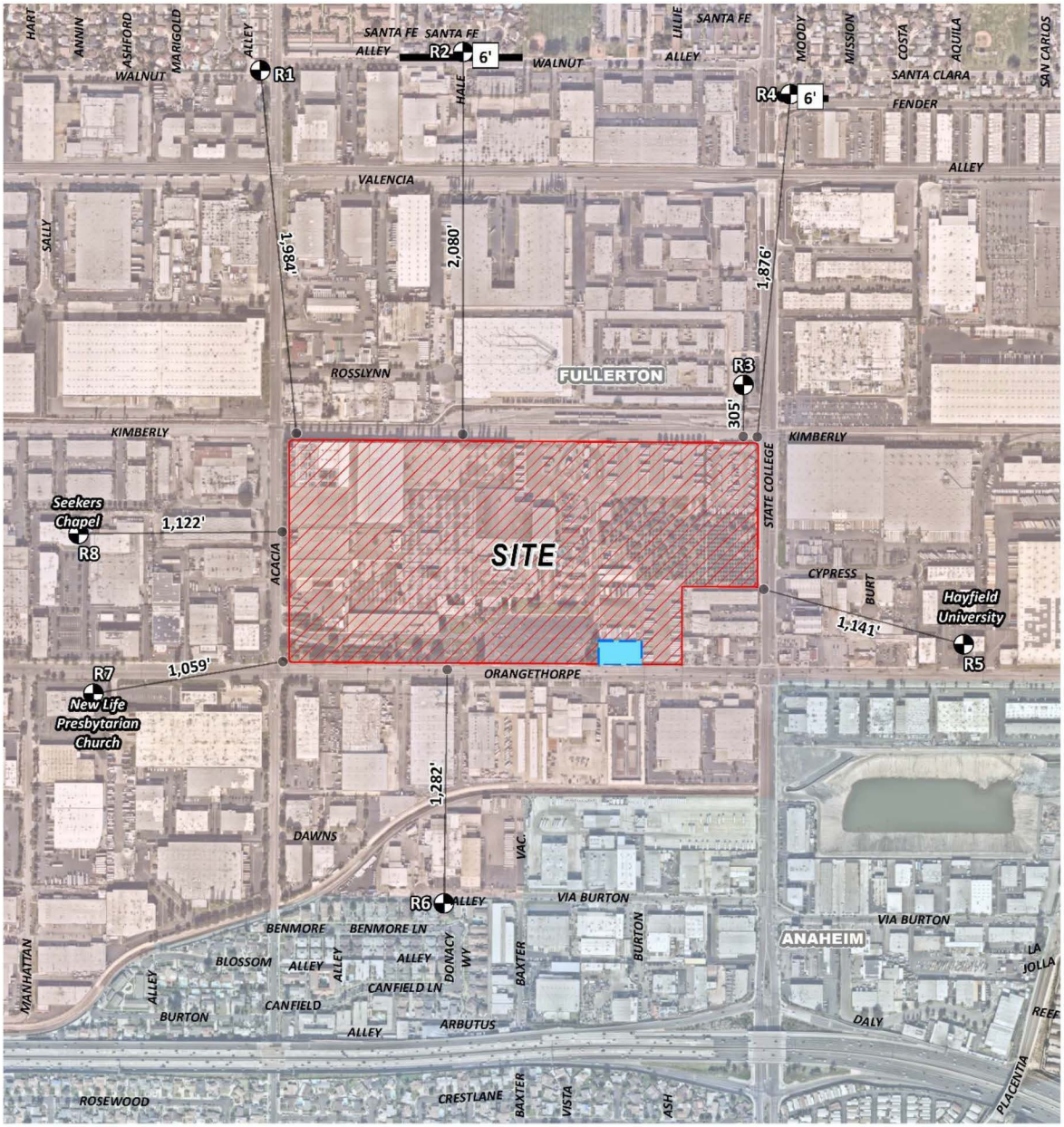
The proposed Project has the potential to result in a substantial temporary or permanent increase in ambient noise levels during construction of the proposed Project, during long-term site operations, and due to Project-related traffic. Each is discussed below.

Short-Term Construction-Related Noise Impacts

Noise generated by typical construction equipment and activities would include a combination of trucks, power tools, concrete mixers, and portable generators operating simultaneously that when combined can reach high levels. No pile driving is expected as part of the Project construction activities. Figure 4.10-3, *Typical Construction Noise Source and Receiver* Locations, shows the construction noise source locations in relation to the nearest sensitive receiver locations previously shown on Figure 4.10-2. The number and mix of construction equipment are expected to occur in the following stages: demolition, site preparation, grading, building construction, paving, and architectural coating.

Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 80 dBA when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver, and would be further reduced to 68 dBA at 200 feet from the source to the receiver.

The construction noise analysis for the Project was prepared using reference noise level measurements taken by Urban Crossroads, Inc., to describe the typical construction activity noise levels for each stage of Project construction. This includes the demolition of existing buildings and facilities on the Kimberly-Clark site and the potential expansion site. The construction reference noise level measurements represent a list of typical construction activity noise levels with multiple pieces of equipment operating simultaneously to conservatively estimate Project construction noise levels. A summary of the construction reference noise level measurements used in the analysis is included as Table 10-1 of the Project's Noise Analysis included in Appendix J of this EIR. The reference noise level measurements were collected from existing construction operations with similar equipment as those expected with the Project. While the construction size, scope of work, and ambient noise levels vary for the reference noise level measurements, each



Source(s): Urban Crossroads (07-13-2020)

Figure 4.10-3

Not to Scale

Typical Construction Noise Source and Receiver Locations

piece of construction equipment fully represents the expected noise levels for each activity. The construction noise analysis does not rely on any one reference noise level to fully describe the potential impacts. Rather, a combination of individual construction noise level measurements is used to describe typical activities for each stage of construction.

Using the reference construction equipment noise levels and the Computer Aided Noise Abatement (CadnaA) noise prediction model, calculations of the Project construction noise level impacts with multiple pieces of equipment operating simultaneously at the nearest sensitive receiver locations were completed. This includes the additional noise attenuation provided by the existing intervening building structures and noise barriers located between the Project site and the nearest receiver locations. As shown on Table 4.10-4, *Typical Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 53.7 to 61.6 dBA Leq at the nearest receiver locations. Appendix 10.1 to the Project's Noise Analysis (Appendix J of this EIR) includes the detailed CadnaA construction noise model inputs.

TABLE 4.10-4 TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})						
	Demolition	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	55.9	59.3	57.5	55.6	55.2	49.2	59.3
R2	54.3	57.7	55.9	54.0	53.6	47.6	57.7
R3	57.9	61.3	59.5	57.6	57.2	51.2	61.3
R4	54.0	57.4	55.6	53.7	53.3	47.3	57.4
R5	58.2	61.6	59.8	57.9	57.5	51.5	61.6
R6	50.6	54.0	52.2	50.3	49.9	43.9	54.0
R7	56.8	60.2	58.4	56.5	56.1	50.1	60.2
R8	50.3	53.7	51.9	50.0	49.6	43.6	53.7

[1] Noise receiver locations are shown on Figure 4.10-3.
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of the Project's Noise Analysis (Appendix J of this EIR).
Source: (Urban Crossroads, 2020)

To demonstrate compliance with local noise regulations, the Project-only construction noise levels are conservatively evaluated against exterior noise level thresholds based on the City of Fullerton and City of Anaheim at the nearest noise-sensitive receiver locations. Table 4.10-5, *Typical Daytime Construction Noise Level Compliance*, shows that the construction noise levels associated with the Project would satisfy the City of Fullerton noise level standards adjusted to reflect the ambient noise level, and the City of Anaheim 60 dBA Leq anytime exterior noise level standards at all the nearest sensitive receiver locations. Therefore, the Project's typical construction-related noise impacts are considered less than significant at the nearest noise-sensitive receiver locations.

TABLE 4.10-5 TYPICAL DAYTIME CONSTRUCTION NOISE LEVEL COMPLIANCE

Receiver Location[1]	Use	City	Measurement Location[2]	Construction Noise Levels (dBA L_{eq})		
				Highest Construction[3]	Daytime Threshold[4]	Threshold Exceeded?[5]
R1	Residential	Fullerton	L1	59.3	64.9	No
R2	Residential	Fullerton	L1	57.7	64.9	No
R3	Church	Fullerton	L2	61.3	63.0	No
R4	Residential	Fullerton	L3	57.4	65.4	No
R5	School	Fullerton	L4	61.6	62.5	No
R6	Residential	Anaheim	L5	54.0	60.0	No
R7	Church	Fullerton	L6	60.2	61.4	No
R8	Church	Fullerton	L7	53.7	54.8	No

[1] Noise receiver locations are shown on Figure 4.10-3.
[2] Reference noise level measurement locations as shown on Figure 4.10-1.
[3] Construction noise level calculations based on distance from the Project site boundaries (construction activity area) to nearby receiver locations as shown on Table 4.10-4.
[4] Exterior noise level standards adjusted to reflect the daytime ambient noise levels (Table 4.10-1) per the City of Fullerton Municipal Code, Section 15.90.030 and the City of Anaheim Municipal Code, Chapter 6.70.
[5] Do the estimated Project construction noise levels exceed the daytime construction noise level threshold?
Source: (Urban Crossroads, 2020)

In addition, nighttime concrete pouring activities would occur as a part of construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours. Since the nighttime concrete pours would take place outside the permitted hours pursuant to Section 15.90.050 of the City of Fullerton Municipal Code, which exempts noise from construction activities from the Noise Ordinance standards during the hours of 7:00 a.m. to 8:00 p.m. on any day except Sunday or a City-recognized holiday, the Project Applicant would be required to obtain authorization for nighttime work from the City of Fullerton. Any nighttime construction noise activities are required to satisfy the noise limit categories outlined in Section 15.90.030 of the Municipal Code.

As shown on Table 4.10-6, *Nighttime Concrete Pour Noise Level Compliance*, the noise levels associated with the nighttime concrete pour activities (paving) are estimated to range from 49.6 to 57.5 dBA Leq and would satisfy the stationary-source exterior hourly average Leq noise levels adjusted to reflect the ambient noise level (per the City of Fullerton Municipal Code), and the City of Anaheim 60 dBA Leq anytime exterior noise level standards at all the receiver locations, with the exception of one receiver in the City of Fullerton. The estimated nighttime concrete pour activity noise levels include the additional noise attenuation provided by the existing intervening building structures and noise barriers located between the Project site and the nearest receiver locations. While location R3 may experience nighttime noise concrete pour activity noise levels that exceed the existing nighttime ambient noise conditions, this receiver is not operational during the nighttime hours. Therefore, based on the results of this analysis, the nearest noise receiver locations would experience less than significant impacts due to the Project-related nighttime concrete pour activities.

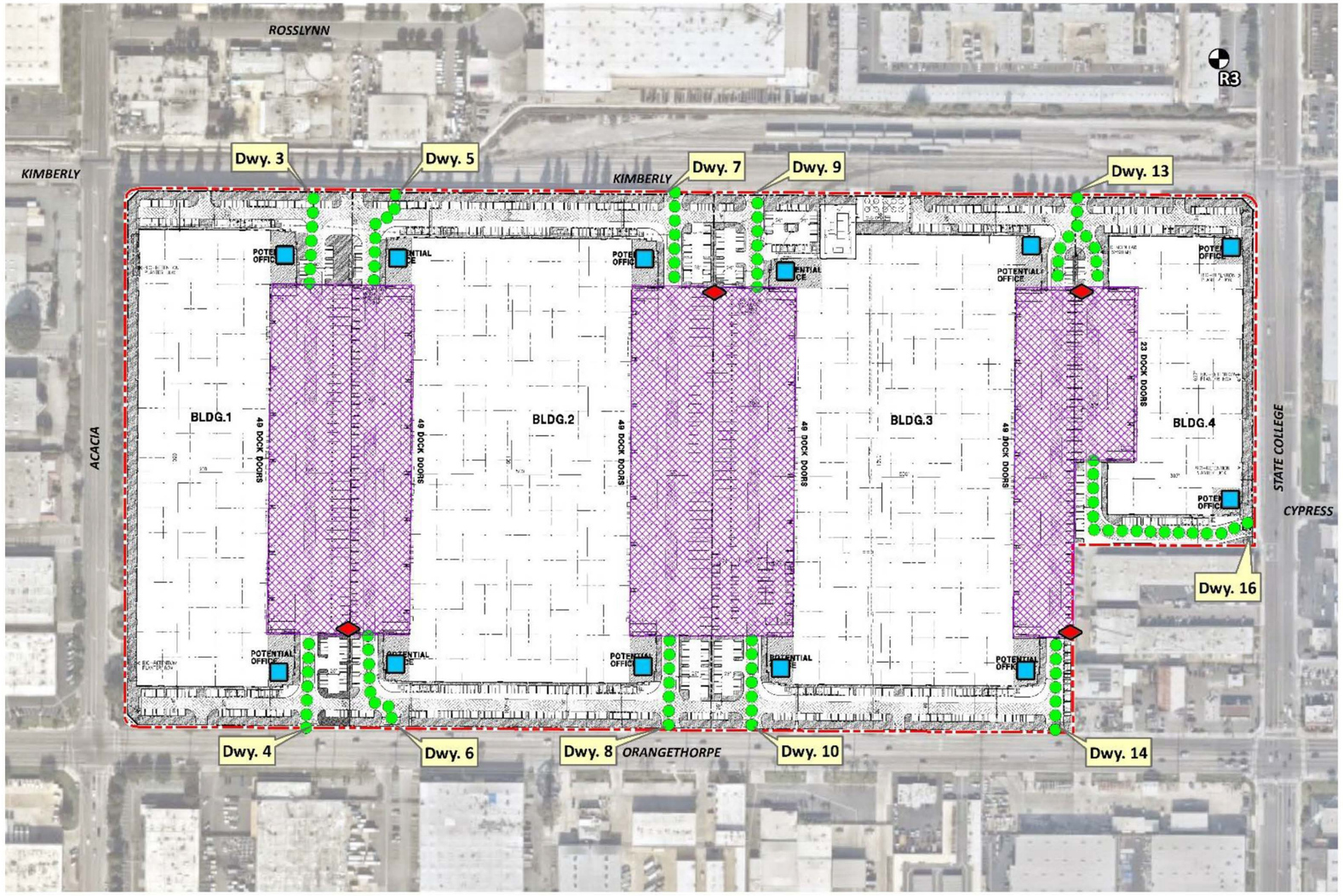
TABLE 4.10-6 NIGHTTIME CONCRETE POUR NOISE LEVEL COMPLIANCE

Receiver Location[1]	Use	City	Measurement Location[2]	Construction Noise Levels (dBA L_{eq})		
				Paving Construction[3]	Nighttime Threshold[4]	Threshold Exceeded?[5]
R1	Residential	Fullerton	L1	55.2	57.5	No
R2	Residential	Fullerton	L1	53.6	57.5	No
R3	Church	Fullerton	L2	57.2	56.2	Yes
R4	Residential	Fullerton	L3	53.3	59.8	No
R5	School	Fullerton	L4	57.5	59.0	No
R6	Residential	Anaheim	L5	49.9	60.0	No
R7	Church	Fullerton	L6	56.1	58.3	No
R8	Church	Fullerton	L7	49.6	50.6	No

[1] Noise receiver locations are shown on Figure 4.10-3.
[2] Reference noise level measurement locations as shown on Figure 4.10-1.
[3] Paving construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown on Table 4.10-4.
[4] Exterior noise level standards adjusted to reflect the nighttime ambient noise levels (Table 4.10-1) per the City of Fullerton Municipal Code, Section 15.90.030.
[5] Do the estimated Project construction noise levels exceed the nighttime construction noise level threshold?
Source: (Urban Crossroads, 2020)

An additional analysis was completed to assess potential noise level impacts due to concrete crushing activities planned near the southern Project site boundary, along E. Orangethorpe Avenue. Exhibit 10-B of the Project's Noise Analysis in Appendix J of this EIR shows the location of the planned concrete crushing activity area in relation to the receiver locations, using the sensitive receptor locations previously depicted on Figure 4.10-3. Table 10-7 of the Project's Noise Analysis provides a summary of the reference average Leq noise levels used to describe concrete crushing construction activities. Using the reference Roadway Construction Noise Model (RCNM) construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at nearest sensitive receiver locations were completed. As shown on Table 4.10-7, *Concrete Crushing Construction Equipment Noise Level Summary*, the concrete crushing construction noise levels are estimated to range from 42.9 to 57.9 dBA Leq at the nearest receiver locations. The concrete crushing construction noise analysis shows that the receiver locations would satisfy the City of Fullerton and City of Anaheim exterior noise level standards at the nearest noise-sensitive receiver locations. Therefore, the noise impacts due to the Project concrete crushing noise would be less than significant at all receiver locations. Appendix 10.2 to the Project's Noise Analysis (Appendix J of this EIR) includes the detailed CadnaA concrete crushing construction equipment noise model inputs.

Based on the foregoing analysis, the Project's construction-related activities would not result in a temporary increase in ambient noise levels in excess of the noise standards adopted by the City of Fullerton and the City of Anaheim. As such, Project-related construction noise impacts would be less than significant, and mitigation measures are not required. Notwithstanding this conclusion, as required by the City, The Fullerton Plan EIR construction-related noise mitigation measures previously identified (MM N-1, MM N-2, and MM N-3) would be implemented by the contractors during Project construction activities.



LEGEND:

- Site Boundary
- Loading Dock Activity
- Roof-Top Air Conditioning Unit
- Trash Enclosure Activity
- Entry Gate & Truck Movements

Source(s): Urban Crossroads (07-13-2020)

Figure 4.10-4

Not to Scale

Operational Noise Source Locations

TABLE 4.10-7 CONCRETE CRUSHING CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY

Receiver Location[1]	Use	City	Measurement Location[2]	Construction Noise Levels (dBA L_{eq})		
				Concrete Crushing[3]	Daytime Threshold[4]	Threshold Exceeded?[5]
R1	Residential	Fullerton	L1	57.1	64.9	No
R2	Residential	Fullerton	L1	55.6	64.9	No
R3	Church	Fullerton	L2	42.9	63.0	No
R4	Residential	Fullerton	L3	55.1	65.4	No
R5	School	Fullerton	L4	52.4	62.5	No
R6	Residential	Anaheim	L5	51.7	60.0	No
R7	Church	Fullerton	L6	57.9	61.4	No
R8	Church	Fullerton	L7	46.3	54.8	No

[1] Noise receiver locations are shown on Exhibit 10-B of the Project's Noise Analysis (refer also to Figure 4.10-3).
[2] Reference noise level measurement locations as shown on Figure 4.10-1.
[3] Concrete crushing noise level calculations provided in Appendix 10.2 to the Project's Noise Analysis in Appendix J of this EIR.
[4] Exterior noise level standards adjusted to reflect the daytime ambient noise levels (Table 4.10-1) per the City of Fullerton Municipal Code, Section 15.90.030 and the City of Anaheim Municipal Code, Chapter 6.70.
[5] Do the estimated Project construction noise levels exceed the daytime construction noise level threshold?
Source: (Urban Crossroads, 2020)

Long-Term Operational Noise Impacts

Project Operational Noise Levels

The operational noise analysis is intended to describe noise level impacts associated with the expected typical of daytime and nighttime activities at the Project site. To present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. Consistent with similar warehouse uses, the Project business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include: loading dock activity, entry gate and truck movements, roof-top air conditioning units, and trash enclosure activity. Exhibit 9-A identifies the representative noise source locations used to assess the operational noise levels

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. Refer to Subsection 9.2 of the Project's Noise Analysis (Appendix J of this EIR) for a detailed description of reference noise levels measurement procedures and results, which are summarized in Table 9-1 of the Noise Analysis.

To fully describe the exterior operational noise levels from the Project, a noise prediction model was developed using the CadnaA computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. The operational noise level calculations provided in the Project's Noise Analysis account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary

source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.0 was used in the CadnaA noise analysis to account for hard site conditions. Refer to Subsection 9.3 of the Project's Noise Analysis for a more detailed discussion of the CadnaA Noise Prediction Model.

Using the reference noise levels to represent the Project operations, the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations were calculated. Table 4.10-8, *Daytime Project Operational Noise Levels*, shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 30.1 to 41.7 dBA L_{eq}.

TABLE 4.10-8 DAYTIME PROJECT OPERATIONAL NOISE LEVELS

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA L_{eq})							
	R1	R2	R3	R4	R5	R6	R7	R8
Loading Dock Activity	39.7	41.5	33.6	38.0	34.4	37.5	33.2	29.2
Entry Gate & Truck Movements	23.3	23.0	18.1	21.3	20.5	18.9	28.6	11.9
Roof-Top Air Conditioning Units	26.4	26.9	33.5	26.8	29.9	26.8	29.5	22.5
Trash Enclosure Activity	8.4	9.1	4.0	8.6	2.0	6.4	1.4	1.4
Total (All Noise Sources)	**40.0**	**41.7**	**36.6**	**38.4**	**35.8**	**37.9**	**35.7**	**30.1**

[1] See Exhibit 9-A of the Project's Noise Analysis (Appendix J of this EIR) for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's Noise Analysis.

Source: (Urban Crossroads, 2020)

Table 4.10-9, *Nighttime Project Operational Noise Levels*, shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 29.7 to 41.6 dBA L_{eq}. The differences between the daytime and nighttime noise levels are largely related to the duration of noise activity (refer to Table 9-1 of the Project's Noise Analysis).

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Fullerton and City of Anaheim exterior noise level standards at the nearest noise-sensitive receiver locations. Table 4.10-10, *Operational Noise Level Compliance*, shows that the operational noise levels associated with the Project would satisfy the City of Fullerton operational noise level standards adjusted to reflect the ambient noise level and the City of Anaheim 60 dBA L_{eq} anytime exterior noise level standards at all the nearest sensitive receiver locations. Therefore, the Project's operational noise impacts are considered less than significant at the nearest noise-sensitive receiver locations.

TABLE 4.10-9 NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)							
	R1	R2	R3	R4	R5	R6	R7	R8
Loading Dock Activity	39.7	41.5	33.6	38.0	34.4	37.5	33.2	29.2
Entry Gate & Truck Movements	14.4	14.0	9.1	12.5	11.7	10.0	19.7	3.0
Roof-Top Air Conditioning Units	24.0	24.5	31.1	24.4	27.5	24.4	27.1	20.1
Trash Enclosure Activity	7.4	8.2	3.0	7.7	1.1	5.4	0.4	0.4
Total (All Noise Sources)	**39.8**	**41.6**	**35.6**	**38.2**	**35.2**	**37.7**	**34.3**	**29.7**

[1] See Figure 4.10-4 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 to the Project's Noise Analysis in Appendix J of this EIR.
Source: (Urban Crossroads, 2020)

TABLE 4.10-10 OPERATIONAL NOISE LEVEL COMPLIANCE

Receiver Location[1]	Use	City	Measurement Location[2]	Project Operational Noise Levels (dBA Leq)[3]		Noise Level Standards (dBA Leq)[4]		Noise Level Standards Exceeded?[5]	
				Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	Residential	Fullerton	L1	40.0	39.8	64.9	57.5	No	No
R2	Residential	Fullerton	L1	41.7	41.6	64.9	57.5	No	No
R3	Church	Fullerton	L2	36.6	35.6	63.0	56.2	No	No
R4	Residential	Fullerton	L3	38.4	38.2	65.4	59.8	No	No
R5	School	Fullerton	L4	35.8	35.2	62.5	59.0	No	No
R6	Residential	Anaheim	L5	37.9	37.7	60.0	60.0	No	No
R7	Church	Fullerton	L6	35.7	34.3	61.4	58.3	No	No
R8	Church	Fullerton	L7	30.1	29.7	54.8	50.6	No	No

[1] See Figure 4.10-2 for the receiver locations.
[2] Reference noise level measurement locations as shown on Figure 4.10-1.
[3] Proposed Project operational noise levels as shown on Table 4.10-8 and Table 4.10-9.
[4] Exterior noise level standards adjusted to reflect the ambient noise levels (Table 4.10-1) per the City of Fullerton Municipal Code, Section 15.90.030 and the City of Anaheim Municipal Code, Chapter 6.70.
[5] Do the estimated Project operational noise source activities exceed the noise level standards?
Daytime = 7:00 a.m. to 10:00 p.m.; Nighttime = 10:00 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2020)

Project Operational Noise Level Increases

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearest receiver locations potentially impacted by Project operational noise sources, as discussed in Subsection 9.6 of the Project's Noise Analysis. The difference between the combined Project and ambient noise levels describe the Project noise level increases to the existing ambient noise environment. As indicated on Table 4.10-11, *Daytime Project Operational Noise Level Increases*, and Table 4.10-12, *Nighttime Operational Noise Level Increases*, the Project would generate daytime and nighttime operational noise level increases ranging from 0.0 to 0.1 dBA Leq at the receiver locations. Project-related operational noise level increases would satisfy the operational noise level increase significance criteria presented in Section 4.10.4. Therefore, the incremental Project operational noise level increase would be less than significant at all receiver locations.

Project Off-Site Traffic Noise Impacts

To assess the off-site traffic CNEL noise level impacts associated with the Project, noise contours were developed based on traffic data in the Project's CEQA Support Traffic Analysis (included in Appendix K2 of this EIR). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Existing conditions noise contours along study area roadway segments without the addition of Project traffic were previously presented in Table 4.10-2, while Tables 7-2 through 7-4 of the Project's Noise Analysis present a summary of the exterior dBA CNEL traffic noise levels without barrier attenuation for each of the study scenarios evaluated in the Project's Traffic Analysis for Existing conditions and Opening Year (2022) conditions. Appendix 7.1 to the Project's Noise Analysis (Appendix J of this EIR) includes a summary of the dBA CNEL traffic noise level contours for each of the traffic scenarios.

TABLE 4.10-11 DAYTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	40.0	L1	64.9	64.9	0.0	3.0	No
R2	41.7	L1	64.9	64.9	0.0	3.0	No
R3	36.6	L2	63.0	63.0	0.0	3.0	No
R4	38.4	L3	65.4	65.4	0.0	3.0	No
R5	35.8	L4	62.5	62.5	0.0	3.0	No
R6	37.9	L5	63.0	63.0	0.0	3.0	No
R7	35.7	L6	61.4	61.4	0.0	3.0	No
R8	30.1	L7	54.8	54.8	0.0	5.0	No

[1] See Figure 4.10-2 for the receiver locations.
[2] Total Project daytime operational noise levels as shown on Table 4.10-8.
[3] Reference noise level measurement locations as shown on Figure 4.10-1.
[4] Observed daytime ambient noise levels as shown on Table 4.10-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as described in subsection 4.10.4.
Source: (Urban Crossroads, 2020)

TABLE 4.10-12 NIGHTTIME OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	39.8	L1	57.5	57.6	0.1	5.0	No
R2	41.6	L1	57.5	57.6	0.1	5.0	No
R3	35.6	L2	56.2	56.2	0.0	5.0	No
R4	38.2	L3	59.8	59.8	0.0	5.0	No
R5	35.2	L4	59.0	59.0	0.0	5.0	No
R6	37.7	L5	62.2	62.2	0.0	3.0	No
R7	34.3	L6	58.3	58.3	0.0	5.0	No
R8	29.7	L7	50.6	50.6	0.0	5.0	No

[1] See Figure 4.10-2 for the receiver locations.
[2] Total Project nighttime operational noise levels as shown on Table 4.10-9.
[3] Reference noise level measurement locations as shown on Figure 4.10-1.
[4] Observed daytime ambient noise levels as shown on Table 4.10-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as described in subsection 4.10.4.
Source: (Urban Crossroads, 2020)

As discussed under Thresholds above, an increase in ambient noise levels is assumed to be a significant noise impact if a project causes ambient noise levels to exceed the following ***at noise sensitive locations:***

- Where the existing ambient noise level is less than 60 dBA, a Project-related permanent increase in ambient noise levels of 5 dBA CNEL or greater.
- Where the existing ambient noise level is greater than 60 dBA, a Project-related permanent increase in ambient noise levels of 3 dBA CNEL or greater.

Existing Project Traffic Noise Level Increases

An analysis of existing traffic noise levels plus traffic noise generated by the proposed Project has been included to fully analyze the existing traffic scenarios. It should be noted that the off-site with Project traffic volumes include the existing trip generation associated with the Kimberly Clark facility as part of the without project traffic volumes. Therefore, the with Project traffic noise level increases account for only the net increase in Project trips.

The Existing without Project exterior noise levels are expected to range from 63.6 to 77.0 dBA CNEL. Table 7-2 of the Project's Noise Analysis shows the Existing with Project conditions would range from 64.0 to 77.6 dBA CNEL. Table 4.10-13, *Existing with Project Traffic Noise Level Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 5.4 dBA CNEL. Based on the 5 dBA CNEL increase significance criteria when noise levels are below 60 dBA CNEL and 3 dBA CNEL increase criteria when the noise levels already exceed 60 dBA CNEL, 2 of the 31 study area roadway segments would experience noise levels increases that exceed the off-site traffic noise level increase significance criteria due to the Existing with Project conditions:

TABLE 4.10-13 EXISTING WITH PROJECT TRAFFIC NOISE LEVEL INCREASES

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Noise Sensitive Land Use?	Incremental Noise Level Increase Threshold[3]	
				No Project Ambient	With Project	Project Addition		Limit	Exceeded?
1	Raymond Av.	n/o Kimberly Av.	I	72.2	72.2	0.0	No	3	No
2	Raymond Av.	s/o Kimberly Av.	I	72.3	72.3	0.0	No	3	No
3	Raymond Av.	s/o Orangethorpe Av.	I	73.3	73.4	0.1	No	3	No
4	Raymond Av.	s/o SR-91 Westbound Ramps	I	74.3	74.3	0.0	No	3	No
5	Raymond Av.	s/o SR-91 Eastbound Ramps	EDR/MDR/GC/NCR	74.4	74.4	0.0	Yes	3	No
6	Acacia Av.	n/o Kimberly Av.	I	67.4	67.5	0.1	No	3	No
7	Acacia Av.	s/o Kimberly Av.	I	67.3	67.4	0.1	No	3	No
8	N. State College Bl.	n/o Chapman Av.	C/LDR/HDR	76.3	76.4	0.1	Yes	3	No
9	N. State College Bl.	s/o Chapman Av.	C/LMDR/LDR	73.3	73.5	0.2	Yes	3	No
10	N. State College Bl.	s/o Commonwealth Av.	MDR/LDR/I	74.3	74.4	0.1	Yes	3	No
11	N. State College Bl.	s/o Kimberly Av.	I	74.2	75.3	1.1	No	3	No
12	N. State College Bl.	s/o Dwy. 16	I	74.3	75.4	1.1	No	3	No
13	N. State College Bl.	s/o Orangethorpe Av.	I/GC/I/WU	75.0	76.2	1.2	No	3	No
14	N. State College Bl.	s/o SR-91 Westbound Ramps	I/LDR/MDR	75.6	75.9	0.3	Yes	3	No
15	N. State College Bl.	s/o SR-91 Eastbound Ramps	LDR/MDR	74.8	74.9	0.1	Yes	3	No
16	S. Placentia Av.	n/o Kimberly Av.	I	71.8	71.8	0.0	No	3	No
17	S. Placentia Av.	s/o Kimberly Av.	I	71.8	71.8	0.0	No	3	No
18	Kimberly Av.	e/o Raymond Av.	I	63.7	64.0	0.3	No	3	No
19	Kimberly Av.	e/o Dwy. 5	I	63.8	67.2	3.4	No	3	Yes
20	Kimberly Av.	e/o Dwy. 11	I	63.6	69.0	5.4	No	3	Yes
21	Orangethorpe Av.	w/o Raymond Av.	GC/OL/I	76.0	76.1	0.1	No	3	No
22	Orangethorpe Av.	e/o Raymond Av.	I	77.0	77.2	0.2	No	3	No

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Noise Sensitive Land Use?	Incremental Noise Level Increase Threshold[3]	
				No Project Ambient	With Project	Project Addition		Limit	Exceeded?
23	Orangethorpe Av.	e/o Acacia Av.	I	76.9	77.1	0.2	No	3	No
24	Orangethorpe Av.	e/o Dwy. 6	I	76.9	77.2	0.3	No	3	No
25	Orangethorpe Av.	e/o Dwy. 10	I	76.9	77.5	0.6	No	3	No
26	Orangethorpe Av.	w/o N. State College Bl.	I	76.9	77.6	0.7	No	3	No
27	Orangethorpe Av.	e/o N. State College Bl.	I	76.7	77.3	0.6	No	3	No
28	Orangethorpe Av.	w/o S. Placentia Av.	I	76.5	77.2	0.7	No	3	No
29	Orangethorpe Av.	e/o S. Placentia Av.	LDR/I/C	74.4	75.0	0.6	Yes	3	No
30	Orangethorpe Av.	e/o SR-57 Southbound Ramps	LDR/C	74.9	75.2	0.3	Yes	3	No
31	Orangethorpe Av.	e/o SR-57 Northbound Ramps	LDR/C/I/CM	75.1	75.1	0.0	Yes	3	No

[1] The Fullerton Plan Community Development Plan, City of Anaheim General Plan Land Use Plan, City of Placentia General Plan Land Use Map.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (as described in subsection 4.10.4)?
I = Industrial; EDR = Estate Density Residential; NCR = Neighborhood Center Commercial; C = Commercial; LDR = Low Density Residential; HDR = High Density Residential; LMDR = Low-Medium Density Residential; MDR = Medium Density Residential; WU = Water Uses; GC = General Commercial; OL = Office Low; CM = Commercial-Manufacturing.
Source: (Urban Crossroads, 2020)

- Kimberly Avenue east of Driveway 5 (Segment 19)
- Kimberly Avenue east of Driveway 11 (Segment 20)

Neither of these two segments include noise sensitive receivers; therefore, all of the study area roadway segments would experience less than significant noise level increases on receiving land uses due to the Project-related traffic under Existing plus Project conditions.

Opening Year (2022) Project Traffic Noise Level Increases

Table 7-3 of the Project's Noise Analysis presents the Opening Year (2022) without Project conditions CNEL noise levels. The Opening Year (2022) without Project exterior noise levels are expected to range from 64.2 to 77.1 dBA CNEL. Table 7-4 of the Project's Noise Analysis shows that the Opening Year (2022) with Project conditions would range from 64.5 to 77.8 dBA CNEL. Table 4.10-14, *Opening Year (2022) With Project Traffic Noise Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 4.9 dBA CNEL.

Based on the 5 dBA CNEL increase significance criteria when noise levels are below 60 dBA CNEL and 3 dBA CNEL increase criteria when the noise levels already exceed 60 dBA CNEL, the same 2 study area roadway segments would experience noise levels that exceed the off-site traffic noise level increase significance criteria under Opening Year (2022) with Project conditions:

- Kimberly Avenue east of Driveway 5 (Segment #19)
- Kimberly Avenue east of Driveway 11 (Segment #20)

Neither of these two segments include noise sensitive receivers; therefore, all the study area roadway segments would experience less than significant noise level increases on receiving land uses due to Project-related traffic.

Level of Significance Before Mitigation

As indicated in the preceding analysis, implementation of the Project would not exceed any of the thresholds of significance identified in Section 4.10.4 due to construction-related noise, on-site operational noise increases, or due to Project-related traffic noise increases, with the exception of traffic noise at two roadway segments. As discussed above, neither of these segments includes noise sensitive receivers; therefore, impacts would be less than significant.

Therefore, the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and impacts would be less than significant. No mitigation measures are required. Notwithstanding this conclusion, as required by the City, The Fullerton Plan EIR construction-related and operational noise mitigation previously identified (MM N-1, MM N-2, MM N-3, and MM N-6) would be implemented by the Project Applicant.

TABLE 4.10-14 OPENING YEAR (2022) WITH PROJECT TRAFFIC NOISE INCREASES

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Noise Sensitive Land Use?	Incremental Noise Level Increase Threshold[3]	
				No Project Ambient	With Project	Project Addition		Limit	Exceeded?
1	Raymond Av.	n/o Kimberly Av.	I	72.5	72.5	0.0	No	3	No
2	Raymond Av.	s/o Kimberly Av.	I	72.6	72.6	0.0	No	3	No
3	Raymond Av.	s/o Orangethorpe Av.	I	73.5	73.6	0.1	No	3	No
4	Raymond Av.	s/o SR-91 Westbound Ramps	I	74.5	74.5	0.0	No	3	No
5	Raymond Av.	s/o SR-91 Eastbound Ramps	EDR/MDR/GC/NCR	74.5	74.5	0.0	Yes	3	No
6	Acacia Av.	n/o Kimberly Av.	I	67.6	67.7	0.1	No	3	No
7	Acacia Av.	s/o Kimberly Av.	I	67.4	67.5	0.1	No	3	No
8	N. State College Bl.	n/o Chapman Av.	C/LDR/HDR	76.4	76.5	0.1	Yes	3	No
9	N. State College Bl.	s/o Chapman Av.	C/LMDR/LDR	73.5	73.6	0.1	Yes	3	No
10	N. State College Bl.	s/o Commonwealth Av.	MDR/LDR/I	74.5	74.6	0.1	Yes	3	No
11	N. State College Bl.	s/o Kimberly Av.	I	74.3	75.4	1.1	No	3	No
12	N. State College Bl.	s/o Dwy. 16	I	74.4	75.5	1.1	No	3	No
13	N. State College Bl.	s/o Orangethorpe Av.	I/GC/I/WU	75.1	76.3	1.2	No	3	No
14	N. State College Bl.	s/o SR-91 Westbound Ramps	I/LDR/MDR	75.7	76.0	0.3	Yes	3	No
15	N. State College Bl.	s/o SR-91 Eastbound Ramps	LDR/MDR	74.9	74.9	0.0	Yes	3	No
16	S. Placentia Av.	n/o Kimberly Av.	I	72.4	72.4	0.0	No	3	No
17	S. Placentia Av.	s/o Kimberly Av.	I	72.2	72.2	0.0	No	3	No
18	Kimberly Av.	e/o Raymond Av.	I	64.2	64.5	0.3	No	3	No
19	Kimberly Av.	e/o Dwy. 5	I	64.4	67.5	3.1	No	3	Yes
20	Kimberly Av.	e/o Dwy. 11	I	64.3	69.2	4.9	No	3	Yes
21	Orangethorpe Av.	w/o Raymond Av.	GC/OL/I	76.1	76.2	0.1	No	3	No
22	Orangethorpe Av.	e/o Raymond Av.	I	77.1	77.3	0.2	No	3	No
23	Orangethorpe Av.	e/o Acacia Av.	I	77.1	77.2	0.1	No	3	No

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Noise Sensitive Land Use?	Incremental Noise Level Increase Threshold[3]	
				No Project Ambient	With Project	Project Addition		Limit	Exceeded?
24	Orangethorpe Av.	e/o Dwy. 6	I	77.1	77.4	0.3	No	3	No
25	Orangethorpe Av.	e/o Dwy. 10	I	77.0	77.6	0.6	No	3	No
26	Orangethorpe Av.	w/o N. State College Bl.	I	77.0	77.8	0.8	No	3	No
27	Orangethorpe Av.	e/o N. State College Bl.	I	76.9	77.5	0.6	No	3	No
28	Orangethorpe Av.	w/o S. Placentia Av.	I	76.7	77.3	0.6	No	3	No
29	Orangethorpe Av.	e/o S. Placentia Av.	LDR/I/C	74.7	75.2	0.5	Yes	3	No
30	Orangethorpe Av.	e/o SR-57 Southbound Ramps	LDR/C	75.1	75.3	0.2	Yes	3	No
31	Orangethorpe Av.	e/o SR-57 Northbound Ramps	LDR/C/I/CM	75.2	75.2	0.0	Yes	3	No

[1] The Fullerton Plan Community Development Plan, City of Anaheim General Plan Land Use Plan, City of Placentia General Plan Land Use Map.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria as described in subsection 4.10.4?
I = Industrial; EDR = Estate Density Residential; NCR = Neighborhood Center Commercial; C = Commercial; LDR = Low Density Residential; HDR = High Density Residential; LMDR = Low-Medium Density Residential; MDR = Medium Density Residential; WU = Water Uses; GC = General Commercial; OL = Office Low; CM = Commercial-Manufacturing.
Source: (Urban Crossroads, 2020)

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b.	***Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?***

Construction Vibration Impacts

Typical Construction Vibration Impacts

Construction activity can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. The City of Fullerton does not identify specific vibration level limits and instead relies on the Federal Transit Administration (FTA) methodology for the purpose of analyzing vibration impacts. The FTA Transit Noise and Vibration Impact Assessment methodology provides guidelines for the maximum-acceptable vibration criteria for different types of land uses. These guidelines allow 90 VdB for industrial (workshop) use, 84 VdB for office use, and 78 VdB for daytime residential uses and 72 VdB for nighttime uses in buildings where people normally sleep. Ground vibration levels associated with various types of construction equipment are summarized in Table 10-5 of the Project's Noise Analysis. It should be noted that pile driving is not required for the Project. This list includes vibration source levels for a hoe ram or breaker representing a percussion hammer fitted to an excavator for breaking concrete. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the following vibration assessment methods defined by the FTA.

Table 4.10-15, *Typical Construction Equipment Vibration Levels*, presents the expected typical construction equipment vibration levels at the nearest receiver locations. At distances ranging from 305 feet to 2,080 feet from typical Project construction activities (at the Project site boundary), construction vibration levels are estimated to range from 29.4 to 54.4 VdB and would remain below the FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria of 78 VdB for daytime residential uses at all receiver locations. Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but would occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site, and no mitigation is required.

Concrete Crushing Construction Vibration Analysis and Compliance

Using the vibration source level of construction equipment list provided in Table 10-5 of the Project's Noise Analysis, which includes source levels for a hoe ram or breaker representing a percussion hammer fitted to an excavator for breaking concrete, and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project concrete crushing construction vibration impacts. Table 4.10-16, *Concrete Crushing Equipment Vibration Levels*, presents the expected concrete crushing construction equipment vibration levels when the equipment with the highest reference vibration activity operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location.

TABLE 4.10-15 TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Receiver Location[1]	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB)[2]					Threshold VdB[3]	Threshold Exceeded?[4]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels		
R1	1,984'	1.0	22.0	29.0	30.0	30.0	78	No
R2	2,080'	0.4	21.4	28.4	29.4	29.4	78	No
R3	305'	25.4	46.4	53.4	54.4	54.4	78	No
R4	1,876'	1.7	22.7	29.7	30.7	30.7	78	No
R5	1,141'	8.2	29.2	36.2	37.2	37.2	78	No
R6	1,282'	6.7	27.7	34.7	35.7	35.7	78	No
R7	1,059'	9.2	30.2	37.2	38.2	38.2	78	No
R8	1,122'	8.4	29.4	36.4	37.4	37.4	78	No

[1] Noise receiver locations are shown on Figure 4.10-3.
[2] Based on the Vibration Source Levels of Construction Equipment included on Table 10-5 of the Project's Noise Analysis (Appendix J of this EIR).
[3] FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria as described in subsection 4.10.4.
[4] Does the vibration level exceed the maximum acceptable vibration threshold?
Source: (Urban Crossroads, 2020)

TABLE 4.10-16 CONCRETE CRUSHING EQUIPMENT VIBRATION LEVELS

Receiver Location[1]	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB)[2]						Threshold VdB[3]	Threshold Exceeded?[4]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Hoe Ram (Breaker)	Highest Vibration Levels		
R1	2,862'	0.0	17.2	24.2	25.2	25.2	25.2	78	No
R2	2,931'	0.0	16.9	23.9	24.9	24.9	24.9	78	No
R3	1,607'	3.8	24.8	31.8	32.8	32.8	32.8	78	No
R4	3,055'	0.0	16.4	23.4	24.4	24.4	24.4	78	No
R5	2,191'	0.0	20.7	27.7	28.7	28.7	28.7	78	No
R6	1,358'	6.0	27.0	34.0	35.0	35.0	35.0	78	No
R7	1,347'	6.1	27.1	34.1	35.1	35.1	35.1	78	No
R8	1,441'	5.2	26.2	33.2	34.2	34.2	34.2	78	No

[1] Concrete Crushing receiver locations are shown on Exhibit 10-B of the Project's Noise Analysis (Appendix J of this EIR).
[2] Based on the Vibration Source Levels of Construction Equipment included on Table 10-5 of the Project's Noise Analysis (Appendix J of this EIR).
[3] FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria as described in subsection 4.10.4.
[4] Does the vibration level exceed the maximum acceptable vibration threshold?
Source: (Urban Crossroads, 2020)

As shown in Table 4.10-16, at distances ranging from 1,347 feet to 3,055 feet from the Project concrete crushing construction activities as shown on Exhibit 10-B of the Project's Noise Analysis, construction vibration levels are estimated to range from 24.4 to 35.1 VdB and would remain below the FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria of 78 VdB for daytime residential uses at all receiver locations. Therefore, the Project-related vibration impacts would be less than significant during Project concrete crushing construction activities at the Project site.

Operational Vibration Impacts

On-site operations associated with the Project would include heavy trucks moving on site to and from the loading dock areas. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Since trucks rarely create vibration that exceed 70 VdB (unless there are bumps due to frequent potholes in the road), it is expected that the on-site heavy trucks would be travelling at very low speeds so activity would satisfy the maximum-acceptable vibration criteria of 78 VdB for daytime and 72 VdB for nighttime for residential uses, and therefore, would be less than significant.

With respect to off-site truck activity, ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks on uneven roadway surfaces. However, due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way. This is consistent with the FTA "Transit Noise and Vibration Impact Assessment Manual," finding that rubber-tired traffic is rarely perceptible on smooth roadways. Since trucks rarely create vibration that exceed 70 VdB (unless there are bumps due to frequent potholes in the road), it is expected that off-site truck vibration impacts at nearest homes would satisfy the maximum-acceptable vibration criteria of 78 VdB for daytime and 72 VdB for nighttime for residential uses. Therefore, vibration impacts associated with Project operations would be less than significant.

Level of Significance Before Mitigation

Vibration impacts associated with construction and operation of the Project would be less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold c.	***For a project located within the vicinity of a private airship or 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 expose people residing or working in the project area to excessive noise levels?***

The Project site is not located within two miles of a public airport or within an airport land use plan. The closest airport is the Fullerton Municipal Airport, which is located over 4.5 miles west of the Project site. As such, the Project site would not be exposed to excessive noise levels from airport operations. Additionally, there are no components of the Project that would exacerbate any existing airport-related noise levels. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels associated with airports, and no impacts would occur.

Level of Significance Before Mitigation

The Project would not expose people residing or working in the Project area to excessive noise levels associated with airports, and no impact would occur.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would occur.

4.10.6 CUMULATIVE IMPACTS

Land uses surrounding the Project site are fully developed with light industrial uses and there are no cumulative projects identified in proximity to the Project site. As such, it is unlikely that any surrounding properties would be under construction while Project construction activities are occurring. Additionally, Project-related construction noise would be below the identified thresholds of significance. Thus, Project construction-related noise impacts would be less than cumulatively considerable. With respect to noise associated with Project operations, the analysis provided herein includes noise from existing developments in the surrounding area. As demonstrated in the analysis of Threshold a, and summarized in Table 4.10-11 and Table 4.10-12, the Project would generate daytime and nighttime operational noise level increases ranging from 0.0 to 0.1 dBA Leq at the receiver locations, which is not a readily perceptible noise level increase as compared to the existing ambient noise environment, which includes the existing surrounding land uses. Thus, operational noise impacts associated with the Project would be less than cumulatively considerable. Similarly, the analysis of Project-related traffic noise impacts includes traffic from existing and projected future traffic on study area roadways. As indicated in Table 4.10-14, Project-related traffic, when combined with existing and projected traffic, would not expose any sensitive receptors to noise levels exceeding the City of Fullerton or City of Anaheim noise standards; thus, Project-related traffic noise increases would be less than cumulatively considerable.

With respect to construction-related vibration impacts, and as noted above, it is unlikely that any surrounding properties would be under construction while Project construction activities are occurring. The analysis of Project-related vibration impacts during construction and operation, presented previously in Table 4.10-15 and Table 4.10-16, demonstrate that Project construction and operational activities would not exceed the FTA Transit Noise and Vibration Impact Assessment Manual maximum acceptable vibration criteria of 78 VdB for daytime residential uses at any receiver locations. Furthermore, for Project operational-related truck traffic, it is expected that off-site truck vibration impacts at nearest homes would satisfy the maximum-acceptable vibration criteria of 78 VdB for daytime and 72 VdB for nighttime for residential uses. Therefore, Project impacts due to vibration would be less than cumulatively considerable.

The Fullerton Municipal Airport is located over 4.5 miles west of the Project site and there are no components of the Project that would result in increased airport-related noise hazards in the local area. Accordingly, Project impacts due to the exposure of people residing or working in the project area to excessive airport noise levels would be less than cumulatively considerable.

4.10.7 References

Urban Crossroads, Inc. 2020a (July 13). *Goodman Logistics Center Fullerton Noise Analysis*. Appendix J of this EIR.

———. 2020b (July 31). *Goodman Logistics Center Fullerton CEQA Support Traffic Impact Analysis*. Appendix K2 of this EIR

4.11 TRANSPORTATION

This section assesses transportation impacts resulting from implementation of the Project. Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, which has a larger building area, and references to the "Project site" include the Kimberly-Clark Fullerton Mill site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

In accordance with Senate Bill (SB) 743, further discussed under Section 4.11.2, Existing *Regulatory Setting*, below, the California Natural Resources Agency (CNRA) adopted changes to the California Environmental Quality Act (CEQA) Guidelines in December 2018, which identify that starting on July 1, 2020, vehicle miles traveled (VMT) is the appropriate metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. The Fullerton City Council adopted the *City of Fullerton Transportation Assessment Policies and Procedures* (TAPP) on June 16, 2020. The purpose of the TAPP is, in part, to establish the City's policies and procedures to evaluate a project for CEQA compliance (VMT analysis) and address, through project conditions and mitigation measures, any corresponding effects on transportation or potential significant impacts. With respect to the CEQA-required VMT analysis, the *Goodman Logistics Center – Fullerton Project Vehicle Miles Traveled (VMT) Assessment* (VMT Assessment) (May 5, 2020) (Urban Crossroads, 2020a) is provided in Appendix K1 of this Environmental Impact Report (EIR).

Transportation and circulation information to support the analysis is presented in the *Goodman Logistics Center Fullerton CEQA Support Traffic Analysis* (Traffic Analysis) (July 2020) (Urban Crossroads, 2020b), which is provided in Appendix K2 of this EIR. Information from the Traffic Analysis is also used as the basis for addressing other potential Project impacts (e.g., air quality and health risk, greenhouse gas emissions, noise, etc.), as discussed in the respective sections of this EIR.

In response to the Notice of Preparation (NOP), comment letters were received from the California Department of Transportation (Caltrans), South Coast Air Quality Management District (SCAQMD), Orange County Transportation Authority (OCTA), City of Anaheim, City of La Habra, and two individuals addressing the analysis of potential transportation impacts, as summarized below and presented in the NOP comments included in Appendix A of this EIR:

- **Caltrans.** The analysis should address potential impacts to State facilities, including freeway interchanges and ramps (State Route [SR]-57/E. Orangethorpe Avenue, SR-57/Chapman Avenue, and SR-91), and queueing on the freeway mainline and ramps and associated operation and safety impacts. Caltrans requires the use of the Highway Capacity Manual (HCM) methods for analysis of traffic impacts on the State facilities. Caltrans also requested that multimodal access be addressed, and that the Project design incorporate designed delivery area parking. Further Caltrans indicated that coordination with Caltrans is necessary regarding planned projects on SR-57 that could impact access

to the Project site, and regarding any encroachment permits (if work is proposed in State right-of-way). The requested analysis is not required for purposes of CEQA.

- **South Coast Air Quality Management District.** Recommends use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in the SCAQMD. ITE truck trip rates have been applied (refer to Table 4.11-1, *Trip Generation Rates*, in Section 4.11.4.
- **Orange County Transportation Authority.** E. Orangethorpe Avenue and State College Boulevard are part of the Congestion Management Program (CMP) Highway System and should be analyzed as such for any potential traffic impacts. The Project's consistency with the CMP is addressed in Section 4.11.4 (Threshold b).
- **City of Anaheim.** Roadway segments and intersections within the jurisdiction of the City of Anaheim that could be impacted by the Project are required by the City to be evaluated per Anaheim's traffic study guidelines. Additionally, the impact of increased truck traffic to roadway operations and pavement should be addressed. Based on the trip distribution for Project-generated trips, there would not be intersections south of SR-91 or west of Raymond Avenue where the Project would contribute more than 50 trips. Similarly, the Project would not involve a volume of truck travel on streets in the City of Anaheim that would warrant a pavement evaluation.
- **City of La Habra.** The City would like to review the traffic study to confirm no impacts will occur to La Habra; if traffic impacts in La Habra are identified, the City of La Habra will assist in development of mitigation measures.
- **Matt Bagne.** Potential impacts at the intersection of Acacia Avenue and Kimberly Avenue should be addressed, including the potential for a higher frequency of traffic accidents. Threshold c addresses potential hazards created by the Project.
- **Julia Roper.** The relationship of the Project's access driveway along State College Boulevard (driveway E1 for Building 4) and the northern access driveway for the property located at 1201 State College Boulevard needs to be reviewed, including the following traffic safety issues: turning movement conflicts, vehicle queues on southbound State College Boulevard, the potential conflict with traffic movements at the intersection at Cypress Way, and line of sight and operational impacts. Alternative access options were identified. Threshold c addresses potential hazards created by the Project

No additional comments regarding transportation were raised at the Draft EIR public scoping meeting held on April 20, 2020.

4.11.1 Existing Setting

A. Regional and Local Roadway Circulation System

As discussed in Section 5.4.3 of The Fullerton Plan EIR, regional access to the City of Fullerton is provided via SR-57, SR-91, and Interstate (I)-5. SR-57 is a north-south freeway that extends from Los Angeles County to Orange County in the eastern portion of the City. SR-91 forms much

of the southern border of the City of Fullerton with the City of Anaheim. SR-91 provides east-west regional access through Orange, Los Angeles, and Riverside Counties. SR-57 provides access to the site via the E. Orangethorpe Avenue interchange. Raymond Avenue, which has an interchange at SR-91, intersects with E. Orangethorpe Avenue west of the Project site. The I-5 interchange with SR-91 is located at the southwest corner of the City. (Fullerton, 2012b)

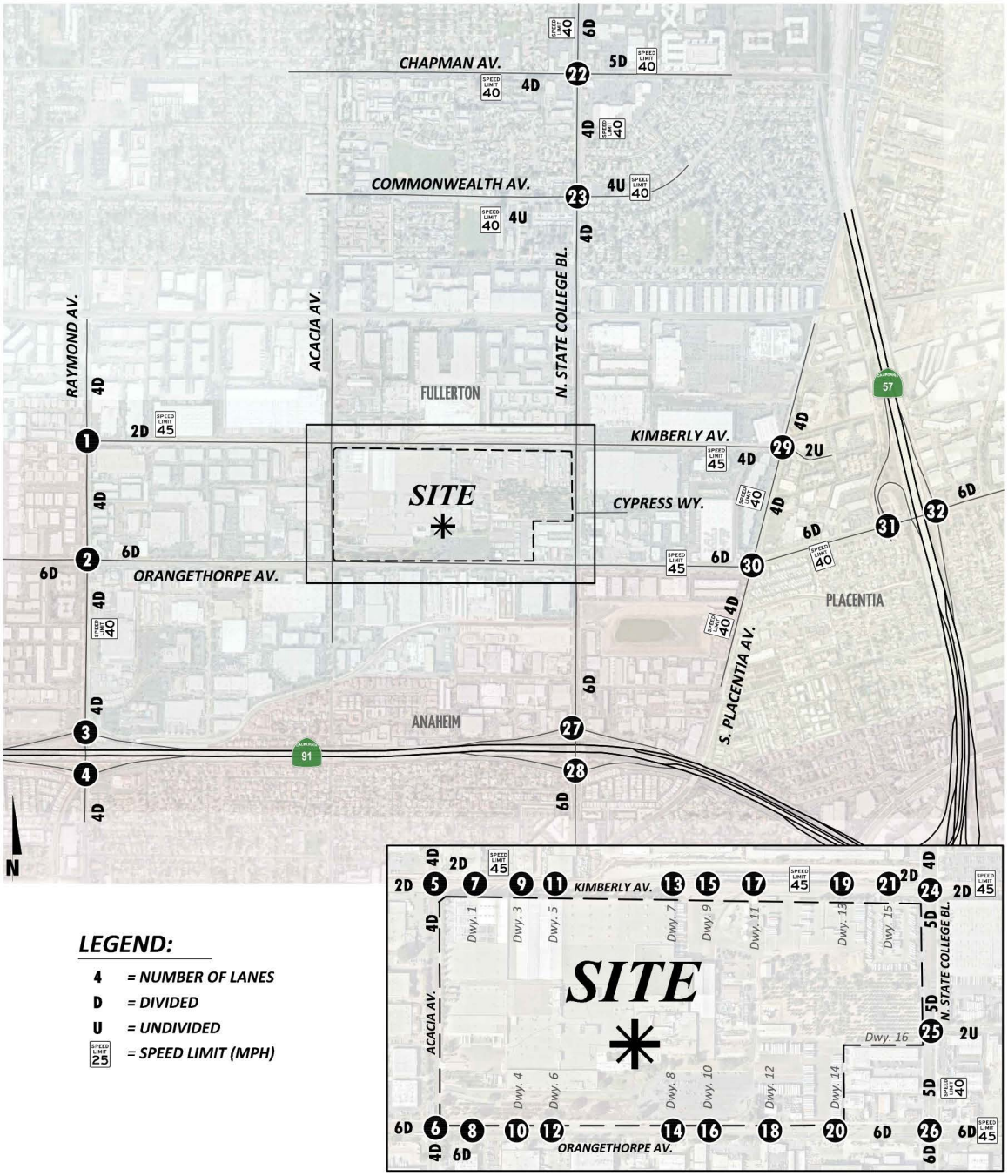
The Project site is bounded by Acacia Avenue to the west, Kimberly Avenue and BNSF railroad tracks to the north, State College Boulevard to the east, and E. Orangethorpe Avenue to the south. Other roadways in the Traffic Analysis study area include Chapman Avenue, Raymond Avenue, Placentia Avenue, and Commonwealth Avenue. State College Boulevard, Orangethorpe Avenue, and Chapman Avenue (east of State College Boulevard) are classified as Major Arterial Highways. Raymond Avenue, Placentia Avenue, Commonwealth Avenue, and Chapman Avenue (west of State College Boulevard) are classified as Primary Arterial Highways. Acacia Avenue is classified as a Secondary Arterial Street within the study area. Figure 4.11-1a and Figure 4.11-1b depict the existing number of through lanes and intersections controls in the study area. It should also be noted that the City of Fullerton completed roadway improvements along Acacia Avenue and State College Boulevard in 2017 and 2018, respectively, including repaving of the roadway surfaces. These streets are subject to the City's Paving Requirements in Moratorium Streets.

Vehicular access to the Kimberly-Clark site is provided from a driveway along Acacia Avenue (in the southwest portion of the Project site), and two driveways along Kimberly Avenue (the eastern driveway provided access to the former RV storage lot). There is also an exit on E. Orangethorpe Avenue. There is also a driveway along E. Orangethorpe Avenue for the potential expansion site.

B. Truck Routes

Trucks in the area use designated truck routes in compliance with the regulations of the cities of Fullerton, Anaheim, and Placentia. Existing truck routes are identified in Chapter 4, Mobility Element, of The Fullerton Plan; Chapter 8.30, Truck Routes and Terminal, of the Fullerton Municipal Code; the City of Placentia General Plan Mobility Element; and the City of Anaheim General Plan Circulation Element. Truck routes are signed accordingly and enforced by each jurisdiction. Following is a summary of the truck routes particularly relevant to the Project. With the exception of Raymond Avenue, each of these roadways is within the City of Fullerton adjacent to the Project site, as shown on Figure 4.11-2, *City of Fullerton Truck Routes*:

- **Acacia Avenue** is designated as a truck route in the City of Fullerton between E. Orangethorpe Avenue and Valencia Drive.
- **Kimberly Avenue** is designated as a truck route in the City of Fullerton between Raymond Avenue and Placentia Avenue.
- **E. Orangethorpe Avenue** is designated as a truck route in the City of Fullerton between east and west City limits. This roadway also is a designated truck routes in the cities of Anaheim and Placentia.

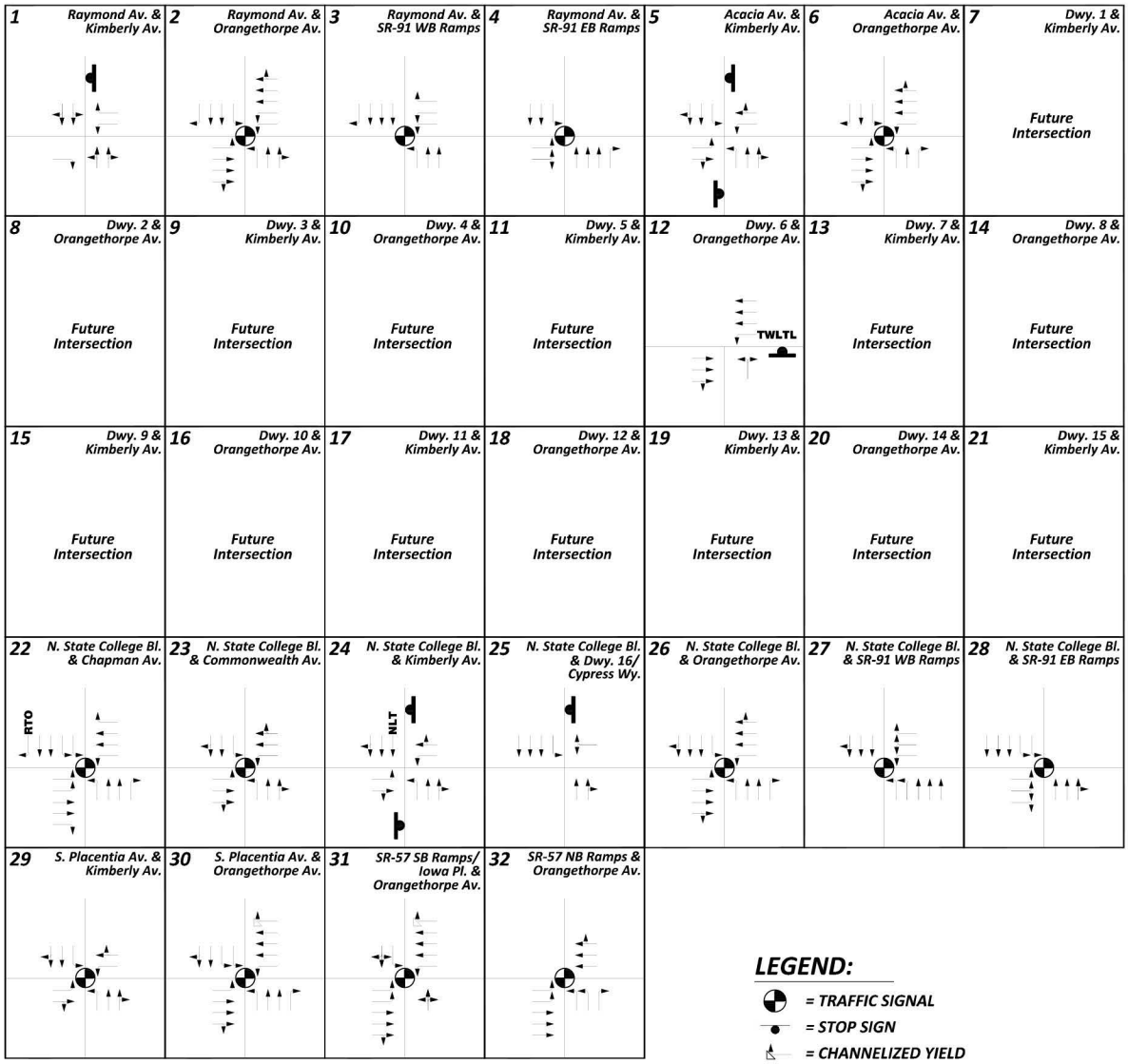


Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-1a

Not to Scale

Existing Number of Through Lanes and Intersection Controls

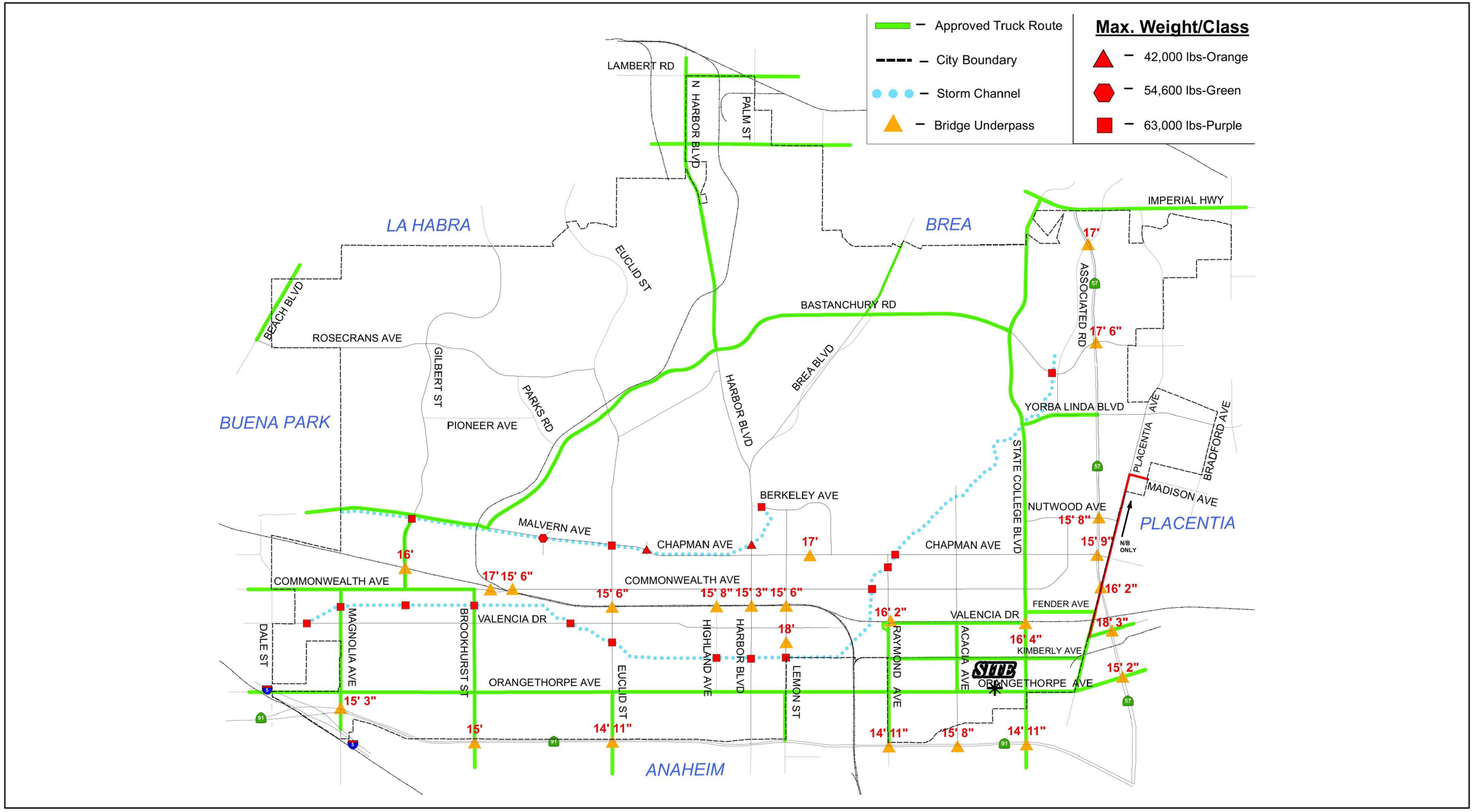


Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-1b

Not to Scale

Existing Number of Through Lanes and Intersection Controls



Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-2

Not to Scale

City of Fullerton Truck Routes

- **State College Boulevard** is designated as a truck route in the City of Fullerton between the north and south City limits. This roadway is also a designated truck route for the City of Anaheim.
- **Raymond Avenue** is designated as a truck route in the City of Fullerton between the southern City limits and Valencia Drive.

C. Transit Service

Passenger rail service is not provided along the BNSF railroad north of the Project site (north of and parallel to Kimberly Avenue). The Orange County Transportation Authority (OCTA) is a municipal transit agency that serves the City of Fullerton and surrounding Orange County communities. OCTA existing transit routes in the vicinity of the Project site are shown on Figure 4.11-3, *Existing Transit Routes*. Existing OCTA Route 30 and Route 57 would likely serve the Project. There are existing bus stops along E. Orangethorpe Avenue and State College Boulevard, which are less than ½-mile from the Project site. The transit frequency at these stops is approximately every 10-minutes.

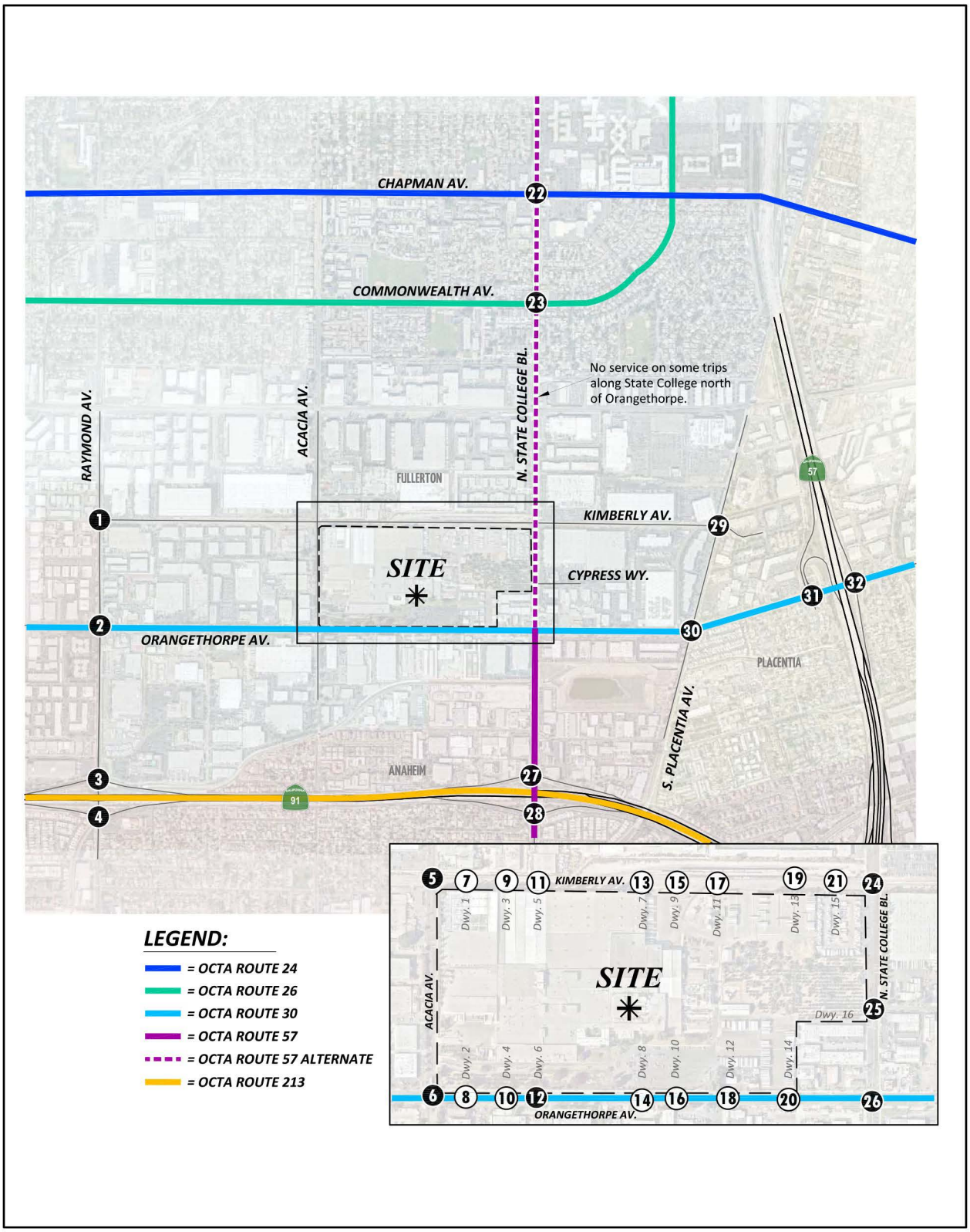
Relevant to transit service and VMT, the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) indicates that "residential and office/industrial projects that locate in areas with low VMT and that incorporate similar features (density, mix of uses, and transit accessibility) will tend to exhibit similarly low VMT." The North Orange County Collaborative VMT Traffic Study Screening Tool (Screening Tool) indicates the Project site is located within a low VMT area due to proximity to transit (bus) routes.

D. Bicycle and Pedestrian Facilities

Bicycle Facilities

The City of Fullerton's existing bike network is shown on Figure 4.11-4, *City of Fullerton Existing Bicycle Network*. As shown, within the Traffic Analysis study area there are Class II (on-street, striped) bicycle lanes currently along Acacia Avenue, E. Orangethorpe Avenue (west of State College Boulevard), and Commonwealth Avenue (west of State College Boulevard). There is a Class III bicycle route between Acacia Avenue and State College Boulevard (signed, but unstriped, on-road bicycle routes).

In the City of Anaheim, Class II bike lanes are proposed along E. Orangethorpe Avenue west of Raymond Avenue and east of State College Boulevard. In the City of Placentia, Class II bicycle lanes are proposed along E. Orangethorpe Avenue, and there is a planned Class I (off-road bike path) that runs south of and parallel to E. Orangethorpe Avenue. Existing and planned bicycle facilities in the cities of Anaheim and Placentia are shown in Exhibit 2-11 and Exhibit 2-12, respectively, in the Traffic Analysis.

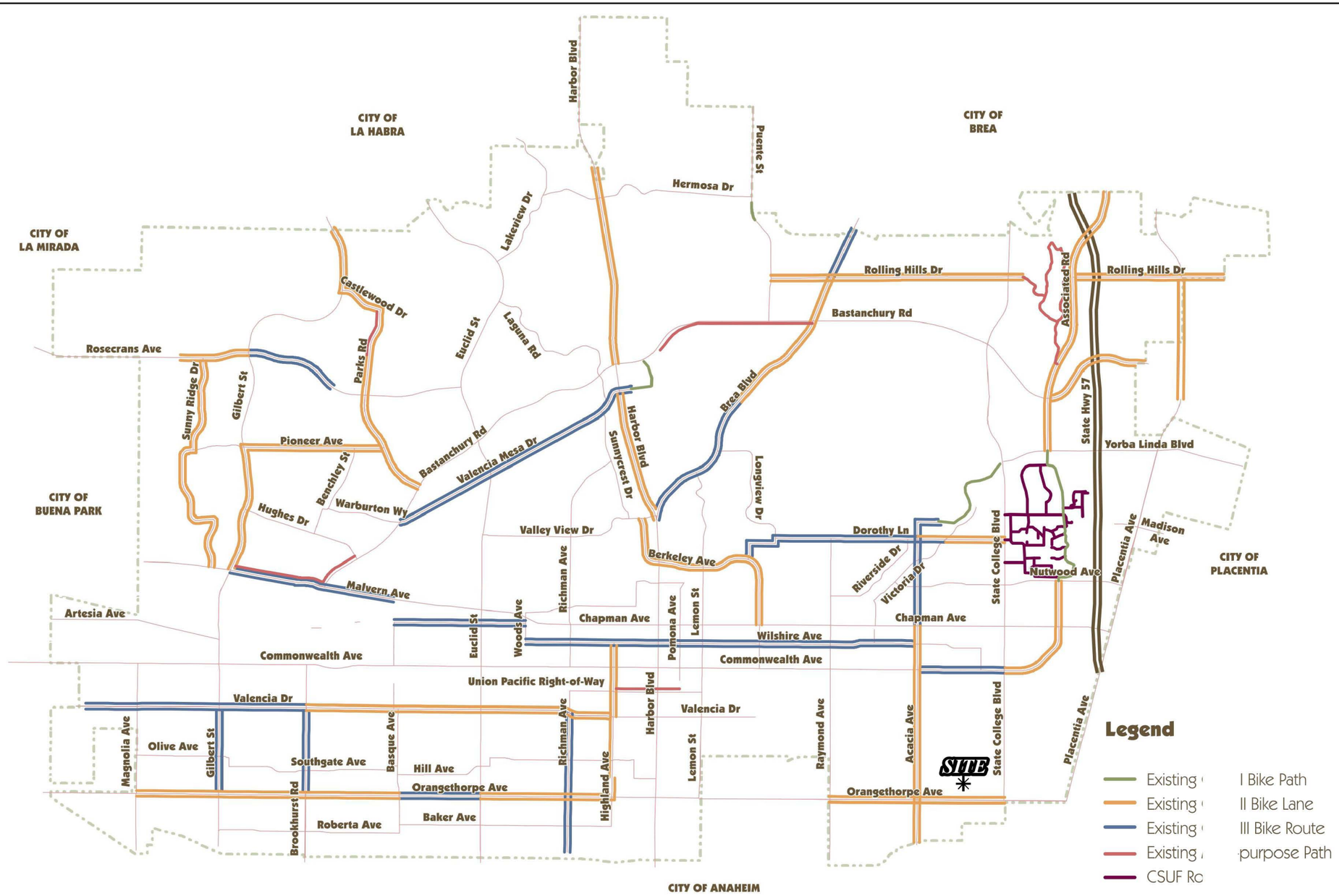


Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-3

Not to Scale

Existing Transit Routes



Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-4

Not to Scale

City of Fullerton Existing Bicycle Network

Pedestrian Facilities

Existing pedestrian facilities and bus stop locations in the vicinity of the Project site are shown on Figure 4.11-5, *Existing Pedestrian Facilities*. As shown, there are existing sidewalks on both sides of State College Boulevard, and on the west side of Acacia Avenue (across the street from the Project site. There are currently no sidewalks along E. Orangethorpe or Kimberly Avenue adjacent to the Project site.

E. Freight Rail Service

The BNSF railroad extends in an east-west direction north of the Project site (north of Kimberly Avenue) and is used for freight service. There is an existing rail spur that extends across Kimberly Avenue into the Project site that would be removed as part of the Project unless otherwise needed by a future tenant. Additionally, this freight line has at-grade crossings at Acacia Avenue and State College Boulevard. Records kept by the DOT's Federal Railroad Administration indicate that in 2019 there were approximately 23 through trains during the daytime (6:00 AM to 6:00 PM) and night time hours (6:00 PM to 6:00 AM) along this segment of the railroad (FRA, 2019).

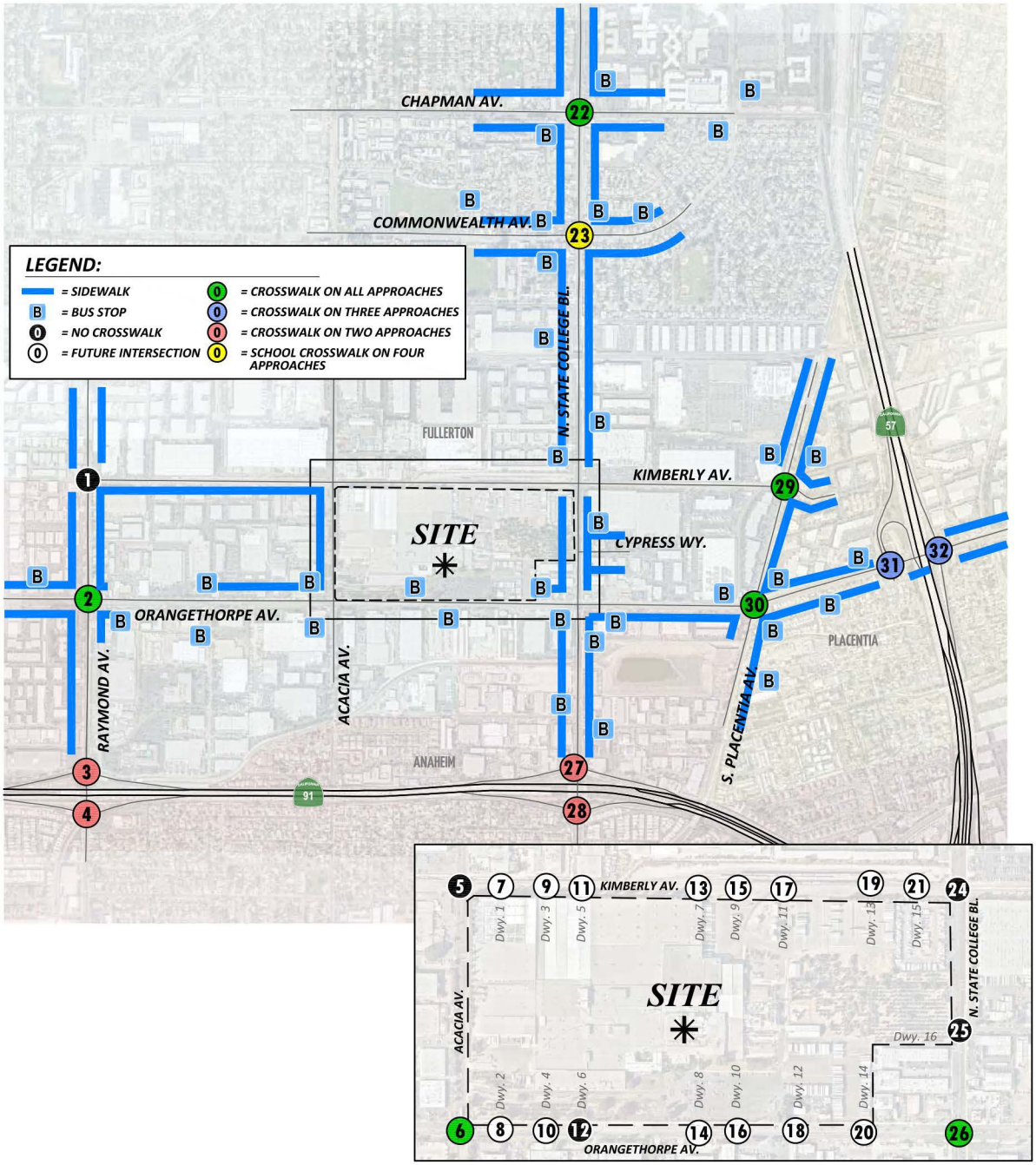
4.11.2 Existing Regulatory Setting

Section 5.4.2 of The Fullerton Plan EIR provides a discussion of the existing regulatory setting relative to traffic and circulation issues in the City, including State and local transportation programs. Following is a discussion of programs and regulations particularly relevant to the Project, including programs and regulations that are new or have been updated since preparation of The Fullerton Plan EIR.

A. State of California

Senate Bill 743, which was codified in Public Resources Code (PRC) Section 21099, requires changes to CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to PRC Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." To that end, in developing the criteria, OPR proposed, and the CNRA certified and adopted changes to the CEQA Guidelines in December 2018, which entailed changes to the thresholds of significance for the evaluation of impacts to transportation. Pursuant to SB 743 and PRC Section 21099, the requirement for analyzing congestion impacts for CEQA purposes was eliminated in December 2018. Therefore, an analysis of congestion impacts, including analysis of impacts related to the LOS of the circulation system, is not provided in this Section.

The updated CEQA Guidelines include the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. As identified in Section 15064.3(b)(4) of the CEQA Guidelines, a lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT. Beginning July 1, 2020, the provisions of CEQA



Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-5

Not to Scale

Existing Pedestrian Facilities

Guidelines Section 15064.3 apply statewide. As previously discussed, the Fullerton City Council adopted the *City of Fullerton Transportation Assessment Policies and Procedures* on June 16, 2020.

B. Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy

As further discussed in Section 4.9, Land Use and Planning, of this EIR, the Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project area is within SCAG's regional authority. On April 7, 2016, SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* to address the region's future needs for "mobility, economy, and sustainability". The 2016-2040 RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources. This would be made through the operation of low or no emission transportation systems by 2040. The RTP/SCS also focuses on the economy, with expectations of shortening the gap between the regional transportation system and economic vitality. To address the mobility challenge of the region's continuing roadway congestion, the RTP/SCS proposes transportation investments in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways, arterials, and goods movement; aviation and airport ground access; and operations and maintenance projects. The 2016-2040 RTP/SCS also includes an appendix titled "Goods Movement" that is applicable to the Project because the Project entails the development of warehouse buildings in the SCAG region that could support a variety of light industrial, warehousing, and logistics users. (SCAG, 2016)

In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason why the region is a critical mode in the global supply chain. (SCAG, 2018)

On May 7, 2020, SCAG's Regional Council adopted Connect SoCal (the 2020 - 2045 RTP/SCS) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020 (September 2020). Connect SoCal is a long-range visioning

plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal also recognizes the opportunities and challenges that come with goods movement, and includes a focus on its rapidly changing nature. As with the 2016-2040 RTP/SCS, Connect SoCal includes a Transportation System Goods Movement Technical Report. (SCAG, 2020)

Orange County Congestion Management Program

Within the SCAG service area, there are five Congestion Management Agencies (CMAs) that have the responsibility of preparing the CMP for their respective County. In its role as Orange County's CMA, the OCTA prepares, monitors, and periodically updates the Orange County CMP. The 2019 Orange County Congestion Management Program was adopted by OCTA in November 2019 and is summarized herein (OCTA, 2019). The goals of Orange County's CMP are to support regional mobility objectives by reducing traffic congestion, to provide a mechanism for coordinating land use and development decisions that support the regional economy, and to support gas tax funding eligibility. The City of Fullerton is required to show continued compliance with the CMP in order to obtain Measure M2 funds.

As previously discussed, under SB 743, automobile delay, as measured by LOS and other similar metrics, no longer constitutes a significant environmental effect under CEQA. However, a jurisdiction may still adopt LOS as a performance standard for analyzing traffic conditions and maintaining throughput on its highway system; the Orange County CMP still uses LOS to monitor CMP Highway System (CMPHS) performance. The CMPHS consists of Orange County's State highways (including SR-57 east of the Project site and SR-91 south of the Project site) and the arterials included in OCTA's Smart Street network. The Orange County CMP sets a standard of LOS E or better for the CMPHS intersections unless the baseline is lower than LOS E, in which case, the ICU rating cannot increase by more than 0.10. Within the City of Fullerton, the following arterials and intersections are included on the CMP Highway System:

- Harbor Boulevard
- Imperial Highway (SR-90)
- E. Orangethorpe Avenue
- Beach Boulevard (SR-39)
- State College Boulevard
- Harbor Boulevard/E. Orangethorpe Avenue Intersection
- State College Boulevard/E. Orangethorpe Avenue Intersection

As Orange County's transit provider, OCTA continually monitors the frequency and routing of its transit services. Bus and rail transit are essential components of Orange County's transportation system, and are important tools for achieving a balanced multi-modal transportation system

capable of maintaining level of service standards. The CMP performance measures provide an index of the effectiveness and efficiency of Orange County's fixed-route bus and commuter rail services. The CMP performance measures provide an index of the effectiveness and efficiency of Orange County's fixed-route bus and commuter rail services. Bus services serving the Project site were previously addressed in Section 4.11.1, above.

Renewed Measure M (Measure M2)

In 1990, Orange County voters approved Measure M, a 20-year program for transportation improvements funded by a half-cent sales tax. Measure M allocates all sales tax revenues to specific Orange County transportation improvement projects in three major areas: freeways, streets and roads, and transit. Renewed Measure M (or Measure M2) was passed by the voters of Orange County in 2006 and extended the half-cent sales tax from 2011 to 2041 to fund specific transportation projects and programs in the County. Revenue generated by Measure M2 is returned to local jurisdictions for use on local and regional transportation improvement and maintenance projects. Each jurisdiction is required to show continued compliance with the CMP in order to obtain Measure M2 funds.

Measure M2 identified a number of freeway improvements, roadway projects, and transit programs that would be funded by the sales tax revenues, including two environmental programs to mitigate the impacts of these transportation projects on natural and biological resources and water quality. Measure M2 freeway projects near the City of Fullerton include improvements to SR-57 (freeway widening between Orangewood Avenue and Tonner Canyon Road) and improvements to SR-91 from I-5 to SR-57.

C. City of Fullerton

The Fullerton Plan

Mobility Element

Chapter 4 of The Fullerton Plan is the Mobility Element, the purpose of which is to further the attainment of a balanced, multi-modal transportation network that minimizes environmental and neighborhood impacts (Fullerton, 2012a) . The Mobility Element includes the City's goals and policies for the circulation system. As previously discussed, the Mobility Element (Exhibit 6, *Roadway Classifications*) designates State College Boulevard and E. Orangethorpe Avenue as Major Arterial Highways, and Acacia Avenue as a Secondary Arterial Highway.

Bicycle Element

Chapter 5 of The Fullerton Plan is the Bicycle Element. The purpose of the Bicycle Element is to provide Fullerton with a plan, as well as goals, policies, and actions, designed to meet the needs of commuter and recreational bicyclists of all abilities and provide safe connectivity to and between activity centers such as schools, transportation centers, open space/parks, residential neighborhoods and commercial areas within the City, and with adjoining jurisdictions – consistent

with the Fullerton Vision and the community's values (Fullerton, 2012a). Existing and planned bikeways in the cities of Fullerton, Anaheim and Placentia were previously discussed above.

Fullerton Municipal Code

Traffic Regulations

Title 8, Traffic, of the Fullerton Municipal Code contains the City's traffic regulations as they relate to road signs and traffic control devices, designated truck routes and terminals, permitted and prohibited activities on streets, use of public parking lots and structures, vehicle removal/impoundment, and weight limits for individual streets.

As identified in Chapter 8.30, Truck Routes and Terminals, of the Municipal Code, as previously discussed, segments of Acacia Avenue, Kimberly Avenue, E. Orangethorpe Avenue, and State College Boulevard within the City of Fullerton (including the roadway segments adjacent to the Project site) are designated truck routes (where vehicles exceeding 10,000 pounds are allowed).

Traffic Impact Mitigation Fee Program

As identified in Section 21.30, Fees for Traffic Impact Mitigation, of the City's Municipal Code, the City adopted a traffic impact mitigation fee program "to implement the City's general plan growth management element, to ensure that new growth pays its share of regional traffic mitigation and to implement the City's circulation/transportation general plan element to improve, maintain and regulate the network of highways, and streets, to ensure their safe and efficient use". Adoption of a traffic impact mitigation fee by the City is mandated by Measure M2 and ensures that new growth pays its share of regional traffic mitigation and that the City remains eligible to receive the half-cent sales tax dollars for transportation improvements.

The traffic impact fee is imposed on new residential units; new office, commercial, industrial, or institutional buildings; and expansions of existing buildings. The fee is reviewed on an annual basis, collected at the time of issuance of building permits, and deposited into a traffic mitigation fund. The funds collected are used solely for needed traffic improvements identified in the City's Capital Improvement Program, The Fullerton Plan, and the City's traffic mitigation fee analysis.

Sight Distance

Section 15.40.040 of the City's Municipal Code outlines site development standards for industrial uses, including requirements for the placement of objects that would block a clear view of traffic across a vision clearance area. The height of walls, fences, hedges or guardrails on property within an industrial zone classification is limited to a maximum height limit of 3-feet.

Transportation Demand Management

Section 15.40.070 of the City's Municipal Code contains the transportation demand management (TDM) strategies that are applicable to new industrial/manufacturing development or major expansion of existing industrial/manufacturing development that is estimated to employ 100 or

more persons. These strategies are intended to reduce single-occupancy automobiles and include, but are not limited to the provision of the following features: convenient carpool/vanpool parking; bus facilities where appropriate; dissemination commuter information and areas to accommodate this; shower/lock room facilities; and, sidewalks with direct and safe routes to the external pedestrian circulation system.

Construction on City Streets

Chapter 16.06 of the City's Municipal Code provides standards and regulations for the construction and dedication of streets, alleys, and other public easements and improvements. Chapter 16.07 requires a permit for any work within public rights-of-way. Chapter 16.08 includes the City's standards for the vacation and abandonment of City streets, alleys, and easements. Chapter 16.11 addresses the removal of obstructions, encroachments, and traffic hazards on City streets.

Additionally, the City has established paving standards for moratorium streets, which include Acacia Avenue and State College Boulevard. Improvements to these roadways, including paving has recently been completed adjacent to the Project site.

City of Anaheim Municipal Code

Chapter 14.49, Through Truck Routes, of the Anaheim Municipal Code, restricts truck travel on City streets with the exception of identified truck routes; this applies to trucks having an unladen weight of 6,000 pounds or more. Relevant to the Project, State College Boulevard is a designated truck route between the northerly and southerly City limits, and E. Orangethorpe Avenue is a designated truck route between the westerly and easterly City limits.

City of Placentia Municipal Code

Chapter 13.44, Truck Routes, of the Placentia Municipal Code, restricts truck travel on City streets with the exception of identified truck routes; this applies to trucks having a gross combination weight rating of five tons (10,000 pounds) or more. Relevant to the Project, all portion of Orangethorpe Avenue and Placentia Avenue are designated truck routes within the City of Placentia.

4.11.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of State CEQA Guidelines, a project will normally have a significant adverse environmental impact on transportation if it will:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and

d. Result in inadequate emergency access.

4.11.4 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report

Refer to The Fullerton Plan EIR MM AQ-6 in Section 4.2, Air Quality, of this EIR, and MM HAZ-5 in Section 4.7, Hazards and Hazardous Materials, which require preparation and implementation of a Traffic Control Plan. These measures are consolidated and supplemented with Project-level MM 11-1 presented under Threshold c of this section.

B. Trip Generation and Distribution

Trip generation represents the amount of traffic which is both attracted to and produced by a development. Determining traffic generation for a specific project is therefore based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed for a given development. The Institute of Transportation Engineers (ITE) Trip Generation Manual is a nationally recognized source for estimating site-specific trip generation. As further described in the Traffic Analysis included in Appendix K2 of this EIR, the trip generation rates used for the Project are based upon data collected by ITE in their *Trip Generation Manual* (10th Edition, 2017) for the proposed high-cube cold storage warehouse use (ITE Land Use Code 157) and the *High Cube Warehouse Trip Generation Study* for the proposed high-cube fulfillment center warehouse use. Trip generation rates for the Project are shown in Table 4.11-1, *Trip Generation Rates*. As noted in Table 4.11-1, refinements to the raw trip generation estimates have been made to provide a more detailed breakdown of trips between passenger cars and trucks. Trip generation for heavy trucks was further broken down by truck type (or axle type). The total truck percentage is comprised of 3 different truck types: 2-axle, 3-axle, and 4+-axle trucks. Passenger car equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (i.e., large 2-axles, 3-axles, 4 or more axles). PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit (e.g., the passenger car). A PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks to estimate each turning movement.

The estimated Project daily and peak hour trip generation by vehicle type (actual and PCE) is shown in Table 4.11-2, *Project Trip Generation Summary*. The Project is estimated to generate a total of 3,422 actual trip-ends per day with 187 AM peak hour trips and 228 PM peak hour trips. When taking into consideration the trips associated with Kimberly-Clark operations, the net new trips are 2,692 trip-ends per day with 185 AM peak hour trips and 226 PM peak hour trips. The Project is also estimated to generate a total of 3,830 PCE net new trip-ends per day with 242 PCE AM peak hour trips and 281 PCE PM peak hour trips.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered in order to identify the route where the

Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site for both passenger cars and truck traffic. The trip distribution patterns are shown on Figure 4.11-6, *Project (Truck) Inbound and Outbound Trip Distribution*, and Figure 4.11-7, *Project (Passenger Car) Inbound and Outbound Trip Distribution.*

The assignment of traffic from the Project to the adjoining roadway system is based on Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, Project ADT volumes for the weekday and peak hour volumes are shown on Exhibit 3-3, Project Only Traffic Volumes, of the Traffic Analysis included in Appendix K2 of this EIR.

TABLE 4.11-1 TRIP GENERATION RATES

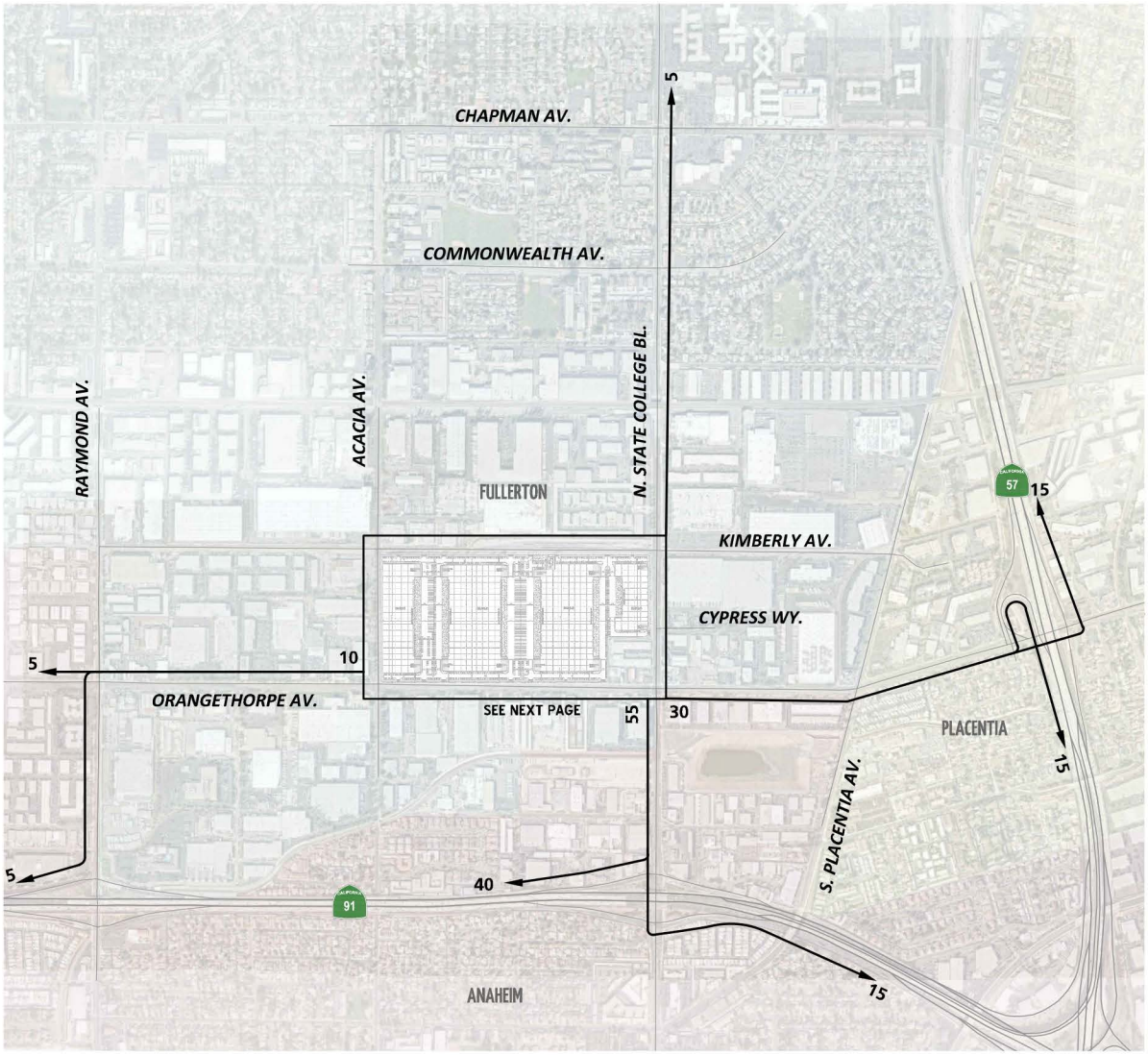
Land Use[1]	Units[2]	ITE Land Use Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates									
High-Cube Fulfillment Center Warehouse[3]	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129
Passenger Cars			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks			0.006	0.002	0.008	0.003	0.008	0.011	0.162
5+-Axle Trucks			0.008	0.003	0.011	0.003	0.007	0.010	0.217
High-Cube Cold Storage Warehouse[4]	TSF	157	0.085	0.025	0.110	0.032	0.088	0.120	2.120
Passenger Cars (AM-73.0%; PM-77.0%; Daily-65.0%)			0.062	0.018	0.080	0.025	0.067	0.092	1.378
2-Axle Trucks (AM-9.37%; PM-7.98%; Daily-12.15%)			0.008	0.002	0.010	0.003	0.007	0.010	0.257
3-Axle Trucks (AM-2.97%; PM-2.53%; Daily-3.85%)			0.003	0.001	0.003	0.001	0.002	0.003	0.082
4-Axle+ Trucks (AM-14.66%; PM-12.49%; Daily-19.01%)			0.012	0.004	0.016	0.004	0.011	0.015	0.403
Passenger Car Equivalent (PCE) Trip Generation Rates[5]									
High-Cube Fulfillment Center Warehouse[3]	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129
Passenger Cars			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks (PCE = 2.0)			0.012	0.004	0.016	0.006	0.016	0.022	0.324
5+-Axle Trucks (PCE = 3.0)			0.025	0.008	0.033	0.008	0.022	0.030	0.651
High-Cube Cold Storage Warehouse[4]	TSF	157	0.085	0.025	0.110	0.032	0.088	0.120	2.120
Passenger Cars			0.062	0.018	0.080	0.025	0.067	0.092	1.378
2-Axle Trucks (PCE = 1.5)			0.012	0.004	0.015	0.004	0.010	0.014	0.386
3-Axle Trucks (PCE = 2.0)			0.005	0.002	0.007	0.002	0.004	0.006	0.163
4-Axle+ Trucks (PCE = 3.0)			0.037	0.011	0.048	0.012	0.033	0.045	1.209

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).
High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.
[2] TSF = thousand square feet
[3] Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.
Inbound and outbound split source: ITE Trip Generation Manual, Tenth Edition (2017) for ITE Land Use Code 154.
[4] Vehicle Mix Source: ITE Trip Generation Handbook Supplement (2020), Appendix C.
Truck Mix: South Coast Air Quality Management District's (SCAQMD) recommended truck mix, by axle type.
Normalized % - With Cold Storage: 34.7% 2-Axle trucks, 11.0% 3-Axle trucks, 54.3% 4-Axle trucks.
[5] PCE factors are: 1.5 for 2-axle, 2.0 for 3-axle, and 3.0 for 4+-Axle.
Source: (Urban Crossroads, 2020b)

TABLE 4.11-2 PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity	Units[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Project Trip Generation Summary (Actual Vehicles)									
High-Cube Cold Storage	804.692	TSF							
Passenger Cars:			50	15	65	20	54	74	1,110
Truck Trips:									
2-axle:			6	2	8	2	6	8	208
3-axle:			2	1	3	1	2	3	66
4+-axle:			10	3	13	3	9	12	324
- Truck Trips			18	6	24	6	17	23	598
SUBTOTAL TRIPS (Actual)[2]			68	21	89	26	71	97	1,708
High-Cube Fulfillment	804.692	TSF							
Passenger Cars:			64	19	83	32	83	115	1,408
Truck Trips:									
2-4 axle:			5	1	6	2	6	8	130
5+-axle:			7	2	9	2	6	8	176
- Truck Trips			12	3	15	4	12	16	306
SUBTOTAL TRIPS (Actual)[2]			76	22	98	36	95	131	1,714
Passenger Cars			114	34	148	52	137	189	2,518
Trucks (Actual)			30	9	39	10	29	39	904
Subtotal Trips (Actual)[2]			**144**	**43**	**187**	**62**	**166**	**228**	**3,422**
Existing Trips (See Table 4-1 of the Traffic Analysis)			**1**	**1**	**2**	**1**	**1**	**2**	**730**
NET NEW TRIPS (Actual)[2]			**143**	**42**	**185**	**61**	**165**	**226**	**2,692**
Project Trip Generation Summary (PCE)									
High-Cube Cold Storage	804.692	TSF							
Passenger Cars:			50	15	65	20	54	74	1,110
Truck Trips:									
2-axle:			10	3	13	3	8	11	311
3-axle:			4	1	5	1	4	5	132
4+-axle:			30	9	39	10	26	36	973
- Truck Trips			44	13	57	14	38	52	1,416
SUBTOTAL TRIPS (PCE)[2]			94	28	122	34	92	126	2,526
High-Cube Fulfillment	804.692	TSF							
Passenger Cars:			64	19	83	32	83	115	1,408
Truck Trips:									
2-4 axle:			10	3	13	5	13	18	262
5+-axle:			20	6	26	7	17	24	524
- Truck Trips			30	9	39	12	30	42	786
SUBTOTAL TRIPS (PCE)[2]			94	28	122	44	113	157	2,194
Passenger Cars			114	34	148	52	137	189	2,518
Trucks (PCE)			74	22	96	26	68	94	2,202
Subtotal Trips (PCE)[2]			**188**	**56**	**244**	**78**	**205**	**283**	**4,720**
Existing Trips (See Table 4-1 of the Traffic Analysis)			**1**	**1**	**2**	**1**	**1**	**2**	**890**
NET NEW TRIPS (PCE)[2]			**187**	**55**	**242**	**77**	**204**	**281**	**3,830**

[1] TSF = thousand square feet
[2] TOTAL TRIPS = Passenger Cars + Truck Trips.
Source: (Urban Crossroads, 2020b)



LEGEND:

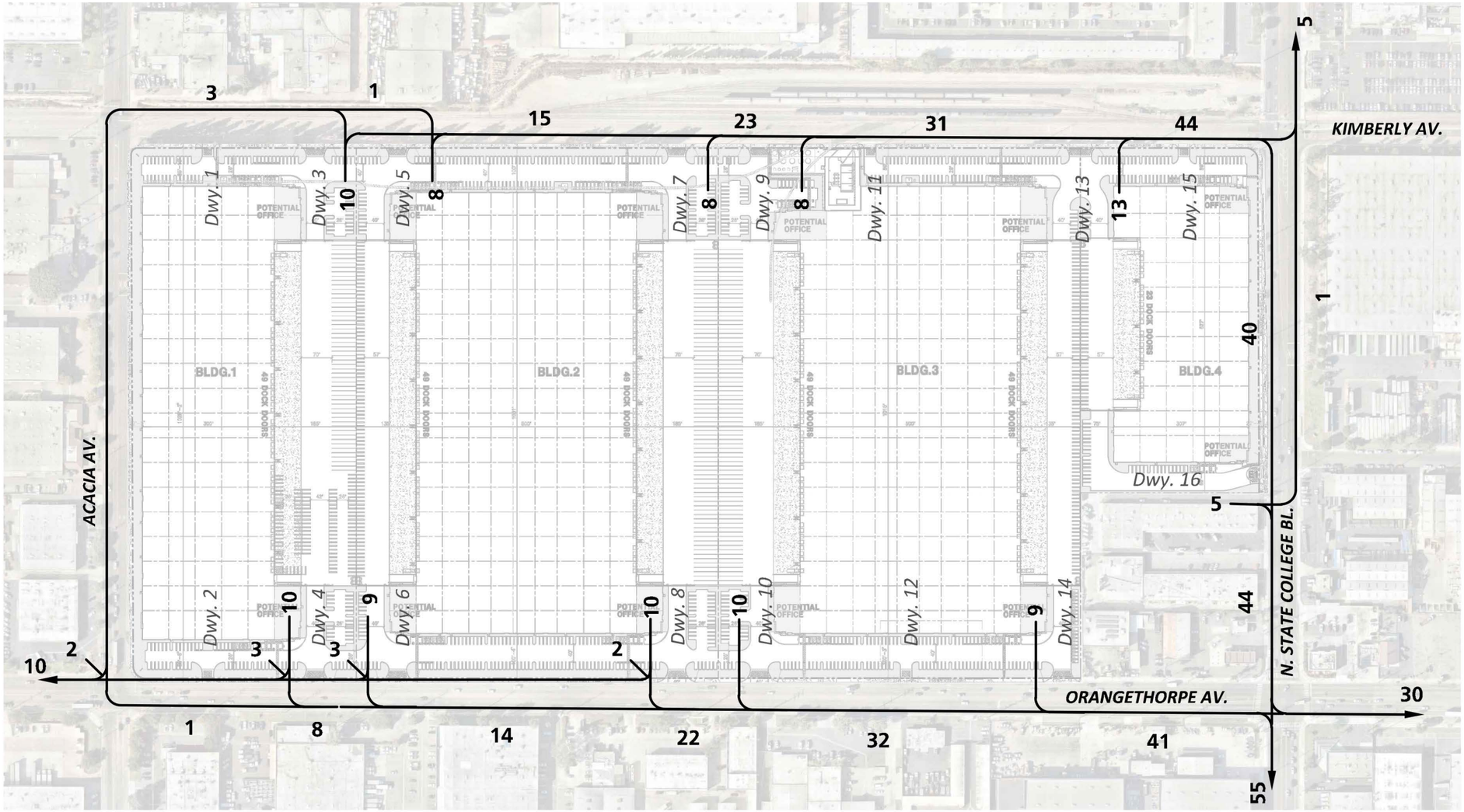
10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-6a

Not to Scale

Project (Truck) Inbound and Outbound Trip Distribution



LEGEND:

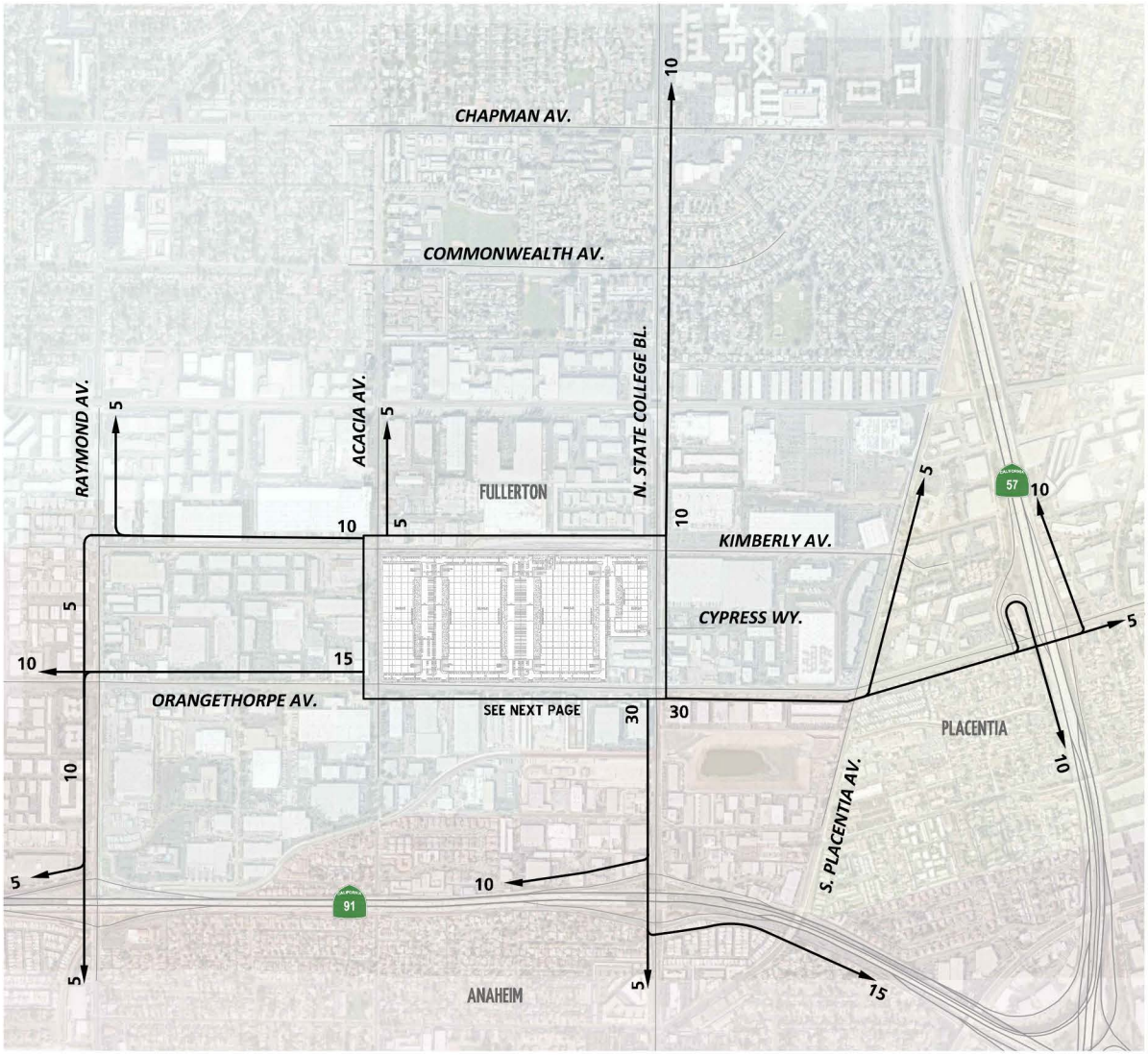
10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (07-16-2020)

Not to Scale

Figure 4.11-6b

Project (Truck) Inbound and Outbound Trip Distribution



LEGEND:

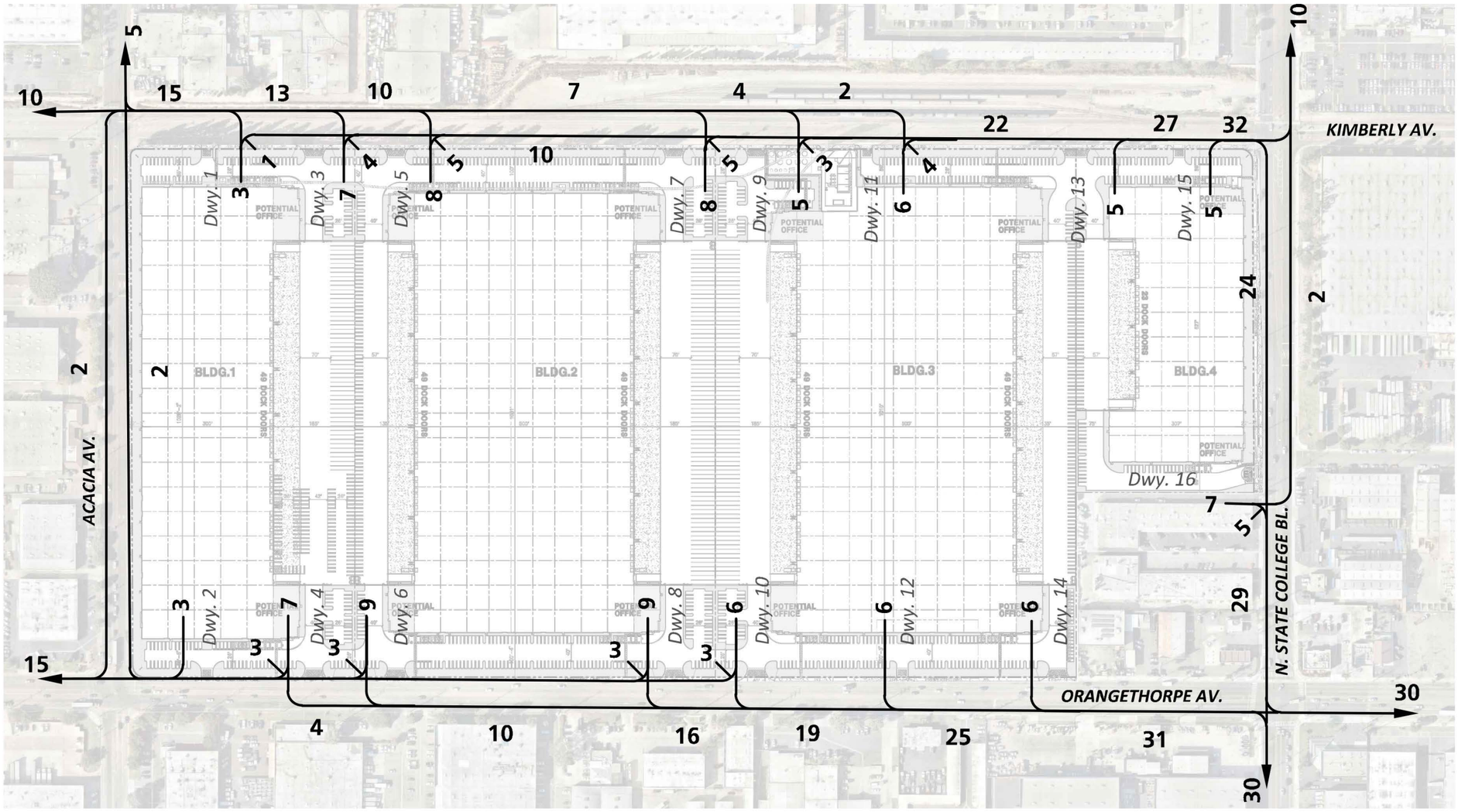
10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-7a

Not to Scale

Project (Passenger Car) Inbound and Outbound Trip Distribution



LEGEND:

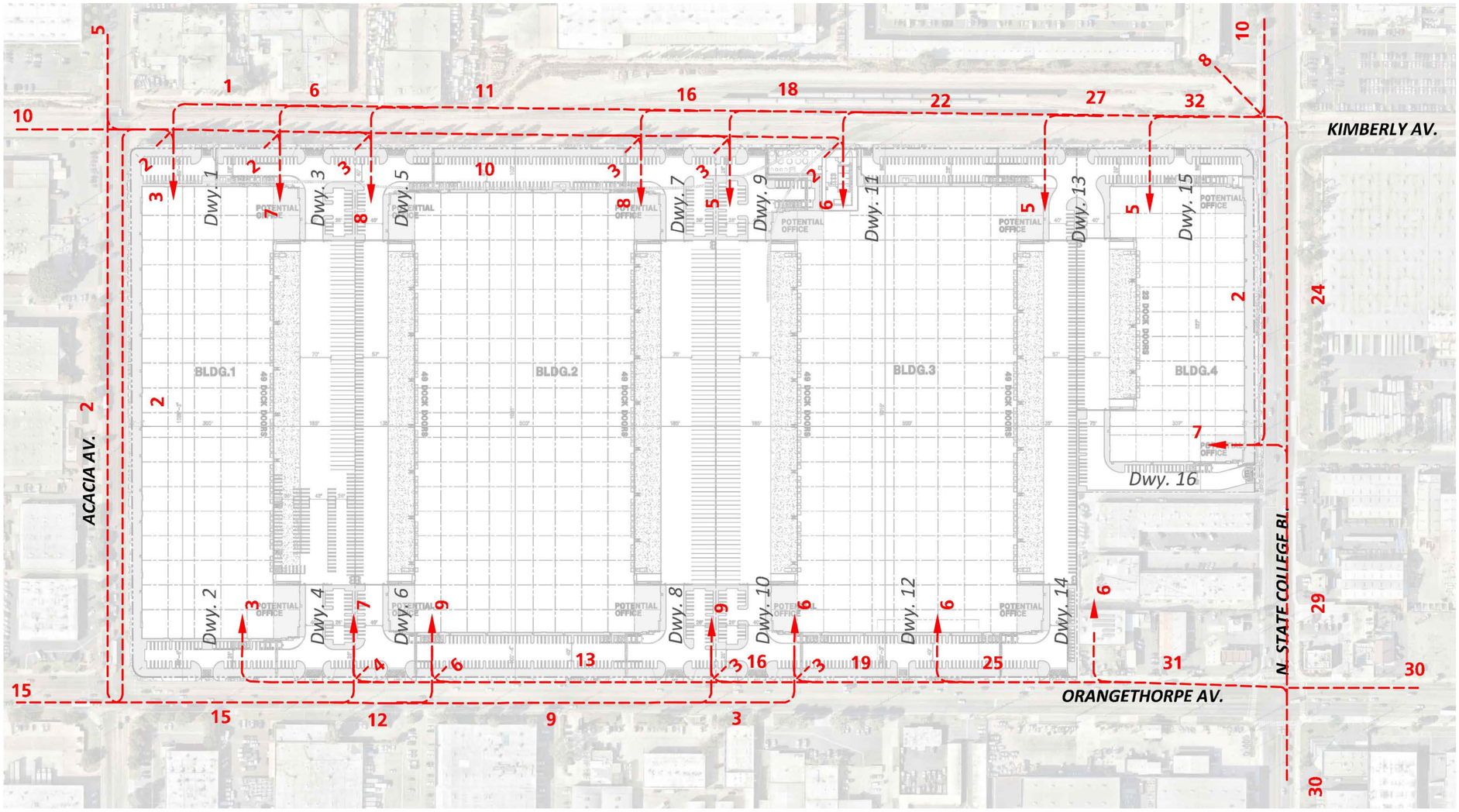
10 = PERCENT TO/FROM PROJECT

Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-6b

Not to Scale

Project (Passenger Car) Inbound and Outbound Trip Distribution



LEGEND:

10 = PERCENT TO PROJECT

Source(s): Urban Crossroads (07-16-2020)

Figure 4.11-6c

Not to Scale

Project (Passenger Car) Inbound and Outbound Trip Distribution

C. Impact Analysis

Threshold a:	***Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

Regional

SCAG 2016 RTP/SCS and Connect SoCal

The fundamental goals of SCAG's 2016-2040 RTP/SCS and SoCal Connect are to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. Table 4.9-1, SCAG RTP/SCS Policy Consistency Analysis, in Section 4.9, Land Use and Planning, of this EIR, addresses the Project's consistency with the 2016 RTP/SCS and Connect SoCal. As demonstrated through this analysis, implementation of the Project would be consistent with the goals of SCAG's regional planning programs, including the following goals related to vehicular and non-vehicular circulation that may be applicable to the Project:

SCAG 2016-2040 RTP/SCS

- Goal 2: Maximize mobility and accessibility for all people and goods in the region.
- Goal 3: Ensure travel safety and reliability for all people and goods in the region.
- Goal 4: Preserve and ensure a sustainable regional transportation system.
- Goal 5: Maximize the productivity of our transportation system.
- Goal 6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
- Goal 7: Encourage land use and growth patterns that facilitate transit and active transportation.

Connect SoCal

- Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4: Increase person and goods movement and travel choices within the transportation system.
- Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.

2019 Orange County CMP

The OCTA monitors the CMPHS to minimize LOS deficiencies. Pursuant to SB 743, LOS is no longer the basis for determining whether a Project has a significant impact pursuant to CEQA. However, for informational purposes, the Project's consistency with the CMP is being discussed. OCTA has adopted LOS E as the minimum standard for intersections and segments along the CMPHS unless the baseline is lower than LOS E, in which case, the ICU rating cannot increase by more than 0.10. The Project would contribute traffic to CMPHS facilities and intersections, but would not exceed the thresholds above because the baseline under existing conditions is lower than LOS E. The Project would not conflict with the 2019 Orange County CMP.

City of Fullerton – The Fullerton Plan

As previously identified, the purpose of the Mobility Element is to further the attainment of a balanced, multi-modal transportation network that minimizes environmental and neighborhood impacts. The purpose of the Bicycle Element is to provide Fullerton with a plan designed to meet the needs of commuter and recreational bicyclists of all abilities and provide safe connectivity to and between activity centers such as schools, transportation centers, open space/parks, residential neighborhoods and commercial areas within the City, and with adjoining jurisdictions.

The Fullerton Plan provides guidance, including goals and polices, for four levels of geography, from the region to the individual project level. At the "project level," the City reviews individual projects for compliance with applicable policies and regulations. The State's general rule for a General Plan consistency determination is that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment" (OPR, 2017). The analysis below addresses the consistency of the Project with project level policies outlined in the Mobility Element and Bicycle Element, and also identifies City level polices that are furthered by the Project. As identified, the Project does not conflict with any applicable policies.

TABLE 4.11-3 THE FULLERTON PLAN CONSISTENCY ANALYSIS

GOAL/POLICY	CONSISTENCY ANALYSIS
MOBILITY ELEMENT	
Goal 5: A balanced system promoting transportation alternatives that enable mobility and enhanced quality of life.	
City-level Policy P5.6 – Quality Highways and Roads. Support projects, programs, policies and regulations to operate and maintain a comprehensive network of arterial highways and local roads supporting safe and efficient movement of people, goods and services to, through and within the City.	**No Conflict.** Access to the Project site would be provided from each of the four roadways adjacent to the Project site, which are all designated truck routes in the City of Fullerton. The roadways provide efficient access to SR-57 approximately 0.7 mile east of the Project site, and SR-91 approximately 0.4 mile south of the Project site. SR-91 provides access to Interstate 5 (I-5) (located approximately 4.7 miles west of the site) and SR-57 provides access to SR-60 (located approximately 10 miles north of the site).

GOAL/POLICY	CONSISTENCY ANALYSIS
City-level Policy P5.7 – Complete Streets. Support projects, programs, policies and regulations to maintain a balanced multi-modal transportation network that meets the needs of all users of the streets, roads and highways – including bicyclists, children, persons with disabilities, motorists, movers of commercial goods, pedestrians, users of public transportation and seniors – for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the City.	The Circulation and Parking description provided in Section 3.0, Project Description, of this EIR identifies required vehicular and non-vehicular circulation improvements in the public right-of-way that would be implemented as part of the Project, per the preliminary Project conditions of approval. Additionally, the Project would include installation of access driveways and an internal network of drive aisles to serve each building, which would meet City of Fullerton Fire Department standards for access, width, and turning radii. As described in Section 3.0, Project Description, circulation improvements required to be implemented with the Project include rehabilitation of pavement over Kimberly Avenue and E. Orangethorpe Avenue; modified turning radii and roadway geometrics, as needed, and as feasible, to accommodate truck turning movements; and, improvements to substandard curb ramps, as needed. Additionally, sidewalks would be constructed adjacent to the Project site along Kimberly Avenue, Acacia Avenue and E. Orangethorpe Avenue, and a new concrete bus pad would be constructed a bus stop would on the north side of E. Orangethorpe Avenue to facilitate pedestrian travel and transit. Improvements implemented by the Project would comply with City standards and would benefit persons of all social and economic groups who utilize these roadways and pedestrian facilities.
City-level Policy P5.14 – Fair Share of Improvements. Support policies and regulations which require new development to pay a fair share of needed transportation improvements based on a project's impacts to the multi-modal transportation network.	**No Conflict.** The Project would pay required fair share fees, as determined by the City, and would not conflict with policies or regulations requiring new development to pay fair share fees. In addition to the construction of transportation improvements, and in accordance with Chapter 21.30 of the City of Fullerton Municipal Code, the Project Applicant would participate in the implementation of the City's Mobility Element through the payment of traffic impact fees.
Project-level Policy P5.16 – Infrastructure for Low and Zero Emissions Vehicles. Support projects, programs, policies and regulations to encourage the development of private and/or public infrastructure facilitating the use of alternative fuel vehicles.	**No Conflict.** The 2019 California Green Building Standards Code (CALGreen) standards are applicable to the Project and require, among other items, provisions for electronic vehicle (EV) charging station and parking dedicated to EV vehicles. As detailed on the conceptual site plans provided in Section 3.0, Project Description, the Project includes EV parking for passenger vehicles, vans, and an ambulatory vehicle, and also provides parking for clean air/van pool vehicles.
BICYCLE ELEMENT	
Goal 6: A bicycle friendly city where bicycling is a safe and convenient alternative to motorized transportation and a recreational opportunity for people of all ages and abilities.	
City-level Policy P6.7 – Development Projects. Support projects, programs, policies, and regulations to reduce negative impacts to and increase opportunities for	**No Conflict.** There are Class II (on-street, striped) bicycle lanes adjacent to the Project site along Acacia Avenue and E. Orangethorpe Avenue. In compliance

GOAL/POLICY	CONSISTENCY ANALYSIS
bicycle users and the bicycle network in private and public development projects.	with Section 15.40.070 of the City's Municipal Code, which identifies required transportation demand strategies to reduce dependency on single occupancy vehicles, and the CALGreen Code, interior bicycle storage would be provided within the proposed buildings, and short- and long-term exterior bicycle parking spaces would be provided at each building. The accommodations for bicyclists and proximity of the Project site to transit would facilitate bicycle travel to and from the Project site.
Project-Level Policy P6.12 – Bicycle Parking and Facilities. Support projects, programs, policies, and regulations to provide convenient bicycle parking and other bicycle facilities in existing and potential high demand locations within the City, such as educational institutions, parks, business districts, transit stops, retail, commercial and employment centers.	

Level of Significance Before Mitigation

Implementation of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and no impact would result.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

Threshold b: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

As previously discussed, SB 743, approved in 2013, changes the way transportation impacts are determined according to CEQA. Updates to the CEQA Guidelines approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. As a component of OPR's revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020; the City adopted its TAPP on June 16, 2020.

Consistent with the City's TAPP requirements, a Project-specific VMT Assessment has been prepared and is included in Appendix K1 of this EIR. The City performed a screening test using "NOCC+," a spreadsheet tool developed for the use of North County Cities in identifying projects that could be considered for screening from project-generated VMT impacts. The screening criterion include: (1) location within a Transit Priority Area (TPA), (2) location within a low VMT area, and (3) project type. While the Project is in a TPA, it does not meet the secondary screening threshold related to floor-to-area ratio (FAR) and parking, as the Project's FAR is less than 0.75 and the Project provides slightly more parking that required by the City's Municipal Code. Further,

the Project does not meet the "project type" screening based on its size and because it would generate more than 836 daily VMT (approximately 110 daily trips).

However, the results of the screening test indicate that the Project is within a low VMT area. The City's TAPP indicates that "[r]esidential and office projects located within a low VMT area may be presumed to have a less than significant impact absent substantial evidence to the contrary." For a project located in a low VMT area, secondary analysis is required do determine if the project:

1. Is inconsistent with the existing land use (i.e. if the project is proposing single-family housing, there should be existing single-family housing of approximately the same density); or
2. Has a unique attribute that would otherwise be misrepresented utilizing the data from the travel demand model such as including land uses that would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

If the answer to both of these questions is no, a project can be screened out under the low VMT area criteria and no further analysis for VMT is needed.

The results of the screening test indicate that the Project is located within a low VMT area; therefore, the secondary analysis is required. The Project site is within the Southeast Industrial Focus Area as established in The Fullerton Plan. As further discussed in Section 4.9, Land Use and Planning, of this EIR, the Project, which involves the development of a logistics center with four high-cube warehouse buildings, is consistent with the Industrial land use designation and the growth assumptions for the Southeast Industrial Focus Area anticipated in The Fullerton Plan. Further, based on a review of the socio-economic data contained within the Project's traffic analysis zone (TAZ), the BAS_EMP or Basic (production/distribution) employment found in the current TAZ is consistent with industrial/warehouse type use, therefore the Project is consistent with the growth assumptions anticipated in The Fullerton Plan. Additionally, the Project would not alter the existing built environment in a way as to increase the rate or length of vehicle trips compared to that anticipated in the travel demand model.

Therefore, the Project can be screened out under the low VMT area criteria and would have a less than significant impact related to VMT.

Level of Significance Before Mitigation

Pursuant to the City's TAPP relative to conducting a VMT assessment, the Project, which is within an established low VMT area, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact is less than significant.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

This impact is less than significant.

Threshold c:	***Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?***

The Project would involve redevelopment of the Project site with four warehouse buildings consistent with the existing land use designations for the Project site. As previously identified, the Project site is within the Southeast Industrial Focus Area as established in The Fullerton Plan, is developed with industrial uses, and is in an area surrounded by other industrial uses. The roadway classifications for the roadways adjacent to the Project site were established in consideration of industrial nature of the area. Site improvements incorporated into the Project to ensure that adequate ingress and egress to the Project site is provided are described in Section 3.0, Project Description, of this EIR. Additionally, as shown on Figure 3-17, *Site Access*, access would be provided from Project driveways along E. Orangethorpe Avenue (six driveways with the Project and seven driveways with the Optional Site Plan), Kimberly Avenue (seven driveways), and State College Boulevard (one driveway). Each driveway would have a stop control and would accommodate full access, with the exception of the westernmost driveway on E. Orangethorpe Avenue, which would be restricted to right-in/right-out access only for passenger cars. The access driveways would have curb return radii able to accommodate large trucks (WB-67 with a 53-foot trailer).

As shown in Table 4.11-2, the project is estimated to generate 904 truck trips daily, with 728 trips by 2- to 4-axle trucks, 176 trips by 5-axle trucks. The introduction of truck trips would not be incompatible with existing development in the area, that generates similar types of truck trips. Additionally, as discussed above, the cities of Fullerton, Anaheim and Placentia have designated truck routes that would be used by Project-generated truck traffic. Notably, each of the four streets adjacent to the Project site are designated truck routes in the City of Fullerton. Trucks traveling to and from the project would adhere to applicable regulations associated with truck travel, including truck weight limits, as previously discussed in Section 4.11.2, above. The Project's impacts related to hazards from truck travel would be less than significant. Therefore, the Project does not involve the introduction of any design features or uses that would substantially increase hazards on the roadways surrounding the Project site. Notwithstanding this conclusion, following is a discussion of potential construction-related transportation hazards, and sight distance associated with Project driveways.

Construction-Related Transportation Hazards

Construction traffic resulting from the Project would primarily be associated with construction workers commuting to and from the Project site; transport of demolition materials and soil; delivery of building materials; and transport of construction equipment (including large equipment). Construction workers would travel to the site by passenger vehicle and construction equipment

and building materials deliveries would arrive by medium- and heavy-duty trucks. The amount of construction traffic would vary daily depending on the nature of the activity. Construction workers do not typically commute during peak hours as they arrive prior to morning peak hour and leave prior to the evening peak hour. The use of heavy trucks for the transport and disposal of building materials, equipment, and soils would occur periodically throughout the workday but largely outside of peak hours. For the Project, it is expected that the peak days for construction-related heavy truck traffic would occur when haul trucks are removing demolition materials from the site.

While the grading operation may ultimately balance on-site, for purposes of providing a conservative analysis, with the use of crushed concrete and pulverized asphalt, it is estimated that approximately 3,060 cubic yards of soil material would ultimately be exported from the Project site. This would represent approximately 153 truckloads. It is expected that the soil transport would occur at the end of the overall construction and that there would be less than 10 truckloads (one-way truck trip) per day. Demolition activities would generate approximately 697 truckloads over the approximate 100-day demolition period, which would represent approximate 7 truckloads per day (one-way truck trips).

The Project is bounded by existing roadway (Acacia Avenue, Kimberly Avenue, State College Boulevard, and E. Orangethorpe Avenue). The Project would involve improvements to these roadways, as previously described, but would not change the overall circulation patterns in the area. It is anticipated that trucks would be routed from SR-57 (northbound and southbound) to the E. Orangethorpe Avenue exit and would travel west toward the Project site. As previously discussed, to minimize traffic congestion and truck traffic impacts, the cities of Fullerton, Anaheim and Placentia have designated truck routes that direct truck traffic to designated arterials, and construction truck traffic would be required to use these designated routes. Compliance with the use of truck routes is enforced by the respective local jurisdictions.

Construction activities associated with the Project would result in the temporary closure of traffic lanes or roadway segments along the site adjacent roadways during various construction activities, including, but not limited to, construction of previously identified roadway improvements and access driveways, and installation of utility infrastructure (including utility connections and undergrounding of existing facilities). The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic due to localized traffic congestion, decreased turning radii, or the condition of roadway surfaces.

In compliance with The Fullerton Plan EIR's MM HAZ-5 presented previously and MM AQ-6 in Section 4.2, Air Quality, of this EIR, a Traffic Control Plan would be prepared and submitted to the City prior to initiation of construction activities. Further, as required by the City, a Public Works Permit/Encroachment Permit would be obtained from the City Engineer prior to any work on curbs, gutters, sidewalks, streets, alleys, public easements, or other City rights-of-way, following the guidelines in Chapter 16.07 of the Fullerton Municipal Code. Obstruction to City streets during construction activities shall be minimized and abated in accordance with Chapter 16.11 of the City's Municipal Code. Further, the City requires construction on public rights-of-way to comply with the Standard Specifications for Public Works Construction (Green Book), which contains

standards for maintenance of access, traffic control, and notification of emergency personnel. In addition, all lane closures and/or detours shall comply with the Work Area Traffic Control Handbook (WATCH) Manual, which provides guidelines for traffic control in construction work areas on local and county roads. Preparation and implementation of the required Traffic Control Plan, and adherence to City requirements, including use of designated truck routes, would ensure that potential hazards to transportation during construction would be less than significant.

Notwithstanding this conclusion, Project-level MM 11-1 has been developed to provide a comprehensive measure addressing preparation of Traffic Control Plans for Project construction activities. The Traffic Control Plans would be required to include the following information/requirements: identify construction routes, route construction traffic away from congested streets, synchronized signals to improve traffic flow, dedicated turn lanes for construction truck and equipment, maintain travel lanes in both directions and/or implement traffic control to accommodate traffic flow, identify and provide signage for detours, construction schedules that avoid peak traffic hours, and consolidation of truck deliveries.

Sight Distance

Based on review of the site plan relative to requirements outlined in Section 15.40.040E of the City's Municipal Code, adequate visibility for vehicular and pedestrian traffic can be provided at each Project driveway by limiting sight obstructions within the limited use area[1]. As required by the Municipal Code, the limited use area would be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. Any landscaping/hardscape within the limited use area shall not exceed 3-feet.

Additionally, the sight distance for the existing exit only driveway immediately to the south of Cypress Way/Driveway 16 on State College Boulevard (for the property south of Building 4) was also reviewed. Based on the setback of Driveway 16 from the existing driveways to the south (approximately 10-feet to the west), the sight distance for a vehicle waiting to exit from existing driveways to the south is not affected by any vehicle waiting to exit from Driveway 16. The Project would not alter the location of the existing curb along State College Boulevard in this area. A vehicle waiting to exit the Project at Driveway 16 on State College Boulevard does not lie within the limited use area for the southbound approaching vehicles. As such, the Project's driveway does not affect the sight distance for the vehicles waiting to exit the existing driveway immediately to the south of Driveway 16.

With adherence to the City's requirements for providing a clear view of traffic, the Project would not increase hazards associated with sight distance at Project driveways. This impact would be less than significant.

[1] The limited use area is determined by starting with a point located 15-feet back from the edge of the traveled way which represents the position of the driver in a vehicle waiting to exit the driveway (minor approach) then a line is drawn to the center of the farthest lane (representing the location of an approaching vehicle) at the required distance per the Caltrans Highway Design Manual (HDM) (Section 405.1) along the major roadway in both directions of travel.

Level of Significance Before Mitigation

The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. This impact would be less than significant.

Project-Level Mitigation Measures

In addition to The Fullerton Plan EIR's MM HAZ-5 and MM AQ-6, Project-level MM 11-1 has been developed to provide a comprehensive measure addressing preparation of Traffic Control Plans for Project construction activities.

MM 11-1 Prior to issuance of demolition and grading permits, the Property Owner/Developer shall prepare a Traffic Control Plan for review and approval by the City Engineer. The Traffic Control Plan shall include the following:

- Identify construction routes and Project site access driveway for construction vehicles.
- Route construction trucks away from congested streets or sensitive receptors.
- Signal synchronization to improve traffic flow, if necessary.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Maintain at least one unobstructed lane in both directions on surrounding roadways, if feasible.
- Provide and maintain all necessary flag persons, barricades, delineators, signs, flashers, and any other safety equipment as set forth in the latest publication of the State of California, Manual of Traffic Control, or as required by the Public Works Department permit requirements to ensure safe passage of pedestrian and vehicular traffic.
- Identify and provide signage for safe detours for vehicles, bicyclists, and pedestrians, as necessary.
- Construction schedules that require construction activities that affect traffic flow on the arterial system to occur during off-peak hours.
- Consolidation of truck deliveries.

Level of Significance After Mitigation

This impact is less than significant.

Threshold d: Would the Project result in inadequate emergency access?

Access to the Project site during construction would primarily be provided via the existing driveways along Acacia Avenue and Kimberly Avenue. There would be temporary and limited partial lane closures to accommodate utility system connections, undergrounding of existing utilities along E. Orangethorpe Avenue, construction of driveways, and construction of site-adjacent roadway improvements. The lane closures would be temporary and would not block all travel lanes. Additionally, Project-level MM 11-1, which consolidates and supplements The Fullerton Plan EIR MM HAZ 5 and MM AQ-6 requires a Traffic Control Plan be prepared and implemented during the Project's construction phases. The Traffic Control Plan would ensure that at least one unobstructed lane is maintained in both directions and that temporary traffic signal, signal carriers (i.e., flagpersons), or other appropriate traffic controls are implemented, if needed.

During operation, access to the Project site would be provided via new driveways along Kimberly Avenue, State College Boulevard, and E. Orangethorpe Avenue. The internal roads and driveways would be required to meet the City of Fullerton's width and turnaround requirements to ensure adequate fire and emergency access. Additionally, the required right-of-way widths for site-adjacent roadways would be maintained.

Therefore, the Project would result in adequate emergency access and this impact would be less than significant.

Level of Significance Before Mitigation

Adequate emergency access would be provided and this impact would be less than significant.

Additional Project-Level Mitigation Measures

Refer to Project-level MM 11-1, above.

Level of Significance After Mitigation

This impact is less than significant.

4.11.5 CUMULATIVE IMPACTS

A comprehensive cumulative project list was compiled based on information provided by the City of Fullerton Community and Economic Development Department and the planning departments in the cities of Anaheim and Placentia. A summary of cumulative development projects and their proposed land uses is provided in Section 4.0 of this EIR.

As identified in the analysis presented under Threshold a, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Cumulative development projects would be reviewed for consistency with adopted programs, plans, ordinances, or policies, including but not limited to the

SCAG RTP/SCS, The Fullerton General Plan, the Fullerton Municipal Code, and the General Plans and Municipal Codes for the adjacent jurisdiction, as applicable. Even if cumulative development projects are in conflict, the Project would not contribute to a cumulative impact and thus would not cumulatively considerable because the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, as identified through the analysis presented in this section.

The City's TAPP identifies that a land use project's effect on VMT would be considered potentially significant for purposes of determining a cumulative impact if either of the following conditions are satisfied:

- The addition of the project in the baseline year causes an increase in the citywide average total daily VMT per service population calculated with Boundary Method VMT; or
- The addition of the project in the horizon year causes an increase in the citywide average total daily VMT per service population calculated with Boundary Method VMT.

As discussed under Threshold b, the results of the VMT screening test indicate that the Project is within a low VMT area. Additionally, the Project is consistent with the land use assumptions for the Project site and the Southeast Industrial Focus Area, as outlined in The Fullerton Plan, and would not alter the existing built environment in such a way as to increase the rate or length of vehicle trips. Therefore, the Project can be screened out under the low VMT area criteria outlined in the City TAPP, and no further analysis for VMT is needed. No additional cumulative analysis is required, and the Project's cumulative impact relative to VMT is considered less than significant. The Project would not result in a cumulatively considerable contribution to a significant cumulative VMT impact.

The Project would have less than significant impacts related to hazards from design or incompatible uses during construction and operation, and with respect to emergency access, with adherence to applicable regulations and implementation of identified MMs. None of the cumulative projects listed on Table 4.0-1, Cumulative Development Land Use Summary, and shown on Figure 4.0-1, Cumulative Development Project Location Map, are immediately adjacent to the Project site or at a location that would otherwise result in potentially cumulative impacts related to hazards from design or incompatible uses. Additionally, each cumulative project would be required to comply with applicable regulations related to the use of designated truck routes for construction and operation, and emergency access which are in place to ensure impacts are less significant. Thus, the Project would not result in a considerable contribution to cumulative impacts for these issues, when considered with the cumulative projects that are planned, proposed, or under construction in the vicinity of the Project site.

4.11.6 References

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Urban Crossroads. 2020a. May 5. *Goodman Logistics Center - Fullerton Vehicle Miles Traveled (VMT) Assessment.* Included in Appendix K1 of this EIR.

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4.12 TRIBAL CULTURAL RESOURCES

This section identifies the potential for the Project site to contain tribal cultural resources and evaluates the Project's potential impacts on tribal cultural resources. The analysis in this section is primarily based on the *Cultural Resources Technical Report for the Goodman Logistics Center Fullerton, Orange County, California* (Cultural Resources Report) prepared by ASM Affiliates, Inc. (ASM) (May 2020), in compliance with The Fullerton Plan Environmental Impact Report (EIR) mitigation measure (MM) CR-1, and included in Appendix C of this EIR. This section also reflects the results of the City's consultation with Native American tribes.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

No comments regarding tribal cultural resources were raised at the EIR scoping meeting. In its Notice of Preparation (NOP) comment letter, the California Native American Heritage Commission (NAHC) provided information about Assembly Bill (AB) 52 and Senate Bill (SB) 18, which address requirements for consultation with Native American tribes related to tribal cultural resources; and, provided standard guidance on the scope of the analysis of potential impacts to archaeological resources and tribal cultural resources. As further discussed below, the City of Fullerton has completed Native American consultation as required by AB 52. SB 18 does not apply to the Project as the Project does not include a General Plan Amendment or Specific Plan Amendment.

The City of Fullerton sent the NOP for this EIR to the following Native American tribes: Gabrieliño Band of Mission Indians – Kizh Nation, Gabrieliño Tongva Tribe, Juaneño Band of Mission Indians – Acjachemen Nation, and Soboba Band of Luiseño Indians. Pursuant to AB 52, these tribes were also sent a Project notification on March 19, 2020. The Juaneño Band of Mission Indians – Acjachemen Nation was the only tribe to respond to the NOP; however, the tribe did not formally request consultation pursuant to AB 52. In its NOP comment letter, the tribe requested to continue to be consulted on the Project and identified that they would, reserve comments pending review of this Draft EIR. The Gabrieleño Band of Mission Indians – Kizh Nation requested consultation pursuant to AB 52.

4.12.1 EXISTING SETTING

Section 5.10, Cultural Resources, of The Fullerton Plan EIR, includes a discussion of the environmental setting for archaeological resources, and indicates that archaeological sites are often located along creek areas, ridgelines, and vistas and may occur within these areas of the City. The Fullerton Plan EIR further indicates that the City of Fullerton is largely urbanized/developed, with the largest concentration of vacant land occurring within West Coyote Hills in the northern portion of the City. Following is a summary of information provided in the Project-specific Cultural Resources Report relevant to tribal cultural resources.

Prehistoric Period

William J. Wallace developed a prehistoric chronology for the southern California coastal region that is still widely used today. Wallace's prehistoric sequence for the Southern California coastal region include four periods: Horizon I – Early Man, Horizon II – Milling Stone, Horizon III – Intermediate, and Horizon IV- Late Prehistoric. A detailed discussion of these periods is provided in the Cultural Resources Report included in Appendix C of this EIR, and a summary is provided below (ASM, 2020).

Horizon I – Early Man (ca. 10,000 – 6,000 B.C.)

Archaeology has identified evidence of human occupation along the southern California coast and Channel Islands during the Early Man period. Present-day Orange and San Diego counties contain several sites dating to 9,000 to 10,000 years ago. Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas and on Pleistocene lakeshores in the Mojave Desert. The earliest well-defined culture in the region is called the San Dieguito tradition, which is marked by sites containing leaf-shaped bifacial projectile points and knives, stemmed or shouldered projectile points, scrapers, engraving tools, and crescents. Subsistence patterns shifted around 6,000 B.C., coincident with the gradual desiccation associated with the onset of the Altithermal, a warm and dry period that lasted for about 3,000 years. After 6,000 B.C., a greater emphasis was placed on plant foods and small animals.

Horizon II – Milling Stone (6,000 – 3,000 B.C.)

The Milling Stone horizon is characterized by an ecological adaptation to collecting and the emergence of milling stones (metates, slabs) and hand stones (manos, mullers), which are typically shaped. As testified by their toolkits and shell middens in coastal sites, people during this period practiced a mixed food procurement strategy. Several key coastal sites in southern California characterize the Milling Stone horizon and the Encinitas tradition. Many of these sites revealed an abundance of stone chopping, scraping, and cutting tools made from locally available raw material. Characteristic mortuary practices of the Milling Stone horizon or Encinitas tradition include extended and loosely flexed burials, some with red ochre, and few grave goods such as shell beads and milling stones interred beneath cobble or milling stone cairns.

Horizon III – Intermediate (3,000 B.C. – A.D. 500)

The Intermediate period is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. During the Intermediate period, there was a pronounced trend toward greater adaptation to regional or local resources. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks become part of the tool kit during this period. Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment. This change in milling stones signals a shift away from the processing and consumption of hard seed resources to the increasing importance of the acorn. It has been argued that mortars and pestles may have been

used initially to process roots (e.g., tubers, bulbs, and corms associated with marshland plants), with acorn processing beginning at a later point in prehistory and continuing to European contact. Characteristic mortuary practices during the Intermediate horizon and Campbell tradition included fully flexed burials, placed facedown or face-up, and oriented toward the north or west. Red ochre was common, and abalone shell dishes were infrequent.

Horizon IV – Late Prehistoric (A.D. 500 – Historic Contact)

In the Late Prehistoric Horizon there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric period, demonstrated by more classes of artifacts. There is also an increased use of asphalt for waterproofing and as an adhesive. By A.D. 1,000, fired clay smoking pipes and ceramic vessels began to appear at some sites. The scarcity of pottery in coastal and near-coastal sites implies ceramic technology was not well developed in that area, or that ceramics were obtained by trade with neighboring groups to the south and east. Mortuary customs during the Late Prehistoric period are elaborate and include cremation and interment with abundant grave goods. The seemingly abrupt changes in material culture, burial practices, and subsistence focus at the beginning of the Late Prehistoric period are thought to be the result of a migration to the coast of peoples from inland desert regions. In Los Angeles and Orange counties, similar changes (introduction of cremation, pottery, and small triangular projectile points) are considered the result of a Takic migration to the coast from inland desert regions.

Ethnography – Gabrielino/Tongva

The Project site is within an area historically occupied by the Gabrieliño or Tongva. The Tongva are a Takic-speaking people whose lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. Their mainland territory was bounded on the west by the Chumash at Topanga Creek, on the north by the Serrano in the San Gabriel Mountains, in the east by the Cahuilla, and on the south at Aliso Creek by the Juaneño. Tongva society was organized into patrilineal non-localized clans. Clans consisted of several lineages, each with their own ceremonial leader. The chief always came from the primary lineage of the clan/village. One or two clans generally made up the population of a village.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. Tongva subsistence economy centered on gathering and hunting. As for most native Californians, acorns were the staple food (an established industry by the time of the Early Intermediate period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sage, and agave). Fresh and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed.

A wide variety of tools and implements were employed by the Tongva to gather and collect food resources. These included bows and arrows, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Many plant foods were collected with woven seed beaters, several

forms of burden baskets, carrying nets, and sharpened digging sticks, sometimes with stone weights fitted onto them. Groups residing near the ocean used ocean-going plank canoes (known as a ti'at) and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands. These ocean-going canoes could hold six to 14 people.

For food processing, Tongva people used several tools: portable and bedrock mortars, pestles, basket hopper mortars, manos and metates, hammerstones and anvils, woven strainers, and winnowers, leaching baskets and bowls, woven parching trays, knives, bone saws, and wooden drying racks. Food was served in various woven and carved wood vessels. For food storage, ground meal and unprocessed hard seeds were placed in large, finely woven baskets, and unprocessed acorns in large granaries made of willow branches, raised off the ground on platforms. The Tongva used Santa Catalina Island steatite to make comals, ollas, and cooking vessels that would not crack after repeated heating episodes, as well as effigies, ornaments, and arrow straighteners.

Refer to Section 4.3, Cultural Resources, of this EIR, for a discussion of the Spanish and Mexican periods. Notably, the 1833 Secularization Act passed by the Mexican Congress ordered half of all mission lands to be transferred to the Native Americans, with the other half to remain in trust and managed by an appointed administrator. These orders were never implemented due to several factors that conspired to prevent the Native Americans from regaining their patrimony. Spanish monks used thousands of native people to work the mission lands.

Tribal Cultural Resources

During preparation of The Fullerton Plan EIR, the NAHC conducted a record search of its Sacred Lands Files (SLF), which did not indicate the presence of Native American cultural resources within 0.5-miles of the City of Fullerton boundaries (Fullerton, 2012). During preparation of the Project-specific Cultural Resources Report, ASM requested a NAHC SLF to identify areas of Native American heritage significance relevant to the Project. The results of the search (April 24, 2020) were also negative; however, the NAHC identified that a lack of specific information in the SLF should not be taken as a confirmation of a lack of resources within the area.

As previously identified, the City of Fullerton provided notification of the Project to tribes that have requested to receive such notice, as required by AB 52. Two tribes requested consultation (Gabrieleño Band of Mission Indians – Kizh Nation, and Juaneño Band of Mission Indians – Acjachemen Nation). The results of the Native American outreach/consultation conducted by the City did not reveal the presence of any tribal cultural resources within the Project site or surrounding areas.

The South Central Coastal Information Center (SCCIC) located at California State University, Fullerton, conducted a records search for the Project site and a search buffer of one-mile around it. The search indicated that no prior surveys have been conducted nor have any cultural resources, including tribal cultural resources, been documented within or near the Project site. A total of 32 prior studies have been conducted and 18 cultural resources have been documented within the one-mile search buffer; all of these resources are historical buildings or structures.

Further, a pedestrian archaeological survey of the Project site was completed by ASM on March 18, 2020. The Project site is almost entirely developed and covered with buildings, pavements, and landscaping. Some open space remains within the remnant orange orchard but these areas have been significantly modified by the planting and maintenance of the now-mature orange and avocado trees over the past at least seven decades. Within the landscaped areas, any exposed ground surfaces were examined wherever ground visibility was available. No previously undocumented cultural resources, including tribal cultural resources, were identified as a result of the survey.

4.12.2 EXISTING REGULATORY SETTING

A. State

Assembly Bill (AB) 52

California AB 52 (2014) Chapter 532 is an act to amend Section 5097.94 of, and add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved by the Governor on September 25, 2014. AB 52 requires:

> *"a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project, if the tribe requested to the lead agency, in writing, be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration or environmental impact report is required for a project."*

If the tribes desire notification of proposed projects in that area that may cause a substantial adverse change in the significance of a tribal cultural resource, AB 52 requires that Native American tribes send written notice of their geographic areas of traditional and cultural affiliation to CEQA lead agencies. The CEQA lead agency is then required to provide such notification and consult with the tribe(s) if the tribe(s) requests a consultation.

The provisions listed in AB 52 apply to projects that have a notice or preparation or a notice of negative declaration filed on or after July 1, 2015. By requiring the CEQA lead agency to consider the effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, AB 52 imposes a state-mandated program. AB 52 requires the NAHC to provide each California Native American tribe, as defined, on or before July 1, 2016, with a list of all public agencies that may be a lead agency within a geographic area in which the tribe is traditionally or culturally affiliated; the contact information of those agencies; and information on how the tribe may request those public agencies to notify the tribe of projects within the jurisdiction of those public agencies for the purposes of requesting consultation.

As indicated above, the City provided notice of the Project to the Native American tribes that have requested such notice. The results of the AB 52 consultation process are discussed below under the analysis of Threshold "a".

California Environmental Quality Act

CEQA defines tribal cultural resources as follows (California Public Resources Code Section 21074):

> *Section 21074.*
> *(a) "Tribal cultural resources" are either of the following:*
> *(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
> *(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
> *(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*
> *(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*
> *(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*
> *(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a)."*

Where, criteria set forth in subdivision (c) of Section 5024.1 (Public Resources Code Section 5024.1, Title 14 of the California Code of Regulations [CCR], Section 4852) state that:

> *"Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code § 5024.1, Title 14 CCR, Section 4852) including the following:*
>
> *(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;*
> *(B) Is associated with the lives of persons important in our past;*
> *(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
> *(D) Has yielded, or may be likely to yield, information important in prehistory or history."*

Where "unique archaeological resources" and "nonunique archaeological resources" are defined in CEQA as follows (Public Resources Code Section 21083[g] and [h], ARCHAEOLOGICAL

RESOURCES; DETERMINATION OF EFFECT OF PROJECT EIR OR NEGATIVE DECLARATION; MITIGATION MEASURES), as follows:

> *"(g) As used in this section, "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*
>
> *(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
>
> *(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
>
> *(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.*
>
> *(h) As used in this section, "nonunique archaeological resource" means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects."*

California Public Resources Code (Section 5097.98)

Section 5097.98 of the California Public Resources Code addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. This Section also establishes procedures to be implemented if Native American skeletal remains are discovered during the construction of a project and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

California Public Resources Code (Section 7050.5, 7051, and 7054)

These sections collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the California Public Resources Code). These sections also address the disposition of Native American burials in archaeological sites and protect such remains from disturbance, vandalism, or inadvertent destruction. Procedures to be implemented are established for: (1) the discovery of Native American skeletal remains during construction of a project; (2) the treatment of the remains prior to, during, and after evaluation; and (3) reburial.

4.12.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on tribal cultural resources if it would:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape,

sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.12.4 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measure from The Fullerton Plan Environmental Impact Report

The Fullerton Plan EIR includes MMs that are relevant to cultural resources, including tribal cultural resources, and are applicable to any new development required throughout the City, including on the Project site. It should be noted that The Fullerton Plan EIR MM CR-1, which requires that a Phase I Cultural Resources Study be prepared for development projects in the City, was completed with the preparation of the Project-specific Cultural Resources Report included in Appendix C of this EIR. Because the required analysis has been completed, MM CR-1 is not listed below will not be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

Based on the results of the Phase I Cultural Resources study prepared pursuant to The Fullerton Plan EIR MM CR-1, including a determination that there is a low but existing potential for unidentified cultural resources to be encountered within the Project site, a requirement for monitoring during construction, as required by The Fullerton Plan EIR MM CR-2, is applicable to the Project. The Fullerton EIR MM CR-3, which identifies actions to take if resources are discovered, and MM CR-4, which addresses actions to take if human remains are discovered, are also applicable to the Project and will be included in the MMRP for the Project.

MM CR-2 If the Phase I Cultural Resources Study required under Mitigation Measure CR-1 determines that monitoring during construction by a professional archaeologist and/or paleontologist is needed for the subject development project, the project proponent shall retain a professional archaeologist and/or paleontologist, subject to approval by the City of Fullerton, prior to the issuance of grading permits. The task of the professional archaeologist and/or paleontologist shall be to verify implementation of the mitigation measures identified in the City-approved Phase I Cultural Resources Study and to monitor the initial ground-altering activities, including but not limited to, debris removal, vegetation removal, tree removal, grading, trenching, or other site preparation activities. The professional archaeologist and/or paleontologist shall be empowered to temporarily halt or divert construction equipment to allow recording and removal of the unearthed

resources. All artifacts and/or fossils discovered at the subject development site shall be inventoried and analyzed by the professional archaeologist and/or paleontologist. If any artifacts of Native American origin are discovered, a Native American Tribal monitor shall be asked to help analyze the Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible.

A report of the findings, including an itemized inventory of recovered artifacts and/or fossils, shall be prepared and shall include a discussion of the significance and disposition of the recovered artifacts and/or fossils. The report and inventory shall be submitted to the City of Fullerton, signifying completion of the program to mitigate impacts to archaeological and/or paleontological resources.

MM CR-3 In the event that cultural resources (archaeological, historical, paleontological) resources are inadvertently unearthed during excavation and grading activities of any future development project, the contractor shall immediately cease all earth disturbing activities within a 100-foot radius of the area of discovery. If not already retained due to conditions present pursuant to CR-2, the project proponent shall retain a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), subject to approval by the City of Fullerton, to evaluate the significance of the finding and appropriate course of action (refer to Mitigation Measures ~~CR-1,~~ CR-2 and CR-4). If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.

MM CR-4 In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.

B. Impact Analysis

Threshold a.i	***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource …and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

As discussed under Threshold “a” in Section 4.3, Cultural Resources, of this EIR, a records search for the Project was undertaken by the SCCIC. Based on this search and review of existing literature related to cultural and historic resources within the Project site, no tribal cultural

resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified. (ASM, 2020)

As previously identified, AB 52 and Public Resources Code Section 21080.3.1 requires lead agencies to provide notice to Native American tribes that are traditionally and culturally affiliated with the geographic area of a Project if they have requested notice of projects proposed within that area. On March 19, 2020, the City of Fullerton sent notification letters to the following tribes that have requested such notification: Gabrieleño Band of Mission Indians – Kizh Nation, Gabrieliño – Tongva Tribe, Juaneño Band of Mission Indians – Acjachemen Nation, and Soboba Band of Luiseño Indians.

The Gabrieleño Band of Mission Indians – Kizh Nation and Juaneño Band of Mission Indians – Acjachemen Nation, requested consultation with the City regarding the Project. In its NOP comment, the Juaneño Band of Mission Indians indicated it would provide comments following review of this EIR.

Pursuant to Public Resources Code Section 21080.3.1, the City has engaged with the Kizh Nation on the Project as follows:

- On March 19, 2020, the City notified the Kizh Nation of the Project pursuant to AB 52.
- On March 24, 2020, Kizh Nation transmitted a letter to the City requesting consultation on the Project pursuant to AB 52.
- On April 22, 2020, the City informed the Kizh Nation that an EIR is being prepared for the Project, which will address potential impacts to Cultural Resources and Tribal Cultural Resources. The City further identified that the technical reports would be included as attachments to the EIR and mitigation would be provided for any impacts identified.
- On April 22, 2020, the Kizh Nation asked the City if the City would like to set up a consultation.
- On April 22, 2020, the City responded, stating that if the Kizh Nation has specific information about the site that would affect the scope/content of the EIR, the City would like to meet. Otherwise, the City suggested it may be more beneficial to meet once the Draft EIR was complete to go over the results.
- On May 13, 2020, the Kizh Nation responded to the City's request for specific information with information summarizing AB52, listing the Tribal Cultural Resources Mitigation Measures within Kizh Nation Tribal Territory, and providing information on the Gabrielino Indians in Orange County.
- On June 2, 2020, the City provided the completed Cultural Technical Report prepared for the Project to the Kizh Nation for review. The City noted that the impact assessment concluded the following:
    - "No CEQA historical resources have been identified within the Project Area. However, archaeological monitoring of ground-disturbing activities during Project construction is recommended due to the low but existing potential for unidentified

cultural resources within the Project Area. This recommendation is based on the lack of prior archaeological survey of the Project Area before development as well as the lack of survey of any adjacent or nearby areas, and the poor ground surface visibility in the majority of the Project Area itself, leaving open the potential for surficial or buried cultural material within the Project Area that may not have been identified during the archaeological study. Once construction excavation has exposed soil to a sufficient depth that precludes the potential for cultural resources, typically >1 meter, or depths at which paleontological resources rather than archaeological resources may be present, ASM recommends cessation of the recommended cultural monitoring.

The City also includes the following standard mitigation measures in our mitigation monitoring and reporting programs:

> "In the event that cultural resources (archaeological, historical, and paleontological resources) are inadvertently unearthed during excavation and grading activities of any future development project, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The project proponent shall retain a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), subject to approval by the City of Fullerton, to evaluate the significance of the find and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.
>
> In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains."

- On June 29, 2020, the City followed up on its June 2nd email and asked if the Kizh Nation had an opportunity to review the Cultural Resources Report. The City noted that they believed it addressed the Kizh Nation's concerns and that it concluded their request for consultation.
- On June 29, 2020, the Kizh Nation responded to the City and indicated they would get back to the City as soon as possible.

- On July 15, 2020, the City followed up on the June 29th emails and said that hearing no additional response, the City was considering the analysis and the City's identified mitigation measures sufficient and was concluding their consultation.

On July 17, 2020, the Kizh Nation responded with documents from historic books, screenshots of historic maps and some explanatory text to explain the cultural significance of the area in addition to the Tribal Cultural Resources Mitigation Measures within Kizh Nation Tribal Territory document. The written and oral communication between the Native American tribes and the City of Fullerton is considered confidential in respect to places that have traditional tribal cultural significance and although relied upon in part to inform the preparation of this EIR section, those communications are treated as confidential and are not available for public review.

In the documentation provided, the Gabrieleño Band of Mission Indians – Kizh Nation failed to indicate known resources which could be reasonably construed to be tribal cultural resources within the Project site, as specified in Public Resources Code Sections 210741, 5020.1(k), or 5024.1. In addition, information provided by the Kizh Nation does not present information indicating the known presence of tribal cultural resources in the Project Area or near the Project site. Specifically, the Kizh Nation does not provide any documentation of resources potentially eligible for the California Register of Historical Resources that are known to occur in or near the Project site, or that meet the criteria set forth in subdivision (c) of Section 5024.1 of the Public Resources Code for a historically significant resource (Public Resources Code Section 5024.1, Title 14 of the California Code of Regulations [CCR], Section 4852), or that meet the definition of a unique archaeological resource or nonunique archaeological resource.

Accordingly, no impact to a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, would occur.

Level of Significance Before Mitigation

Implementation of the Project would result in no impacts to tribal cultural resources that are listed or eligible for listing in the CRHR or local register of historical resources.

Project-Level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impacts would occur.

Threshold a.ii	***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource…and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency will consider the significance of the resource to a California Native American tribe.***

As previously discussed, no cultural resources, including tribal cultural resources, were observed during the field survey and no information obtained from review of applicable records, including the NAHC SLF, indicates that tribal cultural resources are present within the Project site. Further, a pedestrian archaeological survey of the Project site was completed by ASM on March 18, 2020. The Project site is almost entirely developed and covered with buildings, pavements, and landscaping. Some open space remains within the orange orchards but these areas have been significantly modified by the planting and maintenance of the now-mature orange and avocado trees over the past at least seven decades. Within the landscaped areas, any exposed ground surfaces were examined wherever ground visibility was available. No previously undocumented cultural resources, including tribal cultural resources, were identified as a result of the survey.

In addition, as described above, information provided by the Kizh Nation does not present information indicating the known presence of tribal cultural resources in the Project Area. Rather, the Kizh Nation provides generic information without substantiation, which does not constitute substantial evidence that the Project site is likely to contain tribal cultural resources. There is no factual foundation to conclude that there are any known resources that meet the definition of tribal cultural resources that would be affected by the Project. In short, taking into consideration all evidence to-date, including review of the information provided by the Kizh Nation on July 17, 2020, the City has determined, within its discretion under Public Resources Code Section 21074, that there is no substantial evidence of tribal cultural resources on or near the Project site. Therefore, the Project would not impact any known tribal cultural resources. As a result, the mitigation measures suggested by the Kizh Nation are not required and no additional consultation is warranted. Pursuant to Public Resources Code Section 21082.3(d), the City has determined that consultation has concluded and on July 31, 2020, the City provided this notification to the Kizh Nation. Therefore, the Project would not impact any known tribal cultural resources. As a result, Native American monitoring of construction activities is not required.

However, although it is not likely, there is a remote possibility that tribal cultural resources may be present beneath the site's subsurface, and if present, could be impacted by ground-disturbing activities associated with Project construction that extends below disturbed soils, resulting in a potentially significant impact. The anticipated depth of excavation would vary for the Project components, but would likely extend to maximum depths of 20-feet below the ground service (bgs) for removal of existing foundations or other related subterranean features, and 10- to 12-feet bgs for the installation of utility infrastructure, including the subsurface detention chambers. Pursuant to The Fullerton Plan EIR MM CR-2 and MM CR-3, archaeological monitoring would be conducted during ground disturbing activities. Archaeological monitoring would be required until

construction excavation has exposed soil to a sufficient depth that precludes the potential for cultural resources, typically greater than 1-meter, or depths at which paleontological resources rather than archaeological resources may be present, at which point archaeological monitoring is no longer needed. Pursuant to MM CR-2, Native American representatives would be notified if any artifacts of Native American origin are discovered to help analyze the Native American artifacts for identification. Additionally, ground disturbing activities within 100-feet of the discovery would cease to allow for the evaluation and protection of the resource. In the event that human remains are found, The Fullerton Plan EIR MM CR-4 requires adherence to applicable regulations addressing actions to be taken to identify the origins of the remains, and notification of Native American descendants, if applicable. With implementation of The Fullerton Plan EIR mitigation measures MM CR-2, MM CR-3, and MM CR-4, the Project's potential impacts to tribal cultural resources would be less than significant.

Level of Significance Before Mitigation

Ground disturbing activities have a remote potential to encounter unidentified tribal cultural resources. However, with mandatory compliance with The Fullerton Plan EIR MM CR-2, MM CR-3, and MM CR-4, impacts would be less than significant.

Project-Level Mitigation Measures

Additional mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

4.12.5 CUMULATIVE IMPACTS

This cumulative impact analysis considers the development of the Project in conjunction with other development projects and planned development in the City that have a potential for uncovering tribal cultural resources. As noted previously, the City of Fullerton conducted Native American consultation with potentially culturally affiliated tribes, as required by AB 52. As a result of this consultation effort, no tribal cultural resources were identified within the Project site, although a tribe did indicate a concern over potential impacts to subsurface resources.

Direct impacts to tribal cultural resources are site-specific. While the potential for encountering unknown tribal cultural resources at the Project site is remote, the Project, in conjunction with cumulative development, would have the potential to result in impacts to subsurface tribal cultural resources. As discussed in Threshold "a.ii," with the implementation of The Fullerton Plan EIR MM CR-2, MM CR-3, and MM CR-4, the Project's potential impact on tribal cultural resources would be less than significant. Each development proposal received by the City would be subject to the same resource protection requirements as the Project. Neither the Project nor other cumulative developments are expected to result in significant impacts to tribal cultural resources provided site-specific review and required Native American consultation is conducted, if warranted, and required measures to protect the tribal cultural resources, should they be

encountered, are implemented. As such, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact on tribal cultural resources.

4.12.6 REFERENCES

ASM Affiliates, Inc. (ASM). 2020. *Cultural Resources Technical Report for the Goodman Logistics Center, Fullerton, Orange County California.* May 8, 2020.

City of Fullerton (Fullerton). 2012. *The Fullerton Plan 2030 Final Environmental Impact Report*. Available: https://www.cityoffullerton.com/gov/departments/dev_serv/general_plan_update/final_program_eir.asp

4.13 UTILITIES AND SERVICE SYSTEMS

The analysis in this section is based primarily on information contained in the following documents. Other sources used to prepare this section are listed in Section 4.13.6, References.

- *Goodman Logistics Center Water Supply Assessment* (WSA) (May 2020) prepared by Psomas (included in Appendix L1 of this Environmental Impact Report [EIR])
- *Goodman Logistics Center – Fullerton PRJ 2019-00173 Sewer Capacity Memorandum* (June 10, 2020) prepared by TAIT & Associates, Inc. (TAIT) (included in Appendix L2 of this EIR)
- *Water Memorandum, Goodman Logistics Center Fullerton, Water Infrastructure Summary* (July 17, 2020) prepared by TAIT (included in Appendix L3 of this EIR)

Unless otherwise noted, references to "Project" in this section include the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

There were no comments received on the Notice of Preparation or at the EIR public scoping meeting regarding utilities and service systems. NOP comments received regarding storm water runoff are discussed in Section 4.8, Hydrology and Water Quality, of this EIR.

4.13.1 EXISTING SETTING

A. Water Supplies

This summary description of water supplies in the City of Fullerton is based on the Project's WSA included in Appendix L1 of this EIR (Psomas, 2020), which references the City's 2015 Urban Water Management Plan (City UWMP), adopted by the City in June of 2016 and filed with the State of California Department of Water Resources in July of 2016. The City provides water to land uses and developments within its service area through naturally and artificially recharged local groundwater managed by Orange County Water District (OCWD), and imported water from Metropolitan Water District of Southern California (Metropolitan). The City attempts to maximize local groundwater supply each year at least up to the Basin Production Percentage (BPP) established annually by OCWD, as discussed below. In addition, the City maintains six emergency interconnections with adjacent water purveyors that are temporarily utilized on an as-needed basis.

Orange County Groundwater Basin

The primary source of water for the City is the Orange County Groundwater Basin (Basin). The Basin underlies the north half of Orange County, beneath broad lowlands. The Basin covers an area of approximately 350 square miles, bordered by the Coyote and Chino Hills to the north, the Santa Ana Mountains to the northeast, the Pacific Ocean to the southwest, and terminates at the Orange County line to the northwest where its aquifer systems continue into the Central Basin of

Los Angeles County. The sediments containing easily recoverable fresh water extend to approximately 2,000 feet in depth. Although water bearing aquifers exist below that level, reduced water quality and pumping make these materials economically unviable at present. Upper, middle and lower aquifer systems are recognized in the Basin with well production yields ranging from 500 to 4,500 gallons per minute but are generally 2,000 to 3,000 gallons per minute.

The Basin holds millions of acre feet (AF) of water, of which about 1.25 to 1.5 million AF is available for use. To ensure the Basin is not overdrawn, OCWD recharges the Basin with local and imported water. Groundwater conditions in the Basin are influenced by the natural hydrologic conditions. The Basin is recharged primarily by four sources: (1) local rainfall, which varies due to the extent of the annual seasonal precipitation; (2) storm and base flows from the Santa Ana River, which includes recycled wastewater from treatment plants in Riverside and San Bernardino Counties; (3) imported water; and (4) highly treated recycled wastewater. The Basin generally operates as a reservoir in which the net amount of water stored is increased in wet years to allow for manageable overdrafts in dry years. Based on the Basin conditions for the water year ending on June 30, 2019, OCWD may purchase up to 160,000 AF of water for groundwater replenishment during the ensuing water year, beginning on July 1, 2020, pursuant to the District Act.

Metropolitan Water District of Southern California

The City of Fullerton joined with 12 other Southern California cities to form Metropolitan in 1928. Metropolitan is currently a cooperative of 26 cities and water agencies serving 19 million people in six counties. Metropolitan acquires water from Northern California via the State Water Project (SWP) and from the Colorado River to supply water to most of Southern California. As a wholesaler, Metropolitan has no retail customers, and distributes treated and untreated water directly to its member agencies. Metropolitan also helps its members to develop increased water conservation, recycling, storage, and other resource-management programs.

Historical water demands in the Metropolitan service area increased from 3.1 million-acre feet (MAF) in 1980 to 3.9 MAF in 2000. However, water demands decreased to 3.4 MAF in 2010 and further decreased to 3.1 MAF primarily due to water conservation required by the 2009 Water Conservation Act (SBx7-7). Total water use is projected to rebound to 3.7 MAF in 2020 following the State's drought which extended from 2011 to 2019, but is then only forecast to increase to 4.0 MAF by 2040 (7.7 percent) with the implementation of long-term water conservation measures. For the Orange County service area, according to Metropolitan, demands are projected to increase 14.8 percent between 2015 and 2040.

Groundwater Management, Recharge, and Reliability

The Basin is unadjudicated and all pumpers within the Basin are permitted to pump from the Basin, but OCWD is charged with managing the groundwater basin. OCWD manages the Basin largely through the BPP that it establishes each water year. The BPP is set based on groundwater conditions, availability of imported water supplies, ideal precipitation, Santa Ana River runoff, and basin management objectives. In essence, the BPP represents a set percentage identifying the

amount of groundwater all pumpers in the basin can pump without paying a high "pumping tax" or Basin Equity Assessment to OCWD. The BPP is a major factor for the City in determining the cost of groundwater production. Groundwater production equal to or less than the BPP pays a Replenishment Assessment (RA). The City of Fullerton 2015 UWMP used a conservative BPP of 70 percent for future water supply projections; however, a BPP of 77 percent is being proposed for the ensuing water year 2020-21. Even with the accumulated overdraft in the Basin, since 2012-13 the BPP has been above the conservative 70 percent used in the 2015 UWMP and seven of the past nine years, including the current and upcoming year, it's been at 75 percent or above. If groundwater production greater than the BPP occurs, a Basin Equity Assessment (BEA) is assessed against the producer of that amount of groundwater produced in excess of the BPP. The BEA is an additional fee (i.e., a higher "pumping tax") paid on each AF of water pumped above the BPP, making the total cost of that water to Fullerton equal to the cost of imported water from Metropolitan. Thus, the BPP creates pricing incentives to ensure that groundwater producers pump within the framework established by the BPP. Funds collected by OCWD through RA and BEA payments are used to fund groundwater replenishment, and recharge and recycling programs aimed at ensuring the long-term viability and stability of the Basin.

OCWD continues to develop new replenishment supplies, recharge capacity and basin protection measures to meet projected production from the basin during average/normal rainfall and drought periods. OCWD has invested in seawater intrusion control (injection barriers), recharge facilities, laboratories and basin monitoring to effectively manage the basin. Further, Basin management is guided by: (1) the OCWD Long Term Facilities Plan, which identifies potential basin and water quality enhancement projects that may be implemented in the 20-year planning period; (2) the OCWD Groundwater Management Plan, which outlines various programs, policies, goals, and projects to assist OCWD staff meet objectives related to groundwater quality, increasing the Basin's sustainable yield in a cost-effective manner, and increasing operational efficiency; and, (3) the OCWD 2020 Water Master Plan Report, which describes local water supplies and estimates their availability extending to the year 2020.

Basin recharge occurs in four recharge basins, none of which occur at the Project site. A large portion of the recharge of the Basin comes from water flowing in the Santa Ana River (SAR) south of the Prado Dam. The closest recharge basin is the Burris Pit, approximately 2.3 miles southeast of the Project site.

As part of its Basin management function, OCWD operates an extensive groundwater monitoring program whereby OCWD routinely tests all groundwater production wells located within the Basin in compliance with Title 22 of the California Administrative Code. Perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) are chemicals that are prevalent in the environment and were once commonly used in many consumer products. They are part of a larger group referred to as per- and polyfluoroalkyl substances (PFAS). Due to the prolonged use of PFOA and PFOS, the chemicals are now being detected in water sources throughout the United States. In July 2018, the California State Department of Drinking Water (DDW) established interim drinking water Notification and Response Levels for PFOA and PFOS. In April 2019, the DDW sent monitoring orders to more than 200 public water systems across the state to test for PFOA and PFOS, including 12 agencies in OCWD's service area, including the City of Fullerton. The comprehensive

list of monitoring orders included 612 drinking water supply wells in California; of which 53 were in OCWD's service area, and five were in Fullerton (four were tested as one was off-line). All water agencies in OCWD's service area operate their water systems following the drinking water requirements for PFOA and PFOS established by EPA and DDW. Subsequently, in August 2019 and again in February 2020, DDW announced new, more stringent, Response Levels for PFOA and PFOS. To meet the state's recommended PFAS levels, water purveyors are taking actions such as: (1) removal of water supply sources (to date one of Fullerton's wells has been taken out of service); (2) use of imported water that meets state's recommended levels of PFAS; blending multiple water supply sources to meet state's recommended levels of PFAS; and pilot testing of water treatment processes for PFAS.

Over the recent past, production capability of the Basin has increased as a result of increased wastewater reclamation and the blending of waters of different qualities to produce high-quality potable water for public distribution. The most recent example of a highly successful wastewater reclamation project is the construction and operation of OCWD's water-purification plant, which is designed to turn wastewater into drinking water. This Groundwater Replenishment System (GWRS) project has been lauded by the environmental community because of the fact that these types of projects reduce the amount of energy needed to transport water from the northern part of the state to the southern part of the state, thereby also reducing greenhouse gas emissions. The GWRS has operated since 2008 by taking highly treated sewer water, purifying it to levels that meet drinking water standards, and injecting and percolating the recycled water into the groundwater basin to form a seawater barrier and for groundwater replenishment. A treatment plant expansion of 30 million gallons per day was put on line by OCWD in 2015 increasing the recharge capacity of the GWRS to 100 million gallons per day. This equates to the recycling of over 110,000 acre-feet per year (AFY) of wastewater back into the Basin for future extraction and potable use. The GWRS treatment system was being laid out so that it could eventually be expanded to 130 million gallons per day, which is currently expected to be in the 2023 timeframe. Since water from the GWRS is utilized to recharge the groundwater basin and the City extracts water from the groundwater basin, they are, in effect, practicing indirect potable water reuse of recycled water.

To further its goal to maintain and increase the reliability of the Basin by increasing recycled water usage to replace dependency on groundwater this goal, OCWD has also jointly constructed the Green Acres Project (GAP) with the Orange County Sanitation District (OCSD). GAP provides an alternate source of water to the Cities of Fountain Valley, Huntington Beach, Newport Beach, Santa Ana, and Mesa Consolidated Water District. Approximately 100 sites use GAP water, including but not limited to parks, schools, golf courses, and industrial uses.

As technology progresses, additional water supplies and facilities are being brought online to further assure water supply reliability well into the future, including a seawater desalination project in Huntington Beach called the Huntington Beach Sea Water Desalination Facility. As part of the planning process, OCWD has been considering a variety of water conveyance and utilization options they might implement once it purchases the desalinated water from this facility. One of these options includes potential modifications to OCWD's existing groundwater basin recharge and seawater barrier operations. Additionally, OCWD has been working with other water agencies

in the area who may be interested in participating in the integration of the desalinated water supply.

Imported Water Supply and Reliability

The reliability and operational issues related to Metropolitan's various sources of supply, including the SWP, Colorado River Aqueduct, storage facilities, and supply management strategies are discussed in detail in Section 5.1 of the WSA included in Appendix L1 of this EIR. In summary, through its Integrated Resources Plan and subsequent updates including the 2015 update, Metropolitan has worked toward identifying and developing water supplies to provide 100 percent reliability. Due to competing needs and uses for all of the water sources and regional water operational issues, Metropolitan has undertaken a number of planning processes: the Integrated Resources Planning (IRP) Process, the Water Surplus and Drought Management (WSDM) Plan, the UWMP, and the Water Supply Allocation Plan (WSAP). Combined, these documents provide a framework and guidelines for optimum water planning into the future.

The City of Fullerton is one of only three retail member agencies of Metropolitan in Orange County. As a member agency, pursuant to the Metropolitan Act, the City has preferential rights to a certain percentage of water delivered to Metropolitan each year primarily from the State Water Project and/or the Colorado River Aqueduct as well as other Metropolitan storage programs. Being a member agency of Metropolitan puts the City in a better position relative to receiving water directly from Metropolitan, as opposed to other agencies in Orange County which obtain their imported Metropolitan water through the Municipal Water District of Orange County (MWDOC).

B. City of Fullerton Water System

The City of Fullerton Public Works Department is responsible for all aspects of the water system within its 22.3-square mile service area, upgrade and repair of infrastructure, overseeing of water production, conservation, water quality and cross connection prevention. Currently, the City owns, operates, and maintains over 423 miles of transmission and distribution mains, 15 reservoirs with a capacity of 67.5 million gallons, 12 booster/pumping stations, and 10 active production wells, and Metropolitan connections. (City of Fullerton, 2020)

Of the City's 10 production wells, 8 are potentially impacted by 2020 DDW testing orders for PFAS (discussed above). Should wells be recommended for removal from service based on DDW's 2020 Response Levels and related guidance, the City anticipates the loss of approximately 10,000 AFY of production on a temporary basis. If treatment is required, facility construction would be phased with the wells at the City's Main Plant all treated centrally at that location and other wells treated at their respective locations. Optimistically, current City plans would call for half of the treatment facilities online by approximately Spring of 2021 and the remainder online by the end of 2021.

The City purchases both treated potable and untreated non-potable water from Metropolitan. The treated water is delivered through three major feeders: Orange County Feeder, Lower Feeder,

and West Orange County Feeder. All of these infrastructure programs are in place, and no further regulatory permits are required to permit Metropolitan to convey imported water to these facilities for use by the City.

With respect to water facilities in the vicinity of the Project site, there is an existing 18-inch diameter line in Acacia Avenue, a 12-inch diameter line in E. Orangethorpe Avenue, a 10-inch line in State College Boulevard, and 12- and 14-inch diameter lines in Kimberly Avenue. The City of Fullerton also has a well in a city easement in the north-central portion of the Project site, abutting Kimberly Avenue. The well has a 60,000-gallon tank with three booster pumps that connect to the 12- and 14-inch diameter water lines in Kimberly Avenue.

C. Historical Water Production – City of Fullerton

The 2009 Water Conservation Act (SBx7-7) mandates water use reduction by all water agencies required to prepare UWMPs. The City has elected to meet their water use reduction obligations through MWDOC's regional compliance plan "Orange County's 20x2020 Regional Alliance". As a member of the Regional Alliance, the City of Fullerton will follow the lead of the MWDOC as MWDOC administers its water conservation programs. Programs will include requiring new residential, commercial, industrial and institutional developments be constructed with water conserving fixtures inside, more efficient irrigation systems outside, and less water-demanding landscapes.

As previously discussed, water demand in the City is supplied from groundwater and imported water. Historical water production by source from Fiscal Year (FY) 2011 to FY 2015 and total water sales as reported in the 2015 UWMP (the most recent UWMP) is provided in Table 4.13-1, *Fullerton Production by source from 2015* UWMP (Acre-Feet/Year). Table 4.13-2, *Fullerton Updated Production by source (*Acre-Feet/Year), shows updated figures for the four years through fiscal year 2018/19 from City production records.

TABLE 4.13-1 FULLERTON PRODUCTION BY SOURCE FROM 2015 UWMP (ACRE-FEET/YEAR)

Source	2010/11	2011/12	2012/13	2013/14	2014/15
Groundwater	16,229	17,341	19,489	21,279	18,946
Imported Water[1]	9,645	9,370	9,205	8,776	8,298
Total Water Supply	**25,874**	**26,711**	**28,694**	**30,055**	**27,244**

Note: Excludes water delivered for Conjunctive Use Groundwater Storage Program in fiscal years (FYs) 2010/11 and 2011/12
Source: (Psomas, 2020, Table 4.1)

TABLE 4.13-2 FULLERTON UPDATED PRODUCTION BY SOURCE (ACRE-FEET/YEAR)

Source	2015/16	2016/17	2017/18	2018/19
Groundwater	17,541	17,933	17,070	18,373
Imported Water	5,855	6,471	7,317	5.520
Total Water Supply	**23,396**	**24,404**	**24,387**	**23,893**

Source: (Psomas, 2020, Table 4.2)

As shown, for the past four years the City has averaged almost 74 percent from groundwater; 2017/18 was an outlier due to excess rainfall and In-Lieu Program water being taken. As previously identified, the City attempts to maximize local groundwater supply each year at least up to the BPP established annually by OCWD. The 2018/19 (FY 2019) actual use of 23,893 AFY is 2,806 AFY less than what was projected for FY 2020 of 26,699 AFY in the 2015 UWMP. Therefore, the City's actual use seems to be trailing the UWMP projections, which is likely due to conservation and lower growth than projected.

D. Wastewater Infrastructure

The City of Fullerton is responsible for wastewater collection in the City, and the OCSD is responsible for wastewater treatment in the County. Existing sewer lines in the vicinity of the Project site include 12- and 18-inch lines in E. Orangethorpe Avenue, an existing 8-inch line in State College Boulevard, and an existing 18-inch line in Kimberly Avenue. The sewer flows from the 18-inch line in Kimberly Avenue flow to an existing 33-inch OCSD line in State College Boulevard.

OCSD owns and operates two wastewater treatment plants, Reclamation Plant No. 1 in Fountain Valley and Treatment Plan No. 2 in Huntington Beach. The plants can treat 320 million gallons per day (mgd) of wet weather flow, but only 185 mgd on average is treated (OCSD, 2019).

E. Dry Utility Infrastructure

The Project site is within the service area for Southern California Edison (SCE) for electrical services. Existing electric facilities in the vicinity of the Project site consist of overhead 66 kV transmission and 12 kV distribution lines on wooden poles on the south side of Kimberly Avenue and the west side of State College Boulevard abutting the Project site. There is an SCE substation generally in the center of the Project site that would be removed as part of the Project. Additionally, overhead power lines are along Kimberly Avenue and State College Boulevard.

AT&T, Crown Castle, and SiFi Networks provide telecommunications service in the City of Fullerton. There are overhead telecommunication lines for AT&T and Crown Castle on the wooden poles along Kimberly Avenue and E. Orangethorpe Avenue. SiFi Networks is currently installing and will operate a city-wide fiber optic network, which will include facilities within Kimberly Avenue.

Southern California Gas Company (SCG) provides natural gas service to the City of Fullerton. There are existing 6-inch gas lines on the east sides of Acacia Avenue and State College Boulevard, and an 8-inch gas line on the south side of E. Orangethorpe Avenue.

F. Solid Waste

OC Waste & Recycling (OCWR) serves Orange County's solid waste disposal needs by providing waste management services, operating public landfills, protecting the local environment, investing in renewable energy enterprises and promoting recycling. OCWR operates three active landfills:

Olinda Alpha Landfill in Brea, Frank R. Bowerman Landfill in Irvine, and the Prima Deshecha Landfill in San Juan Capistrano. The franchise hauler for the City (Republic Services) will typically decide which Orange County landfill to use, usually depending on the location of their materials recovery facility, where recyclable materials are taken out of the waste stream before the residual solid waste materials are sent to one of the landfills. Solid waste materials generated in the City of Fullerton will ordinarily be disposed at the Olinda Alpha Landfill, which is closest to the City, although this is not required by the Waste Disposal Agreement between the City of Fullerton and the County.

The Olinda Alpha Sanitary Landfill is located at 1942 N. Valencia Ave in the City of Brea and is a Class III facility. The landfill encompasses approximately 565 acres, of which 453 acres are permitted for refuse disposal. The landfill has enough projected capacity until 2030. Olinda's average disposal rate is nearly 7,000 tons per day (TPD), although it is permitted to accept up to 8,000 TPD (OCWR, 2020a). The current closure date for the Olinda Alpha Landfill is December 31, 2021; however, the closure of the landfill will not occur until the landfill operation reaches its final approved elevation of 1,415 feet above mean sea level. The landfill operation is several years away from reaching this final permitted elevation, so OCWR is currently in negotiations with the City of Brea regarding extending the landfill closure date. Once the Olinda Alpha Landfill does close, solid waste materials generated in northern Orange County will be diverted to the Frank R. Bowerman Landfill (Arnau, 2020).

The Frank R. Bowerman Landfill is located at 11002 Bee Canyon Access Road in the City of Irvine and also is a Class III facility. The landfill encompasses 725 acres, of which 534 acres are permitted for refuse disposal. The Frank R. Bowerman Landfill is permitted 11,500 TPD with an 8,500 TPD annual average. The landfill has enough projected capacity until approximately 2053. (OCWR, 2020b)

Construction and demolition debris are handled by various landfill and recycling facilities. It is expected that construction debris would be transported to El Sobrante Landfill on Dawson Canyon Road in Corona. The El Sobrante Landfill has a permitted daily capacity of 16,054 TPD (CalRecycle, 2019a).

G. Existing Site Conditions

The Kimberly-Clark Fullerton Mill operated at the Project site between 1955 and June 2020, when operations ceased. The estimated utility demand and wastewater generation varied over the years based on various factors, including, but not limited to the size of the facility, the source of energy (SCE or the existing cogeneration facility), and conservation efforts. Following is a summary of existing available information related to the existing facility at the Kimberly-Clark site, which has a building area of approximately 1,210,720 square feet (s.f.). It should be noted that the two existing buildings on the potential expansion site, with a combined building area of approximately 5,560 s.f., also consume water and energy, and generate wastewater; however, for purposes of determining the net difference between existing conditions and future conditions with the Project, the quantities are negligible compared to Kimberly-Clark facility. A conservative

estimate of impacts is provided when considering only the Kimberly-Clark facility in the calculation of existing water and energy demand and wastewater generation.

- From January 2019 to June 2019, the Kimberly-Clark Fullerton Mill consumed an average of 891,700 gallons per day (gpd) (approximately 998 AFY) (Fullerton, 2019). However, Based on City-provided meter records, the 2014/15 water use on the site was 1,709 AFY, which would have been accounted for in the City's 2015 UWMP water demand projections (Psomas, 2020).
- In 2018, the Kimberly-Clark Fullerton Mill generated approximately 0.78 million gallons per day (mgd) of wastewater; however, the average wastewater generation between 2010 and 2018 was approximately 1.13 mgd (TAIT, 2020a).
- In June 2019, the Kimberly-Clark Fullerton Mill used 1,488 kilowatt-hours (kWh) of electricity; the average usage between June 2017 and June 2019 was approximately 1,894 kWh per month (SCE, 2019). It should be noted that the electricity use at the Kimberly-Clark site was substantially reduced with the installation of the on-site cogeneration facility in 2002.
- In June 2019, the Kimberly-Clark Fullerton Mill used 129 cubic feet (142 total therms) of natural gas. (SCG, 2019).

4.13.2 EXISTING REGULATORY SETTING

Sections 5.16 through 5.20, of The Fullerton Plan EIR, provide a complete discussion of the regulatory framework for water supply, wastewater, solid waste, electricity, and natural gas. Following is a discussion of regulations that are particularly relevant to the Project and also includes information that is new or has been updated since The Fullerton Plan EIR was prepared.

Title 24, Part 11, Green Building Standards and Title 24, Part 6, Energy Efficiency Standards, of the California Code of Regulations are discussed in Section 4.4, Energy, of this EIR.

A. State

Water-related Regulations

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (California Water Code, Section 10610 et seq.) was enacted in 1983 and applies to municipal water suppliers that serve more than 3,000 customers or supply more than 3,000 AFY of water. The UWMP Act requires these suppliers to prepare and update their UWMPs every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple-dry years. The plans must be prepared every five years and submitted to the Department of Water Resources (DWR). The City of Fullerton adopted its 2015 UWMP in June 2016.

The UWMP Act has been modified over the years in response to the State's water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009, and because of the governor's call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by December 31, 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020. The 20x2020 Water Conservation Plan, issued by the DWR in 2010 pursuant to the SBX7-7, established a water conservation target of 20 percent reduction in water use by 2020 compared to 2005 baseline use.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (Assembly Bill [AB] 1881) requires Cities and Counties, including charter cities and charter counties, to adopt landscape water conservation ordinances by January 1, 2010. Per this Act, the DWR prepared a Model Water Efficient Landscape Ordinance (MWELO), as contained in the California Code of Regulations (CCR, Title 23, Division 2, Chapter 2.7). The MWELO was updated in 2015 and now applies to new construction projects with an aggregate landscape area equal to or greater than 500 square feet requiring a building or landscape permit, plan check or design review and to rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit, plan check, or design review. Cities and Counties had the option to adopt DWR's ordinance or to develop their own. The City of Fullerton implements the model ordinance adopted by the State through regulations contained in Section 15.50, *Landscaping and Irrigation Requirements*, of the City's Municipal Code.

Senate Bill 610

In 2001, Senate Bill (SB) 610 amended the California Public Resources Code to improve the link between information on water supply availability and certain land use decisions made by Cities and Counties. Under SB 610 (codified in the California Water Code beginning at Section 10910), unless the project is otherwise exempt, a WSA must be furnished to Cities and Counties for inclusion in the environmental documentation of certain projects (as defined in the California Water Code), and these WSAs are subject to the California Environmental Quality Act (CEQA). SB 610 requires land use planning entities when evaluating certain large development projects, to request a water supply availability assessment from the entity that would provide water to the project. A WSA must be prepared in conjunction with the land use approval process associated with a project; the information that is required to be included in the WSA is presented in Section 2.1, SB 610-Water Supply Planning, in the WSA included in Appendix L1of this EIR. In summary, a WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. A WSA is required for any "project" that is subject to CEQA and meets certain criteria relative to size (e.g., a proposed industrial, manufacturing, or processing plant or industrial park planned to

house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area).

SB 610 also requires information to be included as part of a UWMP if groundwater is identified as a source of water available to the supplier. The information must include a description of all water supply projects and programs that may be undertaken to meet total projected water use. SB 610 prohibits eligibility for funds from specified bond acts until the plan is submitted to the State.

Sustainable Groundwater Management Act

State Senate Bill 1262 adopted in September 2016 amends Section 66473.7 of the Government Code to require WSAs to address certain elements regarding groundwater sustainability if the project relies in whole or in part on groundwater as a source of supply. The Basin has been designated as medium-priority pursuant to Section 10722.4 of the Water Code. The Sustainable Groundwater Management Act (SGMA) establishes OCWD as the exclusive local agency to manage groundwater within its statutory boundaries with powers to comply with the provisions of the SGMA (California Water Code Section 10723 (c) (1). OCWD adopted a Groundwater Management Plan, 2015 Update dated June 17, 2015, that includes the required elements for Groundwater Sustainability Plans and additional plan elements have been incorporated into OCWD. Section 5 of the Project's WSA sets forth various groundwater production scenarios as required by the Water Code (Single Dry Year, Multiple Dry Year). This information provides additional information pertaining to the sufficiency of the Basin in various pumping scenarios as required by Water Code section 10910(f)(5).

Solid Waste-related Regulations

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act of 1989 (AB 939), created the Board now known as California Department of Resources Recycling and Recovery (CalRecycle) and accomplished the following: (1) it required each jurisdiction in the state to submit detailed solid waste planning documents for CalRecycle approval; (2) it set diversion requirements of 25 percent in 1995 and 50 percent in 2000; (3) it established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and (4) it authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. Jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements.

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population

(or in some cases employment) and (2) its disposal, as reported by disposal facilities. Each year CalRecycle calculates each jurisdiction's per capita (per resident or employee) disposal rates. If a business is the dominant source of a jurisdiction's waste generation, CalRecycle may use the per employee disposal rate. Each year's disposal rate will be compared to that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because, as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress or other changes over time.

Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRA) required the California Integrated Waste Management Board (CIWMB) to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRA also required local agencies to adopt a local ordinance by September 1, 1993, or allow the model ordinance to take effect. The WRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued.

Assembly Bill 341

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB 341 was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 requires all commercial businesses and public entities that generate four cubic yards or more of waste per week to have a recycling program in place.

B. Local

Fullerton Municipal Code

Chapter 12.04, *Water Regulations*, of the Fullerton Municipal Code sets the City's regulations related to water service by the City, including the establishment of rules and regulations for water rates, meters, bypass connections, shutoff valves, and water wastes. The City's Water Rates, Rules, and Regulations define the terms of service that need to be followed by individual customers, including service charges, water line extensions, water meters, and fire protection.

Chapter 12.06, *Water Supply Shortage Conservation Plan*, of the Fullerton Municipal Code outlines the City's procedures, rules, and regulations for mandatory water conservation to minimize the effect of a water supply shortage on the City's water customers. It also identifies prohibited uses of water; establishes a four-phase program to address water supply shortages;

and allows the City to impose emergency water allocation or conservation actions. Any customer who violates provisions by excess use of water or by a specific violation of one or more of the applicable water use restrictions may be cited by the City and may be subject to written notices, surcharges, fines, flow restrictions, service disconnection, and/or service termination. The first and second violation would result in a written notice along with a possible fine. A flow restrictor may be installed or water service may be discontinued after 3 violations in 12 months.

Chapter 12.08, *Sewer Connections*, of the Fullerton Municipal Code outlines the City's regulations for sewer system connections, improvements, and maintenance. Construction or reconstruction of a lateral sewer line or connection to the public sewer system shall require a public works permit; conformance to the construction standards as outlined in Title 16, Subdivisions, of the Municipal Code; and approval by the City Engineer. Also, all new connections must be tested for infiltration per the standards in the latest edition of the Standard Specifications for Public Works Contracts (Green Book). The City also imposes a sewer maintenance fee on all improved properties to connect to the City's sewer system.

Chapter 14.03, *Building Code*, of the City of Fullerton Municipal Code, adopts the requirements of California Green Building Standards (CAL Green) Code. Among other requirements, the CAL Green Code requires that at least 65 percent of demolition and construction debris be diverted from landfills through recycling, reuse, and/or salvage.

Chapter 15.50, *Landscaping and Irrigation Requirements*, is the City's Model Landscape Ordinance. This Ordinance establishes landscaping standards that promote water conservation and the efficient use of water for landscaping so that the project meets the Maximum Applied Water Allowance for the project, as calculated by a licensed landscape professional. Any newly landscaped area is required to comply with the Ordinance through the review and approval of a Landscape Documentation Package that includes a soil management report, water-efficient landscape calculations, a certified landscape design plan, a certified irrigation plan, final project certification, and a one-year maintenance deposit. An irrigation audit report and private yard and open space documentation may also be required.

Section 16.05.060, *Underground Utilities and Service Lines*, of the Fullerton Municipal Code, establishes requirements for the undergrounding of new or proposed dry utilities (e.g., electrical, telephone, cable) which provide direct service to the subject property, and requires that existing facilities providing direct service to a Project be undergrounded. Exceptions to this requirement include, but are not limited to: poles, overhead wires and cables and associated overhead structures and appurtenances used for the transmission of electrical power at nominal voltages in excess of thirty-four thousand five hundred volts, and equipment appurtenant to underground facilities, such as surface mounted transformers, pedestals, terminal boxes, and meter cabinets.

4.13.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project will normally have a significant adverse environmental impact related utilities and service systems if it would:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

b. Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;

e. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

4.13.4 ENVIRONMENTAL IMPACTS

A. Applicable Mitigation Measures from The Fullerton Plan Environmental Impact Report

The Fullerton Plan EIR includes Mitigation Measures (MMs) that are relevant to utilities and service systems, and specifically the sewer system and wastewater treatment, including the following. Because the required analysis has been completed, these MMs will not be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

- **MM WW-1** calls for an engineering study addressing the adequacy of the sewer system; a Sewer Capacity Memorandum was completed for the Project and is provided in Appendix L2 of this EIR.
- **MM WW-2** requires evidence that the OCSD has sufficient transmission and treatment plant capacity to accept sewage flows from buildings for which building permits are being requested; this requirement is addressed through the analysis provided in Threshold c, below.

There are no MMs identified for the remaining utility systems.

B. Impact Analysis

Threshold a:	***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Water Infrastructure

The Project involves the demolition of existing structures on the Project site, and redevelopment of the Project site with four warehouse buildings with a mix of primarily warehouse and some office space uses (up to 1,609,384 s.f., including 1,504,384 s.f. of warehouse space and 105,000 s.f. of office space). The Project's proposed warehouse operations are substantially less water-intensive compared to the previous Kimberly-Clark Fullerton Mill manufacturing uses, which consumed a substantial amount of water as part of the paper manufacturing processes. The Project's water demand (indoor and outdoor uses) as reported in the Project-specific WSA, is estimated to be approximately 43,902 gpd (49.2 AFY). As previously discussed, based on City-provided meter records, the 2014/15 water use on the site was 1,709 AFY, which would have been accounted for in the City's UWMP water demand projections. Therefore, the net decrease in water demand for the site would be approximately 1,659.8 AFY. Since these are demand projections, the supply needed to serve this demand would be 5.7 percent higher to account for water losses[1], or a reduction of 1,754 AFY. (Psomas, 2020)

The proposed buildings would be constructed of concrete tilt-up panels (Type III-B construction), and the largest building (Building 2) would be approximately 545,255 s.f. The fire demand for the fire flow demand for a building of this size and construction type with a 50 percent reduction would be 4,000 gallons of water per minute (gpm), pursuant to Table BB105.1 of the California Fire Code. All the Project's proposed buildings would be fully sprinkled and therefore the total fire demand for each building would be 1,000 GPM per fire hydrant equaling 4 fire hydrants in total. The maximum spacing between fire hydrants would be 350 feet, and the minimum distance between fire hydrants would need to be maintained. With the fire flow test data on Kimberly Avenue (6,600 GPM with a residual pressure of 20 psi), this demand can be met without the need for a site fire pump. However, with the high pile storage at the warehouse each building would most likely require a fire pump to maintain the residual pressure along with the required flow rate; this would be confirmed as part of the standard fire flow analysis that would be completed during final design. (TAIT, 2020b)

Based on the overall reduction in water consumption, and the fire flow demands for the Project, the existing City of Fullerton water mains that serve the Project site are adequate for the Project, and upgrades are not required (TAIT, 2020b). The Project would include the installation of on-site water lines that would connect to existing lines beneath E. Orangethorpe Avenue and Kimberly

[1] The 5.7 percent water loss figure comes directly from the water loss reported in the City's 2015 UWMP.

Avenue (refer to the conceptual utility plans shown in Figures 3-20 and 3-21 in Section 3.0, Project Description, of this EIR).

As previously indicated, the City's on-site well facility has a 60,000-gallon tank with three booster pumps that connect to the 12- and 14-inch diameter water line in Kimberly Avenue. The Project would not affect the existing well facilities or involve the installation of new facilities associated with the well operations; however, the easement for these facilities would be modified with an expansion to the east as shown on Figure 3-5 in Section 3.0 of this EIR. Additionally, the existing cast iron pipes from the booster pumps to the existing water lines beneath Kimberly Avenue would be removed and a new water line would be installed on-site.

Construction activities associated with the proposed on-site water lines and off-site connections would be within the physical impact area identified for the Project and evaluated throughout this EIR. Additionally, water facilities would be installed in compliance with applicable City requirements as outlined in the Fullerton Municipal Code (refer to Section 4.13.2, above). No additional impacts associated with construction of on-site water lines or connections to existing water facilities would occur.

Wastewater

The Project-specific Sewer Capacity Memo (included in Appendix L2 of this EIR) concludes that the Project's estimated wastewater generation entering the City's sewer system (conservatively assumed to be approximately 36,388 gpd based on the water demand) would be less than 5 percent of the existing wastewater generation associated with the Kimberly-Clark Fullerton Mill operations.

The Project would connect to existing public sewer service lines beneath E. Orangethorpe Avenue and Kimberly Avenue (12- and 18-inches, respectively). Each building would have its own 6-inch sewer lateral. Due to the substantial reduction in wastewater generation, no expansion, extension, re-construction, or other modifications to existing off-site public sewer lines would be required to serve the Project. Construction activities associated with the proposed on-site sewer lines and off-site connections to existing facilities would be within the physical impact area identified for the Project and evaluated throughout this EIR. Additionally, sewer facilities would be installed in compliance with applicable OCSD regulations and City of Fullerton requirements, as outlined in the Fullerton Municipal Code (refer to Section 4.13.2, above). No additional impacts associated with construction of on-site sewer lines or connections to sewer facilities would occur.

Stormwater Drainage

As described in in EIR Section 4.8, Hydrology and Water Quality, of this EIR, stormwater from the Kimberly-Clark site would ultimately flow to existing public storm drain facilities in Kimberly Avenue, consistent with existing conditions. The potential expansion site would continue to discharge to E. Orangethorpe Avenue. The proposed on-site storm drain system would be installed as part of the Project, and would consist of a network of catch basins, underground storm drain pipes, modular wetland units, bio-filtration planters, and subsurface detention chambers that

would collect, treat, and detain (as needed) stormwater runoff from the majority of the Project site (refer to Figures 3-22 and 3-23 in Section 3.0 of this EIR). The Project does not include the expansion, extension, re-construction, or other modifications to existing off-site public storm drains to accept stormwater runoff flows from the Project site; however, any existing substandard storm drain connections on Kimberly Avenue will be replaced with new lateral connections in accordance with the current City Standards. Construction activities associated with the proposed on-site storm drain facilities and any off-site connections to existing facilities would be within the physical impact area identified for the Project and evaluated throughout this EIR. No additional impacts associated with construction of on-site storm drain facilities or connections to storm drain facilities would occur.

Dry Utilities

SCE would continue to provide electrical service to the Project site. The existing SCE substation located on-site would be removed and new transformers, pad mounted switches, and a capacitor would be installed in the northern portion of the Project site (refer to Figures 3-20 and 3-21 in Section 3.0 of this EIR). Consistent with Section 16.05.060 of the Fullerton Municipal Code, existing overhead electrical transmission lines along Kimberly Avenue and State College Boulevard, which include 66 kV transmission lines, as well as distribution lines, would remain in place (undergrounding is not required). The Project would connect to the SCE facilities along Kimberly Avenue.

AT&T, Crown Castle, and SiFi have the ability to provide telecommunication services to the Project; however, it is expected that the Project would connect to existing AT&T, existing Crown Castle, and/or planned SiFi facilities in E. Orangethorpe Avenue and Kimberly Avenue. Existing above ground telecommunication lines on the wooden poles with electrical transmission and distribution lines along Kimberly Avenue and State College Boulevard would remain. However, removal of smaller wooden poles holding telecommunication lines would be removed, as necessary. Additionally, as part of the Project, and as required by the City, existing wooden poles carrying overhead telecommunications lines along the Project site frontage with E. Orangethorpe Avenue would be removed and the telecommunications lines would be placed underground adjacent to the Project site. The undergrounding along E. Orangethorpe would extend slightly to the east of the Project site due to the location of the existing poles. Joint trenching of telecommunications and SCE facilities would occur, as feasible.

SCG provides natural gas service to the Project site and has an existing 6-inch gas line beneath Acacia Avenue, an 8-inch gas line beneath E. Orangethorpe Avenue, and a 6-inch gas line beneath State College Boulevard. It is not anticipated that the proposed warehouse uses would require natural gas for operations, and no new natural gas facilities are proposed. Should a future tenant require natural gas service in the future, this would be accommodated through connections to the existing gas lines.

Construction activities associated with the installation of proposed on-site dry utility infrastructure, any off-site connections to existing dry utility infrastructure, and undergrounding of utilities, as needed, would be within the physical impact area identified for the Project and evaluated

throughout this EIR. Additionally, dry utility infrastructure would be installed in compliance with applicable City requirements as outlined in the Fullerton Municipal Code (refer to Section 4.13.2, above). No additional impacts associated with construction of dry utility infrastructure would occur.

Level of Significance Before Mitigation

Utility infrastructure installation and associated improvements would occur within the identified physical impact area for the Project (on-site and within the public right-of-way along adjacent streets) as addressed throughout this EIR, and in compliance with applicable requirements of the utility providers. No additional impacts would result and this impact would be less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b:	***Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

The City of Fullerton is the water provider for the Project and as required pursuant to SB 610 (codified in the California Water Code beginning at Section 10910), a Project-specific WSA has been prepared for the Project. The purpose of the WSA is to provide information demonstrating the City of Fullerton has sufficient water supply entitlements to provide for the Project now and for the next 20 years. The WSA estimates the water demands from the Project that would need to be served by the City. The WSA references the City's 2015 UWMP which was adopted by the City in June of 2016 and filed with the State of California Department of Water Resources in July of 2016. The UWMP was relied upon for preparation of the WSA primarily for historical water use data and other information, and was updated with current data obtained from City staff. The results of the Project-specific WSA are presented below.

The WSA utilizes the net new water demand for the Project site to evaluate if there is sufficient supply to meet the demands of the Project as well as all other existing and planned future water demand for the City over the next 20 years. The net new demand for the Project area is the difference between the existing water use and the estimated new water demand for the site and would typically be a positive number. However, since the previous manufacturing use on the Project site generated a substantially higher water use, the net new demand is negative; there is an overall reduction in demand for the Project site with implementation of the Project.

As noted previously, the Project's water demand (indoor and outdoor uses) is estimated to be approximately 43,902 gpd (49.2 AFY). Based on City-provided meter records, the 2014/15 water use on the site was 1,709 AFY, which would have been accounted for in the City's 2015 UWMP

water demand projections. Therefore, the net decrease in water demand for the site would be approximately 1,659.8 AFY. Since these are demand projections, the supply needed to serve this demand would be 5.7 percent higher to account for water losses, or a reduction of 1,754 AFY. The Project's buildout demand would result in an approximate four to six percent reduction of the total City-wide water use. (Psomas, 2020)

The Project-specific WSA includes a detailed discussion of the projected water supply and demand for the City of Fullerton. In summary, the City's total water demand in FY 2014/15 was approximately 27,244 AFY including unaccounted-for water. This represented a significant decrease in per-capita usage and overall usage since the recorded demands of the City's service area in the 2010 Urban Water Management Plan. The reduced demands are attributable to conservation implemented since the State-wide drought and economic recession. By Year 2040 the City's 2015 UWMP estimates total production requirements for the water service area to be approximately 28,891 AFY, under normal hydrologic conditions.

Since the adoption of the 2015 UWMP in June 2016, the City has approved a WSA for the Beckman Business Center, which was assumed to be excluded from the projections of the UWMP and therefore added a demand of 137 AFY, including water losses under normal hydrologic conditions. The Project is estimated to lower water demand on the project site equating to a net reduction on the City system of 1,754 AFY by Project buildout, scheduled to occur prior to the 2025 5-year projection. Therefore, overall system demands are estimated to be decreased by a net 1,617 AFY over those projected in the 2015 UWMP, in years 2025 and beyond. Another conservative factor is the fact that actual Citywide water demand for FY 2019 was 23,893 AFY and the 2015 UWMP projected 2020 demands to be 26,669 AFY. Therefore, demands would have to increase 11.6 percent in one year to reach that projection, which is unlikely as the highest single year increase in the past eight years has been 7.4 percent.

Therefore, the WSA concludes that sufficient water supplies are available now, and will be available 20 years from now, for its existing and projected demands including the Project, based on the following:

1. The City of Fullerton is the identified Public Water System (supplier) for the Project.
2. The City is a member agency of OCWD and the Metropolitan Water District of Southern California.
3. The Project is not specifically identified in the 2015 UWMP; however, demand growth in the service area through the Year 2040 has been projected, which is estimated and planned to be met by the City's current groundwater production and imported water rights. The City's 2015 UWMP is clear that even meaningfully higher water demand than anticipated would be met.
4. There is an estimated average annual net water demand decrease due to the buildout of the Project of 1,754 AFY, which is equivalent to a reduction of 7.3 percent of the current 2019 water supply of 23,893 AFY.

5. Under normal, single-dry, and multi-dry year conditions, the City will meet its water demand.
6. In general, the City's current water supply is highly reliable now and through the Year 2040 based on the performance of existing supplies and related management activities, as well as the development of additional programs implemented and currently underway by OCWD and Metropolitan, and the cooperative efforts of MWDOC and its member agencies.
7. OCWD's on-going coordination with Metropolitan and its IRP, including In-Lieu and groundwater banking programs, has provided a high level of reliability for all Metropolitan member agencies, including the City of Fullerton.
8. Reliability of the City's future water supplies will continue through on-going implementation of the OCWD Groundwater Management Plan, OCWD's LTFP, local agency programs, and the combined efforts and programs among members and cooperative agencies of Metropolitan. These agencies include all water wholesalers and retailers, OCSD, the Santa Ana Regional Water Quality Control Board, and the Santa Ana Watershed Project Authority.

Therefore, the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years and this impact would be less than significant.

Level of Significance Before Mitigation

The Project would result in an estimated average annual net water demand decrease of approximately 1,754 AFY, and the City of Fullerton, the water provider, would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold c:	***Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments***

As previously discussed, the OCSD provides wastewater treatment services for the City of Fullerton. Wastewater generated in the OCSD service area is treated at two Reclamation Plants: Reclamation Plant No. 1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. The

OCSD wastewater treatment plants have a treatment capacity of nearly 320 mgd (OCSD, 2019). In 2018-2019 OCSD received average daily wastewater flows of approximately 185 mgd for treatment (OCSD, 2020). As discussed under Threshold a, the Project's estimated wastewater generation that would enter the City's sewer system (conservatively assumed to be approximately 36,388 gpd based on the water demand) would be substantially less than the amount of wastewater generated by the Kimberly-Clark Fullerton Mill operations. The Project's wastewater generation is less than 5 percent of that generated by Kimberly-Clark. Because OCSD currently accept flows from the Project site and because the Project would substantially reduce the amount of wastewater generated, the Project would not decrease the available capacity at the OCSD treatment plant. No impact would result.

Level of Significance Before Mitigation

Implementation of the Project would result in a substantial decrease in the amount of wastewater generated from the Project site and treated at OCSD facilities. No impact would result.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impact would result.

Threshold d:	***Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Construction Impacts

During the Project's construction phases, various types of solid waste would be generated. Debris generated during demolition would consist of scrap metal, green waste, and building material trash. Scrap metal would be transported to a commercial metal recycler and processor, and green waste would be transported to a commercial facility that accepts green materials (e.g., for composting). Existing concrete and asphalt would be crushed and pulverized on-site and reused as fill material. Asbestos and lead containing materials would be handled and disposed of in accordance with applicable regulation, as discussed in Section 4.7, Hazards and Hazardous Materials, of this EIR.

The California Green Building Standards (CalGreen) Code, which has been adopted by the City's Municipal Code (Chapter 14.03, *Building Code*), requires that at least 65 percent of construction and demolition debris be diverted from landfills through recycling, reuse, and/or salvage. The Project would exceed this requirement, with an estimated recycle rate of approximately 95 percent. The Project's demolition contractor estimates that approximately 4,800 tons of demolition debris would be transported to the El Sobrante Landfill on Dawson Canyon Road in Corona (an

average of approximately 48 TPD). The El Sobrante Landfill has a permitted daily capacity of 16,054 TPD (CalRecycle, 2019a), and has the capacity to accommodate the demolition debris generated by the Project.

Following demolition, construction of the Project would result in the generation of construction-related waste, primarily consisting of discarded materials and packaging. Based on the U.S. Environmental Protection Agency's (USEPA's) new construction waste generation rate of 3.89 pounds per square foot (lbs/sf) for Light Industrial uses, construction of the proposed 1,609,384 s.f. of industrial warehouse/distribution uses would generate approximately 3,130 tons of solid waste over the construction period. After demolition construction activities for the proposed buildings and associated uses is estimated to occur over an approximate 12-month timeframe, which corresponds to an average of approximately 10.8 tons of construction waste generated per day from building construction activity, which represents approximately 0.07 percent of the El Sobrante Landfill maximum daily capacity. However, based on the diversion requirements for waste reduction and diversion from landfills, the amount of waste disposed of at the landfill would be even less.

Therefore, the disposal of construction-related solid waste associated with the Project would not exceed the permitted capacity of the El Sobrante Landfill. The Project would result in a less than significant impact related to exceeding landfill capacity during construction.

Operational Impacts

The City of Fullerton contracts with Republic Services to provide solid waste collection services. Solid waste collected from the City is disposed of at either the Olinda Alpha Landfill or the Frank R. Bowerman Landfill, as determined by Republic Services. The Olinda Alpha Landfill has enough projected capacity to serve residents and businesses until 2030. Olinda's average disposal rate is nearly 7,000 tons per day (TPD), although it permitted up to 8,000 TPD (OCWR, 2020a). OCWR is currently in negotiations with the City of Brea regarding extending the landfill closure date. Once the Olinda Alpha Landfill does close, solid waste materials generated in northern Orange County will be diverted to the Frank R. Bowerman Landfill (Arnau, 2020). The Frank R. Bowerman Landfill is permitted to receive 11,500 TPD with an 8,500 TPD annual average, and has enough projected capacity to serve residents and businesses until approximately 2053. (OCWR, 2020b)

Based on solid waste generation factors outlined in Table 5.18-2, Net Increase in Solid Waste Generation, of The Fullerton Plan EIR (6 pounds [lbs] of solid waste per day per 1,000 s.f. of non-residential land use), the Project, with a net increase of approximately 393,100 s.f. of building area at the Project site, is estimated to generate approximately 1.18 tons of solid waste per day.[2] This amount of solid waste requiring disposal at local landfills is considered negligible (approximately 0.01 percent) when compared to the permitted daily limits at the Olinda Alpha Landfill and the Frank R. Bowerman Landfill. Further, this likely overstates the amount of solid waste generation when taking into consideration more stringent solid waste diversion requirements, as discussed under Threshold e, below.

[2] 1,609,384 s.f. of new building area – 1,216,280 s.f. of existing building area/1,000 sf. x 6 lbs per day/2,000 lbs per ton = 1.18 tons per day

Therefore, the disposal of solid waste associated with Project operations would not exceed the permitted capacity of the OCWR landfills that would accept solid waste generated by the Project. The Project would result in a less than significant impact related to exceeding landfill capacity during operation.

Level of Significance Before Mitigation

Construction and operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, resulting in a less than significant.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold e:	***Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The Project would be required to coordinate with Republic Services to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, *Mandatory Commercial Recycling*, and the *California Solid Waste Reuse and Recycling Act of 1991*.

Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. In 2018 (the last year data was approved), the City implemented 42 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, special waste materials, and transformation (tires) (CalRecycle, 2019b). Building

operators would be required to participate in the City's recycling programs and comply with hazardous waste disposal regulations. The City had an average disposal rate of 5.5 pounds per resident per day and 12.9 pounds per employee per day in 2018. These disposal rates are less than the established disposal rate targets for the City (7.9 pounds per resident per day and 19.5 pounds per employee per day) (CalRecycle, 2019c). Therefore, resident- and employee-generated solid waste being diverted to landfills is less than anticipated for the City, and the City is in compliance with solid waste management regulations.

Hazardous waste generated during construction would be disposed of per existing regulations (discussed in Section 4.7, Hazards and Hazardous Materials, of this EIR). Similarly, hazardous materials used during the construction and operation of the warehouse uses, including maintenance activities, would be conducted in compliance with applicable regulations. Further, as discussed above, solid waste generated during construction activities would adhere to the diversion requirements outlined in the CalGreen Code, and would exceed the required 65 percent diversion rate.

As such, the Project would not conflict with any federal, State, or local regulations related to solid waste management. Therefore, no impact related to compliance with solid waste statutes would occur, and no mitigation is required.

Level of Significance Before Mitigation

The Project would be constructed and operated in compliance with the applicable statutes and regulations related to solid waste management and reduction, and no impacts would occur.

Project-level Mitigation Measures

Mitigation measures are not required.

Level of Significance After Mitigation

No impacts would occur.

4.13.5 CUMULATIVE IMPACTS

The geographic context for the Utilities and Service Systems cumulative impact analysis is the service area for the respective utility providers, or the service are for specific facilities (e.g., wastewater treatment plants and landfills). The Fullerton Plan EIR concluded that implementation of The Fullerton Plan would not result in cumulatively considerable impacts related to utilities and service systems (Fullerton, 2012).

As with the Project, individual cumulative development projects would require the construction of necessary infrastructure (water and wastewater lines, storm drain facilities, dry utility infrastructure, and others) to serve the projects. However, the infrastructure needed for the Project would be limited to relatively small distribution and collection lines, which would occur within the Project's identified construction impact area. No new or expanded off-site infrastructure is

required. The environmental impacts associated with the construction of these facilities have been addressed throughout this EIR and would be less than significant with mitigation. Therefore, the Project would not have a cumulatively considerable contribution to a significant cumulative impact associated with construction of utility infrastructure.

The Project involves redevelopment of the Project site and as discussed under Threshold a would substantially reduce the water demand and wastewater generated at the Project site, primarily from operation of the Kimberly-Clark Fullerton Mill. According to the Project's WSA included in Appendix L1 of this EIR, the City has sufficient potable water supplies to meet existing and future demands through the year 2040 under normal, single dry, and multiple dry years. As such the Project, with a net decrease in water demand, would not result in a cumulatively considerable impact on water supply. Similarly, the Project would decrease the amount of wastewater treated at OCSD treatment plans. Therefore, the Project would not result in cumulatively considerable impacts related to water supply or wastewater treatment.

The solid waste generated by construction and operation of the Project would represent nominal proportions of the daily disposal capacity at the El Sobrante Landfill (Project construction waste only), OCWR landfills that would receive solid waste generated during operations (Olinda Alpha Landfill and the Frank R. Bowerman Landfill). These landfills have sufficient daily capacity to handle solid waste during the Project construction and operation and the Project and would not directly result in the need for expanded solid waste disposal facilities. Further, the Project would adhere to applicable local and State regulations during both construction and long-term operations. Other cumulative development would also be required to comply with such regulations. Therefore, the Project would not have a cumulatively considerable contribution to a significant cumulative impact related to solid waste disposal and compliance with regulations addressing the reduction of solid waste generation and disposal.

4.13.6 REFERENCES

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SECTION 5.0 ALTERNATIVES TO THE PROJECT

5.1 INTRODUCTION

An Environmental Impact Report (EIR) must identify ways to mitigate or avoid the significant effects that a Project may have on the environment. In compliance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives". This section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are provided below to explain the foundation and requirements for the alternatives analysis in the EIR.

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly (Section 15126.6[b]).
- The specific alternative of 'no project' shall also be evaluated along with its impact (Section 15126.6[e][1]).
- The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (Section 15126.6[f]).
- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (Section 15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example,

in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location (Section 15126.6[f][2][B]).

- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Section 15126.6[f][3]).

5.1.1 SUMMARY OF THE PROJECT

The Kimberly-Clark site encompasses approximately 66.1-net-acres and is located at the northeast corner of the E. Orangethorpe Avenue and Acacia Avenue intersection, and is bounded by Acacia Avenue to the west, Kimberly Avenue and BNSF railroad tracks to the north, State College Boulevard to the east, and E. Orangethorpe Avenue to the south. The Kimberly-Clark site is currently occupied by the former Kimberly-Clark Fullerton Mill (manufacturing facility for paper products), which terminated operations in June 2020, and includes 1,210,720 square feet (s.f.) of existing manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.). The City of Fullerton maintains a water well facility in the north-central portion of the site west of the Kimberly Avenue access driveway. The potential expansion site is developed with two structures (5,560 s.f. of building area) and associated facilities formerly occupied by Chapman Coast Roof Company, Inc.

As described in Section 3.0 of this EIR, the Project involves redevelopment of the Project site with an industrial logistics center consisting of four buildings (up to 1,609,384 s.f.). This would include 1,504,384 s.f. of warehouse space and 105,000 s.f. of office space. For purposes of analysis in this EIR, as applicable, it is assumed that up to 50 percent of the building square footage would consist of a high-cube fulfillment center warehouse, and 50 percent would consist of a high-cube cold storage warehouse. Existing structures and improvements on the Project site would be demolished to accommodate the Project, with the exception of the existing City of Fullerton well facility; the easement for this facility would be expanded to the east.

Access to the Project would be provided from access driveways along E. Orangethorpe Avenue, Kimberly Avenue and State College Boulevard. Additional improvements associated with the Project include, but are not limited to, surface parking areas (automobile and truck trailer spaces), vehicle drive aisles, landscaping, storm water quality/storage, utility infrastructure, exterior lighting, and signage. The Project would also involve improvements to Acacia Avenue, E. Orangethorpe Avenue, State College Boulevard, and Kimberly Avenue, primarily along the Project site frontage.

The Project site is within the Southeast Industrial Focus Area identified in The Fullerton Plan, and has a Community Development Type (General Plan land use designation) of Industrial. The Project is consistent with the Industrial land use designation and the growth assumptions for the Southeast Industrial Focus Area anticipated in The Fullerton Plan.

Approval actions required from the City to implement the Project include: (1) adoption of a Zone Change to change the zoning designation for the southeast portion of the Project site from M-G-ES (Manufacturing General in an Emergency Shelter Overlay Zone) to M-P-200-ES (Manufacturing Park, minimum lot size 200,000 s.f., in an Emergency Shelter Overlay Zone) to allow for consistent zoning across the Project site; (2) approval of a Parcel Map to subdivide the

Project site into four parcels to accommodate the proposed buildings (Buildings 1, 2, 3, and 4); (3) approval of a Variance to allow the proposed buildings to exceed the maximum height permitted in the M-P-200-ES zone (building height of up to 55-feet compared to a maximum 45-foot height limit); (4) a Major Site Plan for review of site, architectural, and landscape plans; and, (5) certification of the EIR. Additionally, the Project Applicant is requesting adoption of a Development Agreement.

5.1.2 PROJECT OBJECTIVES

As stated in Section 3.0 of this EIR, and pursuant to Section 15124 of the State CEQA Guidelines, the objectives that have been established for the Project are listed below.

A. Ensure that redevelopment of the Project site is accomplished, consistent with applicable goals and policies of the City of Fullerton as set forth in *The Fullerton Plan*, the City's general plan.

B. Increase revenues for the City of Fullerton by maximizing opportunities for warehouse uses.

C. To develop Class A speculative industrial buildings in the City of Fullerton that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar industrial buildings in the local area and region.

D. To create employment-generating businesses in the City of Fullerton to reduce the need for members of the local workforce to commute outside the area for employment, and to improve the jobs to housing balance.

E. To develop a project with an architectural design and operational characteristics that complement other existing buildings in the immediate vicinity and minimize conflicts with other nearby land uses.

F. To develop industrial warehouse buildings in close proximity to an already-established industrial area, designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways.

G. To develop a property that has access to available infrastructure, including roads and utilities to be used as part of the Southern California supply chain and goods movement network.

5.1.3 SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis in Sections 4.1 through 4.13 of this EIR concludes that implementation of the Project would result in no impact; a less than significant impact; or a less than significant impact with incorporation of applicable mitigation measures from The Fullerton Plan EIR, and/or Project-level mitigation measures, for each of the thresholds of significance evaluated in this EIR. No significant and unavoidable impacts would result.

It should be noted that although the Project would not result in any significant and unavoidable impacts, Project-level mitigation measures are required to reduce potentially significant impacts to levels considered less than significant for the following topical issues: Hazards and Hazardous Materials (due to potential soil contamination) and Geology and Soils (due to the potential to encounter paleontological resources). These potentially significant impacts are associated with construction activities, not operation of the Project.

5.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should 1) identify alternatives that were considered by the Lead Agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process, and 2) briefly explain the reasons underlying the Lead Agency's determination. Section 15126.6(c) of the CEQA Guidelines states, "[a]mong the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but not selected for detailed analysis in this EIR. As described in greater detail below, the main reason for rejecting these alternatives was that they would not avoid or substantially reduce the impacts associated with the Project and/or would not be consistent with the Project objectives.

5.2.4 ALTERNATIVE SITE

CEQA requires that the discussion of alternatives focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][B]).

To meet the Project objectives and implement The Fullerton Plan, the Alternative Site for consideration in this analysis could include other parcels within the Southeast Industrial Focus Area or in other Focus Areas where the City of Fullerton anticipates future development. For this alternative, any development within these Focus Areas would need to be consistent with the Project, the Project objectives, and development anticipated in the Focus Area, as presented in The Fullerton Plan.

As identified in The Fullerton Plan, the 712-acre Southeast Industrial Focus Area encompasses the largest concentration of Fullerton's industrial base, primarily accessible from the SR-91 and SR-57 and the railroad, and is mainly composed of large parcels with one- and two-story buildings. The Southeast Industrial Focus Area is envisioned as one of the City's primary employment-generating areas. This Focus Area is characterized by industrial uses that will support expanding industries, including high tech and clean technology, research and development, creative industries, and medical research. The Fullerton Plan EIR considers future development in

Southeast Industrial Focus Area to include approximately 2.65 million square feet of new nonresidential development.

Under existing conditions, the entire Southeast Industrial Focus Area is developed, with the exception of the remnant orange orchard in the eastern portion of the Project site. There is no large, undeveloped site in this Focus Area that can accommodate the same development proposed by the Project. Other parcels are developed with industrial or other non-residential uses. Consolidating an Alternative Site that is the same size as the Project site would require acquisition of contiguous property, demolition of existing operational structures, and discontinuing existing land uses, which is likely to disrupt existing businesses and operations, and would result in environmental impacts similar to those identified for the Project.

The development proposed by the Project could not be accommodated by The Fullerton Plan's anticipated development for the Airport Industrial, Commonwealth Corridor, Orangethorpe Corridor Nodes, Harbor Gateway, Downtown, Transportation Center, North Harbor Corridor, Chapman Corridor, and West Coyote Hills Focus Areas because future development to achieve buildout of these Focus Areas is estimated at less than the 1,609,384 s.f. of nonresidential development proposed by the Project. It should be noted that future development in the 244.21-acre Harbor Gateway Focus Area is estimated to include 2,549 new dwelling units and approximately 1.44 million square feet of nonresidential development. While a large portion of the Project's nonresidential development area could be accommodated in this Focus Area, the Project would not meet the planning objectives for this Focus Area, since this Focus Area is planned for low-density and high-density residential developments and commercial and urban center mixed uses. Further, the development potential allocated to the North Industrial Focus Area (approximately 1.35 million square feet) was largely used with implementation of the approximately 978,000 s.f. Beckman Business Center.

Besides the Southeast Industrial Focus area, the Education Focus Area is the only Focus Area anticipated to be able accommodate new nonresidential development greater than 1,609,384 s.f. Future development in the 608.24-acre Education Focus Area is estimated to include 1,234 new dwelling units and 1,880,572 square feet of nonresidential development. However, this Focus Area is planned for high-density residential developments, commercial retail, school-related, and neighborhood center mixed uses around existing universities and would not support the various light industrial warehouse uses proposed by the Project.

As identified in the analysis presented in Sections 4.1 through 4.13 of this EIR, with adherence to applicable regulations required of any similar development in the City, incorporation of The Fullerton Plan EIR mitigation measures, and implementation of Project-level mitigation measures, the Project would result in no impacts, less than significant impacts or less than significant impacts with mitigation for construction-related, operational, and cumulative impacts for the identified topical issues. The impacts of the Project would be similar or greater at an Alternative Site because development of the Project at an Alternative Site would only move Project impacts to a different location, thus, resulting in a similar construction impact area, types of land uses, and Project size and would be subject to the same regulatory requirements and mitigation measures. Plus, developing the Project on another site would not reduce impacts associated with the existing Kimberly-Clark Fullerton Mill.

The Project's potentially significant impacts related to encountering unknown tribal cultural resources and paleontological resources during excavation, and potential exposure of

construction workers to contaminated soil, would be reduced to levels considered less than significant with implementation of Project-level mitigation measures. These potential impacts are also likely to occur at other sites in the Southeast Industrial Focus Area.

Additionally, it is likely that the net increase in construction-related emissions of nitrogen oxides (NOx), operational air quality NOx emissions, and greenhouse gas (GHG) emissions would be greater with development at an Alternative Site, as other uses in the Southeast Industrial Focus Area would not involve the removal of a large manufacturing facility that obtains most of its power from a cogeneration facility, and uses a substantial amount of water as part of the manufacturing operations. As further discussed in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions, of this EIR, these features of the existing Kimberly-Clark Fullerton Mill generate a large amount of NOx and GHG emissions, offsetting the potential impacts of the Project.

The Project-related increase in truck and vehicular trips and the associated air pollutant emissions, off-site increases in traffic-related noise, and GHG emissions, which would be less than significant with the Project, would also occur with development at an Alternative site. Further, there are no sensitive receptors (e.g., residences, schools, hospitals, parks) immediately adjacent to the Project site that would be affected by on-site operations for the Project, whereas sensitive receptors may or may not be located adjacent to an Alternative Site.

Lastly, the Project Applicant does not own and is not involved in the acquisition of any property in the Southeast Industrial Focus Area or any other location in the City that could accommodate the Project, other than the Project site. It would not be feasible for the owner to control or otherwise have access to another site of a similar size to the Project site. Therefore, locating the Project at other parcels within the Southeast Industrial Focus Area would require lot consolidation, demolition, and displacement of existing land uses to provide a site similar to the size of the project site (approximately 66.1 acres). CEQA does not require the consideration of infeasible sites that are not owned by the landowner or that could not be reasonably acquired by the landowner to be analyzed as alternatives to the Project (State CEQA Guidelines, Section 15126.6[f][1]).

Further analysis of an alternative site(s) in this EIR is not required.

5.2.5 ALTERNATIVE DEVELOPMENT PROJECT ON-SITE

It is typical to consider alternative development scenarios for a Project (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) when identifying potential alternatives to avoid or reduce potential significant impacts resulting from construction or operation of a project to a less than significant level. As previously identified, and as demonstrated through the analysis presented in Section 4.1 through Section 4.13 of this EIR, the Project would not result in any significant and unavoidable impacts. The Project's potential impacts are less than significant with incorporation of applicable mitigation measures from The Fullerton Plan EIR and Project-level mitigation measures.

Implementation of an alternative development scenario at the Project site that could potentially meet the established Project objectives would require the removal of the existing Kimberly-Clark Fullerton Mill buildings and associated facilities, site preparation, grading/excavation, building construction and utility installation (including subsurface detention chambers). All project impacts

that require Project-level mitigation are associated with construction activities, not operation, and would therefore also occur under a potential alternative development scenario onsite. For that reason, as discussed further below, there is no need to further evaluate alternative development scenarios.

Alternately, although it would not fully meet the Project objectives, an alternative development scenario could also involve retention of the existing buildings and development of the underutilized eastern portion of the Project site. This area is currently occupied by the remnant orange orchard, trailer parking/storage, and a recreation vehicle storage area. However, this scenario would require construction on the underutilized eastern portion of the site, which would generate construction impacts similar to those identified for the Project. Further, it would not meet the basic Project objectives. Therefore, as discussed further below, there is no need to further evaluate an alternative development scenario that would involve retention of existing buildings and development of the eastern portion of the site.

Following is an explanation for each topical issue as to why further consideration of alternative development scenarios is not warranted for the Project.

Aesthetics

As discussed above, the Project involves a zone change to provide a consistent industrial zoning across the Project site, and a variance to allow the proposed buildings to exceed the maximum height permitted in the M-P-200-ES zone (building height of up to 55-feet compared to a maximum 45-foot height limit). Variances are allowed by Section 15.68 of the of the Zoning Code. The variance is supported by the fact that the established height limit does not account for recent advances in the way that the warehouse and logistics industry has shifted with capabilities and technology driving the need for more storage capacity. Also, advancement in material handling equipment utilized for warehouses enables use of higher clear ceiling heights in industrial buildings. As identified in Section 4.1, Aesthetics, of this EIR, the Project would not result in any significant aesthetics impacts during construction or operation, including an adverse effect on a scenic vista, damage of scenic resources within a state scenic highway, conflict with a regulation governing scenic quality, or substantial light or glare. While the Project would incorporate The Fullerton Plan EIR mitigation measure (MM) AES-2, which ensures that streets surrounding the Project site are maintained free of dirt, this MM is not needed to reduce any potentially significant aesthetic impacts and it would be required for any construction activities at the Project site. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant aesthetic impacts.

Air Quality

As identified in Section 4.2, Air Quality, of this EIR, the Project would result in less than significant air quality impacts (construction-related and operational). The Project's less than significant air quality impacts are primarily based on consistency of the Project with land use and growth assumptions in The Fullerton Plan and the Southern California Association of Governments (SCAG)'s regional planning documents, and elimination of existing air pollutant emissions

generated by operation of the Kimberly-Clark Fullerton Mill, a manufacturing facility that has operated at the Project site since 1955. While the Project would incorporate The Fullerton Plan EIR mitigation measures to reduce air pollutant emissions during construction and operation, these measures are not needed to reduce any potentially significant air quality impacts and would not be required for any construction or operational activities at the Project site. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant air quality impacts.

Cultural Resources

As identified in Section 4.3, Cultural Resources, of this EIR, the Project would not impact any historic or archaeological resources. No mitigation is required and there is no need to further evaluate alternative development scenarios to address cultural resource impacts.

Energy

As identified in Section 4.4, Energy, of this EIR, the Project would comply with applicable regulations for energy conservation, and would not result in any significant energy impacts. No mitigation is required and there is no need to further evaluate alternative development scenarios to address the Project's less than significant energy impacts.

Geology and Soils

As identified in Section 4.5, Geology and Soils, with adherence to state and local building code requirements, and adherence to recommendations outlined in the Project-specific geotechnical report (which is ensured with implementation of Project-level MM 5-1), the Project would not result in any significant impacts associated with geotechnical conditions. Further, any new development at the Project site under alternative development scenarios would be subject to the same geotechnical constraints and similar recommendations to address these constraints.

With respect to paleontological resources, excavation activities during construction to remove existing foundations and to install utility infrastructure would likely extend into native soil formations that have high sensitivity for paleontological resources, resulting in a potentially significant impact. This impact is mitigated to a level considered less than significant with Project-level mitigation measures that outline requirements for monitoring during construction and actions to take if paleontological resources are discovered. This potentially significant impact would occur with any redevelopment of the Project site, as redevelopment of Project site would require the removal of existing buildings and installation of new utility infrastructure. Therefore, this impact would not be reduced or avoided with implementation of alternative development scenarios.

Therefore, there is no need to further evaluate alternative development scenarios to address impacts related to geology and soils.

Greenhouse Gas (GHG) Emissions

As identified in Section 4.5, Greenhouse Gas Emissions, of this EIR, the Project would result in less than significant GHG emissions impacts. The Project's less than significant impact associated with GHG emissions is a result of the elimination of existing GHG emissions generated by operation of the Kimberly-Clark Fullerton Mill, a manufacturing facility that has operated at the Project site since 1955. The Project also would be consistent with the City of Fullerton Climate Action Plan and other plans, policies and regulations addressing GHG emissions. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant GHG impacts.

Hazards and Hazardous Materials

As identified in Section 4.6, Hazards and Hazardous Materials, of this EIR, with the exception of the potential to encounter contaminated soil during construction, and with adherence to applicable regulations, the Project would have no impact or a less than significant impact related to hazards and hazardous materials (e.g., transport, use and disposal of hazardous materials; release of hazardous materials and hazardous emissions; location on a hazardous materials site; hazards from airport operations; emergency response/evacuation; and wildland fires). With respect to soil contamination, there is a potential for construction workers to be exposed to soil contamination remaining under Kimberly-Clark Building 4, and in other areas within the Project site where unknown contamination may be present. This impact would be reduced to a less than significant level with preparation and implementation of a Soil Management Plan (refer to MM 7-1). This potential exposure to contaminated soil would occur with any redevelopment of the site that involves removal of the existing buildings and facilities and excavation, and MM 7-1 would be applicable. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant hazards and hazardous materials impacts.

Hydrology and Water Quality

As discussed in Section 4.8, Hydrology and Water Quality, with adherence to applicable water quality regulations (as required by The Fullerton Plan EIR MM HYD-1 and MM HYD-2), the Project would have no impact or less than significant impacts related to hydrology and water quality. Notably, the Project would retain existing drainage patterns, would decrease the amount of water entering the public storm drain system, and would implement structural and non-structural water quality best management practice (BMPs), which do not currently existing at the Project site. Further, due to the depth of groundwater below the ground surface (bgs) and the presence of contaminated groundwater, the Project does not involve the extraction of groundwater and does not include any infiltration BMPs. Further, the Project would not conflict with the Basin Plan or a Sustainable Groundwater Management Plan. Any redevelopment at the Project site would be subject to the same existing regulations and would have similar less than significant impacts. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant hydrology and water quality impacts.

Land Use and Planning

As discussed in Section 4.9, Land Use and Planning, of this EIR, the Project involves the development of industrial uses that are consistent with land use and growth assumptions for the Southeast Industrial Focus Area, as outlined in The Fullerton Plan, as well as applicable goals and policies. The Project is consistent with the existing zoning for the Project site; however, a zone change is requested for the southeast portion of the site to provide consistent zoning across the site. Additionally, while a variance is being requested to allow for building heights that exceed the City's development standards for industrial uses, the increased height does not result in an environmental impact, and a variance is allowed per the City's Zoning Code.

The Project is also consistent with SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) and 2020 RTP/SCS (Connect SoCal), including applicable goals. Notably, the Project addresses regional needs related to goods movement as presented in the RTP/SCS. Redevelopment of the Project site with an alternative development scenario that meets the Project objectives, is consistent with existing zoning and community development type, and is consistent with local and regional planning programs also would have less than significant land use impacts. An alternative development scenario that is not consistent with the existing zoning and community development type, or that conflicts with local and regional program would have greater impacts compared to the Project. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant land use and planning impacts.

Noise

As discussed in Section 4.10, Noise, of this EIR, the Project would have a less than significant impact related to construction and operational noise and vibration, and no impact related to noise from airport operations. While the Project would incorporate The Fullerton Plan EIR mitigation measures to reduce noise during construction and operation, these measures are not needed to reduce any potentially significant noise impact resulting from the Project. Construction and operation of an alternative development scenario that meets the Project objectives and is consistent with the industrial zoning and community development type would have similar noise and vibration impacts as the Project during construction and operation. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant noise and vibration impacts.

Transportation

As discussed in Section 4.11, Transportation, of this EIR, the Project would have less than significant transportation impacts during construction and operation and no mitigation is required. The Project does not conflict with local and regional plans, policies or ordinances related to vehicular and non-vehicular circulation. The Project is located in a designated low vehicle miles traveled (VMT) area, is consistent with the existing land uses in the Southeast Industrial Focus Area, and does not include any features that would increase the rate or length of trips. Therefore, based on the City's recently adopted Transportation Assessment Policies and Procedures, the

Project can be screened out from further VMT analysis under the low VMT area criteria, and would have a less than significant impact related to VMT.

The Project has been designed to adhere to the City's requirements for access, sight distance, accessibility, etc. and would have a less than significant impact related to increased hazards due to design or incompatible uses, and emergency access. The Project-level mitigation measure to prepare a Traffic Control Plan (refer to MM 11-1) is intended to consolidate and expand on similar requirements outlined in The Fullerton Plan EIR MM HAZ-5 and MM AQ-6.

Construction and operation of an alternative development scenario that meets the Project objectives and is consistent with the industrial zoning and community development type, and adheres to the City's requirements for circulation and access, would have similar transportation impacts as the Project. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant transportation impacts.

Tribal Cultural Resources

As discussed in Section 4.12, Tribal Cultural Resources, excavation activities during construction to remove existing foundations and to install utility infrastructure would likely extend into previously undisturbed sediment. While there is a low potential, previously unknown tribal cultural resources or Native American human remains could be encountered. With implementation of required mitigation measures from The Fullerton Plan EIR (MM CR-2, MM CR-3, and MM CR-4), which require monitoring of construction activities by an archaeologist, and outline actions to take in the event any resources or human remains are discovered, the Project's impact would be less than significant. The potential to encounter tribal cultural resources and human remains would occur with any redevelopment of the Project site, as redevelopment of Project site would require the removal of existing buildings and installation of new utility infrastructure. Therefore, this less than impact would not be reduced or avoided with implementation of alternative development scenarios and there is no need to further evaluate alternative development scenarios to address impacts to tribal cultural resources.

Utilities and Service Systems

As discussed in Section 4.13, Utilities and Service Systems, the Project would have less than significant impacts related to utilities and service systems and no mitigation is required. The Project can be served by existing utility infrastructure located in the roadways surrounding the Project site. The Project would include the installation of new utility infrastructure on-site and connections to existing site-adjacent utilities, and the undergrounding of aboveground utility lines along E. Orangethorpe Avenue. The Project would result in a substantial reduction in water consumption and wastewater generation compared to Kimberly-Clark Fullerton Mill manufacturing operations that occurred at the Project site until June 2020. Further, construction and operation would adhere to applicable regulations for solid waste management and diversion of waste from the existing landfills. Therefore, there is no need to further evaluate alternative development scenarios to address the Project's less than significant utility and service system impacts.

In summary, the analysis above demonstrates that there are no alternative development scenarios involving redevelopment of the Project site that would avoid or otherwise reduce the Project's potentially significant impacts. Each of the Project's impacts that are potentially significant prior to implementation of Project-level mitigation measures are associated with construction activities, would also occur with alternative development scenarios, and the same mitigation requirements would apply. The only type of development that would avoid these impacts would involve retention and reuse of the existing buildings and facilities. This alternative concept is effectively addressed under the No Project Alternative-Reuse of Existing Buildings, below.

Further, consideration of an alternative development scenario that involves a different land use type (e.g. residential) does not need to be further evaluated as it would not be consistent with development anticipated in the Southeast Industrial Focus Area, as identified in The Fullerton Plan, and would not meet any of the Project objectives.

5.3 ALTERNATIVES ANALYSIS

As described in Sections 4.1 through 4.13 of this EIR, and summarized above, the potentially significant impacts of the Project can be mitigated to a less than significant level. There are no significant and unavoidable impacts. When considering potential alternatives to the Project, the City focused on alternatives that would avoid of reduce the potentially significant impacts. As discussed previously, because the Project's potentially significant impacts, prior to mitigation, are related to construction, the only type of development that would avoid these impacts would involve retention and reuse of the existing buildings and facilities. As described below, this also would fulfill the CEQA requirements for evaluating a "no project alternative." As analyzed in Section 5.2, *Alternatives Considered but not Carried Forward for Detailed Analysis*, there is no need to further evaluate development at an alternative site within the City of Fullerton, or alternative development scenarios at the Project site.

For the alternative evaluated below, it is assumed that relevant mitigation measures (MMs) from The Fullerton Plan EIR are incorporated, and that relevant regulatory requirements and Project-specific MMs would also be implemented and thus serve to reduce or avoid potential significant impacts similar to the Project.

5.3.1 NO PROJECT ALTERNATIVE – REUSE OF EXISTING BUILDINGS

Section 15126.6(e) of the State CEQA Guidelines requires than an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a Project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed.

The Project is consistent with The Fullerton Plan community development type for the Project site and a General Plan revision is not needed. Similarly, the Project does not conflict with the land uses allowed by the existing zoning for the site. Although a zone change is proposed, it is only proposed to provide a single consistent zoning designation for the Project site. Thus, with the exception of the exceedance of the building height, which is allowed with an approved variance, the Project represents the development that would be allowed under current City regulations.

A. Description of the Alternative

The No Project Alternative – Use of Existing Buildings (No Project Alternative) addressed in this section represents both types of no project alternatives outlined in the CEQA Guidelines: (1) continuation of development consistent with the existing community development type and zoning designations, and (2) assumes the Project does not proceed (leaving the existing Kimberly-Clark buildings on-site). It should be noted that development of the Project site consistent with existing community development type and zoning designation is also addressed through the discussion of alternative development scenarios, above, which has not been carried forward for detailed analysis in this EIR. Further, a No Project Alternative that would involve retention of the existing buildings but no associated operations is not being considered; such an alternative would not meet the Project objectives and also has potential for negative effects associated with urban blight and safety and security issues.

Under this alternative, the existing buildings and associated facilities on the Kimberly-Clark site and potential expansion site would be retained and reoccupied for use consistent with that allowed by right pursuant to Section 15.40, Industrial Zone Classifications, of the City's Zoning Code. This includes, but is not limited to, ongoing manufacturing uses. As described previously, the Kimberly-Clark site is currently occupied by the former Kimberly-Clark Fullerton Mill, a paper manufacturing facility, which terminated operations in June 2020. The Kimberly-Clark facility includes 1,210,720 s.f. of existing manufacturing (418,720 s.f.) and warehouse buildings (792,000 s.f.). The potential expansion site is developed with two structures (5,560 s.f. of building area) and associated facilities.

It should be noted that with the termination of Kimberly-Clark's operations at the Project site, Kimberly-Clark removed much of its manufacturing equipment and associated facilities that would be needed to initiate similar manufacturing operations at the site. In other words, any new use of the site would require the installation of necessary equipment and supporting facilities, and it is also expected that improvements to the existing buildings would be needed to accommodate future use, depending on the type of use that occupies the site. The cogeneration facility, which provided the main source of energy for on-site manufacturing operations, was also removed by Kimberly-Clark for use at an existing Kimberly-Clark facility in Kentucky. Kimberly-Clark installed the cogeneration facility at the Fullerton facility in 2002. Prior to installation of the facility, electricity was provided solely from the existing SCE substation located onsite. With removal of the existing cogeneration facility, and for purposes of this alternatives analysis, it is assumed that a future use could be powered by the existing on-site SCE substation, or by another cogeneration facility installed by the future occupant.

The City of Fullerton maintains a water well facility in the north-central portion of the site west of the Kimberly Avenue access driveway. This alternative would not preclude expansion and reconfiguration of the City's existing easement to accommodate additional water quality treatment facilities. The Project anticipates the City's easement would be expanded to the east; this area is currently occupied by a truck trailer storage area.

With respect to roadway and utility infrastructure, this alternatives analysis assumes that existing circulation patterns would be maintained, and existing utility infrastructure would continue to serve the site. This alternative would not involve implementation of the roadway and infrastructure improvements proposed as part of the Project.

B. Comparative Analysis of Environmental Impacts

Following is a comparative analysis of the No Project Alternative and the Project. The focus of this analysis is to determine if the No Project Alternative is capable of eliminating or reducing the potentially significant environmental effects of the Project. As previously noted, the Project would not result in any significant and unavoidable impacts; therefore, the analysis addresses significant effects that might occur if the identified Project-level mitigation measures are not applied.

Aesthetics

The No Project Alternative does not involve any new development or change in current uses, except as necessary to accommodate a future occupant of the existing buildings. There would not be a substantial change in the visual character of the Project site under the No Project Alternative. The No Project Alternative would not result in any significant aesthetics impacts, including an adverse effect on a scenic vista, damage to scenic resources within a state scenic highway, conflict with a regulation governing scenic quality, or substantial light or glare. No significant aesthetic impacts related to aesthetics were identified for the Project and no significant aesthetic impacts would occur under this alternative.

Air Quality

The No Project Alternative would not involve substantial construction activities. While there may be some demolition and building modifications to accommodate a future occupant, it is not expected that there would be any grading or excavation. Additionally, the potential for exposure to asbestos containing materials and lead-based materials during demolition would be reduced. Therefore, the No Project Alternative would result in less construction-related air pollutant emissions compared to the Project. However, the Project's construction-related air quality impacts would be less than significant. Therefore, the No Project Alternative would not avoid any significant construction-related air quality impacts.

As with the Project, the No Project Alternative would involve some type of industrial operation at the Project site, and likely manufacturing. It is expected that consistent with the previous Kimberly-Clark facility, the mobile sources emissions from vehicular traffic would be less compared to the Project; however, ongoing manufacturing at the Project site would result in greater emissions from energy sources. The No Project Alternative would be consistent with the South Coast Air Quality Management District Air Quality Management Plan (AQMP) because it would involve no change

in use compared to existing conditions. The Project would also be consistent with the AQMP. Additionally, any operations at the Project site would be conducted in adherence to applicable regulations and would be expected to have potential impacts to sensitive receptors similar to or less than the previous Kimberly-Clark manufacturing operations. As discussed in Section 4.2, Air Quality, of this EIR, when taking into consideration the elimination of air pollutant emissions from the Kimberly-Clark facility, the net air pollutant emission with the Project would be less than significant and less than emissions associated with operation of the Project site with a manufacturing facility, with the exception of PM10 emissions, which would be less than significant. Therefore, the No Project Alternative, assuming continued use of the site with manufacturing operations, would potentially have greater operational air quality impacts compared to the Project.

Cultural Resources

As identified in Section 4.3, Cultural Resources, of this EIR, the Project would not impact any historic or archaeological resources. Therefore, no impact to historic or archaeological resources would occur with implementation of the No Project Alternative or the Project.

Energy

As identified in Section 4.4, Energy, of this EIR, the Project would comply with applicable regulations for energy conservation, and would not result in any significant energy impacts. The Kimberly-Clark facility and buildings on the potential expansion site were initially constructed in the 1950s, with subsequent expansions and modifications at the Kimberly-Clark facility through 1995. The existing buildings do not meet current, more stringent energy requirements including the most current 2019 Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings. Further, similar to the Kimberly-Clark operations manufacturing operations would demand more energy resources than the proposed warehouse uses. Therefore, the No Project Alternative would have greater energy impacts related to energy efficiency compared to the Project, although the Project's impacts would be less than significant.

Geology and Soils

The Project site is subject to seismic ground shaking, and the No Project Alternative would involve use of existing buildings that, given their age, would require modifications to meet existing building standards. Therefore, the No Project Alternative would have greater impacts associated with risks associated with seismic ground shaking. The No Project Alternative would not involve grading and excavation; therefore, potential impacts identified for the Project associated with geology and soil conditions would be reduced under the No Project Alternative. However, the Project impacts would be less than significant. Therefore, the No Project Alternative would not avoid any significant impacts related to geology and soils.

With respect to paleontological resources, the No Project Alternative would not involve any excavation or grading activities. Therefore, the potential to discover previously unidentified paleontological resources is eliminated. As such, the potential for impacts to paleontological resources with the No Project Alternative would be less than with the Project. However, the Project

impacts would be less than significant with Project-level mitigation. Therefore, the No Project Alternative would not avoid any significant impacts related to paleontological resources.

Greenhouse Gas Emissions

It is expected that consistent with the previous Kimberly-Clark facility, the GHG emissions from mobile sources (notably trucks) under the No Project Alternative would be less compared to the Project; however, ongoing manufacturing operations at the Project site would result in greater GHG emissions from energy sources. When taking into consideration the elimination of emissions from the Kimberly-Clark facility, the net GHG emissions with the Project would be less than significant. Therefore, the No Project Alternative, assuming continued use of the site with manufacturing operations, would have less impacts compared to the Project. However, the Project's impacts would be less than significant. Therefore, the No Project Alternative would not avoid any significant impacts related to GHG emissions.

Hazards and Hazardous Materials

As identified in Section 4.6, Hazards and Hazardous Materials, of this EIR, with the exception of the potential to encounter contaminated soil during construction, and with adherence to applicable regulations, the Project would have no impact or a less than significant impact related to hazards and hazardous materials. As with the Project, the No Project Alternative would be operated in compliance with applicable regulations and would have a less than significant impact related to transport, use and disposal of hazardous materials; and, release of hazardous materials and hazardous emissions. Additionally, consistent with the Project, the No Project Alternative would have no impact or a less than significant impact related to its location on a hazardous materials site, hazards from airport operations, emergency response/evacuation, and wildland fires.

With respect to soil contamination, there is a potential for construction workers to be exposed to soil contaminants remaining under Kimberly-Clark Building 4, and in other areas within the Project site where unknown contamination may be present. The No Project Alternative would not involve any excavation or grading activities. Therefore, it is not expected that contaminated soils would be encountered with the No Project Alternative. As such, the potential for impacts would be less than with the Project. However, the Project impacts would be less than significant with mitigation. Therefore, the No Project Alternative would not avoid any significant impacts related to hazards and hazardous materials.

Hydrology and Water Quality

Under the No Project Alternative, the existing hydrology and drainage patterns of the Project site would remain. The Project would reduce the amount of storm water runoff from the Project site. Additionally, in compliance with existing regulations, the Project would involve the installation of structural and non-structural BMPs for water quality treatment, which do not exist under existing conditions. Therefore, while the No Project Alternative would also have no adverse hydrology or water quality impacts with continued use of the site, there would be no reduction in storm water runoff and no implementation of water quality BMPs.

The No Project Alternative would not include any grading, and construction-related water quality impacts would be less than the Project. However, the Project's impacts would be less than significant through compliance with regulatory requirements.

Land Use and Planning

Under the No Project Alternative, the existing land use would be retained and there would be no division of an established community, consistent with the Project. Additionally, the No Project Alternative, which retain existing uses, would not conflict with goals and/or policies SCAG's RTP/SCS, The Fullerton Plan, or other applicable plans and programs. While the No Project Alternative would not conflict with planning programs, it would not meet all of the goals and policies to the same extent as the Project. Notably, the No Project Alternative does not meet the planning objectives for the Southeast Industrial Focus area to the same extent as the Project. The No Project Alternative would not "…expand and attract industrial users that would benefit from freeway access, technology clusters, and industrial infrastructure" and would not "[i]mprove appearance and function through design, including landscaping, pedestrian and transit facilities…". Further, the No Project Alternative would not accommodate revitalization of the area, as outlined in Policy P11.12 of the Community Design and Development chapter. The No Project Alternative would also not implement a Project that would further regional goals outlined in SCAG's RTP/SCS to improve goods movement, to facilitate transit and active transportation, or to improve energy efficiency. However, because it does not conflict with The Fullerton Plan or other Planning document, the No Project Alternative would not result in any significant land use impacts, consistent with the Project.

Noise

The No Project Alternative would not involve construction activities to the same extent as the Project; therefore, noise and vibration effects associated with construction would be less than the Project. However, the Project's construction-related noise impacts would be less than significant. Therefore, the No Project Alternative would not avoid any significant impacts related to noise during construction.

As with the Project, operational activities associated with the No Project Alternative have the potential to generate noise, and it is expected that noise from operations under the No Project Alternative would be similar to noise generated by Kimberly-Clark operations. The No Project Alternative and Project would have less than significant noise and vibration impacts.

Transportation

The No Project Alternative would not involve any roadway or circulation improvements, including installation of sidewalks where they do not currently exist, improving accessibility, or replacement of the existing bus stop on the north side of E. Orangethorpe Avenue. Therefore, the No Project Alternative would not meet the circulation goals and policies outlined in The Fullerton Plan and SCAG's RTP/SCS related to pedestrian and bicycle travel and transit, which are addressed in Table 4.9-1 and Table 4.9-2 in Section 4.9, Land Use and Planning, to the same extent as the Project. However, as with the Project, the No Project Alternative would have a less than significant impact related to conflict with a circulation plan or policy.

As discussed in Section 4.11, Transportation, the Project site is located in a designated a low VMT area. Therefore, as with the Project, the No Project Alternative, which is consistent with existing land uses, and would not include any features that would increase the rate or length of trips, would have a less than significant transportation impact based on VMT. Further, the No Project Alternative would maintain the existing circulation system and would not cause any impacts related to increased hazards due to design or incompatible uses, and emergency access. However, the Project's impacts relative to these issues would also be less significant.

Tribal Cultural Resources

The No Project Alternative would not involve any excavation or grading activities. Therefore, the potential to discover previously unidentified tribal cultural resources is eliminated. As such, the potential for impacts to tribal cultural resources with the No Project Alternative would be less than with the Project. However, the Project impacts are considered less than significant with incorporation of The Fullerton Plan EIR mitigation measures. Therefore, the No Project Alternative would not avoid any significant impacts related to tribal cultural resources.

Utilities and Service Systems

Although there would be no new development under the No Project Alternative, continued use of the Project site with manufacturing operations would result in demands for utilities and service systems that are similar to or less than the previous Kimberly-Clark operations. The manufacturing processes for Kimberly-Clark consumed a substantial amount of water and generated an associated amount of wastewater. If site operations are powered from the existing SCE substation, the demand for electricity would also be increased. However, as with the Project and consistent with existing conditions, the existing utility infrastructure would be sufficient to serve the Project and impacts would be less than significant. Operations under the No Project Alternative and the Project would be conducted in compliance with applicable regulations addressing solid waste management and impacts related to solid waste generation would be less than significant.

C. Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

As presented in Sections 4.1 through 4.13 of this EIR, the Project would not result in any significant and unavoidable impacts; therefore, the No Project Alternative would not avoid or substantially lessen a significant and unavoidable impact. Impacts related to hydrology and water quality, tribal cultural resources, and construction traffic would be less than significant with incorporation of required mitigation measures included in The Fullerton Plan EIR. However, Project-level mitigation measures are required to reduce potentially significant impacts to levels considered less than significant for the following topical issues: hazards and hazardous Materials (due to potential soil contamination) and geology and soils (due to the potential to encounter paleontological resources). These potentially significant impacts are associated with construction activities, not operation of the Project.

As described above, the No Project Alternative would have a similar lack of impacts, or less than significant impacts, related to aesthetics, cultural resources, land use and planning, noise, and transportation. Therefore, the No Project Alternative would not avoid or substantially lessen Project impact related to these issues.

The Project and No Project Alternative would have less than significant impacts for the following topics; however, the No Project Alternative would have potentially greater impacts: operational air quality (associated with manufacturing operations), energy, hydrology and water quality, and utility and service systems. Therefore, the No Project Alternative would not avoid or substantially lessen Project impact related to these issues.

The Project and No Project Alternative would also have less than significant impacts for the following topics; however, the No Project Alternative have less impacts: construction air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, and tribal cultural resources. Notably, the No Project Alternative would avoid potentially significant impacts related to hazards and hazardous materials and paleontological resources that require Project-level mitigation to reduce the impact to a less than significant level.

Attainment of Project Objectives

The discussion below addresses the ability of the No Project Alternative to attain the project objectives.

A. **Ensure that redevelopment of the Project site is accomplished, consistent with applicable goals and policies of the City of Fullerton as set forth in The Fullerton Plan, the City's general plan.** The No Project Alternative would not involve redevelopment of the Project site, rather it would involve the use of existing buildings and facilities at the Project site for continued industrial, and likely manufacturing uses. Therefore, the No Project Alternative does not meet the overall intent of this Project objective. Additionally, as discussed under "Land Use and Planning," above, the No Project Alternative would not further achievement of planning objectives outlined in The Fullerton Plan for the Southeast Industrial Focus Area, and The Fullerton Plan policy related to revitalization.

B. **Increase revenues for the City of Fullerton by maximizing opportunities for warehouse uses.** While the No Project Alternative would continue to generate revenues, the proposed redevelopment of the Project with a contemporary logistics center would provide additional property tax value for the City. Additionally, the new warehouse buildings are likely to attract e-commerce users that also generate sales tax revenue. Therefore, the No Project Alternative would not meet this objective.

C. **To develop Class A speculative industrial buildings in the City of Fullerton that are designed to meet contemporary industry standards, can accommodate a wide variety of users, and are economically competitive with similar industrial buildings in the local area and region.** The reuse of the existing buildings, which are designed to accommodate a paper manufacturing facility, would not meet this Project

objective, which is associated with the operation of a contemporary logistics center. Redevelopment of the Project is necessary to accomplish this objective.

D. **To create employment-generating businesses in the City of Fullerton to reduce the need for members of the local workforce to commute outside the area for employment, and to improve the jobs to housing balance.** The proposed logistics center would generate more employment opportunities than what would be generated through reuse of the existing buildings. As identified in Section 6.1.4, Population and Housing, of this EIR, the Project is estimated to generate up to 1,675 more employment opportunities than the Kimberly-Clark Fullerton Mill, which had an average of approximately 325 individuals employed at the Project site between 2015 and 2019.

E. **To develop a project with an architectural design and operational characteristics that complement other existing buildings in the immediate vicinity and minimize conflicts with other nearby land uses.** The existing uses on-site have been operational since the 1950s and retention of the existing uses/buildings under the No Project Alternative would not conflict with existing architecture or the operations of nearby uses. However, the overall intent of this objective is to introduce a new development to the area, which would not be accomplished with the No Project Alternative.

F. **To develop industrial warehouse buildings in close proximity to an already-established industrial area, designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways.** The reuse of the existing buildings, which are designed to accommodate a paper manufacturing facility, would not meet this Project objective, which is associated with the operation of a contemporary logistics center. Redevelopment of the Project is necessary to accomplish this objective.

G. **To develop a property that has access to available infrastructure, including roads and utilities to be used as part of the Southern California supply chain and goods movement network.** The No Project Alternative would involve the use of existing buildings and facilities at the Project site for continued industrial, and likely manufacturing uses. Although existing uses under the No Project Alternative would continue to operate with service from existing roadways and infrastructure, without implementation of a logistics center with new warehouse uses, the No Project Alternative would not meet the intent of this objective relative to supporting goods movement in Southern California.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. As discussed above, the No Project Alternative, which involves reuse of the existing building and facilities on-site would result in greater operational impacts than the Project for certain environmental issues, less construction-related impacts, and no change from current conditions for other environmental issues. However, Section 15126.6(e)(2) of the CEQA Guidelines states that, if the No Project

Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the analysis presented in Section 4.1 through 4.13 of this EIR, with implementation of applicable mitigation measures from The Fullerton Plan EIR, compliance with applicable regulations, and implementation of Project-level mitigation measures (for potential impacts related to hazards and hazardous materials and paleontological resources), the Project would not result in any significant and unavoidable impacts. Therefore, for the reasons outlined in Section 5.2.5, above, there is no need to further evaluate alternative development scenarios (reduced intensity, reduced development area, alternative site plan, alternative use, etc.) compared to the Project. Any alternative development scenario would have similar impacts as the Project related to construction activities, and the Project would not result in any significant operational impacts that would be avoided by an alternative.

Therefore, there are no alternatives evaluated in this EIR that would be considered environmentally superior to the Project, which would not have any significant and unavoidable impacts associated with construction and operation.

SECTION 6.0 OTHER CEQA CONSIDERATIONS

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines states that "an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." Section 15126 of the CEQA Guidelines requires that all aspects of a project (including planning, acquisition, development, and operation) be considered when evaluating its impact on the environment and sets forth general content requirements for Environmental Impact Reports (EIRs). Potential significant effects of the Project, applicable mitigation measures from The Fullerton Plan EIR and Project-level mitigation measures to address potential significant effects, and potential cumulative impacts have been identified throughout the analysis presented in Sections 4.1 through 4.13 of this EIR. An analysis of alternatives is included in Section 5.0, Alternatives.

This section identifies (1) effects determined not to be significant; (2) significant environmental effects that cannot be avoided if the Project is implemented; (3) significant irreversible environmental changes that would result from implementing the Project; and (4) growth-inducing impacts of the Project.

Unless otherwise noted, references to "Project" in this section include the proposed Project and the Optional Site Plan, and references to the "Project site" include the Kimberly-Clark site and the potential expansion site. If there is pertinent information specific to the Kimberly-Clark site or potential expansion site, this is noted.

6.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Through the preparation of the Notice of Preparation (NOP) for this Draft EIR included in Appendix A (Fullerton, 2020), and comments received on the NOP, the City of Fullerton has determined that detailed discussion for the environmental issues below is not required in this EIR because the Project would have (1) no impact; (2) a less than significant impact; or (3) a less than significant with adherence to applicable regulations.

6.1.1 AGRICULTURE AND FORESTRY RESOURCES

The Project site, including the area planted with a remnant orange orchard in the eastern portion of the Project site, is classified as "Urban and Built-Up Land" by the California Department of Conservation Farmland Mapping and Monitoring Program. The fruit from the orange trees is not harvested or sold and the area where the trees are planted is not considered agricultural land. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as Farmland), forest land, or timberland on or near the Project site. Further, the Project site and surrounding areas are not zoned for agricultural land uses or forestland/timberland, nor is the Project site subject to a Williamson Act contract. Accordingly, implementation of the Project would not result in the loss of Farmland or forest land; result in the conversion of Farmland to non-agricultural use; or result in the conversion of forest land resources to non-forest use.

6.1.2 BIOLOGICAL RESOURCES

The Project site is within an urban area and is entirely surrounded by development, which consists primarily of commercial and industrial uses. The Project site has been utilized for manufacturing and industrial purposes for over 60 years, and is covered by manmade structures, impervious surfaces (e.g., asphalt pavement), and ornamental landscaping (including the remnant orange orchard). No natural biological habitats, riparian habitats, or other sensitive habitats are present on the Project site or adjacent to the site, and implementation of the Project would not impact any candidate, sensitive, or special status species. Further, the Project site does not include any state or federally protected wetlands. Accordingly, implementation of the Project would not adversely affect or result in the loss of sensitive or protected biological resources.

As identified in Section 5.11, Biological Resources, of The Fullerton Plan EIR, wildlife corridors functionally connect larger areas of open, usable habitat together (Fullerton, 2012a). The Project site is in an urban developed area, does not provide habitat for wildlife movement, and is not near areas of the City that contain significant plant and animal populations (i.e., East Coyote Hills or West Coyote Hills). Therefore, as concluded in The Fullerton Plan EIR, implementation of the Project would not interfere with an established or reliable wildlife corridor.

Due to the presence of trees on-site, there is the potential for birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to be present. The MBTA makes it illegal to take, possess, buy, sell, purchase, or barter any migratory bird listed in the Code of Federal Regulations (Title 50, Part 10), including feathers, nests, eggs, or other avian products. This includes the active nests of all bird species, including common species. In addition to the MBTA, the following sections of the California Fish and Game Code include provisions for the protection of nesting birds and avian species:

- **Section 3503** indicates that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”
- **Section 3503.5** indicates that “[i]t is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."
- **Section 3513** indicates that “[i]t is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.”

Existing trees on-site would be removed during construction; however, all vegetation removal would be conducted in accordance with applicable regulations to avoid impacts on nesting birds and avian species, and ensuring impacts are less than significant. Notably, construction activities would be completed in compliance with the federal Migratory Bird Treaty Act, and Sections 3503, 3503.5, 3513 of the California Fish and Game Code, which protect active nests of avian species,

including common raptor species, through the following measures, which will be Conditions of Approval for the project:

- Removal of trees and vegetation shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31). If site-preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-construction nesting bird survey shall be conducted by a qualified Biologist within 72 hours prior to vegetation removal, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located, construction may be conducted during the nesting/breeding season.
- If the biologist finds an active nest on the Project site and determines that the nest may be impacted, the Biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the Biologist, and shall be based on the nesting species, its sensitivity to disturbance, expected types of disturbance, and location in relation to the construction activities. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of raptors and listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The Biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the City.

The Project involves the planting of trees throughout the Project site, which would provide habitat for migratory and nesting birds. Additionally, implementation of the Project would be conducted in compliance with the City's Community Forestry Ordinance (Municipal Code, Chapter 9.06), specifically in accordance with requirements for the planting of trees identified in Section 9.06.090 of the Municipal Code.

As also identified in Section 5.11 of The Fullerton Plan EIR, one habitat conservation plan (HCP), the Coyote Hills East HCP, exists within the City of Fullerton (Fullerton, 2012a). This HCP applies to the northeastern part of the City. The Project site is not located in the area addressed by the Coyote Hills East HCP and implementation of the Project would not conflict with the HCP.

6.1.3 Mineral Resources

The Project site is not located within an area known to be underlain by regionally-important mineral resources. In addition, the Project site is not identified as a locally-important mineral resource recovery site in The Fullerton Plan (Fullerton, 2012b). Accordingly, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or to the residents of the State of California.

6.1.4 POPULATION AND HOUSING

The Project Applicant is pursuing the development of the proposed buildings on a speculative basis and the future occupants of the buildings are not known. Because no occupants have been identified, the precise number of jobs that would be created from implementation of the Project cannot be determined. However, based on the size and type of the proposed buildings, the Project Applicant expects future businesses on the Project site to employ between 1,500 and 2,000 people. This estimated employment generation is consistent with employment generation anticipated in The Fullerton Plan for light industrial uses (1 employee per 1,000 square feet), which would result in up to approximately 1,610 employees (based on the larger building area associated with the Optional Site Plan) (Fullerton, 2012b). Based on an average of the number of employees at the existing Kimberly-Clark facility over the five-year period between 2015 and 2019, there was an average of approximately 325 individuals (including on-site contractors) employed at the Project site. Accordingly, there would be a net increase of approximately 1,175 to 1,675 employment opportunities in the City with implementation of Project. The Fullerton Plan anticipated employment growth within the Southeast Industrial Focus Area (approximately 2,546 jobs associated with light industrial uses), and the number of jobs that would result from the Project is within The Fullerton Plan's expectations for the rate of job growth within the Southeast Industrial Focus Area. The anticipated growth from implementation of The Fullerton Plan, including the Southeast Industrial Focus Area, is also consistent with the growth assumptions in the Southern California Association of Governments' (SCAG's) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). Accordingly, implementation of the Project would not result in substantial unplanned growth in the City that could result in adverse environmental effects.

Further, there are no existing residential uses at the Project site and development of the Project would not necessitate the construction of replacement housing elsewhere.

6.1.5 PUBLIC SERVICES

Fire and police services are provided to the Project site by the Fullerton Fire Department (FFD) and Fullerton Police Department (FPD), respectively. The Project would not involve new residential uses or an increase in the City's population, and there is an existing demand for public services at the Project site associated with the existing development. The nearest FFD fire station is Station No. 3, located approximately 350 feet north of the Project site at 700 S. Acacia Avenue. The FPD operates from one station located at 237 West Commonwealth Avenue, approximately 1.8 miles northwest of the Project site. Consistent with the existing condition, the Project would create the typical range of service calls for the FFD and FPD that occur with the proposed industrial use. The Fullerton Plan includes policies and actions to ensure adequate resources are available to respond to health, fire, and police emergencies (Policy 13.2) and that the FFD is actively involved in the review of development projects to ensure the development would comply with fire management policies (Action 24.2) (Fullerton, 2012b). The City, FFD, and FPD regularly monitor resources to ensure that adequate facilities, staffing, and equipment are available to serve existing and future development and population increases. The Project would not require the

construction of new or alteration of existing fire or police protection facilities to maintain an adequate level of service to the Project area, and no physical environmental impacts would result.

The Project would not directly generate students, as it does not involve the development of residential land uses. Additionally, appropriate net developer impact fees, as required by State law (Section 65995(b) of the California Government Code), shall be assessed and paid by the Project Applicant to the Fullerton School District and Fullerton Joint Union High School District. The Project would not require the construction of new or expanded school facilities and no physical environmental impacts would result.

The City's Parks and Recreation Department operates various City parks and provides a wide range of recreational programs to the community. Because the Project does not propose new residential uses and would not result in a direct increase in the population within the City, it would not create a demand for parks or recreational facilities. The Project would not require the construction of new or expanded park or recreational facilities and no physical environmental impacts would result.

6.1.6 RECREATION

The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. In addition, the Project does not propose to construct any new on- or off-site recreation facilities. Accordingly, implementation of the Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, or substantial adverse environmental effects related to the construction or expansion of recreational facilities.

6.1.7 WILDFIRE

The Project site is in an urban area and is not located within a "Very High Fire Hazard Severity Zone." Accordingly, implementation of the Project would have no risks associated with wildfires.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental impacts of the Project are disclosed in Sections 4.1 through 4.13 of this EIR, and are summarized in the EIR Executive Summary. With incorporation of The Fullerton Plan EIR MMs, and Project-level MMs, the Project would result in less than significant impacts for each of the topical issues addressed in this EIR: Aesthetics, Air Quality, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Services Systems. There are no significant environmental effects which cannot be avoided if the Project is implemented.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(d) states:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or non-use thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Generally, a project would result in significant irreversible environmental changes if the following occurs:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project site has historically been developed with manufacturing and industrial uses, associated facilities, and landscaping. The Fullerton Plan anticipates that future development within the Southeast Industrial Focus Area will eventually support urban uses that would generate jobs and revenue. Thus, the Project would alter the Kimberly-Clark site and potential expansion site by converting the former Kimberly-Clark Fullerton Mill and two smaller industrial buildings, which ceased operations in 2020, to a contemporary four-building logistics center. As identified in Section 6.1, above, because no sensitive biological resources or mineral resources were identified within the Project site or in the vicinity, no significant impacts related to these issues would result from development of the project site. Additionally, although there is remnant of a previous orange orchard located on the Project site, this area is not designated at the State or local level for agricultural use. The fruit from the existing citrus trees is not harvested or sold.

Construction and long-term operation of the Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels and natural gas (e.g., for construction, vehicle operations) as well as lumber, sand/gravel, steel, copper, lead, and other metals (for use in building and internal roadway construction and utility infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation, including air quality (through the combustion of fossil fuels and production of greenhouse gases [GHGs]). However, their use is not expected to negatively impact the availability of these resources as the project remains consistent with the land use and zoning designations under The Fullerton Plan, which anticipates growth in the Southeast Industrial Focus Area. Further, with the removal of on-site manufacturing facilities, the Project would decrease the potable water demands from on-site operations.

An increased commitment of public services (e.g., police and fire) would also be required. Project development is an irreversible commitment of the land, energy resources, and public services. Consistent with the currently proposed redevelopment, after the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to permanently undeveloped conditions due to the large capital investment that would already have been committed.

6.4 GROWTH INDUCING IMPACTS OF THE PROJECT

CEQA requires that EIRs include a discussion of ways in which a proposed project could induce growth. The State CEQA Guidelines identify a project as growth-inducing if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment (State CEQA Guidelines, Section 15126.2[e]). New employees from future warehouse uses that are proposed by the Project represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen

through capital investment in new economic opportunities by the private or public sectors. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. This issue is presented to provide additional information on ways in which the Project could contribute to significant changes in the environment, beyond the direct consequences of implementing the Project examined in the preceding sections of this EIR.

1. **Would this Project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?** As identified in Section 6.3, Growth Inducing Impacts, of The Fullerton Plan EIR, none of the Focus Areas, including the Southeast Industrial Focus Area (which is where the Project is located), would involve development that would establish an essential public service or utility/service system. Urban development in the City of Fullerton and existing developments in the Focus Areas are already served by essential public services and an extensive network of utility/service systems and the other infrastructure necessary to accommodate or serve the existing conditions and planned growth. The existing public services and utility/service systems can be readily upgraded and/or extended onto the future development sites. Further, The Fullerton Plan identifies that future development would be reviewed on a project-by-project basis prior to the time of proposed construction in order to determine the public services and utility/service systems necessary to serve the proposed land uses. Buildout of The Fullerton Plan would not require substantial development of unplanned or unforeseen public services or utility/service systems. Therefore, The Fullerton Plan EIR concludes that implementation of The Fullerton Plan would not be growth-inducing with respect to removal of an impediment to growth through establishment of an essential public service or expansion to a new area. (Fullerton, 2012a) (Fullerton, 2012b)

   Consistent with the conclusions of The Fullerton Plan EIR, the Project would not involve the construction of any major roadways or infrastructure; existing and planned utility infrastructure and facilities are available adjacent to the Project site. New utility infrastructure would be required to serve the proposed development and would connect to existing utilities. The utility infrastructure installed as part of the Project would be sized and located expressly to serve the Project and would not, therefore, induce growth in the Project vicinity.

   The Project is consistent with The Fullerton Plan and does not require a General Plan amendment. Also, the project implements growth and development anticipated in the Southeast Industrial Focus Area, as identified in The Fullerton Plan. However, a Zone Change is requested for the southeastern portion of the site from M-G ES (Manufacturing General in an Emergency Shelter Overlay Zone) to M-P-200-ES (Manufacturing Park, 200,000 square-foot minimum lot size, in an Emergency Shelter Overlay Zone) for consistent zoning across the Project site and a uniform set of development standards to follow. The Project is not, therefore, considered to be growth-inducing with respect to the removal of obstacles to growth.

2. **Would this Project result in the need to expand one or more public services to maintain desired levels of service?** As identified in Section 6.1, above, consistent with the existing condition, the Project would create the typical range of service calls for the FFD and FPD that occur with the proposed industrial use. The Project would not necessitate the construction of new or the expansion of existing public service facilities in order to maintain desired levels of service. No demand for other public services (e.g., schools, parks, libraries) would occur with the Project and the facilities or associated resources of these services do not need to be expanded. In addition, the City has funding mechanisms in place through existing regulations and standard practices to accommodate future growth and the demand for public services. This Project would not, therefore, have significant growth-inducing consequences with respect to public services.

3. **Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?** During Project construction, a number of design, engineering, and construction-related jobs would be created. This would last until Project construction is completed. This would be an indirect, growth-inducing effect of the Project. As the Project is built and occupied, Project employees would seek shopping, entertainment, employment, home improvement, auto maintenance, and other economic opportunities in the surrounding area. This would represent an increased demand for such economic goods and services and could, therefore, encourage the creation of new businesses and/or the expansion of existing businesses that address these economic needs. However, it is expected that any such development would occur consistent with planned growth identified in The Fullerton Plan and the General Plans of nearby cities, including Placentia and Anaheim.

   The Project is located near existing commercial and retail areas that would help serve the needs of Project employees. However, the Project would not increase the residential population in the City and would not directly induce or cause unexpected growth in the area.

   As discussed under Section 6.1.4, above, the Project could result in a net increase of approximately 1,175 to 1,675 employment opportunities in the City. The Fullerton Plan anticipated employment growth within the Southeast Industrial Focus Area (approximately 2,546 jobs associated with light industrial uses), and the number of jobs that would result from the Project is within The Fullerton Plan's expectations for the rate of job growth within the Southeast Industrial Focus Area. The anticipated growth from implementation of The Fullerton Plan is also consistent with the growth assumptions in SCAG's RTP/SCS. It is expected that the short-term construction jobs and new positions during project operation would be filled by workers who already reside in the local area or region. Operation of the Project is not anticipated to generate a substantial permanent increase in population in the City, and the increase in demand for additional goods and services would be limited to those associated with employee demands.

4. **Would this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?** As identified above, the Project does not involve a General Plan amendment and is consistent with the

development and growth assumptions assumed in The Fullerton Plan for the Southeast Industrial Focus Area. A Zone Change would be needed to provide a consistent zoning designation for the Project site. However, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement this Project. The Fullerton Plan EIR and additional Project-level MMs have been identified in Sections 4.1 through 4.13 of this EIR to ensure that implementation of the Project complies with all applicable City plans, policies, and ordinances; these Project-level MMs would also ensure that there are no conflicts with adopted land development regulations and that environmental impacts are minimized. The Project does not propose any precedent-setting actions that, if approved, would specifically allow, or encourage other projects and resultant growth to occur.

6.4.8 REFERENCES

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SECTION 7.0 LIST OF EIR PREPARERS AND CONTRIBUTORS

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Matt Foulkes ..... Director of Community & Economic Development

Public Works Department

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Fire Department

David Rodriguez ..... Plan Check Specialist

7.1.2 T&B PLANNING (EIR PREPARATION)

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Emilie Colwell ..... Environmental Analyst
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7.2 EIR CONTRIBUTORS

7.2.1 ASM AFFILIATES (HISTORIC RESOURCE EVALUATION REPORT)

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7.2.2 URBAN CROSSROADS (AIR QUALITY, ENERGY, GREENHOUSE GAS, HEALTH RISK ASSESSMENT, NOISE, AND TRAFFIC ANALYSIS)

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Haseeb Qureshi ..... Associate Principal
Connor Paquin ..... Transportation Engineer
Charlene So, P.E. ..... Associate Principal
Alyssa Tamase ..... Analyst

7.2.3 HPA, Inc. (Building Plans)

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7.2.4 Southern California Geotechnical (Geotechnical Report)

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7.2.5 Tait & Associates, Inc. (Civil Engineer)

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7.2.6 PaleoServices, San Diego Natural History Museum (Paleontological Resources Report)

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7.2.7 Psomas (Water Supply Assessment)

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7.2.8 Stantec (Phase I and Phase II Environmental Site Assessments)

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