Chapter 4 Environmental Analysis

Sections 4.1 through 4.14 in this chapter contain a discussion of the potential environmental effects from implementation of The Cubes at Placentia Industrial Project (Proposed Project or Project), including the current environmental setting, regulatory setting, method of analysis, thresholds of significance, impacts (including cumulative), and mitigation measures.

Scope of the Environmental Impacts Analysis

In accordance with Appendix G of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the potential environmental effects from the Proposed Project are analyzed for the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

Format of the Environmental Impact Analysis

The following subsections compose each of the 14 environmental issue area sections in Sections 4.1 through 4.14 of this Environmental Impact Report (EIR).

Environmental Setting

This subsection describes the current environmental setting of each environmental issue area. According to Section 15125 of the CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the Proposed Project vicinity to provide the "baseline conditions" against which project-related impacts are compared. Normally, the baseline conditions are the physical conditions that exist when the Notice of Preparation of a Draft EIR is published. The Notice of Preparation for the Proposed Project was published on December 1, 2023, and the baseline conditions contained in this EIR are generally taken from this time period. However, the CEQA Guidelines and applicable case law recognize that the date for establishing an environmental baseline cannot always be rigid. Physical environmental conditions may vary over a range of time periods; thus, the use of environmental baselines that differ from the publication date of the Notice of Preparation is reasonable and appropriate when conducting the environmental analyses. Some sections rely on a variety of data to establish an applicable baseline. For example, in Sections 4.2, Air Quality; 4.3, Biological Resources; 4.4, Cultural Resources; 4.12, Transportation; and 4.13, Tribal Cultural Resources, available data were

months and sometimes several years old. Therefore, projections regarding how those conditions might have changed were incorporated into the EIR sections and corresponding technical reports.

Regulatory Setting

This subsection provides a summary of regulations, plans, policies, and laws that are relevant to each environmental issue area at the federal, state, regional, and local levels.

Thresholds of Significance

Section 15126.2 of the CEQA Guidelines requires that an EIR "identify and focus on the significant environmental effects of the Proposed Project." "Effects" and "impacts" mean the same under CEQA and are used interchangeably in this EIR. A "significant effect" or "significant impact" on the environment is "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (CEQA Guidelines Section 15382).

In determining if an impact is "significant," Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish thresholds of significance to use in determining the significance of an environmental impact. These thresholds may consist of identifiable quantitative, qualitative, or performance-level criteria used to determine non-compliance or compliance. Non-compliance would mean the effect would be significant, and compliance with the thresholds would mean the effect would normally be considered less than significant.

With the exception of thresholds of significance for vehicle miles traveled impacts, the City has not adopted thresholds of significance for general use. Therefore, the significance criteria used in the analysis in this EIR are derived in part from Appendix G of the CEQA Guidelines. In addition, City policies and standards, as well as thresholds adopted by other public agencies with jurisdiction over select environmental issues, are used as thresholds of significance. Also, accepted technical and scientific data are used in some instances to determine if an impact would be considered significant. An effort has been made to use generally accepted thresholds to determine significance. These thresholds are used in analyzing the potential environmental impacts of the Proposed Project.

Project Design Features

Project Design Features are specific design elements incorporated into the Proposed Project or standard procedures that would be included in the Proposed Project's contractor specifications and final plans which are implemented in accordance with City protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects. Not all environmental topics are addressed by Project Design Features. Since Project Design Features have been incorporated into the Proposed Project, they do not constitute mitigation measures as defined by CEQA. The Project

Design Features or their applicable equivalents may be included as Conditions of Approval for the Proposed Project.

Regulatory Requirements

There are local, state, and federal regulations, laws, and ordinances that apply independent of CEQA review but also serve to avoid or reduce potential environmental impacts. As all public and private projects are required to comply with these regulations, as applicable, they are not listed as mitigation measures but as Regulatory Requirements. The Regulatory Requirements or their applicable equivalents would be included as Conditions of Approval for the Proposed Project.

Environmental Impacts

The analyses of environmental impacts of the Proposed Project are presented in this EIR by issue, which includes the direct and indirect, short-term and long-term, cumulative, and any unavoidable impacts from construction and operation of the Proposed Project, with consideration for impacts that would occur on and off site.

The thresholds of significance (discussed above) provide the basis for distinguishing between impacts that are determined to be significant (i.e., the impact exceeds the threshold of significance) and those that are considered to be less than significant. The analysis is structured to address each threshold while considering the residual impact after implementing the Project Design Features and after compliance with the Regulatory Requirements.

Where the analysis of a potential effect concludes that the effect is too speculative or subjective for evaluation, that conclusion is noted and the discussion of that effect is ended. Where the analysis determines that a potential effect may (without undue speculation) occur, but is beneficial, that conclusion is noted. Where the analysis indicates that a potential effect is not significant or not adverse with compliance with Project Design Features and Regulatory Requirements, that conclusion is also noted.

Where the impact analysis determines that a potential effect may (without undue speculation) occur and is found to have a substantial or potentially substantial and adverse impact on existing physical conditions on the site or in the surrounding area, and that the impact would remain significant even after compliance with Project Design Features and Regulatory Requirements, that conclusion is noted. A discussion of the needed mitigation is then provided, along with a summary of the analysis for each threshold.

Cumulative Impacts

While the extent of environmental changes that would occur with the Proposed Project may not be significant, the sum of the impacts of the Proposed Project and other projects that are proposed, planned, or under construction in the surrounding area may be cumulatively considerable, as

defined in Section 15065(a)(3) of the CEQA Guidelines. The Cumulative Impact Methodology section below, contains a discussion of the overall methods used to determine the scope of cumulative projects considered in the cumulative impact analysis.

Level of Significance Before Mitigation

The level of significance of the identified impacts after incorporation of the Project Design Features and compliance with the Regulatory Requirements is listed. It identifies if an impact requires mitigation measures upon implementation of the Project Design Features and Regulatory Requirements.

Mitigation Measures

Where a potentially significant adverse environmental effect has been identified and is not reduced to a level considered less than significant through compliance with the Project Design Features and Regulatory Requirements, mitigation measures have been provided.

Level of Significance After Mitigation

The level of significance of the identified impacts after incorporation of the Project Design Features, compliance with the Regulatory Requirements, and implementation of the mitigation measures is stated at the end of each environmental issue. Unavoidable significant adverse impacts, if any, are effects that cannot be mitigated or that remain significant even after mitigation.

References

Technical studies, analyses, reports, plans, and other sources that have been used in the preparation of the environmental analysis for each issue area are listed in this section.

Cumulative Impact Methodology

CEQA requires that EIRs discuss cumulative impacts in addition to project impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Proposed Project alone. Further, the discussion should be guided by the standards of practicality and reasonableness (CEQA Guidelines Section 15130[b]). According to Section 15355 of the CEQA Guidelines, "cumulative impacts" are defined as follows:

> Two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
>
> (a) The individual effects may be changes resulting from a single project or a number of separate projects.

> (b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130(a) of the CEQA Guidelines further states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts."

In addition, Section 15130(a) of the CEQA Guidelines requires that EIRs discuss the cumulative impacts of a project when the Proposed Project's incremental effect is cumulatively considerable. As further clarified by Section 15065 of the CEQA Guidelines, "cumulatively considerable" means that the incremental effects of an individual 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. Therefore, the discussion of cumulative impacts in an EIR evaluates if the impacts of the Proposed Project would be significant when considered in combination with past, present, and future reasonably foreseeable projects, and if the Proposed Project would make a cumulatively considerable contribution to those impacts. The CEQA Guidelines indicate that, where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but shall briefly describe the basis for its conclusion. The CEQA Guidelines allow for a project's contribution to be rendered less than cumulatively considerable with implementation of mitigation.

The geographic scope of the cumulative impact analysis varies depending on the specific environmental issue area being analyzed. The geographic scope defines the geographic area within which projects may contribute to a specific cumulative impact. Therefore, past, present, and reasonably foreseeable future projects within the defined geographic area for a given cumulative issue must be considered.

CEQA Guidelines Section 15130(b) presents the following two possible approaches for considering past, present, and reasonably foreseeable future projects and indicates that either could be used:

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

This EIR uses the first approach. Existing development is included as part of the existing environmental baseline when evaluating project impacts and is not included in Table 4-1, Cumulative Projects. Active projects within approximately one mile of the Proposed Project Site

are listed in Table 4-1. Collectively, those cumulative projects are in various stages of development, including the planning phase, design stage, or construction phase.

Table 4-1. Cumulative Projects

No.	Name/Applicant	Description	Quantity	Units
1	LCI Wilson	Warehousing	83.910	TSF
2	Redlands Avenue West	High-Cube Warehouse	334.447	TSF
3	Redlands Avenue East	High-Cube Warehouse	254.511	TSF
4	Stratford Ranch	Single-Family Residential	270	DU
5	McKay Indus	High-Cube Warehouse	232.000	TSF
6	Expressway Industrial	High-Cube Warehouse	347.000	TSF
7	Patriot Industrial	High-Cube Warehouse	286.000	TSF
8	First Sinclair	High-Cube Warehouse	423.000	TSF
9	Puliam Industrial	Light Industrial	16.000	TSF
10	Burge Industrial 1	Light Industrial	18.000	TSF
11	Burge Industrial 2	Light Industrial	43.354	TSF
12	Calvio Industrial 1 & 2	Light Industrial	73.000	TSF
13	7-Eleven Auto Carwash	Super Convenience Market	4.100	TSF
14	Rider 2 & 4	High-Cube Warehouse	1,353.586	TSF
15	Chartwell Industrial	Warehousing	141.000	TSF
16	First Industrial (Goodwin)	High-Cube Warehouse	338.000	TSF
17	Wilson Industrial 2	Warehousing	155.000	TSF
18	First Industrial (Wilson)	Warehousing	185.000	TSF
19	May Ranch	Multi-Family Residential	308	DU
20	Gas Station, Car Wash, & Hotel	Hotel Commercial Retail	12.000 10.000	TSF TSF
21	Redlands Industrial	Warehousing	121.100	TSF
22	Nova Homes	PDO	76	DU
23	Mosque	Mosque	12.000	TSF
24	Habits & QSR	Commercial	8.000	TSF
25	Tommy's Carwash & QSR	Commercial	8.500	TSF
26	Walmart Fueling	Commercial	0.440	TSF
27	Citrus Court	PDO	111	DU

Sources: Ganddini 2024.
Notes: DU = Dwelling Units; PDO = Planned District Ordinance; TSF = Thousand Square Feet

Conclusion

This subsection summarizes if each of the Proposed Project's significant environmental effects discussed and analyzed in the impact analysis has or has not been reduced to below a level of significance through mitigation. This subsection includes a discussion supported by a synopsis of

the rationale for the conclusion. Finally, this subsection also discusses why an impact could not be mitigated or otherwise reduced to a less than significant level.