759 North Eckhoff Project

MITIGATED NEGATIVE DECLARATION NO. 1876-21

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1.0 MITIGATED NEGATIVE DECLARATION NO. 1876-21

Project Title:
759 North Eckhoff Project

Reference Application Numbers:
Major Site Plan Review No. 1046-21
Design Review No. 5041-21
Environmental Review No. 1876-21

Lead Agency:
City of Orange
300 East Chapman Avenue
Orange, CA92866

Contact Person and Telephone No.:
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Project Proponent and Address:
IDI Logistics
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Contact Person and Telephone No.:
Brandon Dickens, Vice President of Capital Deployment
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Project Location:
759 North Eckhoff Street,
Orange, CA 92867

Existing General Plan Designation:
Light Industrial Max 1.0 Floor Area Ratio (FAR), 3-story height limit

Existing Zoning Classification:
Light Industrial (M1)

INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from the implementation of the 759 North Eckhoff Project ("Project") in the City of Orange, California. According to the California Environmental Quality Act ("CEQA") Guidelines Section 15367, the City of Orange ("City") is the Lead Agency in the preparation of this IS/MND and any additional documentation required for the Project. The City has discretionary authority over the Project.

The Project entails a proposed Major Site Plan Review No. 1046-21, Design Review No. 5041-21, and Environmental Review No. 1876-21. Approval of Project entitlements would allow for redevelopment of the 12.69-acre site with two 41.5-foot (ft) tall warehouse buildings comprised of approximately a 189,566 square foot (sf) building to the west (Building 1) and a 103,196-sf building to the east (Building 2). Building 1 would include 178,966 sf warehousing, 10,600 sf of two-story office space, and 25 dock doors. Building 2 would include 91,696 sf of warehousing, and 11,500 sf of two-story office space, and 11 dock doors. The Project would have a maximum floor area ratio (FAR) of 0.75 and would provide 268 parking stalls (collectively referred to as the "Project"). The redevelopment would require the demolition of the existing operating manufacturing facility and associated parking areas.

The remainder of this section provides a description of the Project's location and characteristics. Section 2 of this IS/MND includes an environmental checklist giving an overview of the potential impacts that may result from Project implementation. Section 3 elaborates on the information

contained in the environmental checklist within Section 2, along with justification for the responses provided in the environmental checklist.

EXISTING SETTING

Regional Setting:

The Project site is located at 759 North Eckhoff Street in the City of Orange, Orange County, California. As shown in Figure 1, *Regional Location Map*, the City of Orange is in the north-central portion of Orange County. The City of Anaheim borders the City to the north and northwest. The City of Garden Grove borders the west and the Cities of Santa Ana, Tustin, and unincorporated Orange County border the City to the east and south. Interstate 5 (I-5) is located approximately 1.0 miles southwest of the Project site and State Route 57 (SR-57) is located approximately 0.24 miles to the west. Regional access to the site is provided by SR-57 via West Orangewood Avenue located approximately 0.37 miles to the southwest.

Local Setting:

As shown in Figure 2, *Local Vicinity Map*, the approximate 12.69-acre Project site (Assessor Parcel Numbers (APNs) 386-371-20, 386-371-30, and 386-371-32) is generally located north of West Sequoia Avenue, east of North Eckhoff Street, south of Burlington Northern Santa Fe (BNSF) Railroad, and northwest of North Poplar Street.

Existing Site Conditions:

The site is currently occupied and being used by National Oilwell Varco, a manufacturer of equipment and components used in oil, gas drilling, and production operations. Site improvements consist of five structures, outdoor storage, outdoor parking areas, and exterior landscaping. The site is accessed via two two-way driveways along North Eckhoff Street and one two-way driveway at the northwest cul-de-sac of North Poplar Street.

General Plan:

The Project site is designated Light Industrial in the City of Orange General Plan. The Light Industrial designation allows for the manufacturing, processing, and distribution of goods. Wholesale activities associated with industrial operations, as well as small-scale, support retail, service commercial, and office use may also be established in areas with ready access to major circulation routes. A 3-story building height limit and maximum floor area ratio of 1.0 applies within the Light Industrial designation. (Orange, 2015a)

Zoning:

According to the City of Orange Zoning Map, the site is zoned as Light Industrial (M1) (Orange, 2016). M1 district is intended to retain, enhance, and intensify existing, and provide for the new development of light industrial uses. This zone classification implements the Light Industrial General Plan land use designation.

Surrounding Land Uses:

The surrounding properties possess an urban and industrial character like the Project site. Surrounding land uses are as follows:

North:

The property to the north of the Project site, on the opposite side of the BNSF Railroad, is designated for Light Industrial uses. North of and along Collins Road includes Urban Mixed Use, General Commercial, and Public Facilities uses.

East:

The property to the east of the Project site is designated for Light Industrial uses. This area contains the BNSF railroad as it continues in a southeasterly direction and various industrial buildings, indoor and outdoor storage facilities, and outdoor parking areas.

South:

The property to the south of the Project site is designated for Light Industrial uses and Neighborhood Office Professional uses to the southwest. This area contains industrial buildings and commercial offices.

West:

The properties to the immediate west of the Project site are designated for Light Industrial uses, and include several industrial and commercial business.

PROJECT DESCRIPTION

Project Purpose

The Purpose of the Project is to implement the City's vision of redeveloping underutilized parcels with intensified uses, such as general light industrial and warehouse. The Project involves the demolition of the existing five industrial structures, see Figure 3, and redevelopment of the Project site with two warehouse buildings collectively totaling to 292,762 sf. As depicted on Figure 4, *Proposed Site Plan*, Building 1 would be composed of approximately 189,566 sf of warehouse space, including 10,600 sf of two-story office; and Building 2 would be composed of approximately 103,196 sf of warehouse space, including 11,500 sf of two-story office use.

Architecture and Design Feature

Development of the Project would enhance and strengthen the existing urban and industrial character of the site and surrounding area with new modern building elevations and through new landscaping, hardscape, other on-site improvements, and street frontage improvements. As shown in Figure 5, *Architecture and Design Features*, the proposed buildings would consist of concrete tilt-up panels predominantly painted with whites and light grays, with areas of contrast via dark gray eleganza tile, white awnings over the entrances, dark gray paint, windows with both light gray tinted glazing and clear anodized mullions, and a brown painted parapet roof. Building 1 would have a maximum height of 41.5 feet, would be setback 20 feet from North Eckhoff Street, and would feature 25 dock doors located on the north. Building 2 would have a maximum height of 41.5 feet, would be setback 20 feet from North Poplar Street, and would feature 11 dock doors located on the south. The final design and architectural style of the proposed buildings are subject to review and approval by the City's Design Review Committee.

Site Access

As stated, vehicular access is currently provided via two two-way driveways along North Eckhoff Street and one two-way driveway at the northwest cul-de-sac of North Poplar Street. Under Project conditions, vehicular access would remain the same with roadway improvements to the northern entryway along North Eckhoff Street and cul-de-sac entry along North Poplar Street.

The proposed buildings would generate truck trailer trips and trucks would be required to utilize City designated truck routes to and from the Project site. Truck trailers would travel to and from the site from the SR-57, Katella Avenue, and West Orangewood Avenue. Truck trailer travel would be limited to the following routes:

- Truck-trailers exiting the site would travel south on North Eckhoff Street and turn right on West Orangewood Avenue to access the SR-57. Alternatively, truck-trailers exiting the site would travel south on North Poplar Street and make a right turn on West Orangewood Avenue from either North Eckhoff Street or North Poplar Street.

- Truck-trailers entering the site would exit the SR-57 at West Orangewood Avenue and turn right on either North Eckhoff Street or North Poplar Street.

The implementation of the Project would not require the widening of surrounding roadways to accommodate truck-trailer traffic.

Parking

According to the Orange Municipal Code (OMC) Chapter 17.34, *Off-Street Parking and Loading*, the Project is required to provide 261 parking stalls. As depicted on Figure 4, the Project would provide 268 parking stalls, including 257 standard stalls, 7 Americans with Disabilities Act (ADA) standard stalls, and 4 ADA van stalls. Additionally, the Project would provide 22 motorcycle parking stalls and bike racks.

Landscaping, Lighting, and Walls

As depicted on Figure 6, *Conceptual Landscape Plan*, the Project Applicant will incorporate ornamental landscaping at the site's frontage and within the parking lot. A minimum of 8 36-inch box and 171 24-inch box trees would be planted. A comprehensive landscape plan is provided for the Project, which includes a variety of new trees, shrubs, and groundcover. The Project would be required to comply with the landscape standards established in the City's Municipal Code (Chapter 16.50, *Landscape Requirements*).

Exterior lighting would be installed on-site, as necessary, for safety and security. Decorative architectural lighting would also be installed to accent building entries as focal points throughout the site.

The Project Applicant would install an approximately 8-foot high wrought iron fencing along the site's northern perimeter to enclose the proposed buildings, parking area, truck court, and loading dock area. The fence would also serve as a safety precaution to protect visitors and/or employees on-site from vandalism and theft and from traversing the BNSF Railroad track immediately east of the site.

Construction and Phasing

Construction of the Project is expected to occur over approximately 16 months. This construction schedule is shown in Table 1, *Construction Duration*, and includes: demolition/crushing, site preparation, grading; building construction, paving, and architectural coating.

Table 1 Construction Duration

Phase Name	Days
Demolition/Crushing	110
Site Preparation	10
Grading	30
Building Construction	218
Paving	20
Architectural Coating	40

Source: (Urban Crossroads, 2021a)

A summary of construction equipment by phase is provided at Table 2, *Construction Equipment Assumptions*. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 2 will operate up to a total of eight hours per day, or more than two-

thirds of the period during which construction activities are allowed pursuant to the City of Orange Municipal Code.

Table 2 Construction Equipment Assumptions

Phase Name	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Crushing/Proc. Equipment	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Crawler Tractors	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2021a)

Dry Utilities and Service Systems

Plans for utilities that would serve the proposed use under the Project would include the provision of electricity by Southern California Edison (SCE), telecommunications facilities including telephone and fiber-optic lines by AT&T, and solid waste by CR&R Waste and Recycling Services. All new dry utility infrastructure would be installed underground and within the Project site.

Infrastructure Improvements

Water

The City's Public Works Water Division provides potable water service to the Project site and would continue to do so for the Project. Potable water to the site is provided via internal water lines that connect to the existing public water 10-inch main along North Eckhoff Street.

Wastewater

The City's Public Works Department provides wastewater collection services to the existing manufacturing facility and would continue to do so for the Project. Wastewater collected by the City flows through a system of regional trunk lines to Reclamation Plant No. 1 (located within the City of Fountain Valley) and No.2 (located within the City of Huntington Beach) for treatment; the reclamation plants are owned and operated by the Orange County Sanitation District (OCSD).

The Project would include internal wastewater lines that connect to the existing public sewer main along North Eckhoff Street and Poplar Street that is operated by the City's Public Works Department. Proposed wastewater infrastructure improvements would entail trenching and exposing existing lines on-site for connection, and installing new lines, and a break-in connection to the existing mainline. No off-site sewer main construction or upsizing would be required to accommodate the Project. However, some construction may occur within North Eckhoff Street and Poplar Street to make the necessary infrastructure connections. The sewer mains would continue to be maintained by the City, and the proposed lateral connections and other on-site sewer lines would be maintained by the property owner.

Stormwater

Under existing conditions, stormwater on-site differs from the City's Master Plan of Drainage. Currently, stormwater on-site flows westerly towards North Eckhoff Street from the western portions of the site, southerly from the northern and central areas of the site, and easterly towards North Poplar Street from the eastern portion of the site.

Proposed conditions would alter the existing condition drainage patterns as well as drainage divides shown in the City's Master Plan of Drainage. The tributary runoff to Eckhoff Street would be reduced, thus providing relief to the street and downstream facilities. An on-site storm drain system is proposed to direct the majority of the Project site flows easterly to a proposed storm drain in North Poplar Street. This storm drain would continue southerly and connect to the existing 54-inch storm drain system. Since there would be some redirection of runoff with additional area tributary to the existing storm drain at the corner of North Poplar Street and Sequoia Avenue, detention will be utilized to reduce runoff to less than existing conditions and from the City's Master Plan of Drainage.

A detailed description of the proposed drainage system for the Project site is provided in the Project's Hydrology Report (Appendix M) and Preliminary Water Quality Management Plan (WQMP; Appendix N).

Other Public Agencies Whose Approval is Required (Responsible or Trustee Agencies):

The City of Orange, as Lead Agency, has the discretionary authority over the Project. To implement this Project, the Project Applicant would need to obtain the following permits/approvals from the City:

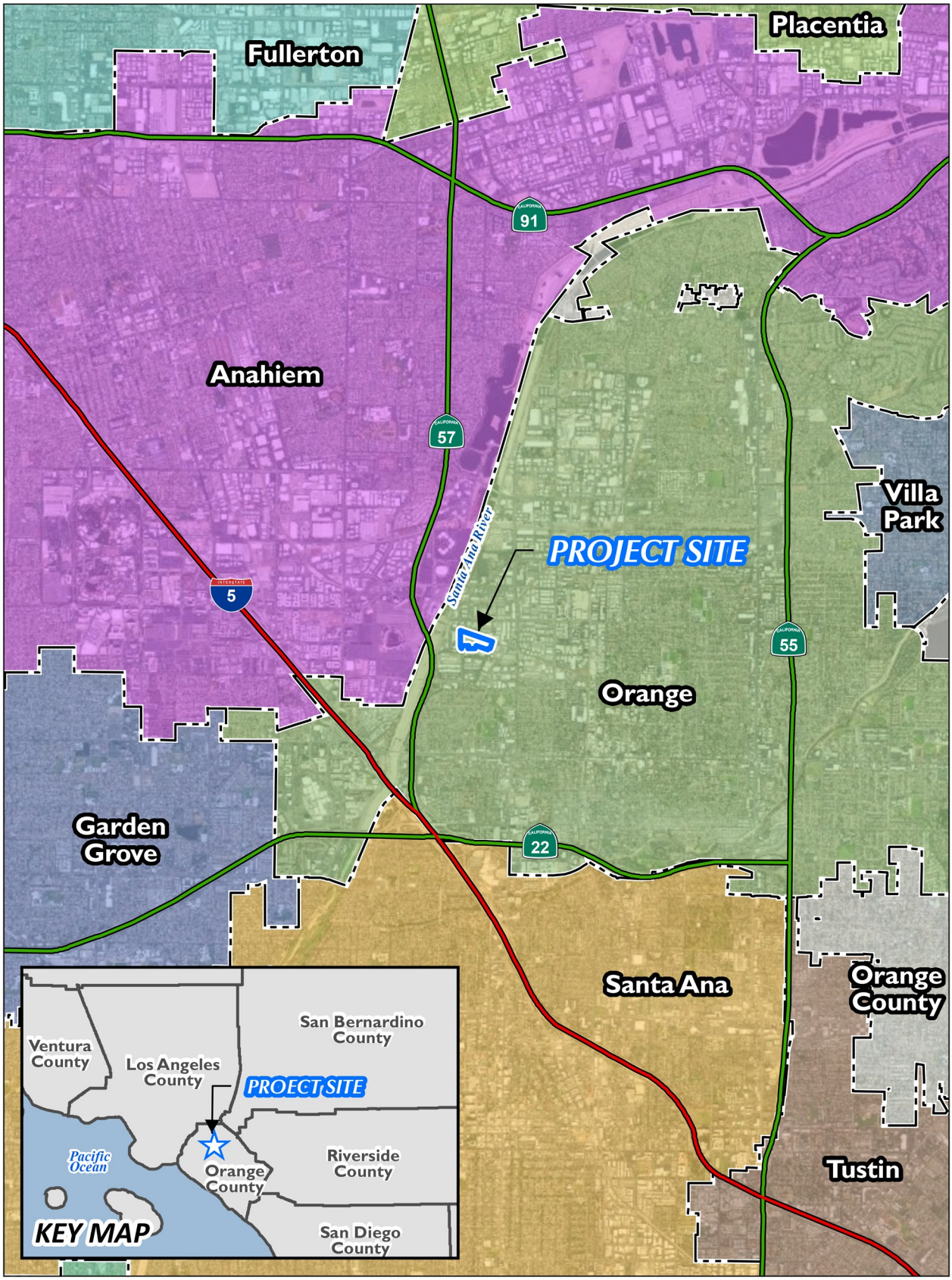
- Adoption of the Initial Study/Mitigated Negative Declaration (Environmental Review No. 1876-21)
- Adoption of the Mitigation Monitoring and Reporting Program
- Major Site Plan Review No. 1046-21
- Design Review No. 5041-21
- Demolition permits for on-site structures and other improvements
- Grading and Building Permits to grade and construct the Project

The Project Applicant would need to obtain the following permits from other agencies:

- Orange County Sanitation District (OCFCD) Municipal Stormwater Permit
- South Coast Air Quality Management District – Construction-related permits (if applicable)

Scheduled Public Meetings or Hearings:

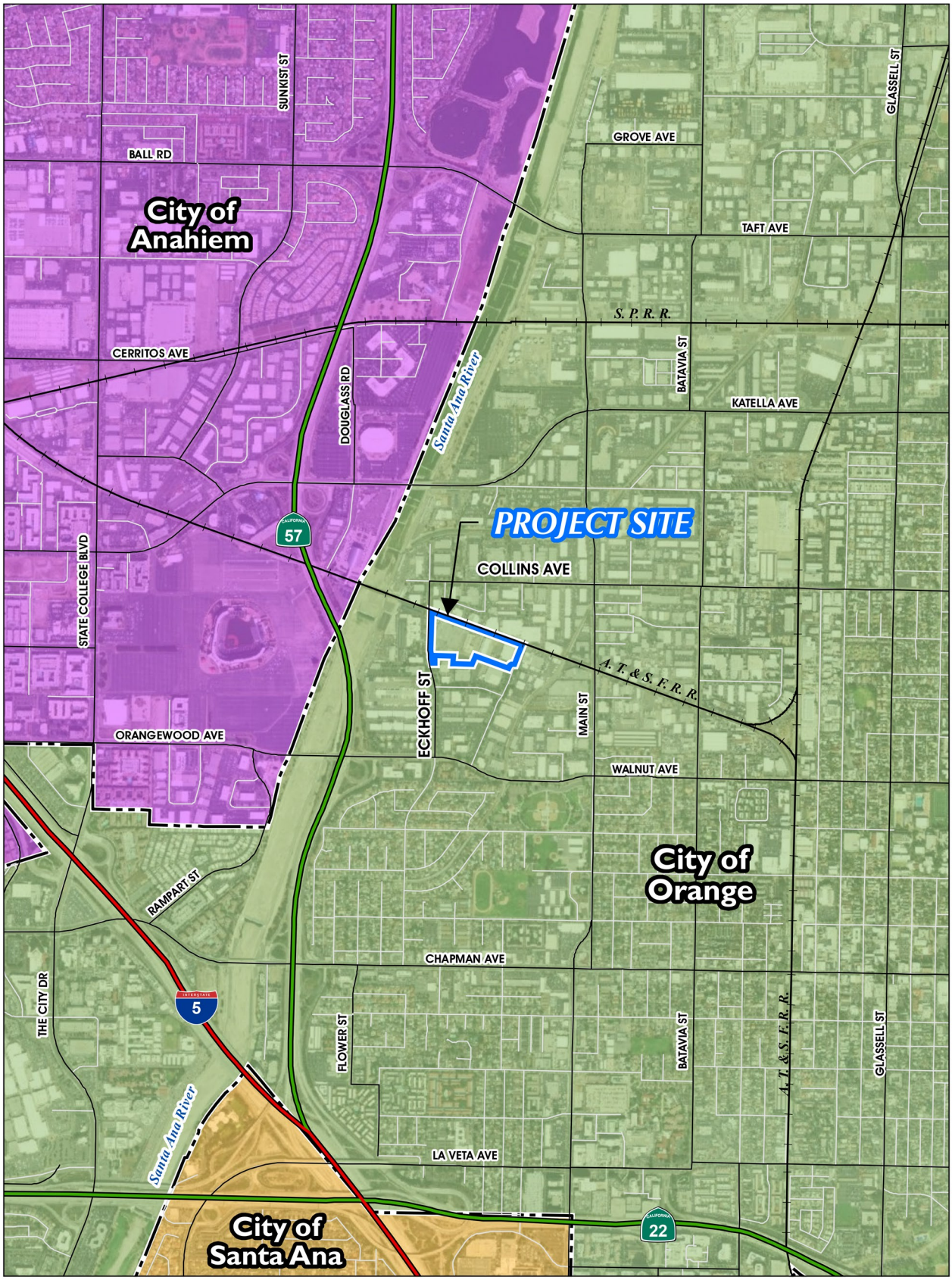
To be determined, separate noticing will be given for public hearings.



Source(s): ESRI, OC Landbase (2021)

Figure 1

Regional Location Map



Source(s): ESRI, OC Landbase (2021)

Figure 2

0 500 1,000 2,000 Feet

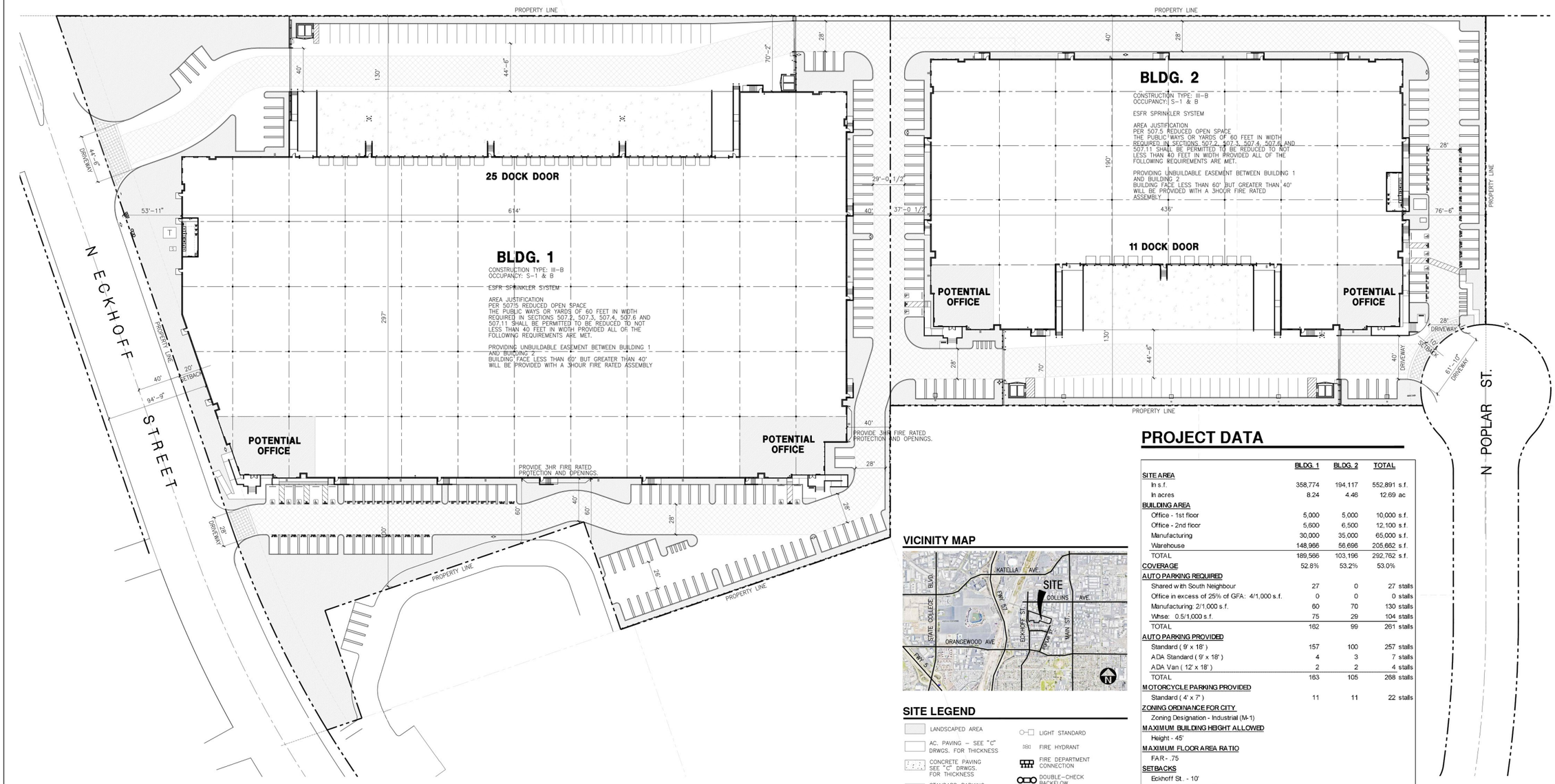
Local Vicinity Map

Source(s): ESRI, OC Landbase (2021)

Figure 3

0 75 150 300 Feet

Aerial Photograph



PROJECT DATA

	BLDG. 1	BLDG. 2	TOTAL
SITE AREA			
In s.f.	358,774	194,117	552,891 s.f.
In acres	8.24	4.46	12.69 ac
BUILDING AREA			
Office - 1st floor	5,000	5,000	10,000 s.f.
Office - 2nd floor	5,600	6,500	12,100 s.f.
Manufacturing	30,000	35,000	65,000 s.f.
Warehouse	148,966	56,696	205,662 s.f.
TOTAL	189,566	103,196	292,762 s.f.
COVERAGE	52.8%	53.2%	53.0%
AUTO PARKING REQUIRED			
Shared with South Neighbour	27	0	27 stalls
Office in excess of 25% of GFA: 4/1,000 s.f.	0	0	0 stalls
Manufacturing: 2/1,000 s.f.	60	70	130 stalls
Whse: 0.5/1,000 s.f.	75	29	104 stalls
TOTAL	162	99	261 stalls
AUTO PARKING PROVIDED			
Standard (9' x 18')	157	100	257 stalls
ADA Standard (9' x 18')	4	3	7 stalls
ADA Van (12' x 18')	2	2	4 stalls
TOTAL	163	105	268 stalls
MOTORCYCLE PARKING PROVIDED			
Standard (4' x 7')	11	11	22 stalls
ZONING ORDINANCE FOR CITY			
Zoning Designation - Industrial (M-1)			
MAXIMUM BUILDING HEIGHT ALLOWED			
Height - 45'			
MAXIMUM FLOOR AREA RATIO			
FAR - .75			
SETBACKS			
Eckhoff St. - 10'			
Interior side & Rear - 0'			
LANDSCAPE REQUIRED			
Percentage	10%		10%
LANDSCAPE PROVIDED			
Percentage of net	13%		10%
in sq. ft.	45,832 s.f.		18,492 s.f.

Source(s): HPA (01-17-2023)

Figure 4

Not to Scale

Proposed Site Plan

North Elevation

West Elevation

South Elevation

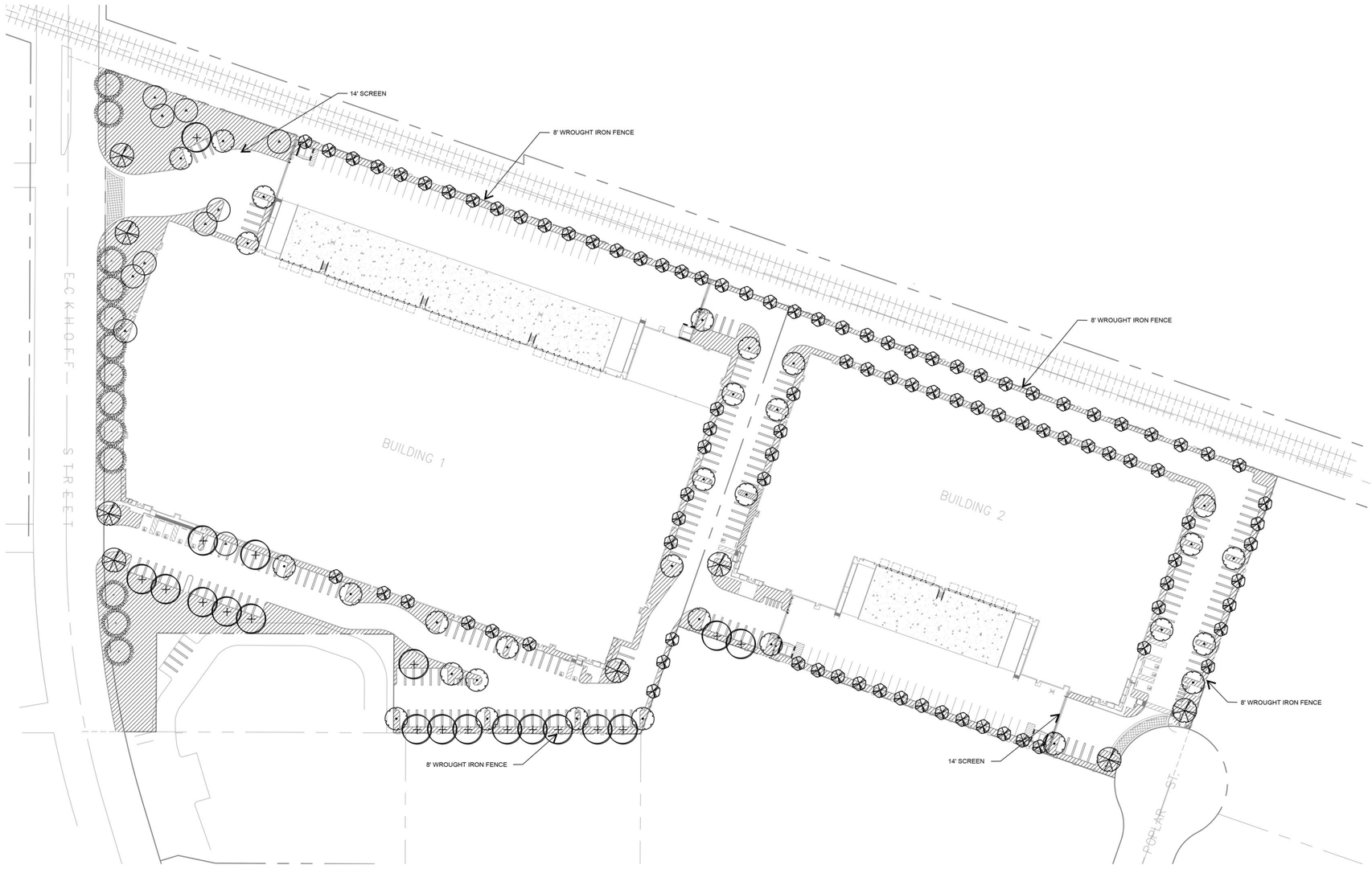
East Elevation

Source(s): HPA (07-27-2021)

Figure 5

Not to Scale

Architecture and Design Features



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Magnolia g. 'Samuel Sommer' Magnolia	36" Box	8	M	Standard
	Podocarpus gracilior Yew Pine	24" Box	31	L	Standard
	Pinus canariensis Canary Island Pine	24" Box	10	M	Standard
	Pistacia chinensis Chinese Pistache	24" Box	19	L	Standard
	Platanus acerifolia London Plane	24" Box	13	M	Standard
	Tristania conferta Brisbane Box	24" Box	98	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Feijoa sellowiana Pineapple Guava	5 Gal		M	
	Heteromeles arbutifolia Toyon	5 Gal		L	
	Leucophyllum f. 'Green Cloud' Texas Ranger	5 Gal		L	
	Ligustrum j. Texanum Texas Privet	5 Gal		M	
	Nassella tenuissima Mexican Feather Grass	5 Gal		L	
	Pennisetum orientale Oriental Fountain Grass	5 Gal		L	
	Salvia 'Bee's Bliss' Bee's Bliss Sage	5 Gal		L	
	Salvia greggii Autumn Sage	5 Gal		L	
	Westringia fruticosa Coast Rosemary	5 Gal		L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave 'Blue Glow' Blue Glow Agave	5 Gal		L	
	Aloe striata Coral Aloe	1 Gal		L	
	Agave villmoriniana Octopous Agave	5 Gal		L	
	Dasylirion wheeleri Desert Spoon	5 Gal		L	
	Hesperaloe parviflora Red Yucca	5 Gal		L	
	Agave angustifolia 'Marginata' Variegated Caribbean Agave	5 Gal		L	

GROUNDCOVER

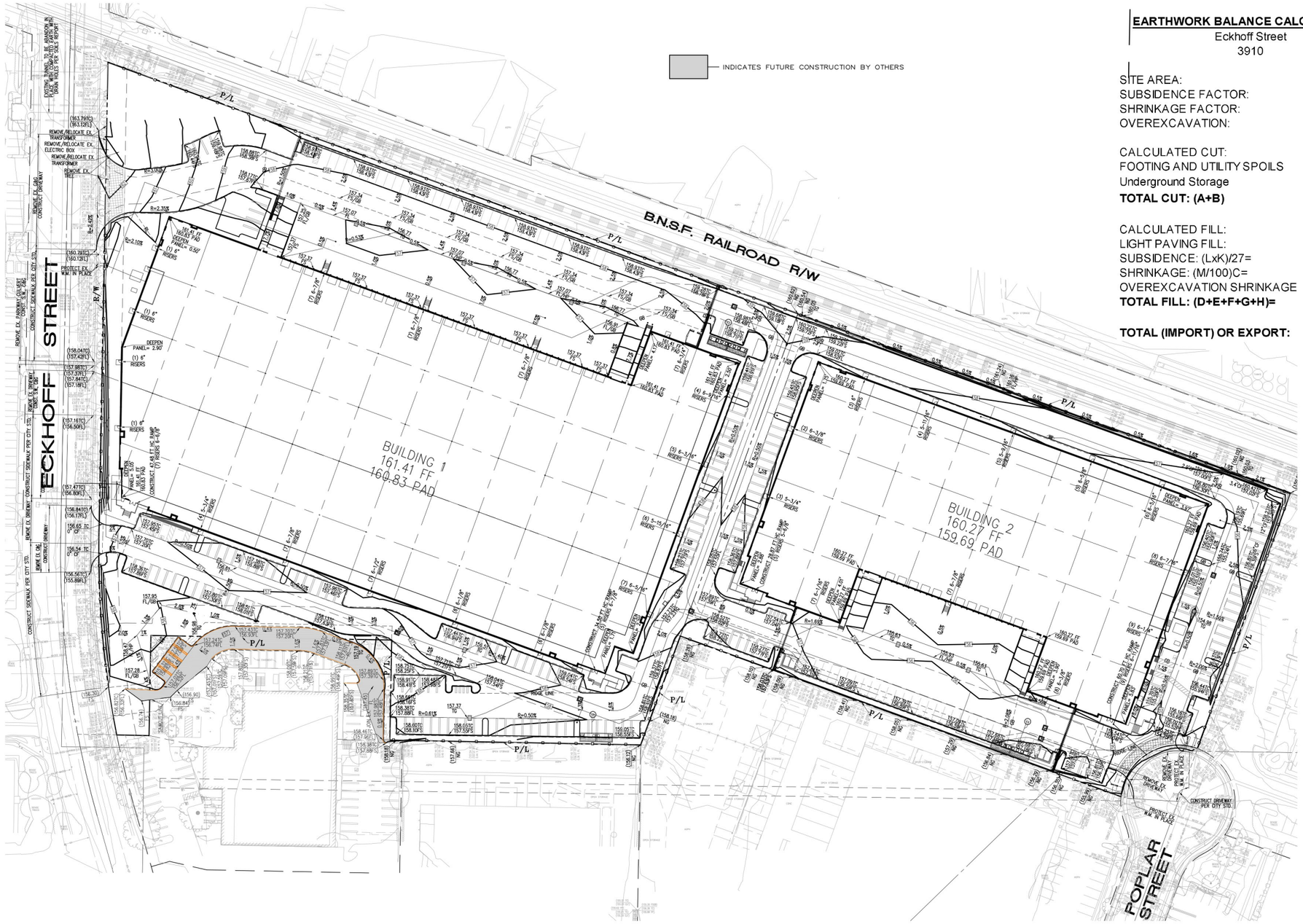
SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Low Boy Trailing Acacia	1 Gal	6' O.C.	L	
	Myoporum pacificum Myoporum	1 Gal	48" O.C.	L	
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	
	Cistus 'Sunset Pink' Pink Rock Rose	1 Gal	48" O.C.	L	
	Senecio mandraliscae Blue Chalksticks	1 Gal	24" O.C.	L	
	Rosmarinus 'Huntington Carpet' Huntington Carpet Rosemary	1 Gal	48" O.C.	L	

Source(s): Hunter Landscape (11-01-2022)

Figure 6

Not to Scale

Conceptual Landscape Plan



EARTHWORK BALANCE CALCULATIONS

Eckhoff Street
3910

SITE AREA:	545,546	SF
SUBSIDENCE FACTOR:	0.063	
SHRINKAGE FACTOR:	5.0	%
OVEREXCAVATION:	53,700.00	CY
CALCULATED CUT:	17,609	CY
FOOTING AND UTILITY SPOILS	**2,023**	CY
Underground Storage	**2,189**	
TOTAL CUT: (A+B)	**21,821**	CY
CALCULATED FILL:	16,782	CY
LIGHT PAVING FILL:	-	CY
SUBSIDENCE: (LxK)/27=	1,263	CY
SHRINKAGE: (M/100)C=	1,091	CY
OVEREXCAVATION SHRINKAGE	2,685	CY
TOTAL FILL: (D+E+F+G+H)=	**21,821**	CY
TOTAL (IMPORT) OR EXPORT:	**0**	CY

Source(s): Thienes Engineering, Inc. (01-16-2023)

Figure 7

Not to Scale

Proposed Grading Plan

2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture & Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION. On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐

2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒

3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

4. I find that the proposed project **may have a "potentially significant impact" or "potentially significant unless mitigated impact"** on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐

5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Robert Garcia Senior Planner — *Name, Title*

January 26, 2023 — *Date*

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced, as discussed below).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identity the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.

   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a. the significance criteria or threshold, if any, used to evaluate each question; and

   b. the mitigation measure identified, if any, to reduce the impact to less than significance.

3.0 ENVIRONMENTAL IMPACT ISSUES

	1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
(b)	Substantially damage 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 and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning or 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?	☐	☐	☒	☐

Impact Analysis

a) Have a substantial adverse effect on a scenic vista?

Significance Determination: No Impact

A significant impact would occur if a project were to introduce incompatible scenic elements within a field of view containing a scenic vista or substantially block views of a scenic vista. Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area.

According to the Natural Resources Element of the City's General Plan, portions of the City of Orange are characterized by scenic vistas that include hillsides, ridgelines, or open space areas that provide a unifying visual backdrop to the urban environment. The Project site is within the western portion of the City, where the topography is relatively flat, and very little open space exists. The Project site does not contain any scenic resources and there are no scenic vistas within proximity to the site. As shown on Figure 8 through Figure 9, the Project area is within a highly urbanized industrial area. Implementation of the Project would not have an impact to a scenic vista.

Mitigation Measures: Mitigation measures are not required.

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

Significance Determination: No Impact

Under existing conditions, the Project site does not contain any scenic resources such as, rock outcroppings, or historic buildings. The Project site contains street trees at the site's frontage along North Eckhoff Street. Implementation of the Project would result in the removal and replacement of street trees. The Project Applicant would be required to obtain a tree removal permit, per City Municipal Code Section 12.28.020 (*Permit-Required for Removal or Planting*).

Based on the California Department of Transportation (Caltrans) List of Eligible and Officially Designated State Scenic Highways, there are no designated or eligible State scenic highways located in proximity to the Project site (Caltrans, 2019). The nearest State designated scenic highway is a 4.2-mile portion of State Route 91 (SR-91) starting at State Route 55 (SR-55) to the city line of Anaheim located approximately 3.9 miles northeast (Google Earth, 2021). Implementation of the Project would not have the potential to substantially damage scenic resources within a State scenic highway corridor. No impact would occur.

As shown in Figure NR-4, Viewscape Corridors, of the General Plan, the City identifies the visual corridors within the City limits. Figure NR-4 identifies the 4.2-mile portion of SR-91, Newport Boulevard from Crawford Canyon Road to Chapman Avenue, and Chapman Avenue to Santiago Canyon Road, a City designated scenic highway (Orange, 2010b). Due to site distance and topography, implementation of the Project would not have the potential to substantially damage scenic resources within City designated scenic corridors. No impact would occur.

Mitigation Measures: Mitigation measures are not required.

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

Significance Determination: Less than Significant Impact.

As shown in Figure 8 and Figure 9, the Project site is within an urbanized area of the City. Because the Project is in an urbanized area, the potential impacts of the Project under this threshold are assessed based on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. As described in further detail below, the Project is consistent with the City's General Plan and zoning designations for the site, including regulations that govern scenic quality.

<u>City of Orange General Plan</u>

As previously stated, the Project site is designated for Light Industrial uses. The Project includes the redevelopment of the Project site with two buildings totaling to 292,762 sf. Table 3, *General Plan Consistency Analysis*, below discusses the Project's consistency with the General Plan goals related to scenic quality.

Table 3 General Plan Consistency Analysis

Goals and Policies	Project Consistency
Land Use Element	
Maximum Intensity • 1.0 Floor Area Ratio (FAR)	**Consistent.** The Project site is designated for Light Industrial uses. The Light Industrial land use designation allows for a maximum FAR of 1.0. As shown on the Project's site plan, the Project would have a FAR of 0.53. Therefore, the Project would not exceed the maximum permitted FAR.
Height Limit • 3 Stories	**Consistent.** The Project would redevelop the site with two buildings totaling to 292,762 sf that would include first floor office and second floor office space. The proposed buildings would be single-story and constructed up to a height of 41.5 feet. The Project would not construct 3 stories and would therefore not exceed the permitted maximum height.
Policy 6.1: Ensure that new development is compatible with the style and design of established structures and the surrounding environment.	**Consistent.** The Project would redevelop the site with modern buildings. The Project's proposed style and design would be compatible with the surrounding environment.

Based on the foregoing analysis, the Project would not conflict with the site's underlying zoning classification or other regulations governing scenic quality. Impacts would be less than significant.

City of Orange Municipal Code

The Project site is zoned Light Industrial (M1) and as such, the Project would be required to comply with the development standards established in Chapter 17.20, *Industrial Districts*, of the City's Municipal Code. The intent and purpose of Chapter 17.20 are to encourage industrial facilities and related uses while recognizing the potential for compatibility between uses through appropriate development and performance standards (Orange, 2020). Chapter 17.20 also intends to promote orderly growth and development through minimal performance standards, sustained property values, protected public safety and health, and further amenities to achieve an environment that is commensurate with prolonged future growth, development, and economic stability. Table 4, *Zoning Development Standards Consistency Analysis*, addresses the Project's consistency with applicable development standards outlined in the City's Municipal Code.

Table 4 Zoning Development Standards Consistency Analysis

Applicable Development Standard	Project Consistency
Light Industrial (M1) Zoning District	
Maximum Permitted Building Height • 45 feet	**Consistent.** The Project involves the redevelopment of the Project site with two 41.5-foot tall buildings. Therefore, the Project's proposed building height would comply with the City's permitted height in the M1 zone.
Development Setbacks • Exterior Front, Side, and Rear Yards o When adjacent to or across from an alley from a residential zone – 20 feet o When adjacent to an arterial street – 20 feet	**Consistent.** The Project site is located immediately east of North Eckhoff Street, a local street. The Project's closest setback to North Eckhoff Street will be 20 feet. The Project site is bordered to the east, south, and west by separate parcels containing existing development. The Project's interior side and rear setbacks will be greater than 0 feet.

Applicable Development Standard	Project Consistency
○ When adjacent to a local street – 10 feet • Interior Side and Rear Yards ○ When adjacent to a separate parcel – 0 Feet	Therefore, the Project would comply with the City's required development setbacks.
Landscaping Requirements • Promote a comprehensive planning effort in which all design elements of a project complement each other and are compatible with their surroundings. In addition, landscape design must be suitable for the topography and coordinated with the preparation of the site grading plan.	**Consistent.** The Project would incorporate a Project-specific landscape plan, as shown in 1.0 Figure 6,that is designed in accordance with the City's Landscape Ordinance. The Project's proposed landscaping would include drought tolerant trees, shrubs, and groundcover. Ornamental landscaping would be provided along the site's perimeter and parking lot area. Additionally, ornamental trees and shrubs are proposed along the proposed buildings' perimeters. Therefore, the Project is consistent with the City's landscape requirements.
Screening of Mechanical Equipment • Shielded from view – All mechanical and air conditioning equipment shall be shielded and screened from view from adjacent streets and properties. The screening shall be architecturally integrated with the building. Ground-mounted equipment screening shall consist of a solid wall, solid fence, or sufficient landscaping. Otherwise, such equipment shall be enclosed in a building. • Setback Required – Mechanical equipment shall not be located in required yards or other setback areas.	**Consistent.** Roof-mounted mechanical equipment would be shielded and screened from view from the neighboring properties and North Eckhoff Street. The proposed shielding and screening would be integrated with the building's design to seamlessly screen the mechanical equipment. The Project does not propose to locate mechanical equipment in yard or setback areas. Therefore, the Project is consistent with the City's requirements to screen mechanical equipment.
Trash enclosures • All developments shall be provided with trash collection areas adequately and conveniently placed throughout the development. Trash collection areas shall be screened from view on 3 sides by a 6-foot-high wall. A visually opaque, self-latching gate shall be provided.	**Consistent.** The proposed trash enclosure for the Project would screen views on 3 sides with a 6-foot-high wall and will provide a visually opaque self-latching gate to access the trash enclosure. Therefore, the Project is consistent with the City's requirements for trash enclosures.
Undergrounding of Utilities • Utility lines shall be required to be placed underground within all commercial or professional development, planned residential development, and residential subdivisions.	**Consistent.** The Project would install new utility lines underground connecting to the existing utility mains within North Eckhoff Street. Therefore, the Project is consistent with the City's requirement to underground utilities.

Mitigation Measures: Mitigation measures are not required.

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

Significance Determination: Less than Significant Impact.

The Project site is currently developed with a manufacturing use (National Oilwell Varco) and is surrounded by existing industrial development. The Project site generates artificial lighting from

building-mounted light fixtures and parking lot lighting. The Project site is within an urbanized area that includes several sources of artificial lighting including interior and exterior building lighting, parking lot lighting, security lighting, and street lighting along North Eckhoff Street. Other sources of artificial light include vehicle headlights traveling along North Eckhoff Street.

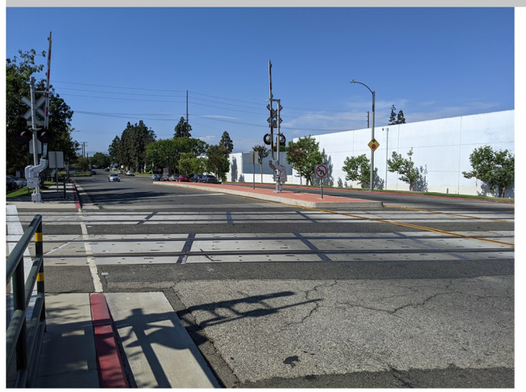
The Project would introduce new sources of light as necessary for security, safety, and wayfinding. The Project's proposed lighting would be similar to existing conditions; therefore, implementation of the Project would not introduce new sources of light that would substantially affect day or nighttime views in the area. Additionally, the Project's proposed lighting is required to be consistent with City Municipal Code Section 17.12.030, Lighting, and Section 17.20.280, Emission of Lighting, Glare, Dust, and Heat, which states that lighting shall be directed, controlled, screened, or shaded in a manner as not to shine directly on surrounding premises (Orange, 2020).

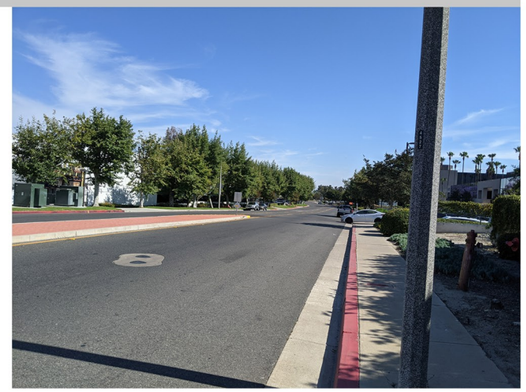
Glare is caused by light reflections from the pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. The proposed buildings are located at the terminus of a cul-de-sac within a buildout area and will be constructed of concrete tilt-up walls. The Project's proposed building materials would not result in potential glare impacts within the Project site or surrounding areas, and notably at the street level. Low-reflective windows would be provided at the proposed office areas. Implementation of the Project would not introduce new sources of glare that would substantially affect day or nighttime views in the area.

Mitigation Measures: Mitigation measures are not required.

VIEW 1

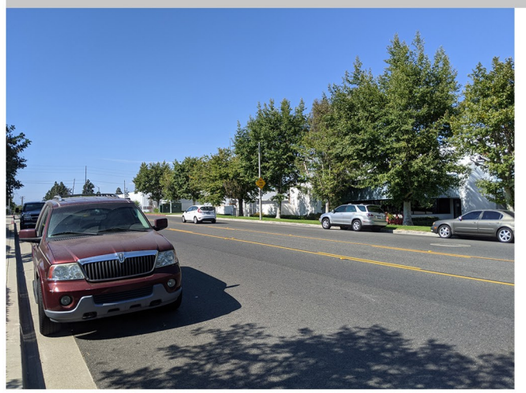
Northwest of the Project Site, at the intersection of Eckhoff St. & A.T. & S.F. Railroad, looking Northeast to Southeast.

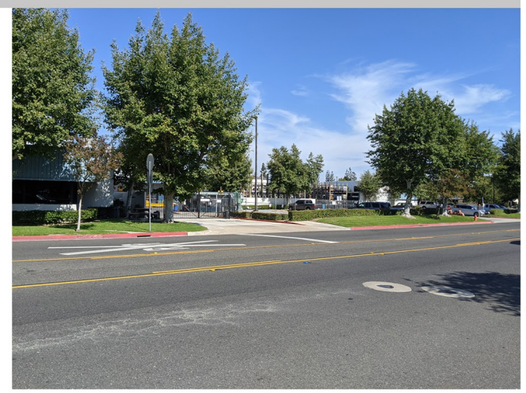


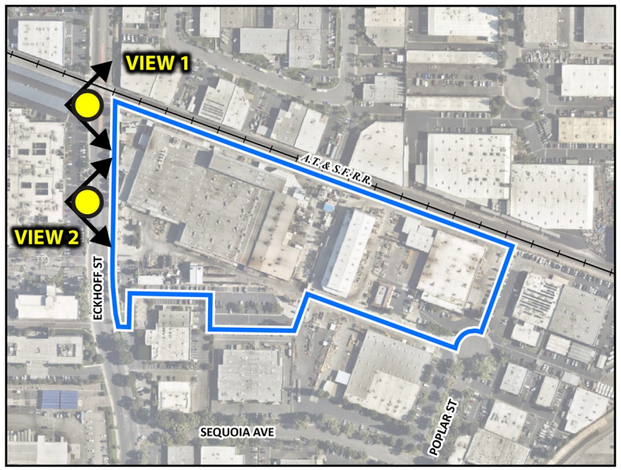


VIEW 2

West of the Project Site, along Eckhoff St., looking Northeast to Southeast.







Source(s): Nearmap Imagery (2021)

Key Map

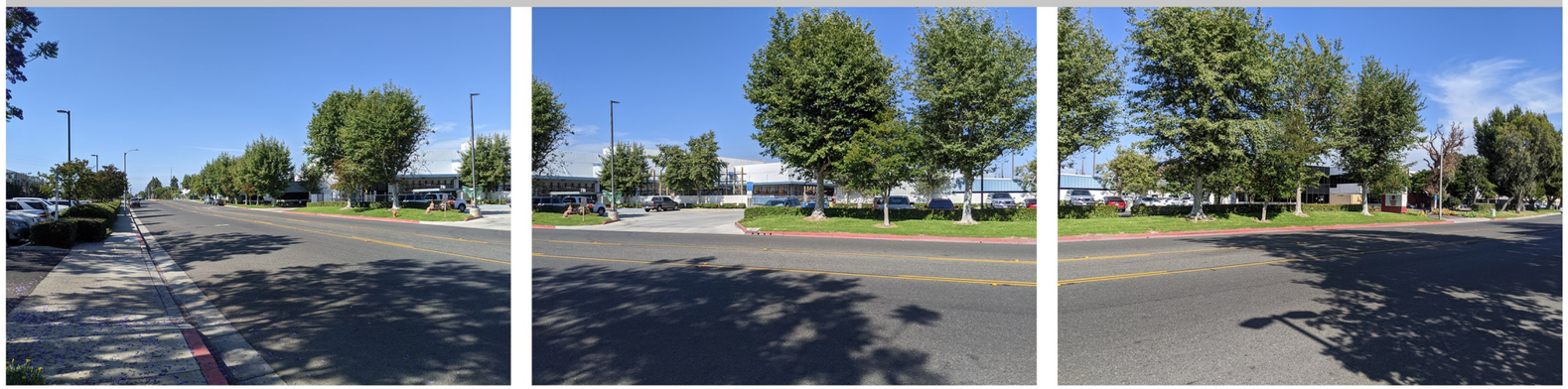
Figure 8

Not to Scale

Views of the Project Site and Surrounding Area

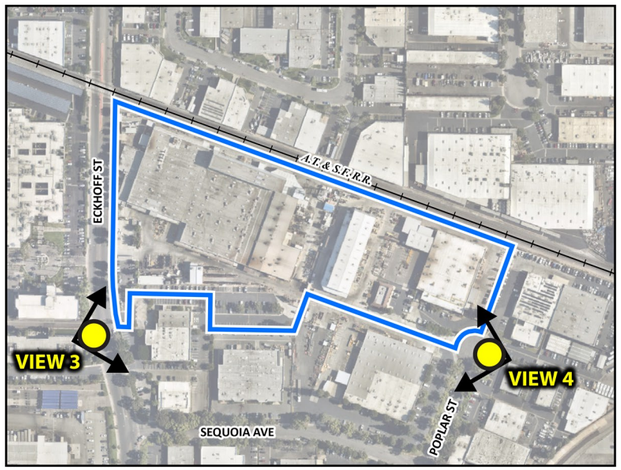
VIEW 3

Southwest of the Project Site, along Eckhoff St., looking Northeast to Southeast.



VIEW 4

Southeast of the Project Site, at the terminus of Poplar St, looking Northwest to Southwest



Source(s): Nearmap Imagery (2021)

Key Map

Figure 9

Not to Scale

Views of the Project Site and Surrounding Area

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

Impact Analysis:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Significance Determination: No Impact

According to the California Department of Conservation's (DOC) California Important Farmland Finder, the Project site is classified as "Urban and Built-Up Land" (DOC, 2016a). The "Urban and Built-Up Land" classification describes land that is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel (DOC, 2016a). The nearest Farmland to the Project site is located approximately 0.97 miles north; this land is classified by the DOC as "Unique Farmland," which describes land that contains lesser quality soils used to produce the State's leading crops. "Unique Farmland" is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Due to the site's distance from designated Farmland, the Project would not have the potential to convert the Farmland to non-agricultural use. The Project does not have the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Significance Determination: No Impact

The Project site is zoned as Light Industrial (M1) (Orange, 2016). The nearest land zoned for agricultural use is located approximately 4.7 miles northeast of the Project site. As such, the Project does not have the potential to conflict with existing zoning for agricultural use. No impacts would occur.

The Williamson Act is a Statewide mechanism for the preservation of agricultural land and open space land. The Act provides a comprehensive method for local governments to protect farmland and open space by allowing lands in agricultural use to be placed under contract (agricultural preserve) between local government and landowner. The Project site is not under a Williamson Act contract. Therefore, implementation of the Project does not have the potential to conflict with an existing Williamson Act contract. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Significance Determination: No Impact

As previously discussed, the Project site is currently zoned as M1. According to the City's Zoning Map, there are no lands within the City that are zoned for forest land, timberland, or timberland zoned Timberland Production (Orange, 2016). Therefore, the Project does not have the potential to conflict with existing zoning or rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Significance Determination: No Impact

As discussed under the Agricultural and Forest Resources Threshold c, the Project site is zoned M1 and there are no lands within the City that are zoned forestland. Additionally, the Project site is developed with a light industrial use. Therefore, the Project would not result in the loss of forest land or conversion of forest land to a non-forest use. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Significance Determination: No Impact

As previously discussed under Agriculture and Forest Resources Threshold a, the Project site is located approximately 0.97 miles southwest of Unique Farmland. Additionally, the Project site is within an urbanized area of the City that contains little open space and no farmland. Therefore, the Project does not have the potential to convert Farmland to non-agricultural use. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

	3. AIR QUALITY. (Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.) *Would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(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 non-attainment 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?	☐	☐	☒	☐

Impact Analysis:

The analysis in this section is based on the *759 North Eckhoff Street Air Quality Impact Analysis City of Orange* (Air Quality Impact Analysis) report prepared by Urban Crossroads, Inc. (Urban Crossroads) dated November 19, 2021 (Urban Crossroads, 2021a) and the *759 North Eckhoff Street Mobile Source Health Risk Assessment* (Heath Risk Assessment) report prepared by Urban Crossroads dated December 2, 2021 (Urban Crossroads, 2021b). The Air Quality Impact Analysis and Health Risk Assessment are provided in its entirety as Appendix A and B, respectively.

Environmental Setting

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of South Coast Air Quality Management District (South Coast AQMD). The South Coast AQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the South Coast AQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. As previously stated, the Project site is located within the SCAB, a 6,745-square mile subregion of the South Coast AQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County.

On May 8, 2021, South Coast AQMD adopted Warehouse Indirect Source Rule 2305, which includes the Warehouse Actions and Investments to Reduce Emissions Program (WAIRE), and Rule 316. Rule 2305 establishes for the first time a regulatory program designed to reduce harmful air pollution caused by warehouse-related activities and is focused on emissions from vehicles that service large warehouses. Rule 316 establishes a fee system to support the Rule 2305 program on an ongoing basis. Rules 2305 and 316 apply to operators and owners of existing and new warehouses with floor space greater than or equal to 100,000 square feet within a single building (i.e., large warehouses). Rules 2305 and 316 require such operators and owners to annually take actions with respect to their warehouses that either reduce emissions regionally and locally or facilitate emission reductions. Specifically, owners and operators must "earn" a specific number of WAIRE points based on the intensity of operations at each of their warehouses every year by purchasing and/or using near-zero (NZE) and zero emission (ZE) equipment selected from a menu of options that will offset or reduce warehouse emissions. Owners and operators may also implement custom WAIRE plans for individual facilities, subject to South Coast AQMD approval; or pay mitigation fees. Owners and operators that over-comply may transfer excess WAIRE Points earned in one year to a subsequent year or may transfer WAIRE points to another site within their

control. Rule 316 is the companion rule to Rule 2305 and establishes the administrative fees that Rule 2305 warehouse owners and operators must pay to support South Coast AQMD compliance activities.

South Coast AQMD Regional and Local Significance Thresholds

The City of Orange utilizes the South Coast AQMD CEQA Air Quality Handbook and thresholds of significance to determine the significance of Project emissions. A Project may have a significant impact if Project emissions would exceed these air pollutions thresholds. Table 5, *Maximum Daily Regional Emissions Thresholds,* below identifies South Coast AQMD's regional construction and operational emissions within its jurisdiction.

Table 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. NOX – Nitrogen Oxides, VOC – Volatile Organic Compounds, PM10 – Particulate Matter 10 microns in diameter or less, PM2.5 – Particulate Matter 2.5 microns in diameter or less, SOX – Sulfur Oxides, CO – Carbon Monoxide, Pb – Lead.
Source: (Urban Crossroads, 2021a)

The South Coast AQMD also established localized significance thresholds (LSTs) that a project can emit without contributing to an existing or new air quality standard exceedance. LSTs are defined separately for construction and operational activities and are dependent on location, project size, and distance to sensitive receptors.

South Coast AQMD Health Risk Significance Thresholds

The AQMD 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 AQMD states (Page D-3):

"…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (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."

The SCAQMD has also 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. In the Project Specific HRA, non-carcinogenic exposures of less than 1.0 are considered less-than-significant.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Significance Determination: Less than Significant Impact

Currently, the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are exceeded in most parts of the SCAB. In response, the South Coast AQMD has adopted a series of Air Quality Management Plan (AQMP) 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. 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. The current AQMP, the 2016 AQMP, was adopted by the South Coast AQMD in March 2017 and the Project's consistency with the 2016 AQMP is discussed below. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the South Coast AQMD's CEQA Air Quality Handbook (1993). The Project's consistency with these criteria is discussed below.

Consistency Criterion No. 1: The Project will 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.

Construction Impacts – Consistency Criterion 1

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations could occur if regional or localized significance thresholds are exceeded. As evaluated, the Project's regional and localized construction-source emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected.

Operational Impacts – Consistency Criterion 1

As evaluated Air Quality Threshold b, below, the Project would not exceed the applicable regional and localized significance thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion. On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

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

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

Operational Impacts – Consistency Criterion 2

As previously stated, the Project site is designated for Light Industrial uses. Light Industrial designation is intended for uses that are compatible with nearby commercial and residential districts and that do not produce substantial environmental nuisances (noise, odor, dust, smoke, glare, etc.). This designation allows for manufacturing, processing, and distribution of goods. The Project is proposed to consist of 292,762 sf of general light industrial and warehousing uses within two buildings, which is consistent with the site's General Plan land use designation. Since the Project's proposed land uses are consistent with the General Plan and as the Project's construction and operational-source air pollutant emissions would not exceed the regional or localized significance thresholds, the Project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion

The Project would not have the potential to result in or cause NAAQS or CAAQS violations. The Project's proposed land uses are consistent with the General Plan land use designation and the Project would not exceed the regional or localized construction and operational thresholds. Additionally, the Project's development intensity is consistent with the development intensities allowed within the General Plan as previously stated. As such, the Project is considered to be consistent with the AQMP.

Mitigation Measures: Mitigation measures are not required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Significance Determination: Less than Significant Impact

The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operation (long-term). However, as discussed below, Project construction and operation would not result in exceedances of South Coast AQMD daily thresholds for Project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the SCAB is designated as non-attainment.

Construction Impacts

Construction activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities: demolition/crushing; site preparation; grading; building construction; and architectural coating.

The Project would demolish 210,646 sf (1,875 tons) of existing building, 254,620 sf (15,100 tons) of concrete, and 65,705 sf (1,215 tons) of asphalt. Approximately 1,875 tons of mixed construction and demolition waste would be hauled off-site to California Waste Services (approximately 30 miles from the Project site) and would generate in 94 (one-way) hauling trips.

For purposes of analysis, construction of Project is expected to occur over an approximate 16-month schedule. The construction schedule utilized in the analysis, shown in Table 1, *Construction Duration*, 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. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. Construction equipment assumptions by phase, equipment type, quantity, and house per day are provided in Table 2, *Construction Equipment Assumptions*.

On October 17, 2017, the South Coast AQMD 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 quantify applicable air quality and GHG reductions achieved from mitigation measures.

The estimated maximum daily construction emissions without mitigation are summarized on Table 6, *Overall Construction Emissions Summary*. Detailed construction model outputs are presented in Appendix 3.1 of the Air Quality Impact Analysis (Appendix A). Under the assumed scenarios, emissions resulting from the Project construction will not exceed thresholds established by the South Coast AQMD for emissions of any criteria pollutant.

Table 6 Overall Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2022	4.53	50.47	29.97	0.08	14.67	6.48
2023	66.04	40.52	44.09	0.11	5.36	2.60
Winter						
2022	4.54	50.48	29.92	0.07	14.67	6.48
2023	66.11	40.65	43.50	0.11	5.36	2.60
Maximum Daily Emissions	**66.11**	**50.48**	**44.09**	**0.11**	**14.67**	**6.48**
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2021a)

As shown on Table 7, *Localized Construction Source Emissions*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Emissions associated with peak demolition/crushing, site preparation, and grading activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown, the Project's unmitigated construction emissions would not exceed South Coast AQMD's LSTs for any criteria pollutant. Therefore, the Project's construction emission impacts would be less than significant.

Table 7 Localized Construction Source Emissions

Construction Phase	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition/Crushing	2022	28.94	24.93	2.89	1.56
	Maximum Daily Emissions	**28.94**	**24.93**	**2.89**	**1.56**
	South Coast AQMD Localized Threshold	183	1,253	171	96
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation	2022	50.35	19.98	14.45	6.42
	Maximum Daily Emissions	**50.35**	**19.98**	**14.45**	**6.42**
	South Coast AQMD Localized Threshold	183	1,253	171	96
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	2022	47.51	29.20	9.51	3.61
	Maximum Daily Emissions	**47.51**	**29.20**	**9.51**	**3.61**
	South Coast AQMD Localized Threshold	183	1,253	171	96
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2021a)

Operational Impacts

Under existing conditions, the Project site is currently occupied by an existing 210,646 sf warehouse building. The estimated operation-source emissions from the existing development are summarized on Table 8, *Emissions from Existing Development*.

Table 8 Emissions from Existing Development

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Area Source	4.71	3.90E-04	0.04	0.00	1.50E-04	1.50E-04
Energy Source	0.02	0.22	0.18	1.32E-03	0.02	0.02
Mobile Source	0.56	2.15	6.23	0.02	1.98	0.55
Total Maximum Daily Emissions	**5.29**	**2.37**	**6.46**	**0.03**	**2.00**	**0.57**
Winter						
Area Source	4.71	3.90E-04	0.04	0.00	1.50E-04	1.50E-04
Energy Source	0.02	0.22	0.18	1.32E-03	0.02	0.02
Mobile Source	0.56	2.26	6.11	0.02	1.98	0.55
Total Maximum Daily Emissions	**5.29**	**2.48**	**6.34**	**0.03**	**2.00**	**0.57**

Source: (Urban Crossroads, 2021a)

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 of the Project are summarized on Table 9, *Summary of Peak Operational Emissions*. It should be noted that the existing development emissions were subtracted from the Project operational emissions to determine the new emissions from the proposed Project. As shown on Table 9, the Project's daily regional emissions from on-going operations will not exceed South Coast AQMD's thresholds of significance.

Table 9 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
Area Source	6.64	9.60E-04	0.11	0.00E+00	3.80E-04	3.80E-04
Energy Source	0.06	0.54	0.45	3.24E-03	0.04	0.04
Mobile Source	2.20	23.80	27.08	0.17	10.02	2.86
On-Site Equipment Source	0.11	1.04	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	**9.01**	**25.38**	**28.39**	**0.18**	**10.10**	**2.94**
Existing Emissions	*5.29*	*2.37*	*6.46*	*0.03*	*2.00*	*0.57*
Net Emissions (Project – Existing)	**3.71**	**23.00**	**21.93**	**0.15**	**8.10**	**2.37**

Source	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	6.64	9.60E-04	0.11	0.00E+00	3.80E-04	3.80E-04
Energy Source	0.06	0.54	0.45	3.24E-03	0.04	0.04
Mobile Source	2.18	24.83	26.68	0.17	10.02	2.86
On-Site Equipment Source	0.11	1.04	0.75	3.17E-03	0.04	0.03
Total Maximum Daily Emissions	**8.99**	**26.40**	**27.98**	**0.18**	**10.10**	**2.94**
Existing Emissions	*5.29*	*2.48*	*6.34*	*0.03*	*2.00*	*0.57*
Net Emissions (Project – Existing)	**3.70**	**23.93**	**21.65**	**0.15**	**8.10**	**2.37**
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2021a)

As shown on Table 10, *LST Summary of Operations*, operational emissions would not exceed the LST thresholds for any criteria pollutant at the nearest sensitive receptor. Therefore, the Project would have a less than significant localized impact during operational activity.

Table 10 LST Summary of Operations

Scenario	Emissions (lbs/day)			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Summer	2.77	2.66	0.58	0.22
Winter	2.82	2.64	0.58	0.22
Maximum Daily Emissions	**2.82**	**2.66**	**0.58**	**0.22**
South Coast AQMD Localized Threshold	183	1,253	41	24
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2021a)

Mitigation Measures: Mitigation measures are not required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Significance Determination: Less than Significant Impact

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. Figure 10, *Receptor*

Locations, depicts the sensitive receptors located in the Project area. The receptor locations are described below:

R1: Location R1 represents the Orangeland RV Park at 1600 West Struck Avenue, approximately 1,470 feet north of the Project site.

R2: Location R2 represents the Praise Chapel at 1200 West Alvarez Avenue, approximately 1,374 feet east of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R2 is placed at the residential building façade.

R3: Location R3 represents Azusa Pacific University Orange County Campus at 1915 West Orangewood Avenue, approximately 969 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R3 is placed at the building façade.

R4: Location R4 represents the Orange Coast Community Church located at 632 North Eckhoff Street, approximately 761 feet southwest of the Project site. Receptor R4 is placed at the building façade.

R5: Location R5 represents the Orange County Department of Education/Foster at 800 North Eckhoff Street, located approximately 152 feet north of the Project site. Receptor R5 is placed at the approximate location of where the future building façade is anticipated.

R6: Location R6 represents the National Oilwell Varco facility at 743 North Eckhoff Street, located approximately 46 feet south of the Project site. Receptor R6 is placed at the approximate location of where the future building façade is anticipated.

As discussed under the Air Quality Threshold b, the Project's construction and operation emissions would not exceed South Coast AQMD's regional significance thresholds or LSTs. Therefore, the nearby sensitive receptors would not be exposed to substantial pollutant concentrations that would present a public health concern. Results of the LST analysis indicate that the Project will not exceed the South Coast AQMD's LSTs during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction.

Additionally, the Project will not exceed the South Coast AQMD's LSTs during operational activity. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

Friant Ranch

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 South Coast AQMD in the Friant Ranch case, South Coast AQMD 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 South Coast AQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk, it does not necessarily mean anyone will contract cancer as a result of the Project. On the other hand, for extremely large regional projects (unlike the Project), the South Coast AQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NO_X and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3. The Project does not generate anywhere near 6,620 lbs/day of NO_X or 89,190 lbs/day of VOC emissions. The proposed Project would generate up to 50.63 lbs/day of NO_X during construction and 11.71 lbs/day of NO_X during operations (0.76% and 0.18% of 6,620 lbs/day, respectively). Additionally, the proposed Project would also generate a maximum of 66.17 lbs/day of VOC emissions during construction and 8.01 lbs/day of VOC emissions during operations (0.07% and 0.01% of 89,190 lbs/day, respectively). Therefore, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

CO "Hot Spot" Analysis

The Project would not result in potentially adverse CO concentrations or "hot spots." Further, detailed modeling of Project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (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 SCAB is now designated as attainment.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, 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 11, *CO Model Results*.

Table 11 CO Model Results

Intersection Location	CO Concentrations (ppm)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

Source: (Urban Crossroads, 2021a)

Based on the South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB 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, 8.4 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. 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 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, 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.

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 2.4 ppm and 2.0 ppm, respectively (data from I-5 Near Road station for 2020). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. 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. 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).

Residential Exposure Scenario

The residential land use with the greatest potential exposure to Project DPM source emissions is Location R1 which is located approximately 1,470 feet north of the Project site at the existing Orangeland RV Park at 1600 West Struck Avenue. At the maximally exposed individual resident (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 0.10 in one million, which is less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, 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 from the Project site and primary truck route than the MEIR analyzed herein, and toxic air contaminants (TACs) generally dissipate 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 will not cause a significant human health or cancer risk to nearby residences.

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R7, which represents the adjacent potential worker receptor 79 feet north of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.21 in one million which is less than the South Coast AQMD's threshold of 10 in one million. Maximum

non-cancer risks at this same location were estimated to be <0.01, 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 will not cause a significant human health or cancer risk to adjacent workers.

School Child Exposure Scenario

There are no schools located within a ¼ mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70-percent drop-off in particulate pollution levels at 500 feet. Based on California Air Resources Board (CARB) and South Coast AQMD emissions and modeling analyses, an 80-percent drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. For purposes of this assessment, a one-quarter mile radius or 1,320 feet geographic scope, is utilized for determining potential impacts to nearby schools. This radius is more robust, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above. As such, the Project will not cause a significant human health or cancer risk to nearby school children.

Mitigation Measures: Mitigation measures are not required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Significance Determination: Less than Significant Impact

The potential for the Project to generate objectionable odors has also been considered. 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 also 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 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 is 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 solid waste regulations. The Project would also be required to comply with South Coast AQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

No other emissions would be anticipated because of Project construction or operation. Therefore, the Project would not result in other emissions that would adversely affect a substantial number of people and impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

Source(s): Urban Crossroads (04-16-2021)

Figure 10

Not to Scale

Receptor Locations

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

Impact Analysis:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Significance Determination: No Impact

The City identifies significant wildlife habitat as being in the City's undeveloped hillside areas, East Orange, and park and open spaces (particularly near Santiago Creek, Santiago Oaks Regional Park, Irvine Regional Park, and Peters Canyon Regional Park) (Orange, 2015b). The Project site is in the western portion of the City and is fully developed with a manufacturing facility. Additionally, the properties surrounding the Project site are fully developed and urbanized. According to the City's General Plan Environmental Impact Report (EIR), urbanized areas provide low habitat value for sensitive species. There are no natural habitats or sensitive species on the Project site or immediately surrounding area. As such, implementation of the Project would not have the potential to have an adverse effect either directly or indirectly through habitat modifications on any species identified as a candidate, sensitive, or special status species in the local or regional plans, policies or regulation, or by the California Department of Fish and Game and Wildlife Service (Orange, 2010a). No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Significance Determination: No Impact

Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animals or plant species or known to be important wildlife corridors. According to the City's General Plan EIR, riparian habitat and wetlands within the existing urbanized area of the City occur along the Santiago Creek (Orange, 2010a). The Project site is located approximately 1.6 miles north of Santiago Creek and there are no other riparian habitat or other sensitive natural communities present on the Project site or within the site's vicinity (Google Earth, 2021). Therefore, implementation of the Project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Significance Determination: No Impact

Wetlands are defined as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support and, that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The Project site and surrounding area are fully developed and do not contain any wetlands. The nearest wetland habitat to the Project site is at the Santiago Creek located approximately 1.6 miles south. Therefore, implementation of the Project would not have an adverse effect on state or federally protected wetlands. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

The City is characterized as mostly urbanized with low habitat value for wildlife. The City's primary functional wildlife corridors are Santiago Creek through the center of the City; the northeastern portion of the City, and the Southern California Edison (SCE) utility corridors, which link with the Santiago Oaks Park; and the preserved hillsides and ridgelines in the southeastern portion of the City that link with Peters Canyon Park (Orange, 2015a). Additionally, a significant amount of East Orange is undeveloped, including the Irvine Ranch Land Reserve (IRLR) and the Nature Reserve of Orange County established by the *Orange County Central/Coastal Natural Community Conservation Plan* (NCCP). These areas have the potential to act as wildlife corridors.

The Project site is fully developed within an urbanized setting and is located outside the identified wildlife corridors. There are no areas within the Project's vicinity which could function as a wildlife corridor or nursery site for wildlife. Therefore, implementation of the Project would not have the potential to interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. No impacts would occur.

The Project requires removal of existing ornamental trees along the western portion of the site. These existing trees have the potential to provide suitable nesting opportunities for nesting birds. The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. To reduce the Project's potential impacts on migratory birds, the Project would implement Mitigation Measure (MM) BIO-1, which requires a pre-construction nesting bird clearance survey to determine the presence/absence, location, and status of any active nests on or adjacent to the Project site. If the nesting bird clearance survey indicates the presence of nesting birds, MM BIO-1 requires buffers to ensure that any nesting birds are protected according to the MBTA. With the implementation of MM BIO-1, the Project's potential construction-related impacts to migratory birds would be less than significant.

Mitigation Measures:

BIO-1 In the event that vegetation and tree removal should occur between January 15 and September 15, the Project Applicant shall retain a qualified biologist to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. The biologist conducting the clearance survey shall document the negative results if no active bird nests are observed on the Project site or within the vicinity during the clearance survey with a brief letter report, submitted to the City of Orange Community Development Department prior to construction, indicating that no impacts to active bird nests would occur before construction can proceed. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 200-foot buffer around the active nest. For listed and raptor species, this buffer shall be 500-feet. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Prior to the commencement of construction activities and the issuance of any permits, results of the pre-construction survey and any subsequent monitoring shall be provided to the City of Orange Community Development Department.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Significance Determination: Less than Significant Impact

The City's participation in the NCCP is through its Master Street Tree Plan and the Tree Preservation Ordinance (Chapter 12.32), which are the primary local measures to protect biological resources. According to the City's General Plan EIR, the Master Street Tree Plan and the Tree Preservation Ordinance are effective procedures to monitor the potential for impacts to existing trees that provide roosting and nesting habitat for native and migratory birds throughout the City. The City's Tree Ordinance restricts the removal of trees including those on private property that are deemed to be "endowed with a public interest" or may be of historical value "by virtue of their origin, size, uniqueness,

and/or national or regional rarity" (Orange, 2020). Trees determined to be historic are compiled on a master list that is maintained by the Community Services Department and approved by resolution of the City Council.

The Project would result in the removal of ornamental trees. According to Municipal Code Section 12.32.030, the Project Applicant would be required to obtain a Tree Removal Permit. According to Municipal Code Section 12.32.060, the Project's ornamental trees are not considered Historical Trees. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources following compliance with Municipal Code Section 12.32.030 and impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Significance Determination: No Impact

The City of Orange is subject to the Natural Community Conservation Plan. As shown on General Plan EIR, Figure 5.4-2, NCCP Habitat Reserve Area, several areas within the City are designated NCCP Habitat Reserve (Orange, 2010a). According to General Plan EIR, Figure 5.4-2, the Project site is not within an NCCP Habitat Reserve Area. No other approved local, regional, or State habitat conservation plans apply to the site. Therefore, implementation of the Project does not have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

5. CULTURAL RESOURCES. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☐	☐	☒
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
(c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

This section is primarily based on the *Cultural Resources Study for the IDI Logistics Eckhoff Street Project* (Cultural Resources Study), prepared by Brian F. Smith and Associates, Inc. dated December 16, 2021. The Project-specific Cultural Resources Study is included as Appendix C of this IS/MND (BFSA, 2021a).

Impact Analysis:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

Significance Determination: No Impact

Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

1) Is associated with events that have made a significant contribution to the broad patters of California's history and cultural heritage;

2) Is associated with the lives of persons important in our past;

3) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possess high artistic values;

4) Has yielded, or may be likely to yield, information important in prehistory or history.

The entire property has been disturbed, first by orchards, then by grading of the Project site for the development of the existing warehouses. During the archaeological survey of the property, there was no visible ground surface due to the presence of paved parking lots and warehouses. The survey did not result in the identification of any historic resources and none of the existing buildings were found to meet the minimum age threshold to be considered historic under CEQA. (BFSA, 2021a, 3.0-7)

Mitigation Measures: Mitigation measures are not required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

The cultural resources study for Project included an institutional records search, review of historic aerials, an intensive cultural resource survey of the 12.69-acre Project site. An archaeological records search for the Project and the surrounding area within a one-mile radius was requested from the South Central Coastal Information Center (SCCIC) at CSU Fullerton on March 11, 2021 and the results were returned on April 9, 2021. The SCCIC records search results indicated that four resources, all historic in age, are located within a one-mile radius of the Project: the Old Towne Orange Historic District, a segment of the historic Burlington Northern Santa Fe railroad, the historic Angel Stadium of Anaheim, and a historic transmission tower. None of these resources are mapped within the subject property. The records search results also indicated that 41 cultural resource studies have been conducted within a one-mile radius of the Project, none of which cover any portions of the subject property.

During the archaeological survey of the property, there was no visible ground surface due to the presence of paved parking lots and warehouses. The survey did not result in the identification of any prehistoric cultural resources. Due to the disturbed nature of the property due to previous grading, clearing, and industrial development, as well as the surrounding industrial development since the 1970s, there is little likelihood that archaeological deposits are present within the Project boundaries. Therefore, impacts to archaeological resources are considered less than significant.

However, while unlikely, the presence of previously undiscovered subsurface archaeological resources on the Project site remains possible, and these resources could be affected by ground-disturbing activities associated with grading and construction at the site. It is possible that subsurface disturbance would occur at levels not previously disturbed (e.g., deeper excavation) or may uncover undiscovered archaeological resources at the site. The Project would implement MM CUL-1, which provides direction for the proper recordation of previously undiscovered archaeological resources, should they be found during Project construction activities. Implementation of MM CUL-1 would ensure that the Project's potential impacts on archaeological resources less than significant.

Mitigation Measures:

CUL-1 In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the resource. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resource found during construction-related activities shall be recorded on the appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA Guidelines Section 15064.5, the qualified archaeologist shall prepare and implement a research design and archeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the State CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated most likely descendant as needed. The report shall be

submitted to the City of Orange, the South-Central Coastal Information Center, and the State Historic Preservation Office, if required.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Significance Determination: Less than Significant Impact

The possibility of uncovering human remains during Project-related grading activities is remote due to fact that the previous development of the Project site has substantially disturbed the subsurface of the site. Pursuant to California Health and Safety Code Section 7050.5, in the unlikely event human remains are encountered during ground-disturbing activities, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Mandatory compliance with these requirements would ensure that no impacts associated with the discovery of human remains would occur.

Mitigation Measures: Mitigation measures are not required.

	6. ENERGY. *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact Analysis:

The analysis in this section is based on the *759 North Eckhoff Energy Analysis* (Energy Analysis), prepared by Urban Crossroads dated November 19, 2021 (Urban Crossroads, 2021c). This report is provided in its entirety as Appendix D to this IS/MND.

Electricity is provided to the Project site by Southern California Edison (SCE) and natural gas is provided to the Project site by the Southern California Gas Company (SoCal Gas). Both forms of energy are provided to the Project site via existing infrastructure located beneath North Eckhoff Street.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Significance Determination: Less than Significant Impact

Project Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, power lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities including the construction of the new building, typically do not involve the consumption of natural gas. Project construction would consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, and delivery and haul truck trips.

The Project's total electricity usage during construction is calculated to be approximately 167,203 kilowatt hours (kWh). Construction equipment used by the Project would result in consumption of approximately 85,444 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 equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best Available Control Measures (BACMs) inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 27,362 gallons of fuel. Additionally, fuel consumption from construction vendor and hauling trips (MHDTs and HHDTs) will total approximately 14,588 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2020 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. As supported by the preceding discussions, the Project's temporary construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Project Operation

Transportation Energy Demands

Transportation energy demand is a function of the total VMT and estimated fuel economies of vehicles accessing the Project site. The Project will result in a net increase of 2,786,550 annual VMT and an estimated net increase in annual fuel consumption of 225,126 gallons of fuel. Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Ed., 2017); and CalEEMod. 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 uses.

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. The Project would implement sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and City requirements, 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. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Facility Energy Demands

Project facility operational net energy demands are estimated at: 1,189,885 kBTU/year of natural gas; and 567,835 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 does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses of similar scale and configuration. Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent state and federal regulatory actions addressing enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). Compliance with applicable

Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Mitigation Measures: Mitigation measures are not required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Significance Determination: Less than Significant Impact

The Project is subject to California Building Code (CBC) requirements. New buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements. The Project would provide for, and promote, energy efficiencies equal to or beyond those required under other applicable federal and State standards and regulations, and in so doing would meet or exceed all CBC 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 uses of similar scale and configuration. On this basis, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the Project would not cause or result in the need for additional energy producing facilities or energy delivery systems.

7. GEOLOGY AND SOILS. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐
	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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

This section is primarily based on the *Geotechnical Investigation Two Proposed Industrial Buildings* (Geotechnical Investigation), prepared by Southern California Geotechnical, Inc. dated October 30, 2020 and the *Paleontological Assessment for the IDI Logistics Eckhoff Street Project* (Paleontological Assessment), prepared by Brian F. Smith and Associates, Inc. dated March 30, 2021 (BFSA, 2021b). The Project-specific Geotechnical Investigation Report and Paleontological Assessment are included as Appendix E and F of this IS/MND, respectively.

Impact Analysis:

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?

Significance Determination: No Impact

Ground rupture is the visible offset of the ground surface when an earthquake rupture along a fault affects the Earth's surface. Southern California, including the City of Orange, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Alquist-Priolo Earthquake Fault Zone. According to the Geotechnical Investigation, the Project site is not within a State of California Alquist-Priolo Earthquake Fault Zone.

Additionally, the Project site is not within any other fault zone (SoCalGeo, 2020). Fault rupture would not occur on the Project site since no active faults cross the Project site. Therefore, no impacts would occur.

Mitigation Measures: Mitigation measures are not required.

ii. Strong seismic ground shaking?

Significance Determination: Less than Significant Impact

As previously stated, the Project site is located within the highly seismic Southern California region within the influence of several fault systems. As a result, the Project would likely experience strong seismic ground shaking during its design life.

The Project's proposed buildings would be constructed in accordance with the 2019 California Building Code (CBC) and OMC Section 15.04.010, California Building Code Adopted by Reference, structures built for human occupancy must be designed to meet or exceed the CBC standards for earthquake resistance. The CBC includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the Project site. In accordance with CBC requirements, a Geotechnical Investigation was prepared to determine site-specific geologic conditions and appropriate design parameters. Nonetheless, the Project would demonstrate compliance with applicable seismic-related design requirements to reduce impacts related to strong seismic ground shaking. The City of Orange Building Division would ensure incorporation of the Geotechnical Investigation's recommended design criteria as a standard condition of approval. Following compliance with the CBC, impacts concerning seismic ground shaking would be less than significant.

Mitigation Measures: Mitigation measures are not required.

iii. Seismic-related ground failure, including liquefaction?

Significance Determination: Less than Significant Impact

Seismic-related ground failure includes, but is not limited to, liquefaction. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to fluids when subject to high-intensity seismic events. Liquefaction occurs when three general conditions coexist: 1) shallow groundwater, 2) low-density non-cohesive (granular) soils and 3) high-intensity ground motion. According to the Geotechnical Investigation and the DOC Earthquake Zones of Required Investigation Map, the Project site is within a Liquefaction Zone (SoCalGeo, 2020; DOC, 2016).

Site-specific liquefaction evaluation included two borings extended to depths of 36 and 50 bgs feet. Liquefiable soils were also encountered between depths of 20 and 27 bgs feet at one of these boring locations. Settlement analyses were conducted for each of the potentially liquefiable locations. Based on the estimated magnitude of the differential settlements, the proposed structures may be supported on shallow foundations to resist the effects of the anticipated differential settlements. Recommendations for foundation construction are outlined in Section 6, *Conclusion and Recommendations*, of the Geotechnical Investigation. Design parameters are detailed in Section 6.5, *Foundation Design and Construction*, of the Geotechnical Investigation (see Appendix E of this IS/MND). The Project would implement the recommendations identified within the Geotechnical Investigation in accordance with

CBC requirements and OMC Section 15.04.010 to preclude impacts related to liquefaction. Additionally, the City of Orange Building Division would ensure incorporation of the Geotechnical Investigation's recommended actions as a standard condition of approval to the Project's building permit. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

iv. Landslides?

Significance Determination: No Impact

Seismic events can cause the soils within a slope to become unstable and slip causing a landslide. According to the DOC Earthquake Zones of Required Investigation Map, the Project site is not within a Landslide Zone (DOC, 2016). The Project does not have the potential to expose people or structures to seismic-related landslides. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) Result in substantial soil erosion or the loss of topsoil?

Significance Determination: Less than Significant Impact

Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the Project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not employed.

Grading and earthwork activities associated with Project construction would expose soils to potential short-term erosion by wind and water. Project construction would be required to comply with the water quality management measures identified in OMC Section 7.01.050, Controls for Water Quality Management. As discussed under Hydrology and Water Quality Threshold a, the Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges, which involves the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for construction-related activities, including grading. As stated previously, the Project would also be required to demonstrate compliance with South Coast AQMD 403, which would reduce the potential for wind erosion during construction through the implementation of dust control measures. Following compliance with the established regulatory framework (i.e., OMC Chapter 7.01.050 and South Coast AQMD Rule 403), impacts during construction would be less than significant.

Long-term operational impacts related to soil erosion or loss of topsoil would be required to comply with the requirements outlined in the Project's Water Quality Management Plan (WQMP) in compliance with OMC Chapter 7.01, Water Quality and Stormwater Discharges. The WQMP includes structural and non-structural best management practices (BMPs) to ensure water quality standards are upheld. Structural BMPs include providing storm drain signage; trash storage areas; efficient irrigation systems and landscape design. Non-structural BMPs, such as educational materials for property owners, tenants, and occupants; activity restriction; common area landscape management; BMP maintenance; spill contingency plant; uniform fire code implementation; common area litter control; employee training, common area catch basin inspection; and street sweeping private streets and parking lots.

The BMPs would reduce the Project's potential operational impacts concerning soil erosion or loss of topsoil. The Project site is within a highly urbanized area with minimal elevation changes. The Project would redevelop the Project site with two warehouse buildings collectively totaling to 292,762 sf and would contain a similar amount of impervious surfaces as compared to the site's existing development. Any exposed soil would be minimal and associated with landscaping areas. Therefore, Project operations would not result in substantial soil erosion or loss of topsoil during operation. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

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?

Significance Determination: Less than Significant Impact

Landslide

Refer to Geology/Soils Threshold a.iv. The Project does not have the potential to be located on a geologic unit or soil that would result in on- or off-site landslides. No impacts would occur.

Lateral Spreading

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied soil layer. Lateral spreading is a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along the sloping ground. The Project site's potential for lateral spreading is considered low based on the site's relatively flat topography, and distance from slopes. The Project does not have the potential to be located on a geologic unit or soil that would result in lateral spreading. No impacts would occur.

Subsidence/Shrinkage

Subsidence and shrinkage are primarily dependent upon the degree of compaction achieved during construction. According to the Project's Geotechnical Investigation, undocumented fill soils were encountered immediately beneath the pavement surface at depths ranging from 2.5 to 5.5 feet bgs that consist of loose to dense silty fine sands and silty fine to coarse sands with occasional clay content Additional soils classified as possible fill were encountered at depths up to 6.5 feet bgs that consist of loose to medium dense silty fine sands and fine to coarse sands with occasional gravel content (SoCalGeo, 2020). Native alluvial located beneath the fill/possible fill soils and/or the existing pavement surface consists of loose to medium dense sands, silty sands, and sandy silt as well as soft to medium stiff silty clays and clayey silts at depths ranging from 20 to 25 feet bgs. At greater depths, the alluvium consists of dense to very dense silty fine to coarse sands with occasional fine to coarse gravel and cobbles. A shrinkage factor of approximately 8 to 13 percent may be considered for near-surface fill materials requiring removal and recompaction (SoCalGeo, 2020). The Project would implement the recommendations identified within the Geotechnical Investigation in accordance with CBC requirements and OMC Section 15.04.010 to preclude impacts related to subsidence and shrinkage. Additionally, the City of Orange Building Division would ensure incorporation of the Geotechnical Investigation's recommended actions as a standard condition of approval to the Project's building permit. Impacts would be less than significant.

Liquefaction

Refer to Geology/Soils Threshold a.iii. The Project have the potential to be located on a geologic unit or soil that would result in liquefaction. The Project would implement the recommendations identified within the Geotechnical Investigation in accordance with CBC requirements and OMC Section 15.04.010 to preclude impacts related to liquefaction. Additionally, the City of Orange Building Division would ensure incorporation of the Geotechnical Investigation's recommended actions as a standard condition of approval to the Project's building permit. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

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?

Significance Determination: Less than Significant Impact

Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking or swelling. According to the Project's Geotechnical Investigation, the Project's on-site near-surface soils have a very low expansion potential. As a result, impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Significance Determination: No Impact

The Project would not involve the use of septic tanks or alternative waste water disposal systems. The Project would connect to the City's existing wastewater service, which currently provides service to the site and surrounding area. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

A paleontological records search was performed by the paleontological curator of the OC Parks Division of Orange County. The records search found that no fossils are recorded within the subject property or in the vicinity of the Project. The nearest fossil localities are approximately five miles east of the Project in much older geologic formations. In sedimentary deposits similar to those at the Project, the nearest fossil localities are located in Tustin, approximately 7.5 miles to the southeast.

Shallow excavations in the younger Quaternary alluvium in the proposed Project area are unlikely to uncover any significant vertebrate fossils. The sedimentary formations exposed within the Project are Holocene-aged young alluvial fan deposits. Young surficial sediments, such as those mapped within the Project site, are noted as having no paleontological sensitivity. In general, fossils are not found in Holocene deposits, due to their young age.

All of these factors support the recommendation that paleontological monitoring should not be required during mass grading, trenching, and excavation activities in Holocene young alluvial fan sediments at the Project. However, if paleontological resources are inadvertently discovered, a Paleontological Mitigation Monitoring and Reporting Program shall be implemented pursuant to MM GEO-1. This would mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils), if present, to a level below significant.

Mitigation Measures:

GEO-1 Prior to the issuance of a grading permit, the Project Applicant shall provide written evidence to the Community Development Department that the Applicant has retained a qualified paleontologist to respond on an as-needed basis to address unanticipated paleontological discoveries.

In the event that paleontological resources are encountered during ground-disturbing activities, all construction activities within a 50 foot vicinity of the find shall halt until the Orange County-qualified paleontologist identifies the paleontological significance of the find. If determined to be significant, the fossil shall be collected and prepared to the point of identification and permanent preservation, including screen-washing sediments to recover small vertebrates and invertebrates if indicated by the results of test sampling. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. Typically, the Cooper Center in Santa Ana is the preferred repository for fossils found in Orange County.

At the conclusion of curation, a report of findings shall be prepared to document the results of the monitoring program, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the appropriate lead agency (*e.g.*, the City of Orange), will signify satisfactory completion of the Project program to mitigate impacts to any nonrenewable paleontological resources. Construction shall not resume within the vicinity until the site paleontologist states in writing that the proposed construction activities would not significantly damage paleontological resources.

8. GREENHOUSE GAS EMISSIONS. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐

Impact Analysis:

The analysis in this section is based on the *759 Eckhoff Street Greenhouse Gas Analysis,* (GHG Analysis), prepared by Urban Crossroads dated November 19, 2021. This report is provided in its entirety as Appendix G to this IS/MND.

On May 8, 2021, South Coast AQMD adopted Warehouse Indirect Source Rule 2305, which includes the Warehouse Actions and Investments to Reduce Emissions Program (WAIRE), and Rule 316. Rule 2305 establishes for the first time a regulatory program designed to reduce harmful air pollution caused by warehouse-related activities and is focused on emissions from vehicles that service large warehouses. Rule 316 establishes a fee system to support the Rule 2305 program on an ongoing basis. Rules 2305 and 316 apply to operators and owners of existing and new warehouses with floor space greater than or equal to 100,000 square feet within a single building. Rules 2305 and 316 require such operators and owners to annually take actions with respect to their warehouses that either reduce emissions regionally and locally or facilitate emission reductions.

The site is currently occupied by multiple buildings and structures totaling 210,646 sf . Emissions associated with the existing use is estimated to be approximately 786.41 metric tons of total carbon dioxide equivalent (CO_2e) per year. The Project would remove the site's existing structure and redevelop the site with the proposed Project buildings.

The City of Orange has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The City's Guidance for Greenhouse Gas Emissions Analysis (Memo) provides guidance to the City of Orange Planning Division staff for evaluating GHG emissions analyses in CEQA documents for all non-exempt project where the City of Orange is the lead agency. Based on the Memo, the City will accept GHG analyses that use the Tier 3 quantitative thresholds recommended in the South Coast AQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (South Coast AQMD Interim Threshold).

The South Coast AQMD's adopted numerical threshold of 10,000 $MTCO_2e/yr$ for industrial stationary source emissions is typically selected as the significance criterion. However, the City has determined that the South Coast AQMD's draft threshold of 3,000 $MTCO_2e/yr$ is more conservative and appropriate for industrial and warehouse land use development projects. The 3,000 $MTCO_2e/yr$ threshold is based on the South Coast AQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the South Coast AQMD Interim Thresholds. The South Coast AQMD Interim Threshold identifies a screening threshold to determine whether additional analysis is required.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Significance Determination: Less than Significant Impact

Project Construction

The Project's construction activities would generate carbon dioxide (CO_2) and methane (CH_4) emissions (greenhouse gases [GHGs]). 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 South Coast AQMD 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. The amortized construction emissions are presented in Table 12, *Amortized Annual Construction Emissions*.

Table 12 Amortized Annual Construction Emissions

Year	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2e
2022	537.32	0.12	0.01	543.22
2023	610.03	0.10	0.02	617.39
Total GHG Emissions	1,147.35	0.22	0.03	1,160.61
Amortized Construction Emissions ($MTCO_2e$)	**38.25**	**0.01**	**0.00**	**38.69**

Source: (Urban Crossroads, 2021d)

Project Operation

The annual GHG emissions associated with the Project are summarized in Table 13, *Project GHG Emissions*. It should be noted that the existing development emissions were subtracted from the Project operational emissions to determine the new emissions from the Project. As shown in Table 13, construction and operation of the Project would generate a net total of approximately 2,550.23 $MTCO_2e$/yr. As such, the Project would not exceed the South Coast AQMD's recommended numeric threshold of 3,000 $MTCO_2e$/yr. As such, Project-related emissions would not have a potential significant direct or indirect impact on GHG and climate change (Urban Crossroads, 2021d).

Table 13 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	38.25	0.01	0.00	38.69
Area Source	0.03	0.00	0.00	0.03
Energy Source	361.09	0.02	0.00	363.04
Mobile Source	2,396.95	0.17	0.28	2,484.69
On-Site Equipment	50.75	0.02	0.00	51.16
Waste	59.03	3.49	0.00	146.24
Water Usage	181.29	2.22	0.05	252.79
Total CO_2e (All Sources)	**3,336.64**			
Existing Emissions	**786.41**			
Net Emissions (Project – Existing)	**2,550.23**			

* Rounded to the nearest hundredth decimal.
Source: (Urban Crossroads, 2021d)

Mitigation Measures: Mitigation measures are not required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Significance Determination: Less than Significant Impact

Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. In November 2017, CARB released the Final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. As Project building is anticipated to occur in 2023, consistency with SB 32 is discussed below.

2017 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 14, *2017 Scoping Plan Consistency*, summarizes the Project's consistency with the 2017 Scoping Plan. As summarized, the Project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

Table 14 2017 Scoping Plan Consistency

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

Action	Responsible Parties	Consistency
		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 be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
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.		**Consistent.** The Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The proposed 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.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of 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 electric vehicle 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		**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 electric vehicle 2030 targets.
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.
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.

Action	Responsible Parties	Consistency
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.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts improve transit-source emissions.
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.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
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."		**Consistent.** This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets), which apply to passenger vehicles.

Action	Responsible Parties	Consistency
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	**Consistent.** The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
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	**Consistent.** The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
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. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
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.		**Consistent.** The Project would not obstruct or interfere with agency efforts to 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.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**Consistent.** When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to

Action	Responsible Parties	Consistency
		adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, 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.		
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	**Consistent.** The Project would implement waste reduction and recycling measures consistent with State and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLCP and SB 1383.
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	**Consistent.** The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		**Consistent.** The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		**Consistent.** Where appropriate, Project designs will incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.

Action	Responsible Parties	Consistency
Establish scenario projections to serve as the foundation for the Implementation Plan		**Consistent.** The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Consistent.** The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Consistent.** The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Consistent.** The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On November 7, 2019, SCAG adopted the *2020-2045 RTP/SCS (Connect SoCal)* and its associated Program EIR for federal transportation conformity purposes only. *Connect SoCal* serves as an update to the *2016-2040 RTP/SCS* and focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land uses strategies in development of the SCAG region through horizon year 2045. The goals for *Connect SoCal* include: 1) encourage regional economic prosperity and global competitiveness; 2) improve mobility, accessibility, reliability, and travel safety for people and goods; 3) enhance the preservation, security, and resilience of the regional transportation system; 4) increase person and goods movement and travel choices within the transportation system; 5) reduce greenhouse gas emissions and improve air quality; 6) support healthy and equitable communities; 7) adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) promote conservation of natural and agricultural lands and restoration of habitats (SCAG, 2020, p. 9).

Table 15 SCAG's RTP/SCS Goal Consistency Analysis

RTP/SCS Goals	Goal Statement	Project Consistency Discussion
1	Encourage regional economic prosperity and global competitiveness.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. It should be noted that the Project would improve the regional economy by creating a new industrial facility.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	No conflict identified. MND Subsection 3.17, *Transportation*, evaluates the potential for Project-related transportation impacts and describes the Project's design features and payment obligations for improvements associated with mobility and accessibility. The Project would improve the accessibility of goods to the surrounding area.
3	Enhance the preservation, security, and resilience of the regional transportation system.	No conflict identified. As disclosed in MND Subsection 3.17 there are no components of the Project that would result in substantial safety hazards to motorists or pedestrians.
4	Increase person and goods movement and travel choices within the transportation system.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would have no adverse effect on such planning or maintenance efforts.
5	Reduce greenhouse gas emission and improve air quality.	No conflict identified. An analysis of the Project's environmental impacts is provided throughout this EIR. Air quality is addressed in MND Subsection 3.3, *Air Quality*, and impacts are determined to be less than significant with mandatory regulatory compliance. As discussed in this Subsection and Subsection 3.5, *Energy*, the Project would foreseeably incorporate various measures related to building design, landscaping, and energy systems to promote the efficient use of energy and thereby reduce GHG emissions.
6	Support healthy and equitable communities.	No conflict identified. This policy pertains to health and equitable communities, and these issues area addressed through goals and policies outlined in the City's General Plan. The Project site is developed with an existing industrial facility. Existing industrial development borders the site to the north, west, and south; the BNSF railroad track borders the site to the north; and North Eckhoff Street and office uses to the west. Air quality pollutant emissions associated with the Project were fully analyzed and addressed in Subsection 3.2, *Air Quality*, concluding that the Project would not: 1) exceed applicable SCAQMD localized criteria pollution emissions thresholds during construction and operation; 2) would not expose sensitive receptors to toxic air contaminants (i.e., DPM) that exceed the applicable SCAQMD carcinogenic and non-carcinogenic risk thresholds; and 3) would not cause or contribute to the formation of a CO "hot spot."

RTP/SCS Goals	Goal Statement	Project Consistency Discussion
7	Adapt to a changing climate and support an integrated regional development.	No conflict identified. This policy provides guidance to the City of Orange 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.
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No conflict identified. The *2020 SCS/RTP* indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouses, such as that 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 electric-powered and 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 to support advancements in these and other transportation technologies.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No conflict identified. 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 identified. As disclosed in MND Subsection 3.4, *Biological Resources*, the Project site is developed and does not include sensitive, native vegetation types worthy of conservation. The site also is not in agricultural use. Therefore, implementation of the Project would not interfere with City's ability to promote the conservation of natural and agricultural lands and the restoration of habitats.

Source: (SCAG, 2020, p. 9)

As shown above, the Project would not conflict with any of the 2017 Scoping Plan or *Connect SoCal* elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030. Therefore, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. As such, impacts would be less than significant.

	9. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 reasonable 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 one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(d)	Be located on a site which is included on a list of hazardous materials sites complied 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?	☐	☐	☐	☒

This section is primarily based on the *Phase I Environmental Site Assessment* (Phase I ESA), prepared by Hazard Management Consulting (HMC) dated October 27, 2020 (Appendix H); *Soil and Soil Vapor Investigation*, prepared by HMC dated November 20, 2020 (Appendix I); the *Asbestos Survey Report*, prepared by HMC dated October 24, 2020 (Appendix J); *Lead-Based Paint Testing Report* prepared by Allstate Services dated October 2, 2020 (Appendix K); and *Soil Management Plan* (SMP) prepared by HMC on January 20, 2022 (Appendix L).

Impact Analysis:

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project Applicant proposes to redevelop the Project site with buildings that have the potential to store hazardous materials during the future building user's daily operations.

Project Construction

Heavy equipment (e.g., dozers, excavators, tractors) would operate on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. Also, 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, California Department of Toxic Substances Control (DTSC), South Coast AQMD, and Santa Ana Regional Water Quality Control Board (RWQCB). With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Impacted Soils

Construction activities required to develop the Project site would involve the disturbance of on-site soils. There is a potential for the discovery of contamination during these activities due to past reported evidence of soil contamination and underground storage tanks.

The Project was observed to have historically been used for agricultural land as early as 1938 until it was first seen to be vacant in the mid-1970's. The site was then developed with the current facility (the National Oilwell Varco or "NOV") and was noted with additional development from 1985 until 2016 when the site was first seen in the approximate orientation it is in today. The site's historical industrial use presents a likelihood that hazardous chemicals have been stored at the Project site.

The NOV facility's activities include the manufacturing of heavy equipment for the oil and gas industry. In the Phase I ESA prepared for the Project site, Buildings 1 through 3 of the NOV facility were noted with significant areas of staining and spills, subsurface piping, trenches, metal plates, concrete patches, and machinery pits. Staining and spills were also noted in the hazardous waste areas along with surface staining seen in various areas around the site, such as in drainage swales lead toward storm drains. What appeared to be leaking oil was seen leaking from a refuse bin located in the hazardous waste storage area and entering a drain near the bin.

The facility has been under investigation and remediation for chlorinated solvents and received closure from the RWQCB in 1995. Perched groundwater was encountered at 53 feet below ground surface (bgs), and a potential for a vapor intrusion conduction at the site through migratory VOCs exists, in particular to the western portion of the site given the southerly flow of groundwater.

Historic Underground Storage Tanks (USTs) files indicate that the Pacific Delivery Service operated three gasoline USTs (two 10,000-gallon and one 1,000-gallon) and one 1,000-gallon waste oil UST. A 1989 permit from the Orange County Healthcare Agency for the removal of the two 10,000-gallon USTs was found for the site, however no additional documentation related to the remaining tanks were discovered. After review of the off-site facilities, the Inland Specialty Chemical Company, located approximately 497 feet northwest of the site, was identified to pose a potential vapor intrusion condition to the Site (HMC, 2020d). While no Controlled Recognized Environmental Conditions (CRECs) or Historical Recognized Environmental Conditions (HRECs) were identified at the Project site, the following Recognized Environmental Conditions (RECs) were identified during HMC's Phase I investigation:

- The approximately 30-year industrial use of the Project site and associated chemical uses;
- Significant areas of staining and spills, subsurface piping, trenches, metal plates, concrete patches, and machinery pits;
- Unknown status of historical USTs in the vicinity of Building 3;
- Potential vapor intrusion condition from on and off-site facilities; and,
- The reported clarifier/sump below the wash pad.

Accordingly, HMC prepared a Phase II ESA to assess whether releases of hazardous chemicals from on-site or off-site sources have affected subsurface conditions at the site, and to assess the presence of USTs in the vicinity of the Project site. The soil and vapor investigation included the advancement of 29 borings, samples were collected at depths of approximately 1, 5, 10, and/or 15 ft bgs. After collection, a soil vapor probe was installed at each location at approximately 5 ft bgs. Soil vapor analysis generally reported non-detectable consentrations, though several volitle organic compounds (VOCs) were reported at detectable concentrations in soil vapor at three of the locations at the site. All VOCs were found to be below established screening levels. Furthermore, all soil samples analyzed reported non-dectable levels of VOCs and concentations of metals that would typically be considered within background concentrations for Southern California soils. A geophysical investigation was conducted in the vicinity of the existing buildings to assess the unkown status of historical USTs. No evidence of USTs were found. However, elevated levels of total petroleum hydrocarbons (TPH) were noted at one boring location. All subsurface anomolies were reported to coincide with interference from above ground features.

Accordingly, no evidence of significant contamination was found at the site. However, there were isolated detections of certain contaminants that will require consideration during the Project's implementation. HMC recommended that the site should undergo closure to ensure that the NOV facility has removed all equipment and associated subsurface conduits, sumps, all chemicals, spills and staining, and the TPH impacted soil. In addition to compliance with the Soil Management Plan (SMP), described below, contaminated soils would be removed and disposed of offsite in accordance with all applicable regulatory guidelines which include:

- **South Coast AQMD Rule 1166 requirements:** The rule requires monitoring of soils contaminated with VOCs during excavation or grading. A Rule 1166 permit must be obtained from South Coast AQMD prior to the start of work. Field monitoring will be conducted as required under Rule 1166 and soils will be monitored for VOCs in accordance with the South Coast AQMD Executive Officer. In the event that VOC detections reach or exceed 50 parts per million, further grading or excavation activities would be conducted in accordance with Rule 1166 to minimize releases of VOCs to air. Monitoring and record keeping would be submitted to the South Coast AQMD.

- **South Coast AQMD Rule 403:** Best available dust control measures and monitoring for fugitive dust would be conducted in accordance with South Coast AQMD's Rule 403. In order to minimize exposure of on-site grading workers to dust and minimize dust from migrating off-site, various dust control measures would be implemented, including: spraying water on soil, limiting vehicle speeds on site to 5 miles per hour or less, controlling excavation activities, cleaning up track-outs at the end of each work day, minimizing drop heights during vehicle loading, and covering exposed stockpiles.

- **SWRCB General Construction Permit:** A SWPPP for construction would need to be in place prior to the start of grading. A SWPPP requires the incorporation of best management practices to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies.

Demolition

A recognized environmental condition (REC) is defined by the American Society for Testing Materials (ASTM) as, "the presence or likely presence of any hazardous substances or petroleum products in, on, or at the property: 1) due to a 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."

The use of asbestos-containing materials (ACM, a known carcinogen) and lead-based paint (LBP) (a known toxic), both of which are considered hazardous materials, was a common building construction prior to 1978 and may be present in the existing building. All proposed demolition activities would be required to comply with all applicable federal, State, and local hazardous materials regulation, which includes mandatory provisions for the safe removal, transport, and disposal of ACMs and lead paint. South Coast AQMD Rule 1403 (Asbestos Emissions) and Title 17 of the California Code of Regulations (CCR), Division 1, Chapter 8: *Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards* applies.

South Coast AQMD Rule 1403 establishes survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Assuming that ACMs are present in the existing structure located on-site, then Rule 1403 requires notification of the South Coast AQMD prior to commencing any demolition activities. Rule 1403 also sets forth specific procedures for the removal of asbestos and requires that an on-site representative trained in the requirements of Rule 1403 be present during the stripping, removing, handling, or disturbing of ACM. Mandatory compliance with the provisions of Rule 1403 would ensure that construction-related grading, clearing, and demolition activities do not expose construction workers or nearby sensitive receptors to significant health risks associated with ACMs. Because future development on the Project site would be required to comply with AQMD Rule 1403 during demolition activities, impacts due to asbestos would be less than significant.

Title 17, CCR, Division 1, Chapter 8: Accreditation, Certification and Work Practices for Lead-Based Paint and Lead Hazards, defines and regulates lead-based paint. Any detectable amount of lead is regulated. During the demolition of the existing manufacturing building, there is a potential for exposing construction workers to health hazards associated with lead. The Project would be required to comply with Title 17, CCR, Division 1, Chapter 8, which includes requirements such as employer-provided training, air monitoring, protective clothing, respirators, and handwashing facilities. Mandatory compliance with these requirements would ensure that construction workers and the public are not exposed to significant LBP health hazards or upset during demolition and/or during transport of demolition waste to an appropriate disposal facility and would ensure that impacts related to LBP remain less than significant. Accordingly, neither ACMs nor lead paint are determined to be a significant hazard on the Project site.

Soil Management Plan

The Project's Phase I and Phase II ESA and did not find evidence of significant contamination at the Project site. However, there were isolated detections of certain contaminants that were not considered an immediate threat at that time, provided that the Project site remained in its current use and orientation. The closure of the existing use at the Project site and removal of all chemicals will receive guidance from the Project's site specific Soil Management Plan (SMP) (Appendix L) during grading activites; handling, disposal, or reuse of soils containing elevated concentrations of COCs; and response to unknowns that could be encountered during grading.

In order to ensure public and worker safety, an SMP was prepared to provide procedures for efficiently managing potentially-impacted soils during grading and site preparation activities. Removal of the existing chemicals and closure of any activity located on the site is the responsibility of the NOV. The SMP would begin after the site has been closed and all demolition acitivites completed. The SMP has been prepared to guide soil handling and grading activities. During grading activities, the soil with known impacts as described above will be removed for off-site disposal prior to mass grading activities. In addition, there is always a chance of encountering previously unknown impacted soil. Given the known conditions and site history, grading activities will need to take into consideration the South Coast Air Quality Management District's (SCAQMD's) Rule 1166 should any "VOC Contaminated soil," be encountered as well as the general need for monitoring both for general health & safety needs as well as to monitor for potential VOC Contaminated soil.

The activity taking place that is subject to the SMP is the over excavation and recompaction of shallow soil for the development of building pads, drive aisles and parking areas of the site. Soil excavation and grading operations will be conducted in accordance with the following site-specific soil management protocols, developed after considering the site history and previous subsurface investigations. These protocols are intended to be followed during all grading activities and cover both known and, if encountered, unanticipated environmental conditions. The Environmental Field Coordinator (EFC) will periodically inspect the work locations to assess potential unknowns and monitor general grading practices. The Contractor's Field Coordinator will notify the EFC if any odorous or discolored soil is encountered. There are thee types of soil sampling that may be conducted as part of the SMP, including: soil for off site disposal; imported fill; and soil to be reused on-site.

Implementation of MM HAZ-1 would ensure compliance with the SMP, which would reduce potential impacts related to routine transport, use, or disposal of contaminated or potentially contaminated soils to less than significant.

Project Operation

As previously mentioned, the Project's future building occupants are not yet identified; however, the Project is designed to house general light industrial and warehouse space occupants and it is possible that hazardous materials could be used during the future building user's daily operations. State and federal Community-Right-to-Know laws allow public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that requires businesses to plan and prepare for possible chemical emergencies. The City follows the County's Hazardous Materials Inspection and Enforcement Plan (Orange, 2010b). To prevent accidents, and ensure proper handling, routine inspections are conducted at businesses within the City that store, use, or handle hazardous materials. The City concentrates the production of hazardous materials within its industrial area, separated from residential areas, educational uses, and institutional facilities. The City also identifies businesses

transporting, manufacturing, using, and storing hazardous chemicals, and requires such businesses to exercise caution and to mitigate potential negative effects on surrounding land uses prior to obtaining business licenses. Additionally, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file 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 hazardous material. The HMBEP intends to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the Project, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures:

HAZ-1 The Project Contractor shall adhere to the protocols and performance standards stipulated in the SMP (Appendix L). Contractors working at the site shall follow all applicable Cal/OSHA regulations for construction safety. A Completion Report shall be prepared at the conclusion of grading activities. The report shall document field monitoring activities and visual observations made during grading/excavations, as well as soil sampling locations and results. The report shall include a description of the location of impacted soil encountered, actions taken to characterize and mitigate impacts, confirmation soil sampling results, and disposition of any excavated soil. In addition, the report shall include a description of encountered subsurface structures and steps to remove and close such structures. The report shall be reviewed and approved by the City of Orange Community Development Director, prior to issuance of building permits.

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?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

During Project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction protocol and safety procedures that would avoid and minimize the potential for accidental release of such that any materials released are appropriately contained and remediated as required by local, State, and federal law.

Demolition

As stated above, ACM and LBP may be present in the existing buildings. Furthermore, ACMs were identified in materials at buildings A and C, as identified in the *Asbestos Survey Report*. All proposed demolition activities would be required to comply with all applicable federal, State, and local hazardous materials regulation, which includes mandatory provisions for the safe removal, transport, and disposal of ACMs and lead paint. South Coast AQMD Rule 1403 (Asbestos Emissions) and Title 17 of the California Code of Regulations (CCR), Division 1, Chapter 8: Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards, applies. Because future development on the Project site would be required to comply with South Coast AQMD Rule 1403 and Title 17, CCR, Division 1, Chapter 8, construction workers and the public would not be exposed to significant ACM and LBP health hazards due to upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Grading Activities

As discussed above, elevated levels of total petroleum hydrocarbons (TPH) were noted at one boring location. Although there was no evidence of significant contamination was found at the site, there were isolated detections of certain contaminants that will require consideration during the Project's implementation. If contaminants are encountered during grading activities there is a potential for upset and accident conditions involving the release of hazardous materials into the environment. MM HAZ-1 below would require implementation of an SMP to ensure the proper handling of potential contaminated soils. With implementation of this mitigation measure, the Project would not 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.

Mitigation Measures:

HAZ-1, as presented above, would apply.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Significance Determination: No Impact

The closest existing schools to the Project site are California Elementary School and Yorba Middle School located approximately 0.78 miles east of the Project site. Implementation of the Project would not have the potential to 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.

Mitigation Measures: Mitigation measures are not required.

d) Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Significance Determination: Less than Significant Impact

The Project site appears on the EnviroStor database sites; however, this listing represents a HREC at the Site. A HREC refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority (EDR, 2016). The status of the site is listed as "refer: other agency" and no further action (NFA) was recommended for the site as "remediation of soil was completed by Orange County." With the consideration of the absence of reported violations, spills, or releases, the Project site is not considered to be a REC (GeoTek, 2020b). Therefore, the Project would not create a significant hazard to the public or environment and impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

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?

Significance Determination: No Impact

The closest airport to the Project site is the Fullerton Municipal Airport located approximately 7.8 miles northwest. The Project site is not within an airport land use plan or within 2 miles of a public airport or public use airport. Implementation of the Project would not result in a safety hazard or excessive noise for people residing or working within the Project area. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Significance Determination: Less than Significant Impact

The City has an adopted emergency plan that establishes emergency preparedness and emergency response procedures for both peacetime and wartime disasters. The plan is termed an "Emergency Operations Plan," prepared in accordance with the State Office of Emergency Services guidelines for multi-hazard functional planning. The plan consists of 3 parts 1) a basic plan; 2) specific functions and duties of response agencies; 3) a directory of emergency response resources. The City's plan concentrates on specific agency response for any type of disaster.

All City arterials are recognized as primary emergency response routes. Additionally, non-arterials can be secondary emergency response routes. If current emergency vehicle access does not meet response standards, traffic calming efforts should not further degrade response times. The City's Emergency Operations Plan does not indicate evacuation routes for emergencies adjacent to the Project site. The routes of escape from disaster-stricken areas would depend on the scale and scope of the disaster.

As shown in Figure PS-4 of the City's General Plan Public Safety Element, Katella Avenue is the closest designated evacuation corridor in the City to the Project site. The Project is not anticipated to affect access to Katella Avenue during construction, and would not require road closures or otherwise impact the functionality of this, or other designated evacuation corridors.

Additionally, the Project would not affect emergency access. The Project is required to comply with applicable fire codes established by the Orange County Fire Authority (OCFA). The Project would be

required to go through the City's development review and permitting process and would be required to incorporate all appliable design and safety standards and regulations in the California Fire Code and Orange Municipal Code. Incorporation of applicable design and safety standards and regulations would ensure that the Project's development does not interfere with the provision of local emergency services.

Based on the foregoing, the implementation of the Project would not impair the implementation of or physically interfere with the City's Emergency Operation Plan, the General Plan Public Safety Element, or any other emergency response plan. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

Significance Determination: No Impact

The Project site is fully developed and is within a completely urbanized area that is void of any wildland areas. 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. Implementation of the Project would not expose people or structures to a significant risk involving wildland fires. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

10. HYDROLOGY AND WATER QUALITY. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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:	☐	☐	☐	☒
	(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
	(ii) increase the rate or amount of surface runoff in a manner which would result in flooding in- or off-site;	☐	☐	☐	☒
	(iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
	(iv) 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?	☐	☐	☐	☒
(f)	Potentially impact stormwater runoff from construction activities?	☐	☐	☒	☐
(g)	Potentially impact stormwater runoff from post-construction activities?	☐	☐	☒	☐
(h)	Result in a potential for discharge of stormwater pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas?	☐	☐	☒	☐
(i)	Result in the potential for discharge of stormwater to affect the beneficial uses of the receiving waters?	☐	☐	☒	☐
(j)	Create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm?	☐	☐	☒	☐
(k)	Create significant increases in erosion of the project site or surrounding areas?	☐	☐	☒	☐

This Section is primarily based on: 1) *Preliminary Hydrology Calculations for Proposed Buildings Eckhoff Street and Poplar Street* prepared by Thienes Engineering on November 2, 2022 (Appendix M) and 2) *Preliminary Water Quality Management Plan (WQMP) for Eckhoff Street Proposed Buildings* prepared by Thienes Engineering on November 3, 2022 (Appendix N).

Impact Analysis:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Significance Determination: Less than Significant Impact

As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the NPDES program to control direct storm water discharges. In California,

the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The City of Orange, including the Project site, is within the jurisdiction of the Santa Ana RWQCB.

Construction Impacts

The Project may result in water quality impacts during short-term construction activities. The grading/excavation required for Project implementation would result in exposed soils that may be subject to wind and water erosion. Although erosion occurs naturally in the environment, improperly managed construction activities can lead to substantially accelerated rates of erosion that are considered detrimental to the environment. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

The SWRCB adopted the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. Additionally, the Project would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance with the Construction General Permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The purpose of the SWPPP is to identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and to describe and ensure the implementation of best management practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity.

The Project would be required to comply with the City's Stormwater Local Implementation Plan (LIP) (Orange, 2011). The LIP requires all private and public works construction projects to implement and be protected by an effective combination of erosion and sediment controls and waste and materials management BMPs, such as source control BMPs (e.g. site planning and landscaping, use of pervious pavement), structural BMPs (e.g. protection from rain, secondary containment, etc.), and treatment control BMPs (e.g. constructed wetlands and vegetative swales), to prevent discharges into the storm drain system or watercourses. Table A-8.3 of the LIP provides a comprehensive list of designated construction BMPs (Orange, 2011). The minimum requirements for all construction sites include erosion and sediment controls, and waste and materials management controls (Table A-8.2 of the LIP), which would be implemented during the Project's construction phase (Orange, 2011). Additionally, the Project would be required to comply with Chapter 7.01, *Water Quality and Stormwater Discharges*, of the OMC. This chapter includes conditions and requirements related to the control of urban pollutants to stormwater runoff.

Mandatory compliance with the SWPPP, the City's LIP, and Chapter 7.01 of the OMC would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Impacts would be less than significant.

Post Construction-Impacts

The Project Applicant would redevelop the Project site with two buildings totaling to 292,762 sf and associated parking and landscaping. The anticipated pollutants to be generated from the Project site include: suspended solids and sediments, nutrients (from the proposed landscaping), heavy metals (from vehicles), pathogens (bacteria/virus from parking areas), pesticides, oil and grease, toxic organic compounds, and trash and debris. The Santa Ana River Reach 2 is the downstream receiving water for the Project site. (Thienes, 2022a)

The Project Applicant has prepared a WQMP (Appendix N), which includes structural and non-structural BMPs. Routine structural BMPs include: storm drain signage; trash and waste storage areas; efficient irrigation systems and landscape design; and loading dock areas. Non-structural BMPs include: education materials for property owners, tenants, and occupants; activity restriction; common area landscape management; uniform fire code implementation; common area litter control; employee training; common area catch basin inspection; and strew sweeping private streets and parking lots.

In addition to the WQMP, the NPDES program also requires certain land uses, including the industrial land uses proposed by the Project, to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption is granted. Because the permit is dependent upon the operational activities of the building and the tenants are not known at this time, details of the SWPPP (including BMPs) or potential exemption to the SWPPP operational activities requirement cannot be determined at this time. However, based on the requirements of the NPDES Industrial General Permit, the Project's mandatory compliance with all applicable regulations would further reduce potential water quality impacts during long-term operation. It should be noted that under existing conditions, flows generated from the site drain to North Eckhoff and Poplar Street unmitigated and untreated. Implementation of the Project would have a beneficial impact on water quality because it would capture first-flush flows and treat flows prior to being discharged into the City's storm drainage system.

Based on the foregoing analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality or result in potential discharge of stormwater to affect beneficial uses of receiving waters. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Significance Determination: Less than Significant Impact

Implementation of the Project would not include the construction of a potable groundwater well and no potable groundwater wells are located on-site. The City of Orange would provide potable water services to the Project. Most of the City's water comes from 2 sources: groundwater from the Lower Santa Ana River Groundwater Basin and imported water purchased from the Metropolitan Water District of Southern California (MWD).

Groundwater Supply

According to the City's 2015 Urban Water Management Plan (UWMP), the City's water resources have adequate supply to serve the Project site in addition to past, present, and future commitments under normal year, single dry year, and multiple dry years through the year 2040. Additionally, the Project does not propose a General Plan Amendment to modify the site's land use designation, and the proposed uses are already anticipated in the City's General Plan and UWMP. Based on the foregoing analysis, the Project would not have the potential to substantially decrease groundwater supplies. Impacts would be less than significant.

Groundwater Recharge

Under existing conditions, approximately 99 percent of the Project site contains impervious surfaces that provides little opportunity for infiltration. The Project would create similar impervious surface conditions, but slightly reducing the Project site's impervious surface coverage to 90 percent. Therefore, redevelopment of the site would not substantially interfere with groundwater recharge.

Additionally, as shown in Figure N-2 of the City General Plan Natural Resources Element, groundwater recharge facilities for the Lower Santa Ana River Groundwater Basin include the Santa Ana River and Santiago Creek. The Project site is located approximately 0.16 miles east of the Santa Ana River and approximately 2.5 miles west of the Santiago Creek. Implementation of the Project would not have the potential to interfere with groundwater recharge. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

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: (i) result in substantial erosion or siltation on- or off-site; (ii) increase the rate or amount of surface runoff in a manner which would result in flooding in- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?

Significance Determination: No Impact

Under existing conditions, the Project site does not contain a stream or river; therefore, the Project does not have to potential to alter the course of a stream or river. Furthermore, the Project would result in a reduction of impervious surfaces as compared to the existing condition (1% pervious surfaces existing to 10% proposed). No impacts would occur in this regard.

The Project would be designed to maintain the existing drainage flow across proposed impervious surfaces and would not result in erosion or siltation on- or off-site. Because the Project would not result in a substantial change to the ground surface conditions of the Project site, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute to runoff water which would exceed the capacity of existing or proposed stormwater drainage systems, or impede or redirect flood flows. Accordingly, no impacts are anticipated.

Mitigation Measures: Mitigation measures are not required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Significance Determination: No Impact

The Project site is not within a 100-year flood hazard zone. The Project does not have the potential to release pollutants due to 100-year flood inundation. No impacts would occur.

According to the Federal Emergency Management Agency (FEMA) flood map No. 06059C0161J, the Project site is within Zone X (shaded), an area with reduced flood risk due to levee (FEMA, 2009). The Project does not have the potential to release pollutants due to Project inundation. No impacts would occur.

A tsunami is a sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a seafloor associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank.

The Project site is located approximately 18 miles northeast of the Pacific Ocean. Due to site distance, the Project would not be subject to tsunami-related inundation. Additionally, there are no enclosed or semi-enclosed bodies of water in proximity to the Project site. Due to site distance, the Project would not be subject to seiche-related inundation. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Significance Determination: No Impact

Refer to the impact analysis under Threshold a.

Mitigation Measures: Mitigation measures are not required

f) Potentially impact stormwater runoff from construction activities?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold a.

Mitigation Measures: Mitigation measures are not required

g) Potentially impact stormwater runoff from post-construction activities?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold a.

Mitigation Measures: Mitigation measures are not required.

h) Result in a potential for discharge of stormwater pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas, loading docks or other outdoor work areas?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold a.

Mitigation Measures: Mitigation measures are not required.

i) Result in the potential for discharge of stormwater to affect the beneficial uses of the receiving waters?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold a.

Mitigation Measures: Mitigation Measures are not required.

j) Create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold c.

Mitigation Measures: Mitigation Measures are not required.

k) Create significant increases in erosion of the project site or surrounding areas?

Significance Determination: Less than Significant Impact

Refer to the impact analysis under Threshold c.

Mitigation Measures: Mitigation Measures are not required.

11. LAND USE/PLANNING. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	☐	☐	☐	☒
(b)	Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Impact Analysis:

a) Physically divide an established community?

Significance Determination: No Impact

The Project site is developed with an existing industrial facility. Existing industrial development borders the site to the north, west, and south; the BNSF railroad track borders the site to the north; and North Eckhoff Street and office uses to the west. The Project Applicant would redevelop the site with two buildings totaling to 292,762 sf with associated parking and improvements. The Project would not have the potential to physically divide an established community. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Significance Determination: No Impact

Under existing conditions, the Project site is designated for "Light Industrial" land uses in the City of Orange General Plan and "Light Industrial (M- Light Industrial)" zone. The Project Applicant would redevelop the Project site in accordance with the underlying land use designations and applicable zoning ordinance development standards. Accordingly, the Project would not conflict with the General Plan or Zoning Code. Because the Project would be consistent with the underlying General Plan designation for the site, the Project would not conflict with any applicable goals, objectives, and policies of South Coast AQMD's AQMP and SCAG's Connect SoCal, which base their assumptions and analyses upon the full build-out of the existing General Plans throughout the region. Refer also to Section 8(b) of this IS/MND. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

12. MINERAL RESOURCES. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Impact Analysis:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Significance Determination: No Impact

According to Appendix A of the City's General Plan EIR, the City's mineral resources are limited to sand and gravel resources (aggregate) along the Santa Ana River and Santiago Creek. The Project site is located within a developed, urbanized area of the City and is located approximately 0.16 miles east of the Santa Ana River and 2.5 miles west of the Santiago Creek (Orange, 2010a). As such, no mineral resources are anticipated in the Project area and the 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 and residents of the State. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Significance Determination: No Impact

As previously discussed, the Project site is located approximately 0.16 miles east of the Santa Ana River and approximately 2.5 miles west of the Santiago Creek; therefore, the Project does not have the potential to contain any aggregate resources. Additionally, the site is not permitted for mining use under the Light Industrial land use designation and Light Industrial zoning classification. Because the Project site is not delineated as containing mineral resources on the City's General Plan, the implementation of the Project does not have the potential to result in the loss of availability of a locally-important mineral resource recovery site. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

	13. NOISE. *Would the project result in:*	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
(c)	For a project located within the vicinity of a private airstrip 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?	☐	☐	☐	☒

This section is primarily based on the *Eckhoff Street Noise Impact Analysis* (Noise Study), prepared by Urban Crossroads, Inc. (Urban Crossroads) dated September 21, 2021 (Urban Crossorads, 2021e). The Project-specific Noise Study is included as Appendix O of this IS/MND.

Impact Analysis:

a) 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?

Significance Determination: Less than Significant Impact

Noise generated at the Project site under existing conditions is limited to surface street vehicle noise which includes auto and heavy truck activities on the surrounding roadways and the railroad tracks located north of the Project site.

Redevelopment of the Project site with new buildings and associated improvements has the potential to result in the generation of elevated noise levels during both near-term construction activities and under long-term operational conditions. Near-term (i.e., temporary) and long-term (i.e., permanent) noise level increases that would be associated with the Project are described below. Urban Crossroads took 24-hour noise measurements at four noise measurement locations depicted in Figure 11, *Noise Measurement Locations*. To assess the potential short-term construction and long-term operational noise impacts, four representative noise-sensitive receiver locations were identified at which the Project's anticipated noise generation was compared against, as shown in Figure 12, *Receiver Locations.*

Construction Noise Impact Analysis

The Project's only potential to cause a substantial temporary or periodic increase in ambient noise levels would occur during the construction phase. Construction activities on the Project site, especially those involving the use of heavy equipment, would create intermittent, temporary increases in ambient noise levels in the vicinity of the Project site. Noise generated by heavy construction equipment including trucks, graders, bulldozers, concrete mixers, and portable generators can reach high levels. However, construction-related noise increase would: 1) be transitory (i.e., varying from day-to-day and throughout the day), 2) completely cease upon completion of Project construction, and 3) not represent a recurring, periodic source of noise. However, periodic and temporary construction noise has the potential to be substantial compared to existing ambient noise levels. The Project's construction-related activities are

required to comply with the City's Noise Ordinance (OMC Section 8.24.040), which exempts construction activities during the hours of 7:00 am and 8:00 pm on any day except for Sunday or a Federal holiday, or between the hours of 9:00 am and 8:00 pm on a Sunday or a Federal holiday.

To evaluate the Project potential to generate potentially significant construction noise levels at the off-site receiver locations, the analysis is based on a threshold of 80 decibels (dBA) equivalent sound level (L_{eq}) for more than 8 hours per day for construction-related noise. This threshold was established in the Transit Noise and Vibration Impact Assessment Manual prepared by the Federal Transit Administration. As shown in Table 15, *Construction Noise Level Compliance*, the Project's construction-related noise at the off-site receiver locations are below the 80 dBA L_{eq} significance threshold. Therefore, impacts would be less than significant.

Table 16 Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Level (dBA L_{eq})		
	Highest Noise Level[2]	Threshold[3]	Threshold Exceeded?[4]
R1	59.6	80	No
R2	58.2	80	No
R3	62.2	80	No
R4	70.8	80	No

Notes:
1. Noise receiver locations are shown on Figure 13.
2. Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.
3. Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
4. Do the estimated Project construction noise levels exceed the construction noise level threshold?

Source: (Urban Crossorads, 2021e)

Operational Noise Impacts

Future tenants of the proposed Project are currently unknown. Therefore, this analysis presents worst-case scenario noise conditions for typical general light industrial and warehouse activities, assuming that the Project would be operational 24-hours per day, 7 days per week. The Project's proposed business operations would primarily be conducted within the enclosed building, except for traffic movement, parking, and loading/unloading of trucks at designated loading bays. The on-site Project-related noise-sources are anticipated to include: loading dock activity, truck terminal activity, truck movements, and roof-top air conditioning units.

According to OMC Section 8.24.040, the maximum allowable exterior sound levels for uses in proximity to residential uses are 55 dBA L_{eq} from 7:00 am to 10:00 pm (daytime) and 50 dBA L_{eq} from 10:00 pm to 7:00 am (nighttime) (Orange, 2020). Public facility uses do not have a threshold for maximum allowable exterior sound levels established in the OMC.

To estimate the Project's operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels anticipated with the development of the Project. It should be noted that the Project's projected noise levels assume the worst-case scenario environment with the loading dock activity, truck terminal activity, truck movements, and roof-top air conditioning units all operating at the same time. However, these activities and resulting noise level impacts will likely vary throughout the day. Table 16, *Operational Noise Level Compliance*, shows that the Project's operational noise levels would not exceed noise level standards. Impacts would be less than significant.

Table 17 Operational Noise Level Compliance

Receiver Location[1]	Receiver Land Use	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	Urban Mixed Use	46.6	46.6	55	50	No	No
R2	Light Industrial	43.6	43.5	55	50	No	No
R3	Neighborhood Office Professional Max	49.3	49.3	55	50	No	No
R4	Light Industrial	44.5	44.3	55	50	No	No

[1] See Exhibit 6-A for the receiver locations.
[2] Proposed Project operational noise levels as shown on Tables 7-1 and 7-2.
[3] Exterior noise level standards, as shown on Table 4-1.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
Source: (Urban Crossorads, 2021e).

Traffic-Related Noise Impact

According to the *759 North Eckhoff Scoping Memorandum* (Traffic Assessment; Appendix P), traffic generated by the operation of the Project is not expected to meaningfully influence the traffic noise levels on nearby roadway segments or land uses surrounding the off-site areas. When accounting for existing conditions, the Project would result in a net increase of 514 vehicle trips per day (394 passenger cars and 120 truck trips). The expected Project traffic represents an incremental increase to the existing roadway volumes. Project traffic is not expected to generate a perceptible noise level increase of 3 dBA CNEL at nearby sensitive land uses adjacent to study area roadways, since a doubling of the existing traffic volumes would be required to generate a 3 dBA CNEL increase. Due to the low increase in traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant.

Mitigation Measures: Mitigation measures are not required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Significance Determination: Less than Significant Impact

According to the Federal Transit Administration (FTA), vibration is the period oscillation of a medium or object. Sources of ground-borne vibrations include natural phenomena (e.g., earthquake, landslides, sea waves) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment).

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. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made

activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment and/or activities.

Construction-Related Vibration Impacts

Construction activities on the Project site would utilize heavy equipment that has the potential to generate low levels of intermittent, localized ground-borne vibration. The Project's construction activities most likely to cause vibration impacts are small bulldozers, jackhammers, loaded trucks, and large bulldozers.

Table 17, *Construction Equipment Vibration Levels*, presents the expected Project related vibration levels at the nearby receiver locations. At distances ranging from 152 to 1,470 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.000 to 0.006 in/sec PPV. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels will be less than the building damage thresholds at all the noise sensitive receiver locations. In addition, the typical construction vibration levels at the nearest sensitive receiver locations are unlikely to be sustained during the entire construction period but rather only during the times that heavy construction equipment is operating adjacent to the Project site boundaries. Impacts would be less than significant.

Table 18 Construction Equipment Vibration Levels

Receiver [1]	Receiver Land Use	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Threshold PPV (in/sec)[4]	Threshold Exceeded? [5]
			Small bulldozer	Jack-hammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	Urban Mixed Use	1,470	0.000	0.000	0.000	0.000	0.000	0.3	No
R2	Light Industrial	1,374	0.000	0.000	0.000	0.000	0.000	0.3	No
R3	Neighbor-hood Office Professiona l Max	969	0.000	0.000	0.000	0.000	0.000	0.3	No
R4	Light Industrial	152	0.000	0.002	0.005	0.006	0.006	0.3	No

[1] Receiver locations are shown on Figure 13.
[2] Distance from receiver location to Project construction boundary (Project site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment (Table 8-4 of the Noise Impact Analysis, Appendix O of this IS/MND).
[4] Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Tables 19, p. 38.
[5] Does the peak vibration exceed the acceptable vibration thresholds?

Operational Vibration Impacts

Under long-term conditions, the Project would not include nor require equipment, facilities, or activities that would result in substantial or perceptible ground-borne vibration. Trucks would travel to-and-from the Project site during long-term operation; however, vibration levels for heavy trucks operating at low-to-normal speeds on smooth, paved surfaces, as expected on the Project site and surrounding roadways-typically do not exceed 0.004 in/sec PPV, which is lower than the Caltrans vibration thresholds of 0.3 in/sec PPV for building damage and 0.04 in/sec PPV annoyance. Accordingly, long-term operation of

the Project would not expose persons or generate excessive groundborne vibration or groundborne noise levels, and a less than significant impact would occur.

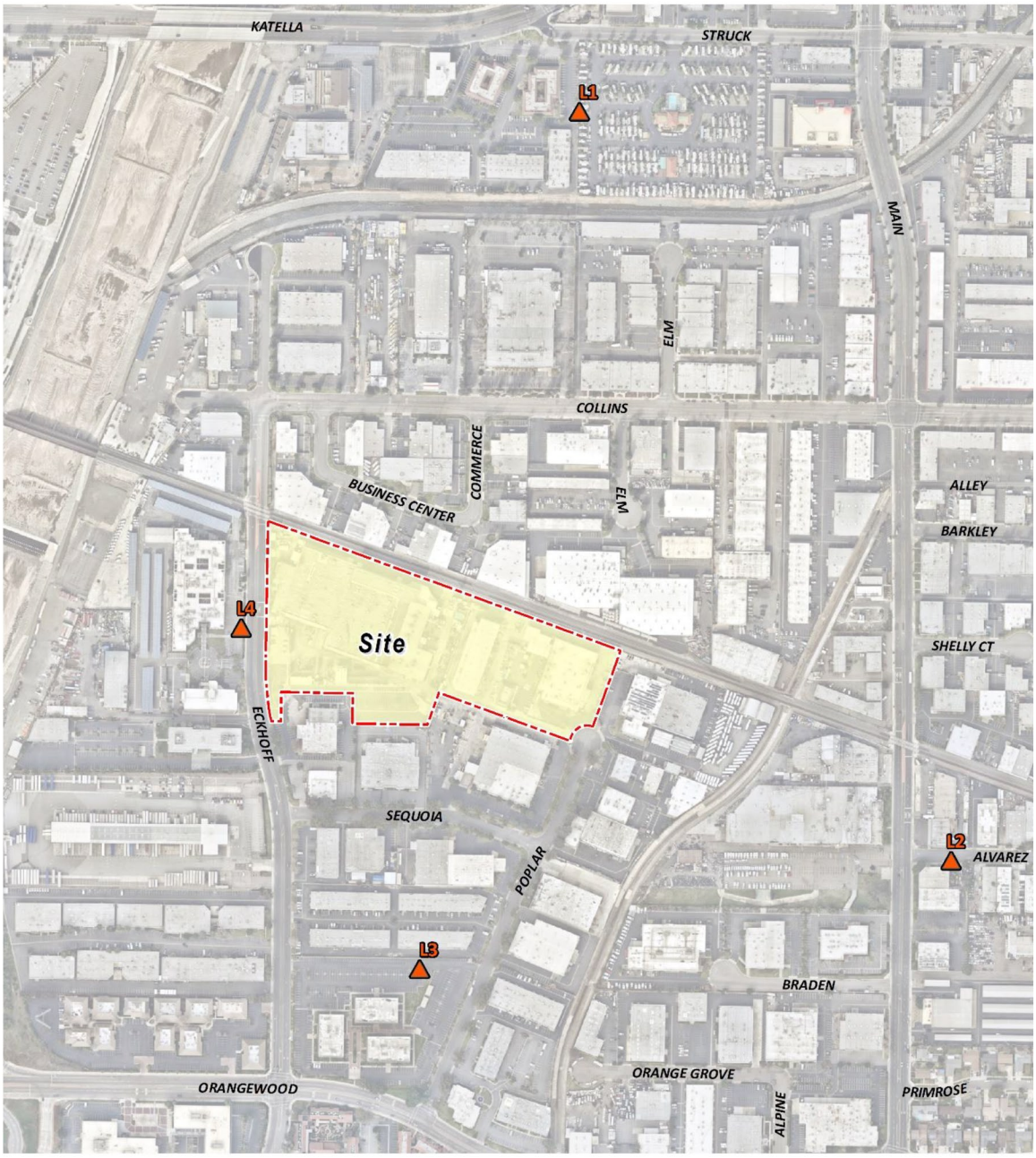
Mitigation Measures: Mitigation measures are not required.

c) For a project located within the vicinity of a private airstrip 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?

Significance Determination: No Impact

As previously discussed, the Project site is not in proximity to any private airstrip or airport and is not within an airport land use plan. The closest airport to the Project site is the Fullerton Municipal Airport located approximately 7.8 miles northwest. Implementation of the Project does not have the potential to expose people residing or working in the Project area to excessive noise levels associated with air travel. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

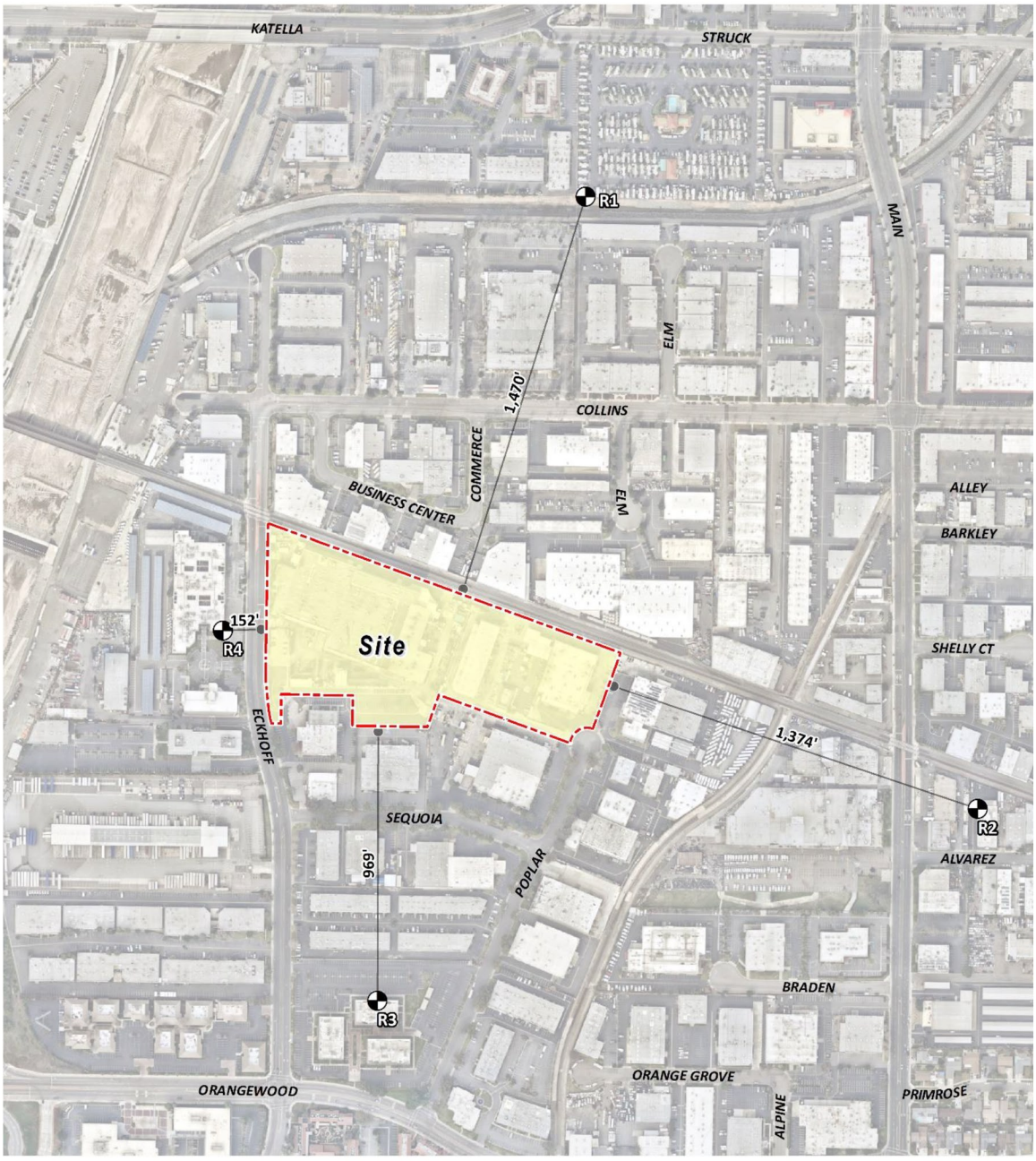


Source(s): Urban Crossroads (08-13-2021)

Figure 11

Not to Scale

Noise Measurement Locations



Source(s): Urban Crossroads (08-13-2021)

Figure 12

Not to Scale

Receiver Locations

	14. POPULATION AND HOUSING. *Would the project:*	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact Analysis:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Significance Determination: Less than Significant Impact

The Project does not include any residential uses; therefore, the Project does not have the potential to directly induce substantial unplanned population growth. Redevelopment of the Project site with two buildings totaling to 292,762 sf has the potential to result in 183 new jobs. According to the California Employment Development Department (EDD), as of April 2020, the City of Orange has a labor force of 67,200 persons and of that labor force, 8,300 are unemployed (unemployment rate of 12.4 percent) (EDD, 2020). According to SCAG's 2020-2045 Jurisdiction – Level Growth Forecast, the City of Orange is anticipated to employ approximately 131,300 persons (SCAG, 2020a). Project employment is well within the growth forecasts of the City and implementation of the Project would further balance the City's employment-to-population ratio. Therefore, the Project's proposed employees are not likely to relocate to the City, rather, the new jobs associated with the Project would provide employment opportunities for individuals already residing in the City.

The Project involves redevelopment of the site with a permitted use within the Light Industrial land use designation and M1 zoning classification. Accordingly, the Project would not result in growth that was not already anticipated by the City of Orange General Plan and General Plan EIR. Further, the Project site is already developed and contains existing infrastructure that serves the site's existing use. The Project would improve North Eckhoff Street along the site's frontage and connect to the existing utility connections. In doing so, the Project would be in conformance with the General Plan and applicable infrastructure master plans. Therefore, the Project would not induce substantial indirect population growth in the area.

Based on the foregoing analysis, the Project is not anticipated to induce substantial unplanned population growth in the area. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Significance Determination: No Impact

The Project site is developed with an existing industrial facility and does not contain any residential structures. Implementation of the Project would not displace any housing or people and no replacement housing would be required. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

15. PUBLIC SERVICES.		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	☐	☐	☒	☐
	ii) Police Protection?	☐	☐	☒	☐
	iii) Schools?	☐	☐	☐	☒
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☐	☒

Impact Analysis:

a) Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire Protection?

Significance Determination: Less than Significant Impact

The Orange City Fire Department (OCFD) provides fire and emergency response to the City, including the Project site. According to the City General Plan EIR, the OCFD operates eight fire stations within the City. OCFD Station No. 5, located at 1345 Maple Street, is the closest fire station to the Project site (located approximately 0.8 miles southwest). According to OCFD's Annual Report for 2017, the average response time was 3 minutes and 46 seconds (OCFD, 2018).

As previously discussed, the Project Applicant proposes to demolish the existing on-site structures and redevelop the site with two buildings totaling to 292,762 sf. Because the Project site is occupied by an existing manufacturing facility that requires fire protection services, and based on the site's close proximity to an existing fire station, the City's existing fire protection facilities would adequately serve the Project. The Project is not anticipated to result in the construction of new or physically altered fire facilities. The Project would be required by the City's Municipal Code Chapter 15.38, *Fire Protection Facilities Program*¸ to pay a fire protection facilities fee to aid in offsetting the increased demand for fire services created by non-residential development. This fee is due prior to the issuance of a building permit.

The Project's proposed buildings would feature fire safety and suppression design, including the type of building construction, fire sprinklers, a fire hydrant system, and paved access. The proposed buildings would be a concrete tilt-up construction that contains a low fire hazard risk rating. Additionally, a fire alarm system is proposed to be installed, as well as an Early Suppression, Fast Response (ESFR) ceiling-mounted fire sprinklers. ESFR provides protection that exceeds that of in-rack systems. ESFR high output, high-volume systems are in ceiling spaces as with conventional fire sprinkler systems, but they incorporate large, high-volume, high-pressure heads to provide the necessary fire protection for

buildings that may contain high-piled storage. While most other sprinklers are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire, which knocks the fire down to its source.

Based on the foregoing, the Project would receive adequate fire protection services and would not result in the need for new or physically altered fire protection facilities. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

ii) Police Protection?

Significance Determination: Less than Significant Impact

The City of Orange Police Department provides law enforcement services to the City, including the Project site. The Orange Police Department is located at 1107 N. Batavia Street, which is located approximately 0.7 miles northwest of the Project site. Implementation of the Project is anticipated to result in similar service calls (typical of an industrial facility) as the existing manufacturing use. According to the General Plan Public Safety Element, to maintain the City's ability to serve current residents and businesses, applicants are required to provide for adequate services and equipment to serve businesses of new developments. Land uses will be evaluated and modified, if necessary, to facilitate access to emergency services, meet service standards, and ensure land use compatibility. Therefore, it is anticipated that emergency response would occur with acceptable response times.

According to City of Orange Municipal Code Chapter 3.13, Police Facility Development Fee, the Project Applicant would be required to pay fair share fees to help finance police facilities required by new development to avoid adversely impacting existing police protection facilities. Additionally, the Project plans are reviewed and approved by the City of Orange Building and Police Departments, which ensure that adequate safety and crime prevention measures are provided within the Project's design. Therefore, implementation of the Project is not anticipated to result in the new or physically altered police protection facilities. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

iii) Schools?

Significance Determination: No Impact

The City provides school services through the Orange Unified School District. Redevelopment of the site not have the potential to result in substantial direct growth in the population, nor an increase in student population. The Project would be required to pay appropriate school fees applicable to all new development in accordance with Assembly Bill (AB) 2926 and Senate Bill (SB) 50 to offset potential impacts on school services. No impact would occur.

Mitigation Measures: Mitigation measures are not required.

iv) Parks?

Significance Determination: No Impact

According to the General Plan Natural Resources Element, the City owns and has developed 22 parks (Orange, 2015b). The City provides approximately 1.81 acres of parkland per 1,000 persons. The City anticipates developing approximately 43.5 acres of planned future parks; the nearest park to the Project site is the Camino Real Park located approximately 0.39 miles southeast. The Project would not introduce new residents to the City necessitating the need for additional parks. No impact would occur.

Mitigation Measures:

v) Other public facilities?

Significance Determination: No Impact

Other public facilities include public libraries. The City's public libraries operate according to the Public Library Facilities Master Plan (2002-2020). This master plan outlines current and projected future demand based on the City's General Plan buildout; it is intended to ensure that the California State Library's recommended standard of 4 volumes and 0.7 square foot per capita is maintained and that the City's library service needs are met as future development occurs. The nearest library to the Project site is Charles P. Taft Library, located approximately 1.4-miles northeast. The Project would not introduce new residents to the City necessitating the need for additional libraries or demand for library services. No impact would occur.

Mitigation Measures: Mitigation measures are not required.

16. RECREATION.		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Impact Analysis:

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Significance Determination: No Impact

As previously stated, the City has owned and developed 22 parks and approximately 15 miles of equestrian, biking, and recreational trails. Parks and open space make up 31.8 present of land use in the City (Orange, 2010a). The Project Applicant does not propose to construct any residential uses on the Project site. Therefore, the Project would not create a substantial population increase that would increase the use of existing neighborhood and regional parks or other recreational facilities, resulting in physical deterioration of park facilities. No impact would occur.

Mitigation Measures: Mitigation measures are not required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Significance Determination: No Impact

The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Implementation of the Project would not result in any adverse physical effects on the environment due to the construction of recreational facilities. No impact would occur.

Mitigation Measures: Mitigation measures are not required.

17. TRANSPORTATION. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
(b)	Would the project 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)?	☐	☐	☒	☐
(d)	Result in inadequate emergency access?	☐	☐	☒	☐

This section is primarily based on the *759 North Eckhoff Street Scoping Memorandum* (Traffic Assessment), prepared by Urban Crossroads dated December 17, 2021 (Urban Crossroads, 2021f), and *759 North Eckhoff Street Vehicle Miles Traveled (VMT) Assessment* (VMT Assessment), prepared by Urban Crossroads dated September 15, 2021 (Urban Crossroads, 2021g). The Project-specific Traffic Assessment and VMT Assessment are included as Appendix P and Q of this IS/MND, respectively.

Impact Analysis:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Significance Determination: Less than Significant Impact

Project Trip Generation

The Project site is developed and access is provided via driveways on Eckhoff Street and Poplar Street. The trip generation rates used for this analysis are based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (10th Edition, 2017) and the 10th Edition Supplement (February 2020). The proposed Project is anticipated to generate 682 two-way vehicle trips per day with 77 AM peak hour trips and 77 PM peak hour trips (actual vehicles) and 884 total passenger car equivalent (PCE) trips. As discussed in more detail below, due to adoption of CEQA Guidelines section 15064.3, automobile delay shall no longer constitute a significant impact. Thus any discussion of congestion in this IS/MND is for informational purposes only.

When accounting for existing conditions, the Project would result in a net increase of 514 vehicle trips per day and a net increase of 81 AM peak hour trips and 68 PM peak hour trips. According to the TIA Guidelines, a TIA may not be required if the AM or PM peak hour trip generation is less than 100 vehicle trips, the Project would generate less than 1,600 trip-ends per day, and the Project would contribute less than 51 peak hour trips to any intersection during the AM and PM peak hours.

Transit

The Orange County Transit Authority (OCTA) provides bus service for the City (Orange, 2015d). The nearest bus stop to the Project site is the Route 53 Main-Collins bus stop operated by OCTA located approximately 0.7 (approximate 14-minute walk) miles northeast. The City recognizes that ridership of bus systems will increase and has designed a land use plan that enables and accommodates increased

transit use, including major commercial and employment areas (e.g., Town and County Road corridor, South Main Street, Katella Avenue, Uptown Orange, and Old Towne). The Project does not have the potential to interfere with the City's goal to provide convenient and attractive transit amenities and streetscape features to encourage transit use. No impacts would occur.

Bicycle and Pedestrian Facilities

The City of Orange recognizes walking and biking contribute to a healthy community and play significant roles as alternatives to the automobile. The City has identified mixed-use areas and reinvigorated commercial areas within the City as spaces that will provide people areas to walk and shop. The City's goal is to create and implement a pedestrian-oriented streetscape master plan addressing the key commercial corridors including Tustin Street, Chapman Avenue, Main Street, Lincoln Avenue, and Katella Avenue. The Project site not in any of the key commercial corridors. The Project site is within an urbanized and industrial portion of the City that is not conducive to walking. Under existing conditions, sidewalks are provided along the west side of North Eckhoff Street. Therefore, the Project's access on the east side of North Eckhoff Street, including passenger cars and trucks accessing the site, would not interfere with pedestrian facilities. Implementation of the Project would not interfere with the City's pedestrian-oriented streetscape master plan. No impacts would occur.

As previously discussed, the Project site is within an industrialized area of the City. According to Figure CM-3 of the City's General Plan Circulation and Mobility Element, there are no existing or proposed bicycle facilities in the Project area. Implementation of the Project would not interfere with the City's Bikeway Master Plan. No impacts would occur.

Mitigation Measures: Mitigation is not required.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (*In accordance with CEQA Guidelines Section 15064.3(c), the City of Orange, as the lead agency, will implement the provisions of Section 15064.3 of the CEQA Guidelines, when the provisions go into effect statewide beginning July 1, 2020.)*

Significance Determination: Less than Significant Impact

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This Statewide mandate went into effect July 1, 2020.

The City of Orange adopted their own VMT analysis guidelines and thresholds on July 14, 2020, which are described in detail in the *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment*. Based on these guidelines the City has chosen to utilize the North Orange County Collaborative VMT Traffic Study Screening Tool (Screening Tool) that identifies VMT screening criteria for a project based on the type of land use and its location within the City. The Screening Tool is based on the screening criteria described in the adopted City Guidelines and follows those recommended by the Governor's Office of Planning and Research (OPR) in their Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory).

The City Guidelines provides a multi-step procedure to evaluate VMT screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less than significant

transportation impact without conducting a more detailed project level VMT analysis. The screening criteria are listed in the following three steps:

Step 1: Transit Priority Area (TPA) Screening
Step 2: Low VMT Area Screening
Step 3: Project Type Screening

A land use project need only meet one of the above screening thresholds to result in a less than significant transportation impact.

TPA Screening

The City Guidelines state that projects located within a TPA, ½ mile of an existing "major transit stop," or an existing stop along a "high-quality transit corridor" will have a less than significant impact on VMT. According to the Screening Tool results, the Project is within a TPA.

Once a project is determined to be within a TPA, the City Guidelines also recommends consideration of secondary screening checks. For example, a proposed land use project is not eligible for TPA screening if the project meets any of the following sub-criteria:

1) Has a Floor Area Ratio (FAR) of less than 0.75;
2) Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3) Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
4) Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

The Project is located within a TPA, and therefore may be considered under the secondary screening checks. The Project site is consistent with the City's General Plan Land Use Map, is consistent with the SCAG's Sustainable Communities Strategy, and does not replace affordable residential units with a smaller number of moderate- or high-income residential units. However, the Project supplies more parking than minimum requirements and has an FAR of less than 0.75. Therefore, the Project does not meet the secondary TPA criteria.

Low VMT Area Screening

As noted in the City Guidelines, "residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area." The Project is consistent with this criterion as the proposed general light industrial and warehouse uses are consistent with the existing area. The existing area consists of light manufacturing immediately surrounding the Project with professional office uses to the south and industrial uses to the east.

The Screening Tool uses the sub-regional Orange County Transportation Analysis Model (OCTAM) to measure VMT performance within the City of Orange for individual traffic analysis zones (TAZ's). Based on the Screening Tool results (Appendix Q of this IS/MND [Attachment A]), the Project's physical location is reported to be located within a low VMT generating TAZ as compared to the City of Orange General Plan Buildout VMT per service population.

Once a project is identified to be within a low VMT area, City Guidelines also state that the traffic analyst should ensure that the Project is consistent with the land use assumptions contained in the travel demand model's TAZ used to measure VMT performance. The Project proposes general light industrial and warehouse uses, which would be consistent with existing allowable uses and thus meeting the low VMT area screening criteria.

Project Type Screening

The City Guidelines provides a list of project types that are presumed to have a less than significant impact absent substantial evidence to the contrary. A brief list of these project types includes:

- Local serving essential services (i.e., public schools, parks, day care centers, etc.)
- Local serving retail (less than 50,000 square feet)
- Local serving hotels
- Assisted living facilities
- Community institutions (i.e., public libraries, fire stations, local government)
- Projects that generate less than 110 daily vehicle trips

The Project as designated is forecasted to generate more than the 110 daily trip threshold. Therefore, the Project Type Screening Criteria is not met.

Conclusion

The Project meets the Low VMT Screening threshold and is anticipated to exhibit a similar level of low VMT. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

c) Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Significance Determination: Less than Significant Impact

Vehicular access is currently provided via two two-way driveways along North Eckhoff Street and one two-way driveway at the northwest cul-de-sac of North Poplar Street. Under Project conditions, vehicular access would remain the same with roadway improvements to the northern entryway along North Eckhoff Street and cul-de-sac entry along North Poplar Street.

The proposed buildings would generate truck trailer trips and trucks would be required to utilize City designated truck routes to and from the Project site. Truck trailers would travel to and from the site from the SR-57, Katella Avenue, and West Orangewood Avenue. Truck trailer travel would be limited to the following routes:

- Truck-trailers exiting the site would travel south on North Eckhoff Street and turn right on West Orangewood Avenue to access the SR-57. Alternatively, truck-trailers exiting the site would travel south on North Poplar Street and make a right turn on West Orangewood Avenue from either North Eckhoff Street or North Poplar Street.

- Truck-trailers entering the site would exit the SR-57 at West Orangewood Avenue and turn right on either North Eckhoff Street or North Poplar Street.

Implementation of the Project would not require the widening of surrounding roadways to accommodate truck-trailer traffic. As such, there would be no transportation hazards created as a result of an incompatible land use.

All proposed improvements within the public right-of-ways would be installed in conformance with City design standards. The City's Public Works Department reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced by the Project. Therefore, the Project would not increase hazards and impacts are less than significant.

Mitigation Measures: Mitigation measures are not required.

d) Result in inadequate emergency access?

Significance Determination: Less than Significant Impact

According to the City General Plan Public Safety Element, the City has an emergency plan which establishes emergency preparedness and emergency response procedures. All City arterials are recognized as primary emergency response routes and non-arterials are recognized as secondary emergency response routes. The Project would have three driveways, similar to existing conditions, along North Eckhoff Street and North Poplar Street. All Project driveways would be subject to the City's site access and circulation requirements identified in the City's Municipal Code Chapter 12, *Streets, Sidewalks, and Public Places*. Additionally, the Project's internal drive aisles will provide adequate access for emergency vehicles. Moreover, all construction staging would occur within the boundaries of the Project site and would not interfere with the circulation of nearby roadways or implementation of the City's emergency plan. The Project would provide adequate emergency access for fire vehicles via North Eckhoff Street. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

18. TRIBAL CULTURAL RESOURCES. *Would the project 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:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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).	☐	☐	☐	☒
(b)	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.	☐	☒	☐	☐

Impact Analysis:

On July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource that would require a lead agency to "being consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and object with cultural value to a California Native American tribe" and are either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

In compliance with AB 52, the City of Orange distributed letters on May 17, 2021 to those Native American tribes that have requested notification for AB 52 notifying each tribe of the opportunity to consult with the City on the Project.

a) 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)?

Significance Determination: No Impact

As analyzed in Cultural Resources Threshold a, there are no resources on the Project site that are eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined by Public Resources Code Section 5020.1(k). Implementation of the Project would not result in a substantial adverse change in the significance of a listed historical resource. No impacts would occur.

Mitigation Measures: Mitigation measures are not required.

b) 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.

Significance Determination: Less than Significant Impact with Mitigation Incorporated

As indicated in the Cultural Resources section of this IS/MND, the Project site is not included on the National Register of Historic Places, California Register of Historical Resources, or a local register of historical resources, nor is it eligible for listing. Accordingly, pursuant to subsection (c) of Public Resources Code Section 5024.1, the City of Orange has determined that the Project would not impact historical resources resulting from Project implementation.

A records search of the sacred land file (SLF) at the NAHC was requested, which was negative for the presence of sacred sites in the search radius (see Appendix C of this IS/MND). As of the date of this IS/MND, only the Gabrieleno Band of Mission Indians – Kizh Nation requested consultation with the City of Orange on May 17, 2021. The City conducted consultation with the Gabrieleno Band of Mission Indians – Kizh Nation and the Tribe and received recommended mitigation to reduce potential impacts to undiscovered tribal cultural resources.

Because the Project would require excavation for construction into previously undisturbed soils, there is a potential to uncover tribal cultural resources during excavation. Therefore, while unlikely, the presence of subsurface tribal cultural resources on the Project site remains possible, and these could be affected by ground-disturbing activities associated with grading and construction at the Project Site. To address the inadvertent discovery of tribal cultural resources, MM TCR-1 has been incorporated into the Project. This mitigation measure requires the presence of a Native American monitor during grading activities and the proper handling, treatment, and disposition of any discovered tribal cultural resources. With implementation of MMe TCR-1, impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

TCR-1 Prior to the commencement of any ground disturbing activity at the Project site, the Project Applicant shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this Project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the City of Orange Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal Monitor will be present during all ground disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project Site. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be

evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural, and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources.

19. UTILITIES/SERVICE SYSTEMS. *Would the project:*		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
(b)	Have sufficient water supplies available to serve the project and reasonably forseeable 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 adequate 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)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	☐	☐	☒	☐

Impact Analysis:

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 telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Significance Determination: Less than Significant Impact

Water and Wastewater Treatment

The City of Orange Water Division provides potable water service (water supplies include imported water, groundwater, and surface water) to over 139,000 residents within the City's 32 square-mile planning area. The Orange County Sanitation District (OCSD) provides wastewater services to the City.

Under existing conditions, the Project site is developed with a manufacturing facility. Implementation of the Project would demolish the existing manufacturing facility and redevelop the site with two warehouse buildings. The Project Applicant would connect a new 3-inch water line, 3-inch fire line and 18-inch sewer lines to the existing 10-inch water line and 8-inch sewer line beneath North Eckhoff Street and North Poplar Street. Because the Project Applicant proposes to redevelop the site with a permitted use under the Light Industrial land use designation and M1 Zone Classification, the water demand and wastewater generation from the Project site was anticipated. Therefore, the City's existing water infrastructure and wastewater treatment facilities are adequate to serve the Project. OMC Section 13.56.090, *Charges for Sewer Mains and Extensions*, imposes a sewer main connection fee on non-residential development in the City as a condition precedent to the issuance of a building permits to fund the Project's fair share of costs to upgrade the City's sewer system. Additionally, the Project would be required to pay on-going user fees. Payment of these fees would offset the Project's potential increase in demand for wastewater collection services.

Although the Project would result in new water and sewer line connections, these connections would occur on-site and would be part of the Project's construction phase, which is evaluated throughout this IS/MND. The construction of the Project's water and sewer lines necessary to serve the Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this IS/MND. Impacts would be less than significant.

Stormwater Drainage

Proposed conditions would slightly alter the existing condition drainage patterns as well as drainage shown in the City's Master Plan of Drainage. The tributary runoff to North Eckhoff Street would be reduced, thus providing relief to the street and downstream facilities. An on-site storm drain system is proposed to direct the majority of the Project site easterly to a proposed storm drain in North Poplar Street. This storm drain will continue southerly and connect to the exiting 54-inch storm drain system.

Runoff from the westerly portion of the Building 1 site and existing portions of the southwest corner of the site will continue to drain to North Eckhoff Street. Runoff from the existing building and parking area to the south will continue to drain to the existing "v" gutter that will remain. The remining runoff will flow easterly towards Poplar Street, which will be detained to meet the Project's 100-year peak flow rate.

The Project's proposed detention basin is designed to retain 100-year peak flows and will discharge 10-year peak flows from the detention basin and into the City's existing storm drain system. The City's existing storm drain system has the capacity to accept the Project's 10-year peak flows in addition to the 10-year peak flows from the surrounding development. Additionally, the Project's proposed BMPs would ensure that pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the Project site. Impacts would be less than significant.

Dry Utilities

Under existing conditions, the Project site is served by Southern California Edison (SCE) for electrical power, Southern California Gas Company (SoCal Gas) for natural gas, and AT&T for telephone and fiber optics. Connections to the existing utility networks are available in the Project area and any off-site improvements would occur within improved rights-of-way, which are inherent to the Project's construction phase and have been evaluated throughout this IS/MND. Where necessary, mitigation measures have been identified to reduce impacts to a level below significance. Because the Project site has been previously developed with a manufacturing facility that requires electric power, natural gas, and telecommunication services, implementation of the Project is not anticipated to limit the ability of SCE, SoCalGas, or AT&T to provide service to Project. Therefore, the Project would not require or result in the construction or expansion of new facilities, and impacts would be less than significant.

Mitigation Measures: Mitigation Measures are not required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Significance Determination: Less than Significant Impact

The City of Orange provides water service to the City. Under existing conditions, the City of Orange provides water services to the Project site. The City receives its water from 2 main sources: groundwater

from the Lower Santa Ana River Groundwater Basin, managed by the Orange County Water District (OCWD), and imported water from the MWD, managed by the Municipal Water District of Orange County. Groundwater is pumped from 15 active wells in the City. According to the City's Urban Water Management Plan (UWMP), the City relies on approximately 6,515 acre-feet per year (AFY) of imported water and 20,372 AFY of groundwater form the Lower Santa Ana River Groundwater Basin. Additionally, the City relied on 1,757 acre-feet of surface water purchased through the Serrano Water District in 2015.

The City's UWMP includes an analysis of water supply reliability projected through 2040 under normal years, single dry year, and multiple dry years. The City's total water demand for 2015 was approximately 28,643 AF. The City's forecasts for projected water demand based on the population projections of the SCAG, which rely on the adopted land use designations contained within the general plans that cover the geographic area within City of Orange's service. Because the Project Applicant would redevelop the site with a use permitted under the Light Industrial land use designation, the Project would be consistent with the City's General Plan and, therefore, the water demand associated with the Project was considered in the demand anticipated by the 2015 UWMP and analyzed therein. As stated above, the City is anticipated to have adequate water supplies to meet all its demands until the year 2040 under a normal year, single dry year, and multiple dry years. Therefore, the City has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Significance Determination: Less than Significant Impact

The OCSD provides wastewater treatment for the City of Orange via 2 reclamation plants: Reclamation Plant No.1 in Fountain Valley and Treatment Plant No. 2 in Huntington Beach. Reclamation Plant No. 1 has a total rated primary capacity of 108 million gallons per day (mgd) and a secondary treatment capacity of 80 mgd. Treatment Plant No. 2 has a total rated primary capacity of 168 mgd and a secondary treatment capacity of 90 mgd. (Carollo, 2020) According to OCSD, the estimated average daily flow of wastewater received in 2020 to 2021 at Plant No. 1 and Plant No. 2 are 118 mgd and 64 mgd, respectively. (OCSD, 2022) According to the City's General Plan EIR, the City's Sewer Master Plan estimated a wastewater generation rate of 23.7 mgd in the City, which includes wastewater flow from industrial, commercial, and residential land uses.

The Project site is developed with a manufacturing facility that requires wastewater treatment services. The Project Applicant would demolish the existing structure and redevelop the site with two buildings totaling to 292,762 sf. The Project Applicant would redevelop the Project site with a use that is consistent with the site's underlying land use designation; therefore, the wastewater generation associated with the Project was considered in the demand anticipated by the City's General Plan EIR and the City's Sewer Master Plan and analyzed therein. As such, the OCSD's existing wastewater treatment facilities are anticipated to have adequate capacity to serve the Project's projected demand in addition to its existing commitments. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

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?

Significance Determination: Less than Significant Impact

The City of Orange contracts with a private service provider to collect solid waste, green waste (grass clippings, tree, and shrub clippings), and items for recycling. Waste collected from the City is disposed of at 1 of 3 landfills in Orange County: Olinda Alpha Landfill, Frank R. Bowerman Landfill, and the Pima Deshecha Landfill. The Orange County Integrated Waste Management Department (OCIWMD) owns and operates these landfills.

According to the California Department of Resources Recycling and Recovery (CalRecycle), the Olinda Alpha Landfill is permitted to accept 8,000 tons per day (tpd), the Frank R. Bowerman Landfill is permitted to accept 11,500 tpd, and the Pima Deshecha Landfill is permitted to accept 4,000 tpd. Additionally, the Olinda Alpha Landfill has a closure date of December 21, 2036; the Frank R. Bowerman Landfill has a closure date of December 31, 2053; and the Prima Deshecha Landfill has a closure date of December 31, 2102. (CalRecycle, 2020a; CalRecycle, 2020b; CalRecycle, 2020c)

Implementation of the Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. Additionally, the Project would be required to comply with mandatory waste reduction requirements, as described in further detail below.

Construction Impact Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded demolition materials and packaging. The Project would reuse 136,075 tons of crushed concrete and asphalt.

Based on the size of the Project (292,762 sf) and the United States Environmental Protection Agency's (US EPA) construction waste generation factor of 4.34 pounds per sf (lbs/sf) for non-residential uses, approximately 631.3 tons of waste is calculated to be generated during the Project's construction phase ([292,762 sf x 4.34 lbs/sf]/2,000 lbs/ton = 635.3 tons) (EPA, 2009, p. 10). California Assembly Bill 939 (AB 939) requires that a minimum of 50% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies); therefore, the Project is estimated to generate approximately 317.6 tons during its construction phase. The Project's construction phase is anticipated to last for approximately 430 days; therefore, the Project is calculated to generate approximately 0.74 tons of solid waste per day requiring landfill during its construction phase.

The Project's non-recyclable construction waste generated by the Project would be disposed of at 1 of the 3 landfills as described above. The Project's estimated total construction solid waste would represent approximately 7.9 percent of the daily tpd at Olinda Alpha Landfill, 5.4 percent at the Frank R. Bowerman Landfill, and 15.3 percent at the Prima Deshecha Landfill. These landfills have sufficient daily capacity to accept solid waste generated by the Project's construction phase. Impacts would be less than significant.

Operational Impact Analysis

Based on a daily waste generation factor of 1.42 lbs of waste per 100 sf of industrial building obtained from CalRecycle, long-term, on-going operation of the Project would generate approximately 2.07 tons ([292,762 sf x {1.42 lbs/100sf}]/2,000 lbs/ton= 2.07 tons) of solid waste per day (CalRecycle, 2006). Under existing conditions, the existing buildings generates approximately 1.49 tons per day (210,646 sf x {1.42 lbs/100sf}]/2,000 lbs/ton = 1.49 tons). Implementation of the Project would result in an approximate 0.58-ton net increase in solid waste generation. Although the implementation of the Project would increase the amount of solid waste generated at the Project site, the Project's projected solid waste would be below the Olinda Alpha, Frank R. Bowerman, and Prima Deshecha Landfills daily disposal volume and remaining capacity.

Additionally, according to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate approximately 1.04 tons of solid waste per day requiring landfilling (2.07 tons per day x 50% = 1.04 tons per day); (CA Legislative Information, 2015). The non-recyclable solid waste generated during the long-term operation of the Project would be disposed at 1 of the 3 landfills described above. The Project's estimated solid waste is well below the maximum daily capacities of each of the landfills. The Project is not anticipated to cause these landfills to exceed their maximum daily permitted solid waste amounts. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?

Significance Determination: Less than Significant Impact

AB 939 requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. SB 2202 clarified that local governments shall continue to divert 50 percent of all solid waste on and after January 1, 2000. SB 1016 introduced a per capita disposal measurement system that measures the 50 percent diversion requirement using a disposal measurement equivalent. For the 2017 reporting year, the City's per employee disposal rate was 7.10 lbs/person/day, which is approximately half of the City's Disposal Rate Target of 14.4 lbs/person/day. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued (CA Legislative Information, 2005). Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant of the Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (CA Legislative Information, 2011). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be required to comply with all applicable solid waste statutes and regulations. Impacts would be less than significant.

Mitigation Measures: Mitigation measures are not required.

	20. WILDFIRE. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
(b)	Due to slope prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Impact Analysis:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Significance Determination: No Impact

The State Responsibility Area (SRA) is the land where the State of California is financially responsible for the preservation and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership; therefore, the Project site does not have the potential to be in an SRA. Based on the review of Figure PS-1, *Environmental and Natural Hazard Policy Map,* of the City's General Plan Public Safety Element, the Project site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) (Orange, 2010b). Additionally, according to CalFire, the Project site is not within a VHFHSZ (CalFire, 2011). As such, no impacts related to wildfire would occur.

Mitigation Measures: Mitigation measures are not required.

21. MANDATORY FINDINGS OF SIGNIFICANCE.		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	☐	☐	☒	☐
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact Analysis:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

The Project site is fully developed and is void of any suitable habitat for rare, endangered, or threatened plants and animal species. The Project would require MM BIO-1 to reduce potential temporary impacts that could result from removal of existing trees.

As indicated in the Cultural Resources section of this IS/MND, the Project site is not included on the National Register of Historic Places, California Register of Historical Resources, or a local register of historical resources, nor is it eligible for listing. However, while unlikely, the presence of subsurface paleontological resources on the Project site remains possible, and these resources could be affected by ground-disturbing activities associated with grading and construction at the site. Additionally, based on the results of Native American consultation pursuant to AB 52, the City is requiring monitoring of ground-disturbing activities to ensure there are no impacts to paleontological or tribal cultural resources in the event they are encountered during construction (refer to MMs GEO-1, TCR-1 and TCR-2). Potential impacts to these resources, if encountered during construction, would be less than significant with implementation of mitigation measures. All other environmental impacts were determined to be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)

Significance Determination: Less than Significant Impact

As identified through the analysis presented in this IS/MND, with the implementation of Project-specific mitigation measures identified herein, the Project would have no impact or less than significant impacts related to each topical issue after mitigation on a direct or cumulatively considerable basis. The Project site is developed and redevelopment of the site to accommodate a warehouse building would result in minimal environmental impacts, including impacts related to transportation, air quality, GHG emissions, and utilities and service system. All potential Project impacts were related to temporary construction-related grading activities (e.g, biological resources [tree removal], paleontological resources, hazards and hazardous materials, and tribal cultural resources). Even without mitigation measures for temporary construction-related impacts, to due to their site-specific nature, none of the impacts would be considered cumulative considerable. The Project would have less than significant cumulative impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Significance Determination: Less than Significant Impact with Mitigation Incorporated

The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this IS/MND. The Project would result in less than significant impacts related to air quality and associated effects on human health from air pollutants, GHG emissions, compliance with mandatory regulatory requirements associated with potential ACM and LBP exposure, and construction-related noise and potential effects on hearing impairment. However, due to the potential for soil contamination on-site that may be encountered during grading activities, the Project is required to prepare and implement an SMP (MM HAZ-1). Compliance with the SMP would ensure that impacts are considered less than significant.

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5.0 PREPARERS AND PERSONS CONSULTED

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Andrew Salas, Chairman

Gabrielino/Tongva Nation
Samuel Dunlap, Cultural Resources Director

San Gabriel Band of Mission Indians
Anthony Morales, Chief

Torres Martinez Desert Cahuilla Indians
Michael Mirelez, Cultural Coordinator

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Reinhard Stenzel, Senior Engineer

6.0 MITIGATION MONITORING AND REPORTING PROGRAM

PROJECT NAME: 759 NORTH ECKHOFF PROJECT
PROJECT LOCATION: 759 NORTH ECKHOFF, ORANGE, CA
PROJECT DESCRIPTION: The Project entails the demolition of the site's existing five industrial structures and associated structures to redevelop the site with two warehouse buildings collectively totaling to 292,762 sf.

LEAD AGENCY: CITY OF ORANGE
CONTACT PERSON/TELEPHONE NO.: ROBERT GARCIA, SENIOR PLANNER (714) 744-7231

APPLICANT: IDI LOGISTICS
CONTACT PERSON/TELEPHONE NO.: BRANDON DICKENS, VICE PRESIDENT OF CAPITAL DEPLOYMENT (213) 334-4805

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
Aesthetics						
The Project would not result in significant adverse impacts related to aesthetics. No mitigation is required.						
Agriculture and Forestry Resources						
The Project would not result in significant adverse impacts related to agriculture and forest resources. No mitigation is required.						
Air Quality						
The Project would not result in significant adverse impacts related to air quality. No mitigation is required.						
Biological Resources						
BIO-1	In the event that vegetation and tree removal should occur between January 15 and September 15, the Project Applicant shall retain a qualified biologist to conduct a nesting bird survey no more than 3 days prior to commencement of construction activities. The biologist conducting the clearance survey shall document the negative results if no active bird nests	Prior to vegetation/tree removal; Project Applicant	Prior to the commencement of construction activities and the issuance of any permit; City of Orange Director of			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	are observed on the Project site or within the vicinity during the clearance survey with a brief letter report, submitted to the City of Orange Community Development Department prior to construction, indicating that no impacts to active bird nests would occur before construction can proceed. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 200-foot buffer around the active nest. For listed and raptor species, this buffer shall be 500-feet. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Prior to the commencement of construction activities and the issuance of any permits, results of the pre-construction survey and any subsequent monitoring shall be provided to the City of Orange Community Development Department.		Community Development			
Cultural Resources						
CUL-1	In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the resource. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resource found during construction-related activities shall be recorded on the appropriate Department of Parks and	During subsurface earthwork activities; Project Applicant	During subsurface earthwork activities; City of Orange Director of Community Development			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA Guidelines Section 15064.5, the qualified archaeologist shall prepare and implement a research design and archeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the State CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated most likely descendant needed. The report shall be the South-Central Coastal Information Center, and the State Historic Preservation Office, if required.					
Energy						
The Project would not result in significant adverse impacts related to energy. No mitigation is required.						
Geology and Soils						
GEO-1	Prior to the issuance of a grading permit, the Project Applicant shall provide written evidence to the Community Development Department that the Applicant has retained a qualified paleontologist to respond on an as-needed basis to address unanticipated paleontological discoveries.	Prior to the issuance of a grading permit; Project Applicant	Prior to the issuance of a grading permit; City of Orange Director of Community Development			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	In the event that paleontological resources are encountered during ground-disturbing activities, all construction activities within a 50 foot vicinity of the find shall halt until the Orange County-qualified paleontologist identifies the paleontological significance of the find. If determined to be significant, the fossil shall be collected and prepared to the point of identification and permanent preservation, including screen-washing sediments to recover small vertebrates and invertebrates if indicated by the results of test sampling. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. Typically, the Cooper Center in Santa Ana is the preferred repository for fossils found in Orange County. At the conclusion of curation, a report of findings shall be prepared to document the results of the monitoring program, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the appropriate lead agency (e.g., the City of Orange), will signify satisfactory completion of the Project program to mitigate impacts to any nonrenewable paleontological resources. Construction shall not resume within the vicinity until the site paleontologist states in writing that the proposed construction activities would not significantly damage paleontological resources.					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
Greenhouse Gas Emissions						
The Project would not result in significant adverse impacts related to greenhouse gas emissions. No mitigation is required.						
Hazards and Hazardous Materials						
HAZ-1	The Project Contractor shall adhere to the protocols and performance standards stipulated in the SMP (Appendix L). Contractors working at the site shall follow all applicable Cal/OSHA regulations for construction safety. A Completion Report shall be prepared at the conclusion of grading activities. The report shall document field monitoring activities and visual observations made during grading/excavations, as well as soil sampling locations and results. The report shall include a description of the location of impacted soil encountered, actions taken to characterize and mitigate impacts, confirmation soil sampling results, and disposition of any excavated soil. In addition, the report shall include a description of encountered subsurface structures and steps to remove and close such structures. The report shall be reviewed and approved by the City of Orange Community Development Director, prior to issuance of building permits.	During construction; Project Contractor	Prior to issuance of building permits; City of Orange Director of Community Development			
Hydrology and Water Quality						
The Project would not result in significant adverse impacts related to hydrology and water quality. No mitigation is required.						
Land Use and Planning						
The Project would not result in significant adverse impacts related to land use and planning. No mitigation is required.						
Mineral Resources						
The Project would not result in significant adverse impacts						

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
related to mineral resources. No mitigation is required.						
Noise						
The Project would not result in significant adverse impacts related to noise. No mitigation is required.						
Population and Housing						
The Project would not result in significant adverse impacts related to population and housing. No mitigation is required.						
Public Services						
The Project would not result in significant adverse impacts related to public services. No mitigation is required.						
Recreation						
The Project would not result in significant adverse impacts related to recreation. No mitigation is required.						
Transportation						
The Project would not result in significant adverse impacts related to transportation. No mitigation is required.						
Tribal Cultural Resources						
TCR-1	Prior to the commencement of any ground disturbing activity at the Project site, the Project Applicant shall retain a Native American Monitor approved by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this Project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). A copy of the executed contract shall be submitted to the City of Orange Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal Monitor will be present during all ground disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading,	Prior to the commencement of any ground disturbing activity; Project Applicant	Prior to issuance of any permits necessary to commence a ground-disturbing activity; City of Orange Director of Community Development			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	excavation, drilling, and trenching, within the Project Site. The Tribal Monitor will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural, and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources.					
Utilities and Service Systems						
The Project would not result in significant adverse impacts related to utilities and service systems. No mitigation is required.						
Wildfire						
The Project would not result in significant adverse impacts related to wildfire. No mitigation is required.						

7.0 APPENDICES

Appendix A	Urban Crossroads, Inc. 2021. 759 North Eckhoff Street Air Quality Impact Analysis City of Orange. November 19, 2021.
Appendix B	Urban Crossroads, Inc. 2021. 759 North Eckhoff Street Mobile Source Health Risk Assessment. December 2, 2021.
Appendix C	Brian F. Smith and Associates, Inc. 2021 Cultural Resources Study for the IDI Logistics Eckhoff Street Project. December 16, 2021.
Appendix D	Urban Crossroads, Inc. 2021. 759 North Eckhoff Energy Analysis. November 19, 2021.
Appendix E	Southern California Geotechnical, Inc. 2020. Geotechnical Investigation Two Proposed Industrial Buildings. October 30, 2020.
Appendix F	Brian F. Smith and Associates, Inc. 2021. Paleontological Assessment for the IDI Logistics Eckhoff Street Project. March 30, 2021.
Appendix G	Urban Crossroads, Inc. 2021. 759 Eckhoff Street Greenhouse Gas Analysis. November 19, 2021
Appendix H	Hazard Management Consulting. 2020. Phase I Environmental Site Assessment. October 27, 2020.
Appendix I	Hazard Management Consulting. 2020. Soil and Soil Vapor Investigation. November 20, 2020.
Appendix J	Hazard Management Consulting. 2020. Asbestos Survey Report. October 24, 2020.
Appendix K	Allstate Services. 2020. Lead-Based Paint Testing Report. October 2, 2020.
Appendix L	Hazard Management Consulting. 2022. Soil Management Plan. January 20, 2022.
Appendix M	Thienes Engineering. 2021. Preliminary Hydrology Calculations for Proposed Buildings Eckhoff Street and Poplar Street. November 2, 2022.
Appendix N	Thienes Engineering. 2022. Preliminary Water Quality Management Plan (WQMP) for Eckhoff Street Proposed Buildings. November 3, 2022.
Appendix O	Urban Crossroads, Inc. 2021. Eckhoff Street Noise Impact Analysis. September 21, 2021.
Appendix P	Urban Crossroads, Inc. 2021. 759 North Eckhoff Street Scoping Memorandum. December 17, 2021.
Appendix Q	Urban Crossroads, Inc. 2021. 759 North Eckhoff Street Vehicle Miles Traveled (VMT) Assessment. September 15, 2021