DRAFT

Initial Study and Mitigated Negative Declaration

10th and Flower Street Park Project

Santa Ana, California

Lead Agency:

City of Santa Ana Public Works Agency
20 Civic Center Plaza, Ross Annex, M-20
Santa Ana, CA 92701

Prepared by:

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

2861 Pullman Street
Santa Ana, CA 92705

August 2024

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DRAFT MITIGATED NEGATIVE DECLARATION

Lead Agency: City of Santa Ana Public Works Agency

Project Proponent: City of Santa Ana Public Works Agency

Project Location: The Project is located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard in the City of Santa Ana.

Project Description: The Proposed Project entails the construction of a new approximately 1.4-acre neighborhood park located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard. The intent of this park is to provide the local community with access to open space, exercise, and recreation facilities. The Project components included within the park concept plan consist of a basketball court, skate park, playground area with rubberized play surface, an exercise area, canvas shade structures, turf play areas, new site lighting, water wise landscaping with shade trees, automated irrigation system, site furnishings including benches, bike racks, trash receptacles, drinking fountain and picnic tables, and a park monument sign. This park would be a walk-up, pedestrian park without a vehicle parking lot and would primarily serve the local neighborhood. No restrooms or staff would be present. The Project also includes a zone change from Professional (P) to Open Space (O).

Mitigation Measures Incorporated into the Project to Avoid Significant Effects:

Biological Resources

BIO-1: **Pre-Construction Nesting Bird Survey.** If ground disturbing Project activities, tree trimming, or tree removal are scheduled to occur during the nesting bird season (February 1 – August 30), a qualified biologist shall conduct a pre-construction nesting bird survey to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than 3 working days prior to initial ground disturbance. The nesting bird survey shall include the Project Site and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly due to construction activity, noise, or vibrations. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

Cultural Resources

CUL-1: **Contractor Awareness Training Program.** The City of Santa Ana shall ensure that a Contractor Awareness Training Program about cultural resources is delivered to train equipment operators. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the City of any occurrences; project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program.

The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground-disturbing equipment. All personnel shall be required to sign a training roster. The construction manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the City as proof of compliance.

CUL-2: **Unanticipated discoveries.** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the City. The City shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined by CEQA or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Orange County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5

of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

Geology and Soils

GEO-1: **Unanticipated Discovery of Paleontological Resources.** If paleontological resources are discovered during construction, all work must halt within a 100-foot radius of the discovery and a qualified paleontologist will be retained to evaluate the find. The paleontologist shall notify the lead agency if the find is significant. The paleontologist shall evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The qualified paleontologist will evaluate the significance of the find and recommend appropriate measures for the disposition of the find (e.g., fossil recovery, curation, data recovery, and/or monitoring). Construction activities may continue on other parts of the construction site while evaluation and treatment of the paleontological resource takes place.

Noise

NOI-1: **Hours of Construction.** Project construction shall be limited to the City standard exempted hours of 7:00 a.m. through 5:00 p.m., Monday through Friday. All Project construction is prohibited on Sundays.

Tribal Cultural Resources

TCR-1: **Monitoring Agreement.** Prior to the commencement of ground disturbing activities, the City shall extend the offer to enter into a tribal monitoring agreement with the Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California, and Juaneño Band of Mission Indians, Acjachemen Nation. The offer to execute a monitor agreement shall be made at least 30 days prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that

are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

- For the purpose of compliance with this measure, the City shall accept any of the following circumstances to be compliant with this measure: a) that tribes entering into agreements with the City rotate the monitoring duties among them; b) that only one tribe enters into an agreement with the City to monitor exclusively; or c) that all three tribes enter into agreements with the City and each provide full-time monitors. In the unlikely event that no tribes are willing to enter into a tribal monitoring agreement with the City, then work can proceed without a tribal monitor provided that an archaeological monitor is present and that the offer to all three tribes was extended and documented.
  - In the event that one or more Tribe chooses not to enter into an agreement or fails to respond to the offer, the City shall allow construction to proceed without the Native American monitor(s) as long as the offer was extended and documented.
- The monitors will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the culturally affiliated Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon completion of the Project.
- On-site tribal monitoring shall conclude upon the latter of the following:
  - Written confirmation to consulting culturally affiliated Tribe from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or
  - A determination and written notification by the culturally affiliated Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact culturally affiliated Tribal TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the approved culturally affiliated Tribal monitor and/or archaeologist. The culturally affiliated Tribe will recover and retain all discovered TCRs in the form and/or manner all consulting culturally affiliated Tribes deems

appropriate, and for any purpose the consulting culturally affiliated Tribes deem appropriate, including for educational, cultural and/or historic purposes.

TCR-3: **Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** If human remains or funerary objects are encountered during any activities associated with the Project:

- Work in the immediate vicinity (i.e., not less than the surrounding 100 feet) shall cease and the Orange County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.
- The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641).
- Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

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LIST OF ACRONYMS AND ABBREVIATIONS

Term	Definition
AB	Assembly Bill
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CO Plan	Federal Attainment Plan for Carbon Monoxide
CRHR	California Register of Historic Resources
CWA	Clean Water Act
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
GHG	Greenhouse Gas
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendent
MMT	Million Metric Tons
MND	Mitigated Negative Declaration

Term	Definition
MSHCP	Multiple Species Habitat Conservation Plan
$MTCO_2e$	metric tons of carbon dioxide equivalent
NAHC	Native American Heritage Commission
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
N_2O	nitrous oxide
NO_x	nitrogen oxides
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OHV	Off-Highway Vehicle
OPR	California Office of Planning and Research
$PM_{2.5}$	Particulate matter with a diameter of 2.5 microns or less
PM_{10}	Particulate matter with a diameter of 10 microns or less
RCPG	Regional Comprehensive Plan and Guide
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
USACE	United States Army Corps of Engineers
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SP	Service Population
SoCAB	South Coast Air Basin
SR	State Route
SRA	Sensitive Receptor Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone

1.0 BACKGROUND

1.1 Summary

Project Title:	10th and Flower Street Park Project
Lead Agency Name and Address:	City of Santa Ana Public Works Agency 20 Civic Center Plaza, Ross Annex, M-20 Santa Ana, CA 92701
Contact Person and Phone Number:	Suzi Furjanic Acting Park Planning Manager City of Santa Ana Public Works Agency (714) 589-5252
Project Location:	The Project is located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard in the City of Santa Ana. The site is currently comprised of eight separate parcels (APN's 005-142-34, 005-142-35, 005-142-47, 005-142-48, 005-142-49, 005-142-58, 005-142-02, and 005-142-03), Garnsey Street, and portions of 10th Street and Flower Street.
General Plan Designation:	Professional & Administrative Office (PAO)
Zoning:	Professional (P)

1.2 Introduction

The City of Santa Ana (City) is the Lead Agency for this California Environmental Quality Act (CEQA) Initial Study. This Initial Study has been prepared to identify and assess the anticipated environmental impacts of the 10th and Flower Street Park Project (Project) to satisfy CEQA (Public Resources Code [PRC], Section 21000 et seq.) and state CEQA Guidelines (Title 14, California Code of Regulations [CCR] 15000 et seq.). CEQA requires that all state and local government agencies consider the environmental consequences before approving projects. The City will use this CEQA Initial Study to determine which CEQA document is appropriate for the Project: Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR).

In accordance with CEQA, this Initial Study/Mitigated Negative Declaration (IS/MND) will be circulated for a 30-day public review and comment period. Written comments on the Draft IS/MND should be submitted to:

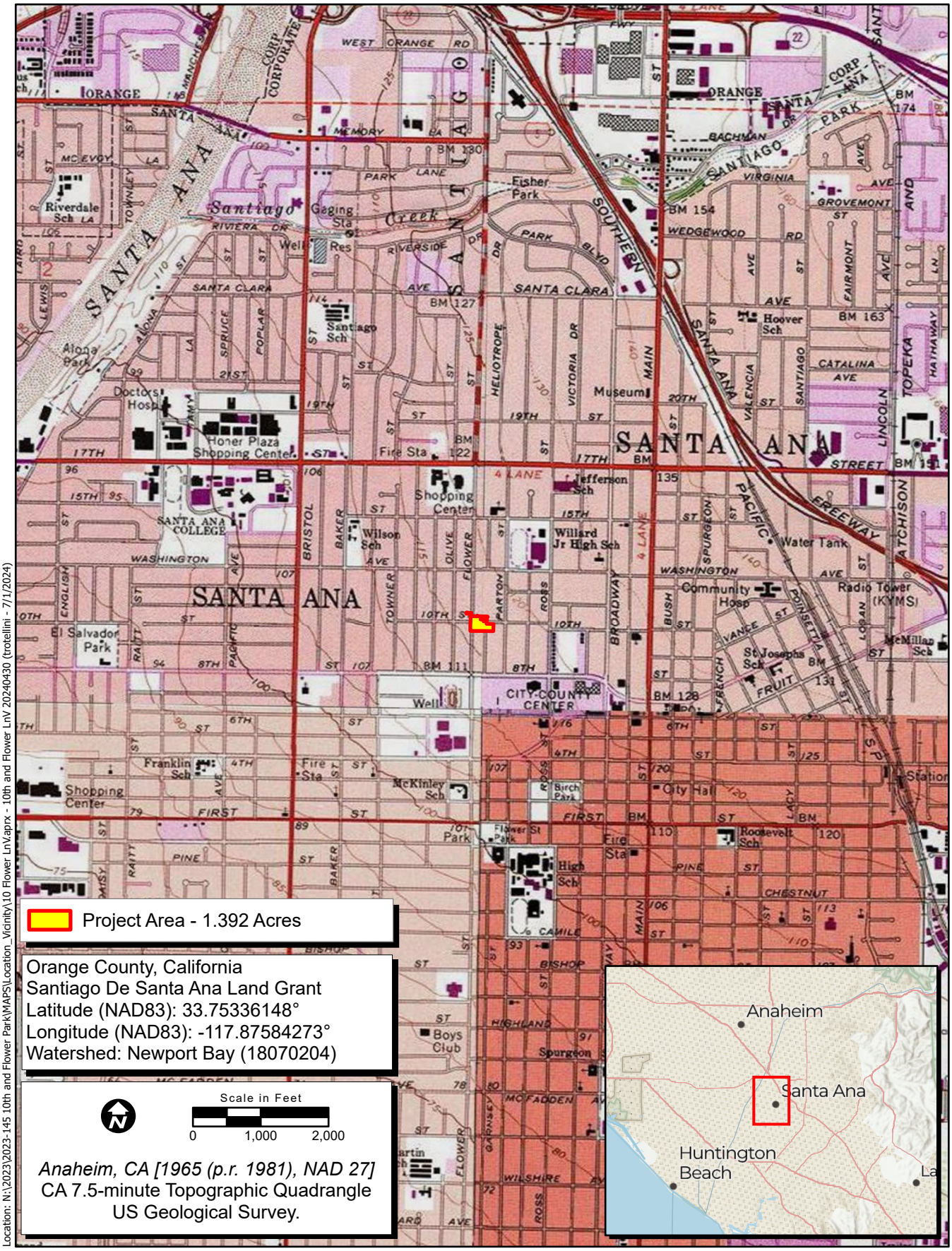
Suzi Furjanic
Acting Park Planning Manager
City of Santa Ana Public Works Agency
20 Civic Center Plaza, Ross Annex, M-20
Santa Ana, CA 92701
(714) 589-5252
SFurjanic@santa-ana.org

1.3 Surrounding Land Uses/Environmental Setting

The proposed new 1.4-acre neighborhood park is located at the southeast corner of 10th Street and Flower Street, City of Santa Ana, California, just north of Civic Center Boulevard. The undeveloped portion of the site is surrounded by an approximately 6-foot-high steel fence with vehicular and pedestrian access points on the east side.

The site is bounded by 10th Street to the north, an unnamed alleyway to the east, parking lot to the south, and Flower Street to the west. The approximate elevation of the site varies between 109 and 111 feet above mean sea level (AMSL). The site is currently comprised of eight separate parcels (APN's 005-142-34, 005-142-35, 005-142-47, 005-142-48, 005-142-49, 005-142-58, 005-142-02, and 005-142-03), Garnsey Street, and portions of 10th Street and Flower Street. The lots are currently designated as Professional and Administrative Office (PAO) in the City's General Plan and zoned Professional (P).

Surface material is comprised of a thin layer of engineered wood fiber. The site contains two single family residences located on APN's 005-142-02 and 005-142-03. Ornamental trees line the outside perimeter of the fence and there are overhead utilities on the east side of Garnsey Street. Please see Figures 1 and 2 for depictions of the Project location.



Map Date: 7/1/2024
Sources: ESRI, USGS

Figure 1. Project Location and Vicinity

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Location: N:\2023\2023-145 10th and Flower Park\MAPS\Location_Vicinity\10 Flower LnV.aprx - 10th and Flower Vicinity 202406181 (trotellini - 6/18/2024)

Map Date: 6/18/2024

Sources: ESRI, Maxar (2022)

Figure 2. Project Location

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2023-145 10th and Flower Park

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2.0 PROJECT DESCRIPTION

2.1 Project Background

In May 2022, the Santa Ana City Council adopted a Parks Master Plan that provides goals to develop parkland within a 10-minute walk for all residents, and three acres of parkland per 1,000 residents citywide. The proposed 10th and Flower Park is intended to create a recreational amenity in a "park gap" area, serve four adjacent neighborhoods, and create a new park that was identified in the Parks Master Plan.

2.2 Project Characteristics

2.2.1 Project Components

The Proposed Project entails the construction of a new 1.4-acre neighborhood park located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard. The intent of this park is to provide the local community with access to open space, exercise, and recreation facilities. Please refer to Figure 3 for a depiction of park components.

Based on input from the local community, the Project would include the following:

- A playground area, with rubberized play surface
- Fitness area
- Basketball court
- Skate park
- Canvas shade structures (20 feet high)
- Turf play area, site lighting with new electrical service
- Water wise landscaping with shade trees
- Automated irrigation system with new water service
- Site furnishings including benches, bike racks, trash receptacles, drinking fountain, and picnic tables
- Park monument sign
- Perimeter right-of-way (ROW) improvements, including sidewalks and landscaping
- Hybrid crosswalk beacon across Flower Street

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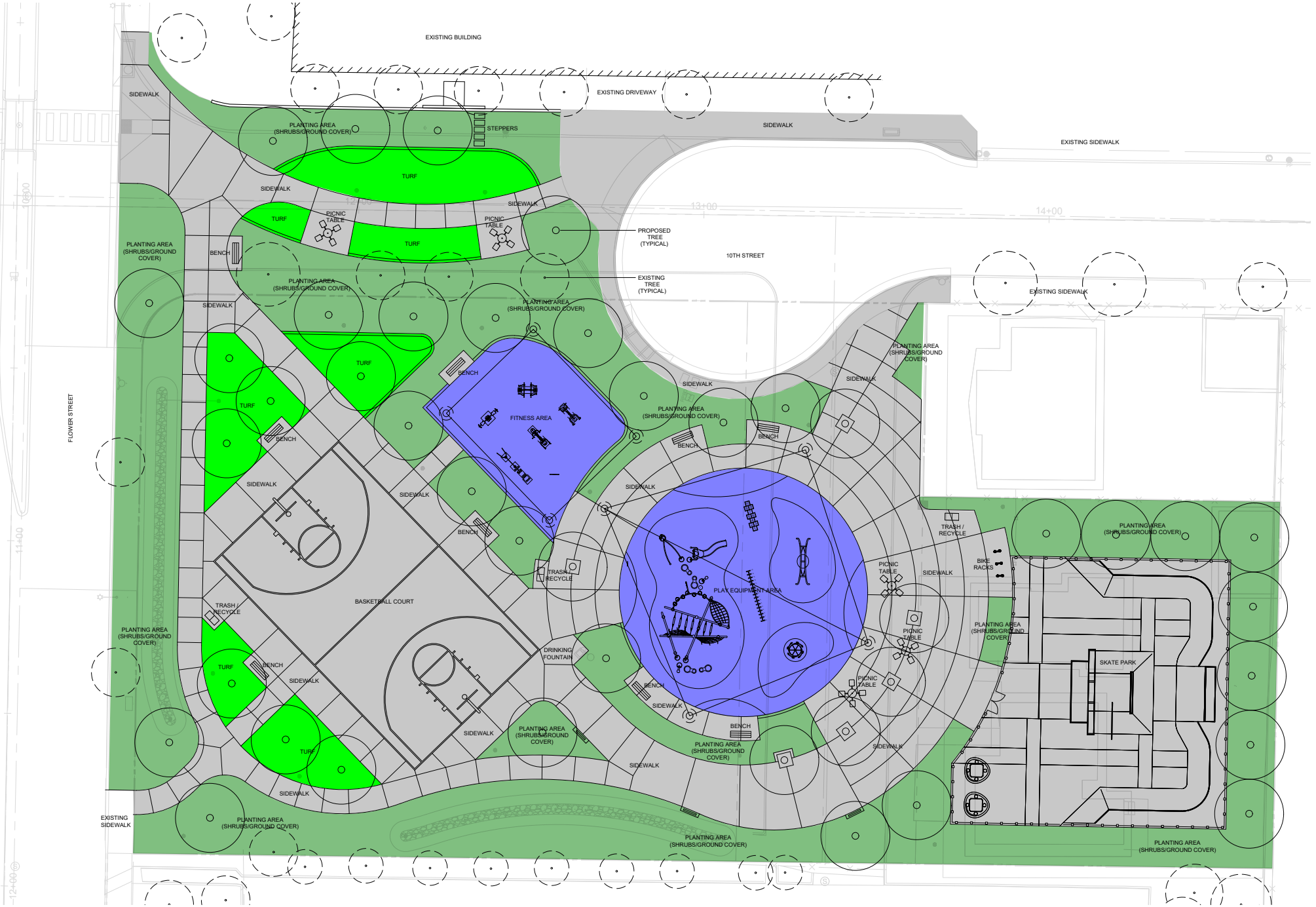

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Figure 3. Project Site Plan
2023-145 10th and Flower Park Project

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2.2.2 Demolition of Two Single-Family Residences

Two existing single-family residences are present on the Project Site; these buildings would be demolished as part of the Project. A detailed description of the houses is provided in Section 4.5 *Cultural Resources* and in Appendix C.

2.2.3 Zone Change

The Project would require a zone change from Professional (P) to Open Space (O).

2.2.4 Parking and Access

This park would be a walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local neighborhood. Pedestrian access would be provided from existing and proposed sidewalks along 10th Street and Flower Street. No restrooms would be available.

The Project includes closure of 10th Street at the Project boundary west to Flower Street and construction of a cul-de-sac (Figure 3). The cul-de-sac would include a 35-foot turn radius. The Project also includes demolition of Garnsey Street; this area would be included in the park design.

2.2.5 Site Drainage

The Project includes approximately 20,500 square-feet (SF) of irrigated landscape and approximately 30,700 SF of non-irrigated surfaces like concrete sidewalks and rubber surfacing. For drainage facilities, a storm drain system connected to catch basins would collect all water from the Project Site and direct it to natural bioswales located along the western and southern Project boundaries for infiltration into the ground. Additional storm quality controls include capturing water from Flower Street and treating the 85th percentile storm event. To address the existing flooding along Flower Street, an underground bio-retention storage facility would be installed underneath the proposed basketball court to store approximately 54,800 cubic feet of water for infiltration. This approach is designed to alleviate some of the flood concerns along Flower Street.

2.2.6 Excavation and Grading

The maximum depth of disturbance would be approximately 13 feet. Site grading would mainly be balanced, however there would be an export for the excavation of the water treatment facilities. The approximate export would be 5,500 cubic yards. This soil would be disposed of at nearby landfills including the Frank R. Bowerman Landfill in Irvine, Olinda Alpha Landfill in Brea, and Prima Deshecha Landfill in San Juan Capistrano.

2.2.7 Security Features and Lighting

Hours of operation for the 10th and Flower Street Park would be 6:00 a.m. to 10:00 p.m. daily. A security guard would be posted on rotation and available on-call.

The park boundary would include fencing along Flower Street. The skate park would be gated and enclosed with fencing on all sides. The park would provide security lighting located along walkways and

pathways and within the playgrounds/natural play areas for children. The proposed down-shield lighting would be timer controlled and remain on through the evening and automatically shut off during the day.

2.3 Project Funding

2.3.1 Land and Water Conservation Fund

The Proposed Project will be partially funded by the Land and Water Conservation Fund (LWCF) grant from the National Parks Service (NPS). This grant will cover the southern half of the park site including the basketball court, skate park, fitness zone, playground, and picnic areas.

2.3.2 American Rescue Plan Act Funds

The Proposed Project will be partially funded by American Rescue Plan Act (ARPA) funds. These funds will cover the northern half of the park site including the 10th Street cul-de-sac, picnic areas, and hybrid crosswalk beacon.

2.4 Project Timing

The Project would be constructed in two phases. Project construction is anticipated to begin in Fall 2024 and occur through Fall 2025. Phase 1 would include closure of 10th Street and construction of the cul-de-sac, crosswalk, and northern picnic area. Phase 2 would demolish the existing single-family residences and construct the remaining park amenities including the basketball court, skate park, playground, fitness area, picnic areas, turf, and bioswales. This phase also includes construction of the underground bio-retention facilities.

2.5 Regulatory Requirements, Permits, and Approvals

The Proposed Project would require the following approvals and regulatory permits:

- Zone Change from Professional (P) to Open Space (OS).
- General Plan Amendment – to demonstrate how rezoning will comply with the Land Use Element and the Open Space Element of the General Plan.
- Street Vacation (Garnsey Ave) – to demonstrate General Plan conformity.
- Santa Ana Regional Water Quality Control Board – National Pollution Discharge Elimination System Permit; issuance of waste discharge requirements and construction stormwater runoff permits.
- Orange County Fire Authority – Fire and emergency access approvals.

2.6 Consultation With California Native American Tribe(s)

The City of Santa Ana has notified the following California Native American tribes traditionally and culturally affiliated with the geographic area of the Proposed Project:

- Gabrieleño Band of Mission Indians - Kizh Nation

- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino - Tongva Tribe
- Juaneño Band of Mission Indians Acjachemen Nation - Belardes
- Juaneño Band of Mission Indians Acjachemen Nation 84A
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians

The Gabrielino Tongva Indians of California, Gabrieleno Band of Mission Indians - Kizh Nation, and Juaneno Band of Mission Indians Acjachemen Nation - Belardes have requested consultation pursuant to PRC Section 21080.3.1. Section 4.18 of this IS/MND provides a summary of the consultation process, including the determination of significance of impacts to Tribal Cultural Resources (TCRs).

Each recipient was provided a brief description of the Project and its location, the lead agency (City) contact information, and a notification that the tribe has 30 days to request consultation, pursuant to PRC Section 21080.3.1(d). Phone calls and follow-up emails were made to reach non-responsive representatives. As a result of the initial notification letters and follow-up contacts, the City received the following responses:

- On May 29, 2024, Christina Conley from the Gabrielino Tongva Indians of California requested a copy of the cultural resources report.
- On June 26, 2024, Joyce Perry of the Juaneno Band of Mission Indians Acjachemen Nation - Belardes requested consultation and a copy of the cultural resources report.
- On July 3, 2024, Brandy Salas of the Gabrieleno Band of Mission Indians - Kizh Nation requested consultation.
- All other tribes did not respond to the opportunity to consult; therefore, the City considers consultation concluded with the remaining tribes pursuant to Section 21082.3(d)(3) of the Public Resources Code.

Section 4.18 of this IS/MND provides a summary of the consultation process, including the determination of significance of impacts to TCRs.

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

3.1 Environmental Factors Potentially Affected

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

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

Determination

On the basis of this initial evaluation:

I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	☐
I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	☒
I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the 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 Project, nothing further is required.	☐

Suzi Furjanic — 8.29.24

Suzi Furjanic
Acting Park Planning Manager

Date

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4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION

4.1 Aesthetics

4.1.1 Environmental Setting

The Project Site is located within a developed area of the City of Santa Ana (Figures 1 and 2). The City is largely built out with a few remaining open spaces. Specifically, the Project is located within the Willard neighborhood which is bounded by 17th Street, Flower Street, Broadway, and Civic Center Drive (City of Santa Ana 2023a). The Project Site is bordered by a parking lot to the south, Flower Street and single-family homes to the west, 10th Street and multifamily homes to the north, and an unnamed alleyway single-family homes to the east.

4.1.1.1 State Scenic Highways

The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. The Project Site is located approximately 0.8 mile west of Interstate 5 (I-5) (Santa Ana Freeway). This highway is not designated as a State Scenic Highway within the City of Santa Ana (Caltrans 2019; City of Santa Ana 2020).

4.1.1.2 Local Scenic Features

The Scenic Corridors Element of the existing General Plan has identified scenic corridors that serve as major view and vantage points (City of Santa Ana 2020). These scenic corridors are listed below:

- Primary street corridors are significant transportation and activity corridors in the City and are accessible from all freeways. They include the 1st/4th Street, Main Street/Broadway, and MacArthur Boulevard corridors.
- Secondary street corridors link neighborhoods, district centers, and mixed-use corridors. They include 17th Street, Edinger Avenue, and Bristol Street.
- Intercity corridors are major image makers for the city. They include Harbor Boulevard and Fairview Street.
- High-speed scenic corridors that operate at a regional scale to influence the City's image. They include the Newport, Santa Ana, and Garden Grove freeways.
- Watercourse corridors operate at a regional scale and are part of the County's open space network. They include the Santa Ana River and Santiago Creek.

These corridors provide views of Santa Ana and largely influence the public's aesthetic and visual experience of the City. Furthermore, Santa Ana's downtown area contains many of the oldest buildings in the City, including several national, state, and County historical landmarks (City of Santa Ana 2020).

4.1.1.3 Visual Character of the Project Site

The visual character of the Project Site is defined by an established residential neighborhood with adjacent small commercial retail uses. The site is bounded by 10th Street to the north, an unnamed alleyway to the east, parking lot to the south, and Flower Street to the west. The undeveloped portion of the site is surrounded by an approximately 6-foot steel fence with vehicular and pedestrian access points on the east side. Surface material is comprised of a thin layer of engineered wood fiber. The site contains two single family residences located on APNs 005-142-02 and 005-142-03. Ornamental trees line the outside perimeter of the site and there are overhead utilities on the east side of Garnsey Street.

4.1.2 Aesthetics (I) Environmental Checklist and Discussion

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?	☐	☐	☐	☒

No Impact.

The Project Site is not located in proximity to a City-designated scenic vista or state scenic highway. The Project Site is visually obscured from scenic highways and corridors by intervening development and vegetation. The topography in the immediate Project Area is relatively flat and views in the vicinity of the Project Site largely constrained by structures and trees on adjacent parcels. The Project Area is developed with residential and commercial land uses and associated landscaping and roadways. The nature of the Proposed Project (a neighborhood park) would have no impact on scenic vistas.

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

No Impact.

The Proposed Project would be located within residential areas approximately 0.8 mile west of the I-5 freeway. This highway is not designated as a State Scenic Highway by Caltrans and there are no County-designated scenic highways within the City of Santa Ana. The nearest State Scenic Highway to the Project Site is a portion of SR-91 which runs from SR-55 to east of the Anaheim city limit, located approximately 6 miles to the north (Caltrans 2019). The Project Site is visually obscured from this highway by intervening development and vegetation. No impact would occur.

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
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 and other regulations governing scenic quality?	☐	☐	☒	☐

Less Than Significant Impact.

The construction phase of the Proposed Project would introduce equipment and personnel, which would disturb the existing site. This could be perceived as an impact to the visual character or quality of the site; however, these activities would be short-term and would only last during construction.

The park would also provide various landscaping and trees, which incorporates drought tolerant landscaping and preservation of some existing trees. Visual impacts are subjective, and development of a park in residential neighborhood is generally considered a beneficial impact that improves visual character of a site and its surroundings. The proposed project would not obstruct any protected views or significant visual resources from adjacent residential uses; therefore, no substantial adverse visual impact is anticipated. The proposed project would change the existing visual quality, but the changes would not degrade the existing aesthetic quality. In addition, the proposed structures, paved areas, and landscaped areas would be visually compatible with the existing neighborhood because they would use similar materials (paving) and similar landscaping (shrubs and trees). Impacts to the existing visual character and visual quality of the site would be less than significant.

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

Less Than Significant Impact.

The Proposed Project would introduce new light fixtures for the park. These light fixtures would provide increased visibility and security. The new lighting would be consistent in height, design, and illumination with existing lighting within the adjacent neighborhoods and parking lot (street lighting, safety lighting around walkways). In addition, the park facilities would be closed, and lighting would be turned off, by 10 p.m. every evening, which would limit ambient nighttime lighting and vehicular glare impacts to the neighboring communities during nighttime hours. The Project would comply with City regulations and design standards, including the use of shielding around light fixtures to minimize spillover effects on

surrounding properties. Due to the developed nature of the adjacent properties and the shielded design of light fixtures on the site, impacts from lighting would be less than significant.

4.1.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

Forest land, as defined by Public Resources Code Section 12220(g), is "…land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."

Timberland, as defined by Public Resources Code Section 4526, means "…land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis."

Timberland zoned Timberland Production, as defined by Public Resources Code Section 51104(g), is "…an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision h."

According to the California Department of Conservation (DOC) Important Farmland Finder, the Project Site is classified as Urban and Built-Up Land. The site is not located on or near Prime Farmland, nor is it under a Williamson Act Contract (DOC 2023). The Project Site is currently zoned Professional (P) and is not zoned as forest land or agriculture. The Project Site and surrounding properties are not currently used for agriculture or timberland production, as defined by the California Public Resources Code.

4.2.2 Agriculture and Forestry Resources (II) Environmental Checklist and Discussion

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?	☐	☐	☐	☒

No Impact.

The Project Site consists of vacant land, roadways, and vacant homes and is located within a developed, urbanized area. The California Mapping and Monitoring Program, Important Farmlands Map lists the Project Site as Urban and Built-Up Land. Therefore, the Proposed Project would not convert Farmland to non-agricultural use. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

No Impact.

The Project Site is not located on land zoned for agricultural use. According to the California Important Farmland Finder, the Project Site is mapped as Urban and Built-Up Land and not an agricultural preserve subject to a Williamson Act contract (DOC 2023). The Proposed Project would not conflict with zoning for agricultural use or a Williamson Act contract. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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))?	☐	☐	☐	☒

No Impact.

The Project consists of vacant and developed land and is surrounded by residential land uses. The Project Site is not located on land designated for forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact.

The Project Site is not zoned for forest land, timberland, or Timberland Production (DOC 2023). Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact.

The Project Site and surrounding properties are not designated for agricultural use. Areas to the north, east, south, and west of the Project Area are on land designated as Urban and Built-Up Land (DOC 2023). Development on the Project Site would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

4.2.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.3 Air Quality

The Proposed Project is located in the City of Santa Ana in Orange County. The California Air Resource Board (CARB) has divided California into regional air basins according to topographic features. The City of Santa Ana is located in a region identified as the South Coast Air Basin (SoCAB). The SoCAB occupies the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The air basin is on a coastal plain connecting broad valleys and low hills and is bounded by the Pacific Ocean to the southwest, with high mountains forming the remainder of the perimeter. The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions.

Ambient air quality is commonly characterized by climate conditions, the meteorological influences on air quality, and the quantity and type of pollutants released. The air basin is subject to a combination of topographical and climatic factors that reduce the potential for high levels of regional and local air pollutants. The following section describes the pertinent characteristics of the air basin and provides an overview of the physical conditions affecting pollutant dispersion in the Project Area.

Both the U.S. Environmental Protection Agency (USEPA) and CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas.

Toxic air contaminants (TACs) are separated into categories of carcinogens and noncarcinogens. Carcinogens, such as diesel particulate matter (diesel PM), are considered dangerous at any level of exposure. Noncarcinogens, however, have a minimum threshold for dangerous exposure. Common sources of TACs include, but are not limited to: gas stations, dry cleaners, diesel generators, ships, trains, construction equipment, and motor vehicles.

4.3.1 Ambient Air Quality

Ambient air quality in the Project Area can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. CARB maintains more than 60 monitoring stations throughout California. O_3, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) are the pollutant species potently most affecting the Project region. As described in detail below, the region is designated as a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, $PM_{2.5}$, PM_{10} (CARB 2022). The Anaheim – Pampas Lane air quality monitoring station (1630 Pampas Lane) located approximately 6.4 miles northwest of the Project Area monitors ambient concentrations of O_3, $PM_{2.5}$, and PM_{10}. Ambient emission concentrations will vary due to localized variations in emission sources and climate and should be considered "generally" representative of ambient concentrations in the Project Area. Table 4.3-1 summarizes the published data for the last three available years for O_3, $PM_{2.5}$, and PM_{10} from the Anaheim-Pampas Lane air quality monitoring station.

Table 4.3-1. Summary of Ambient Air Quality Data

Pollutant Standards	2020	2021	2022
O_3			
Max 1-hour concentration (ppm)	0.142	0.089	0.102
Max 8-hour concentration (ppm) (state/federal)	0.098 / 0.097	0.068 / 0.068	0.077 / 0.076
Number of days above 1-hour standard (state/federal)	6 / 2	0 / 0	1 / 0
Number of days above 8-hour standard (state/federal)	16 / 15	0 / 0	1 / 1
PM_{10}			
Max 24-hour concentration (µg/m3) (state/federal)	74.5 / 74.8	63.3 / 63.6	66.7 / 67.0
Number of days above 24-hour standard (state/federal)	* / *	5.7 / 0	* / *

Table 4.3-1. Summary of Ambient Air Quality Data

Pollutant Standards	2020	2021	2022
$PM_{2.5}$			
Max 24-hour concentration (µg/m3) (state/federal)	64.8 / 60.2	54.4 / 54.4	33.1 / 33.1
Number of days above federal 24-hour standard	12.0	10.0	0

Source: California Air Resources Board (CARB) 2023
Note: $\mu g/m^3$ = micrograms per cubic meter; O_3 = Ozone; $PM_{2.5}$ = Fine Particulate Matter; PM^{10} = Coarse Particulate Matter; ppm = parts per million; * = Insufficient data available

The USEPA and CARB designate air basins or portions of air basins and counties as being in "attainment" or "nonattainment" for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. The National Ambient Air Quality Standards (NAAQS) for O_3, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the Orange County portion of the SoCAB, which encompasses the Project Area, is included in Table 4.3-2.

Table 4.3-2. Attainment Status of Criteria Pollutants in the Orange County Portion of the SoCAB

Pollutant	State Designation	Federal Designation
O_3	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment

Source: California Air Resources Board (CARB) 2022
Note: SoCAB = South Coast Air Basin; CO = Carbon Monoxide; NO_2 = Nitrogen Dioxide; O_3 = Ozone; $PM_{2.5}$ = Fine Particulate Matter; PM_{10} = Coarse Particulate Matter; SO_2 = Sulfur dioxide

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The portion of Orange County

encompassing the Project Area is designated as a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, $PM_{2.5}$, and PM_{10} (CARB 2022). It is noted that the Project would not be a source of lead emissions.

4.3.2 Regulatory Setting

4.3.2.1 City of Santa Ana General Plan

The City's General Plan Conservation Element provides guidance for the management of the City's air, water, energy, and natural resources (City of Santa Ana 2022b). The following air quality goals and policies are applicable to the Proposed Project:

Goal CN-1: Air Quality and Climate. Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.

Policy CN-1.1: Regional Planning Efforts. Coordinate air quality planning efforts with local and regional agencies to meet or exceed state and federal ambient air quality standards in order to educate the community on and protect all residents from the health effects of air pollution.

Policy CN-1.5: Sensitive Receptor Decisions. Study the impacts of stationary and non-stationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks. Develop and adopt new regulations avoiding the siting of facilities that potentially emit increased pollution near sensitive receptors within environmental justice area boundaries.

Policy CN-1.8: Promote Alternative Transportation. Promote use of alternate modes of transportation in the City of Santa Ana, including pedestrian, bicycling, public transportation, car sharing programs, and emerging technologies.

Policy CN-1.8: Public Investment in Parks. Coordinate with park renovation and new development to address air quality and climate impacts by reducing the heat island affect by providing green infrastructure and shade, and reducing air pollution by providing vegetation that removes pollutants and air particles

4.3.2.2 South Coast Air Quality Management District

The local air quality regulating authority in the portion of Orange County encompassing the Project Area is the South Coast Air Quality Management District (SCAQMD). The SCAQMD's primary responsibility is ensuring that the NAAQS and California Ambient Air Quality Standards (CAAQS) are attained and maintained in the Orange County portion of the SoCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle

emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The following is a list of noteworthy SCAQMD rules that are required of construction activities in SoCAB, including those associated with the Proposed Project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible PM are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

    a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
    b) All onsite roads will be paved as soon as feasible or watered periodically or chemically stabilized.
    c) All material transported offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
    d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
    e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce reactive organic gas (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

4.3.2.3 Thresholds of Significance

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the impact determination shown below in the Checklist Questions. According to the SCAQMD, an air quality impact is considered significant if the Proposed Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD

has established thresholds of significance for air quality for construction and operational activities of land use development projects such as that proposed, as shown in Table 4.3-3.

Table 4.3-3. SCAQMD Regional Significance Thresholds – Pounds per Day

Air Pollutant	Construction Activities	Operations
Reactive Organic Gas	75	55
Carbon Monoxide	550	550
Nitrogen Oxide	100	55
Sulfur Oxide	150	150
Coarse Particulate Matter	150	150
Fine Particulate Matter	55	55

Source: South Coast Air Quality Management District (SCAQMD) 1993 ($PM_{2.5}$ threshold adopted June 1, 2007)

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

4.3.2.4 Localized Significance Thresholds

In addition to regional significance thresholds, the SCAQMD developed localized significance thresholds (LSTs) for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (offsite mobile source emissions are not included in the LST analysis protocol). LSTs represent the maximum emissions that can be generated in the Project Area without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. LSTs are based on the ambient concentrations of that pollutant within the Project Source Receptor Area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. The Project Area is located within SCAQMD SRA 17 (Central Orange County). Table 4.3-4 shows the LSTs for a one-acre, two-acre, and five-acre Project Site in SRA 17 with sensitive receptors located within 25 meters of the Project Area (the nearest sensitive receptors to the Project Area are located approximately 3 meters to the north).

Table 4.3-4. Local Significance Thresholds at 25 Meters of a Sensitive Receptor (SRA 17)

Project Size	Pollutant (pounds per day during Construction)			
	NO_2	CO	PM_{10}	$PM_{2.5}$
1 Acre	81	512	4	3
2 Acres	115	754	6	4
5 Acres	183	1,323	3	2

Source: South Coast Air Quality Management District (SCAQMD) 2009
Note: CO = Carbon Monoxide; NO2 = Nitrogen Dioxide; PM2.5 = Fine Particulate Matter; PM10 = Coarse Particulate Matter; SRA = Source Receptor Area

4.3.3 Air Quality (III) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

As part of its enforcement responsibilities, the USEPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the NAAQS and CAAQS. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

As previously mentioned, the Project Area is located within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. The 2022 Air Quality Management Plan (AQMP) is the SIP for the SoCAB. The 2022 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SoCAB and those portions of the Salton Sea Air Basin that are under SCAQMD's jurisdiction. The 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available zero emission and low NOx technologies and (2) developing new zero emission and ultra-low NOx technologies for use in cases where the technology is not currently available. The 2022 AQMP prioritizes distribution of incentive funding in "environmental justice" areas and seek opportunities to focus benefits on the most disadvantaged communities. The 2022 AQMP focuses on available, proven, and cost-effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities promoting reductions in GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The AQMP relies on a regional and multi-level partnership of governmental agencies at the federal, state, regional, and local level. These agencies (USEPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's latest Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. The 2022 AQMP includes integrated strategies and measures to meet the NAAQS.

According to the SCAQMD, in order to determine consistency with SCAQMD's air quality planning two main criteria must be addressed, as described below.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?

As shown in Table 4.3-5 and 4.3-6 below, the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds during construction. Because the Proposed Project is a neighborhood park, it would not generate significant traffic and would not have any stationary sources of emissions during operation. Therefore, the Project would generate negligible emissions during operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.

b) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in Table 4.3-5 and 4.3-6 below, the Proposed Project would be below the SCAQMD regional thresholds for construction. The Project would generate negligible emissions during operations. Because the Project would result in less than significant regional emission impacts, it would not delay the timely attainment of air quality standards or AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SoCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented its air quality planning documents. Determining whether or not a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

a) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2022 AQMP?

A project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the projections of air pollutant emissions in the City of Santa Ana. Specifically, SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) provides regional population forecasts for the region and SCAG's RTP/SCS provides socioeconomic forecast projections of regional population growth. The City of Santa

Ana General Plan is referenced by SCAG in order to assist forecasting future growth in the unincorporated portions of the City.

The Proposed Project is consistent with the land use designation and development density presented in the City of Santa Ana General Plan. The Project Area currently has a General Plan land use designation of *Professional,* which provides for permanent open spaces in the city and permits uses such as open-air recreational and entertainment uses, government buildings, school buildings and facilities, public utility facilities, quasi-public and service facilities, flood-control structures, and uses accessory thereto. The Proposed Project aims to construct a new 1.4-acre neighborhood park located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard. The intent of this park is to provide the local community with access to open space, exercise, and recreation facilities (City of Santa Ana 2022b). The uses proposed by the Project are consistent with the General Plan's *Open Space* land use designation, and the Project would not increase the number of people residing in the area.

The Project is consistent with the City of Santa Ana General Plan and is therefore consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the RTP/SCS and RCPG. Several of the goals laid out by SCAG's RTP/SCS promote construction of and access to open space and parks. The Proposed Project would boost the availability and accessibility of parks and recreational facilities for local residents, and therefore is consistent with the land uses envisioned by the City's General Plan and SCAG's RTP/SCS. As a result, the Project would neither conflict with the land use assumptions nor exceed the population or job growth projections used by SCAQMD to develop the 2022 AQMP. The City's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City; and these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into their air quality planning efforts, it can be concluded that the Proposed Project would be consistent with the projections. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. Therefore, the Proposed Project would be considered consistent with the population, housing, and employment growth projections utilized in the preparation of SCAQMD's air quality plans.

b) Would the project implement all feasible air quality mitigation measures?

In order to further reduce emissions, the Project would be required to comply with emission reduction measures promulgated by the SCAQMD, such as SCAQMD Rules 402, 403, and 1113. SCAQMD Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of

these coatings, primarily by placing limits on the ROG content of various coating categories. As such, the Proposed Project meets this consistency criterion.

c) Would the project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. As mentioned previously, the Proposed Project aims to construct a neighborhood park to provide the local community with access to open space, exercise, and recreation facilities. This park would be a walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local neighborhood. This would not increase the Project Area's development density and would not conflict with the development density standards set out by the City of Santa Ana General Plan. This would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a Project on air quality. The Proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. The Proposed Project's long-term influence would also be consistent with the goals and policies of the SCAQMD's 2022 AQMP.

Because of these reasons, this impact is less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less Than Significant Impact.

Air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

Air quality impacts were assessed in accordance with methodologies recommended by the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Project construction-generated air pollutant emissions were calculated using CalEEMod model defaults for Orange County. The Project would be a walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local

neighborhood; therefore, the Project would only generate negligible emissions during operations and less-than-significant operational emission impacts would occur as a result of the Project.

Regional Construction Significance Analysis

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. The basic sources of short-term emissions that will be generated through construction of the Proposed Project will be from grading activities and the from the operation of the construction vehicles (i.e., trenchers, dump trucks). Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities.

Construction-generated emissions associated with the Proposed Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See Appendix A for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 4.3-5. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Table 4.3-5. Construction-Related Emissions (Regional Significance Analysis)

Construction Year	Pollutant (pounds per day)					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction Calendar Year One	1.93	31.6	22.6	0.10	6.03	3.08
Construction Calendar Year Two	1.07	8.95	10.0	0.02	0.33	0.30
SCAQMD Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: California Emissions Estimator Model (CalEEMod) version 2022.1.1. Refer to Appendix A for Model Data Outputs.

Notes: Emissions taken of the season, summer or winter, with the highest outputs. Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 25 miles per hour.
CO = Carbon Monoxide; NO_x = Nitric Oxide; $PM_{2.5}$ = Fine Particulate Matter; PM_{10} = Coarse Particulate Matter; ROG = Reactive Organic Gas; SCAQMD = South Coast Air Quality Management District; SO_2 = Sulfur dioxide

As shown in Table 4.3-5, emissions generated during Project construction would not exceed the SCAQMD's regional thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard, and no health effects from Project criteria pollutants would occur. As such, the Project would have a less than significant impact.

Localized Construction Significance Analysis

The nearest sensitive receptor is a single-family residence, which is located approximately 3 meters to the north of the eastern portion of the Project Area. In order to identify localized, air toxic-related impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level Proposed Projects.

For this Project, the appropriate SRA for the localized significance thresholds is Central Orange County, SRA 17. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. Over the course of construction, the Proposed Project would disturb approximately 1.4 acres. The SCAQMD has produced lookup tables for projects that disturb one, two, and five acres. While the Project Area could disturb over one acre during construction, the LST threshold value for a one-acre site was employed from the LST lookup tables for these phases. This is a conservative estimate since the analysis will only account for the dispersion of air pollutants over one acre before reaching sensitive receptors, as opposed to accounting for the dispersion of pollutants over the 1.4-acre Project Area.

LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive receptor is a single-family residence that is located approximately 3 meters to the north of the Project Area. Notwithstanding, the SCAQMD Methodology explicitly states: "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Therefore, LSTs for receptors located at 25 meters were utilized in this analysis. The SCAQMD's methodology clearly states that "offsite mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. Table 4.3-6 presents the results of localized emissions from the most polluting activity for each year of construction.

Table 4.3-6. Construction-Related Emissions (Localized Significance Analysis)

Activity	Onsite Pollutant (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition (Year One)	15.6	16.0	0.67	0.62
Site Preparation (Year One)	13.7	12.9	0.65	0.59
Grading (Year One)	15.9	15.4	0.74	0.68
Building Construction (Year One)	9.44	10.1	0.37	0.34
Building Construction (Year Two)	8.95	10.0	0.33	0.30
Paving (Year One)	4.90	6.53	0.23	0.21
Architectural Coating (Year One)	0.91	1.15	0.03	0.03
SCAQMD Localized Significance Threshold (1.0 Acre)	*81*	*512*	*4*	*3*
Exceed SCAQMD Localized Threshold?	**No**	**No**	**No**	**No**

Source: California Emissions Estimator Model (CalEEMod) version 2022.1.1. Refer to Appendix A for Model Data Outputs.

Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 25 miles per hour.
CO = Carbon Monoxide; NO_x = Nitric Oxide; $PM_{2.5}$ = Fine Particulate Matter; PM_{10} = Coarse Particulate Matter; SCAQMD = South Coast Air Quality Management District

Table 4.3-6 shows that the emissions of these pollutants during construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. Therefore, impacts would be less than significant concerning LSTs during construction activities.

For the reasons described above, this impact would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Less than Significant Impact.

As previously described, sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptor is a single-family residence located approximately 3 meters north of the eastern portion of the Project Area.

Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term Proposed Project-generated emissions of diesel particulate matter (DPM), ROG, NOx, CO, and PM_{10} from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The portion of the SoCAB which encompasses the Project Area is designated as a nonattainment area for the federal O_3 and $PM_{2.5}$ and is also a nonattainment area for the state standards for O_3, $PM_{2.5}$, and PM_{10} (CARB 2022). Thus, existing O_3, PM_{10}, and $PM_{2.5}$ levels in the SoCAB are at unhealthy levels during certain periods. However, as shown in Table 4.3-5 and Table 4.3-6, the Project would not exceed the SCAQMD regional or localized significance thresholds for emissions.

The health effects associated with O_3 are generally associated with reduced lung function. O_3 is not emitted directly into the air but is formed through complex chemical reactions between precursor emissions of ROG and NOx in the presence of sunlight. The reactivity of O_3 causes health problems because it damages lung tissue, reduces lung function and sensitizes the lungs to other irritants. Scientific evidence indicates that ambient levels of O_3 not only affect people with impaired respiratory systems, such as asthmatics, but healthy adults and children as well. Exposure to O_3 for several hours at relatively low concentrations has been found to significantly reduce lung function and induce respiratory inflammation in normal, healthy people during exercise. This decrease in lung function generally is accompanied by symptoms including chest pain, coughing, sneezing and pulmonary congestion.

Studies show associations between short-term O_3 exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to O_3 may increase the risk of respiratory-related deaths. The concentration of O_3 at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion of O_3 and a 50 percent decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum O_3 concentration reaches 80 parts per billion. Because the Project would not involve construction activities that would result in O_3 precursor emissions (i.e., ROG or NO_x) in excess of the SCAQMD thresholds, which are set to be protective of human health and account for cumulative emissions in the SoCAB, the Project

is not anticipated to substantially contribute to regional O_3 concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The Project would not involve construction activities that would result in CO emissions in excess of the SCAQMD thresholds, which are set to be protective of human health and account for cumulative emissions in the SoCAB. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM_{10} and $PM_{2.5}$) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary TAC of concern. PM_{10} exhaust, which contains $PM_{2.5}$ exhaust as a subset, is considered a surrogate for DPM as all diesel exhaust is considered to be DPM. As with O_3 and NOx, the Project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. The increases of these pollutants generated by the Proposed Project would not on their own generate an increase in the number of days exceeding the NAAQS or CAAQS standards. Therefore, PM_{10} and $PM_{2.5}$ emissions, when combined with the existing PM emitted regionally, would have minimal health effect on people located in the immediate vicinity of the Project Site. Additionally, the Project would be required to comply with Rule 403 for fugitive dust control, as described above, which limits the amount of fugitive dust generated during construction. Accordingly, the Project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, Project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Furthermore, the Project has been evaluated against the SCAQMD's LSTs for construction. As previously stated, LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and can be used to assist lead agencies in analyzing localized impacts associated with Project-specific level of Proposed Projects. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. The Environmental Justice Program is divided into three categories, with the LST protocol promulgated under Category I: *Further-Reduced Health Risk*. As shown in Table 4.3-6, the emissions of pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Thus, the fact that onsite Project construction emissions would be generated at rates below the LSTs for NO_x, CO, PM_{10}, and $PM_{2.5}$ demonstrates that the Project would not adversely impact vicinity sensitive receptors. A less than significant impact would occur.

Operational Air Contaminants

The health risk public-notification thresholds adopted by the SCAQMD Board is 10 excess cancer cases in a million for cancer risk and a hazard index of more than one (1.0) for non-cancer risk. Examples of projects that emit toxic pollutants over long-term operations include oil and gas processing, gasoline dispensing, dry cleaning, electronic and parts manufacturing, medical equipment sterilization, freeways, and rail yards. The Project would be a walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local neighborhood. Operation of the Proposed Project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the Project; nor would the Project attract additional mobile sources that spend long periods queuing and idling at the site. Therefore, no operational emission impacts would occur as a result of the Project.

Would the Project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

No Impact.

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant

reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the Project Area. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people from odor emissions.

According to the SCAQMD, land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Proposed Project includes the development of a neighborhood park in the Project Area. There would not be any introduction of other uses identified by the SCAQMD as being associated with odors.

4.3.4 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.4 Biological Resources

This section is based on the analysis and recommendations presented in the Biological Resources Technical Report prepared for the Proposed Project by ECORP Consulting, Inc. (ECORP) (ECORP 2024b; Appendix B). ECORP performed a reconnaissance survey for the Project Area on June 3, 2024. Prior to conducting the survey, ECORP performed a literature review and database search using the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society's (CNPS) Electronic Inventory (CNPSEI) to determine the special-status plant and wildlife species that have been documented on or near the Project Site.

4.4.1 Environmental Setting

4.4.1.1 Vegetation Communities

No vegetation communities were identified on the Project Site; however, two land cover types; developed and disturbed, were observed. Disturbed land includes areas where the native vegetation community has been heavily influenced by human actions but lack development. Disturbed areas may be actively maintained to be free of vegetation or have been compacted or disked to such a degree that native and nonnative vegetation is very sparse. On the Project Site, the enclosed undeveloped portion of park is mapped as disturbed.

The developed land cover type is characterized by some level of anthropogenic development or disturbance and includes various types of landscaping including lawns and ornamental shrubs/trees. The developed designation can indicate a location where vegetation is highly managed and maintained such

as in areas of urban and residential landscaping and active agriculture fields and orchards (U.S. Forest Service 2009). On the Project Site, this includes the maintained medians and ornamental vegetation surrounding the residences and apartment building.

4.4.1.2 Plants

The plant species identified on the Project Site consisted of common ornamental plants including Outeniqua yellowwood (*Afrocarpus falcatus*), agave (*Agave ssp*.), bougainvillea (*Bougainvillea sp*.), red iron bark (*Eucalyptus sideroxylon*), crape myrtle (*Lagerstroemia indica*), southern magnolia (*Magnolia grandiflor*a), and Chinese elm (*Ulmus parvifolia*). Additional species surrounding the Project Site include eucalyptus (*Eucalyptus sp*.), jacaranda (*Jacaranda mimosifolia*), date palm (*Phoenix sp*.), elephant bush (*Portulacaria afra*), and ornamental rose (*Rosa sp*.).

4.4.1.3 Wildlife

The wildlife species present on the Project Site at the time of the survey included American crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), house sparrow (*Passer domesticus*), Allen's hummingbird (*Selaphorus sasin*), European starling (*Sturnus vulgaris*), and Swinhoe's white-eye (*Zosterops simplex*). Bird activity was high particularly in the trees and landscaping surrounding the apartment complex and residences to the east.

4.4.1.4 Special-Status Plants and Wildlife

The literature review and database searches conducted prior to the survey identified several listed and special-status plant and wildlife species that occur near the Project Site, such as least Bell's vireo (*Vireo bellii pusillus*, state and federally Endangered), coastal California gnatcatcher (*Polioptila californica californica*, federally Threatened, CDFW SSC), western pond turtle (*Emys marmorata*, federally proposed Threatened, CDFW SSC), southern California legless lizard (*Anniella stebbinsi*, CDFW SSC), western mastiff bat (*Eumops perotis californicus*, CDFW SSC), southern tarplant (*Centromadia parryi ssp*. *australis*, California Rare Plant Rank [CRPR] 1B.1 [rare in California and elsewhere]), chaparral sand-verbena (Abronia *villosa var*. *aurita*, CRPR 1B.1), and San Bernardino aster (*Symphyotrichum defoliatum*, CRPR 1B.2 [moderately threatened in California]). Habitats and conditions suitable for the species identified in the literature review were searched for during the survey and were not observed on the Project Site.

4.4.2 Biological Resources (IV) Environmental Checklist and Discussion

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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The approximately 1.4-acre Project Site is located in a busy, residential area of Santa Ana in which biological resources consist primarily of ornamental plant species and wildlife species common to developed areas. Several listed and special-status plant and wildlife species were included in the literature review; however, none of these species are expected to occur due to lack of suitable habitat present, frequent human disturbance, and dogs present on the Project Site.

The Project Site provides suitable habitat for nesting birds and raptors protected by the Migratory Bird Treaty Act and California Fish and Game Code in the surrounding trees and ornamental vegetation. During the survey, several active house sparrow and European starling nests were observed in the roof of the adjacent apartment building. Additionally, American crow fledglings were observed being fed by an adult crow in a eucalyptus tree in the commercial parking lot south of the site.

Ornamental trees on and near the Project Site could provide habitat for nesting birds. Nesting birds are protected under both the Migratory Bird Treaty Act and the California Fish and Game Code (Sections 3503, 3503.5, 3513, and 3800) and cannot be subjected to take (as defined in California Fish and Game Code) during the bird breeding season, which typically runs from February 15 through August 31. If construction of the Proposed Project or tree trimming or removal occurs during the bird breeding season, ground-disturbing construction activities could directly affect native and nongame birds and their nests through direct removal of nests and indirectly through increased disturbances associated with the Project such as noise, ground vibrations, and human and vehicular activity. Impacts would be less than significant with the implementation of mitigation measure BIO-1.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

No Impact.

There are no known natural communities identified in local or regional plans or policies or by the CDFW or USFWS on the Project Site or in the Project vicinity. The Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. No riparian habitat occurs on or in the immediate vicinity of the Project Site (USFWS 2024). No impact to sensitive habitats would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project Site is currently an existing developed site, which is located within a developed, urbanized area. No federally protected wetlands (e.g., emergent, forested/shrub, estuarine and marine deep water, estuarine and marine, freshwater pond, lake, or riverine) occur on or in the immediate vicinity of the Project Site (USFWS 2024). Therefore, the Proposed Project would not result in the direct removal, fill, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The Project Site is currently a developed site, which is located within a developed, urbanized area. There is no native habitat on or adjacent to the Project Site and, due to the existing urban development surrounding the site, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the Project Area. Furthermore, I-5 (located 0.85 mile east of the site) functions as an artificial barrier to any potential wildlife movement. Thus, the Proposed Project would not interfere with wildlife movement or native wildlife nursery sites.

Ornamental trees on and near the Project Site could provide habitat for nesting birds, which are protected under both the Migratory Bird Treaty Act and the California Fish and Game Code (Sections 3503, 3503.5, 3513, and 3800). Impacts would be less than significant with the implementation of mitigation measure BIO-1.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

No Impact.

The Project would not conflict with any specific policies regarding biological resources, including a tree-preservation ordinance. The City of Santa Ana adopted the Tree Care Ordinance in 1999. City of Santa Ana Municipal Code Article VII, Regulations of the Planting, Maintenance, and Removal of Trees, establish policies, regulations and standards for public trees. Public trees refer to any and all trees owned by the City and include, but are not limited to, median trees and street trees. The Proposed Project would maintain some of the existing trees while removing others. Replacement trees would be planted. Tree maintenance would be performed in accordance with the Tree Care Ordinance. Implementation of the Proposed Project would not conflict with any local policies or ordinances.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project would not conflict with any Habitat Conservation Plans, Natural Community Conservation Plans, or any other local, regional, or state Habitat Conservation Plan because no areas governed by such plans encompass or are near the Project Site. No impacts are anticipated.

4.4.3 Mitigation Measures

BIO-1: **Pre-Construction Nesting Bird Survey.** If ground disturbing Project activities, tree trimming, or tree removal are scheduled to occur during the nesting bird season (February 1 – August 30), a qualified biologist shall conduct a pre-construction nesting bird survey to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than 3 working days prior to initial ground disturbance. The nesting bird survey shall include the Project Site and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly due to construction activity, noise, or vibrations. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

4.5 Cultural Resources

ECORP prepared a Cultural Resources Inventory and Architectural History Evaluation Report (ECORP 2024c) for the Proposed Project to determine if cultural resources were present in or adjacent to the Project Area and assess the sensitivity of the Project Area for undiscovered or buried cultural resources. Cultural resources include prehistoric archaeological sites, historic archaeological sites, and historic structures, and generally consist of artifacts, food waste, structures, and facilities made by people in the past. Prehistoric archaeological sites are places that contain the material remains of activities carried out by the native population of the area (i.e., Native Americans) prior to the arrival of Europeans in Southern California. Places that contain the material remains of activities carried out by people during the period when written records were produced after the arrival of Europeans are considered historic archaeological sites. Historic structures include houses, garages, barns, commercial structures, industrial facilities, community buildings, and other structures and facilities that are more than 50 years old. Historic structures may also have associated archaeological deposits, such as abandoned wells, cellars, privies, refuse deposits, and foundations of former outbuildings.

The information provided below is an abridged version of the Cultural Resources Inventory and Architectural History Evaluation Report and is included here to provide a brief context of the potential cultural resources in the Project Area.

4.5.1 Cultural Resources (V) Environmental Checklist and Discussion

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 Section15064.5?	☐	☐	☐	☒

No Impact.

ECORP's pedestrian survey of the Project Area did not identify any new archaeological resources; however, the survey did identify three previously unrecorded built environment resources: two historic residences and one historic street segment. ECORP evaluated these resources using the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and local (City of Santa Ana) eligibility criteria.

The residences at 841 North Garnsey Street and 843 North Garnsey Street were assigned California Historical Resource Status Code 5D2 (individually eligible for local listing or designation), through a 1979 City of Santa Ana survey of historic residential properties. However, this 1979 survey finding of eligibility was made prior to significant exterior alterations to both dwellings. ECORP's revaluation of 841 North Garnsey Street and 843 North Garnsey Street found that they no longer retain the characteristics required to be listed as 5D2. As a result, ECORP has determined that the residences at 841 North Garnsey Street and 843 North Garnsey Street as well as the segment of West 10th Street are not eligible for inclusion in

the NRHP, CRHR, or City of Santa Ana Register of Historical Properties. Therefore, they are not considered Historical Resources or Historical Properties in accordance with CEQA.

No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The records search identified 64 previous cultural resource investigations within 1 mile of the Project Area, covering approximately 45 percent of the total area within the 1-mile records search radius. None of the 64 studies included the Project Area. These studies revealed the presence of historic sites, including single-family properties, multiple family properties, industrial buildings, and 1-to-3-story commercial buildings; these studies also revealed one multicomponent site, which consists of a historic ranch on which pre-contact mortars, lithics, and habitation debris were discovered. The previous studies were conducted between 1977 and 2017 and vary in size from approximately 8 to 70 acres.

The results of the records search indicate that Project Area has not been previously surveyed for cultural resources; therefore, a pedestrian survey of the Project Area was warranted.

The records search also determined that 157 previously recorded cultural resources are located within 1 mile of the Project Area. One of the 157 resources is multi-component site: a historic ranch component and a pre-contact component consisting of lithics and habitation debris. Twenty-five of the resources are historic-era sites associated with water conveyance systems, privies/dumps/trash scatters, and historical sites. The remaining 131 resources are associated with the built environment and include single-family properties, multi-family properties, industrial buildings, and 1-to-3-story commercial buildings associated with the development of the area of Santa Ana. ECORP did not identify any previously recorded cultural resources within or adjacent to the Project Area as a result of the records search.

For pre-contact archaeological sites, the soil types present within and near the Project Area (mostly late-Holocene alluvium from Santiago Creek and the Santa Ana River) are gravelly, well drained, deep, and loamy, which is characteristic of the alluvium sediments that frame the Santa Ana River drainage basin and floodplain. Pre-contact archaeological sites could have been buried during alluvial events in the past.

Due to the presence of alluvium throughout the Project Area and given the likelihood of pre-contact archaeological sites to be located along perennial waterways such as the nearby Santa Ana River and Santiago Creek, the Project Area has potential for buried pre-contact archaeological sites. The area that surrounds the Project Area is also known to have been used as farmland, as evidenced by the presence of documented historic-period sites that were mostly related to agriculture. Because the Project Area is in a heavily developed urban setting, the potential for undisturbed buried pre-contact or historical archaeological sites is low.

However, there always remains the potential for ground-disturbing activities to expose previously unrecorded cultural resources. CEQA requires the lead agency (in this case, the City) to address any unanticipated cultural resource discoveries during Project construction. Therefore, mitigation measures CUL-1 and CUL-2 would reduce impacts to less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The potential exists that as-yet undiscovered human remains may be encountered during Project development activities. In the event human remains are encountered, the discovery is required to comply with State of California Public Resources Health and Safety Code Section 7050.5-7055. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are discovered during excavation of a site. As required by State Law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County Coroner has been contacted, the remains investigated, and appropriate recommendations made for the treatment and disposition of the remains. Given required compliance with state regulations that detail the appropriate actions necessary in the event human remains are encountered required in mitigation measures CUL-1 and CUL-2, impacts associated with development would be less than significant.

4.5.2 Mitigation Measures

CUL-1: **Contractor Awareness Training Program.** The City of Santa Ana shall ensure that a Contractor Awareness Training Program about cultural resources is delivered to train equipment operators. The program shall be designed to inform construction personnel about: federal and state regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the City of any occurrences; project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program.

The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground-disturbing equipment. All personnel shall be required to sign a training roster. The construction manager is responsible for ensuring that all

required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the City as proof of compliance.

CUL-2: **Unanticipated discoveries.** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the City. The City shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined by CEQA or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Orange County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

4.6 Energy

Energy consumption is analyzed according to the potential direct and indirect environmental impacts associated with the construction and operation of the Project. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emissions of pollutants during the construction phase and the use of electricity during normal operations. The impact analysis focuses on the sources of energy that are relevant to the Proposed Project, which includes the equipment fuel necessary for Project construction. While the Project would contain lighting, this would be a negligible source of energy consumption.

4.6.1 Environmental Setting

Energy relates directly to environmental quality. Energy use can adversely affect air quality and other natural resources. The vast majority of California's air pollution is caused by burning fossil fuels. Consumption of fossil fuels is linked to changes in global climate and depletion of stratospheric ozone. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes (auto, carpool, and public transit); vehicle speeds; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy. In addition, residential, commercial, and industrial land uses consume energy, typically through the usage of natural gas and electricity.

4.6.1.1 Energy Consumption

Vehicle fuel use is typically measured in gallons (e.g., of gasoline or diesel fuel), although energy use for electric vehicles is measured in kilowatt hours.

Automotive/equipment fuel consumption in Orange County from 2019 to 2023 is shown in Table 4.6-1. Fuel consumption has generally decreased since 2019.

Table 4.6-1. Automotive Fuel Consumption in Orange County 2019 to 2023

Year	Total Fuel Consumption (gallons)
2023	1,327,425,976
2022	1,341,933,982
2021	1,349,467,796
2020	1,205,066,071
2019	1,364,891,618

Source: California Air Resources Board (CARB) 2024

4.6.2 Regulatory Setting

4.6.2.1 State

Senate Bill 1389

Senate Bill 1389 (SB 1389, Bowen and Sher, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial Integrated Energy Policy Report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code [PRC] Section 25301a).

Executive Order B-55-18 and Assembly Bill 1279

Executive Order (EO) B-55-18 was established in September 2018 by Governor Jerry Brown to establish a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Although this EO has not been codified in law, it directs CARB to ensure that future climate change scoping plans identify and recommend measures for achieving the carbon neutrality goal. On September 16, 2022, the state legislature passed AB 1279 which codified this carbon neutrality goal for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045.

California Code of Regulations, Title 24, Part 6 – Energy Efficiency Standards

The California Code of Regulations, Title 24, Part 6 is the California Energy Efficiency Standards for Residential and Nonresidential Buildings. This code was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years. The 2019 Title 24 updates went into effect on January 1, 2020. The 2022 standards went into effect January 1, 2023.

The 2022 Energy Standards improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2022 update to the Energy Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings, encouraging better energy efficiency, strengthening ventilation standards, and more.

California Code of Regulations, Title 24, Part 11 – California Green Building Standards Code

The State of California adopted the California Green Building Standards Code (CALGreen) in January 2010. CALGreen establishes mandatory green building standards for all buildings in California. The California Building Standards Commission has the authority to propose CALGreen standards for nonresidential structures such as new buildings or portions of new buildings, including additions and alterations. The code was subsequently updated in 2013, 2016, 2019, and most recently in 2022. The 2022 CALGreen Code is effective as of January 2023. The code covers five categories: planning and design, energy efficiency,

water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality.

4.6.2.2 Local

City of Santa Ana General Plan

The City's General Plan Conservation Element provides guidance for the management of the City's air, water, energy, and natural resources (City of Santa Ana 2022b). The following energy goals and policies are applicable to the Proposed Project:

Goal CN-1: Air Quality and Climate. Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.

Policy CN-1.2: Climate Action Plan. Consistency with emission reduction goals highlighted in the Climate Action Plan shall be considered in all major decisions on land use and investments in public infrastructure.

Goal CN-3: Energy Resources. Reduce consumption of and reliance on nonrenewable energy and support the development and use of renewable energy sources.

Policy CN-3.5: Landscaping. Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.

Goal CN-4: Water Resources. Conserve and replenish existing and future water resources.

Policy CN-4.2: Landscaping. Encourage public and private property owners to plant native or drought-tolerant vegetation.

Policy CN-4.4: Irrigation Systems. Promote irrigation and rainwater capture systems that conserve water to support a sustainable community.

City of Santa Ana Climate Action Plan

The City of Santa Ana's Climate Action Plan (CAP) provides strategies to increase water and energy efficiency, renewable energy, sustainable modes of transportation, recycling of waste, and to build more sustainable communities. The CAP includes a list of measures in five sectors to reduce emissions: Transportation and Land Use, Energy, Solid Waste, Water, and Wastewater. According to the CAP, the measures are projected to accomplish the goals of a 15 percent reduction in community-wide emissions by 2020 and nearly reach 30 percent reduction by 2035. The CAP will be updated periodically to meet the 2035 goal as it is anticipated that new policy and technology options for reducing emissions will become available before 2035. The CAP measures affecting municipal operations are projected to accomplish goals of 30 percent reduction by 2020 and 40 percent reduction by 2035 (City of Santa Ana 2015).

4.6.3 Energy (VI) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

The impact analysis focuses on the sole source of energy that is relevant to the Proposed Project: the equipment-fuel necessary for Project construction. Addressing energy impacts requires an agency to determine as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For this analysis, the amount of fuel necessary for Project construction is calculated and compared to that consumed in Orange County.

The amount of total construction-related fuel use was estimated using ratios provided in the Climate Registry's General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Energy consumption associated with the Proposed Project is summarized in Table 4.6-2.

Table 4.6-2 Proposed Project Fuel Consumption

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Automotive Fuel Consumption		
Project Construction Year One	10,246 gallons	0.001 percent
Project Construction Year Two	13,103 gallons	0.001 percent

Source: California Emissions Estimator Model (CalEEMod) 2022.1.1. Climate Registry 2019. Refer to Appendix G.
Notes: The Project increases in construction automotive fuel consumption are compared with the countywide fuel consumption in 2023, the most recent full year of data.

As shown in Table 4.6-2, the fuel necessary for Project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the Project Area. The fuel expenditure necessary to construct the neighborhood park and amenities such as a skate park, basketball court, a fitness zone with shade structure, playground, and associated ADA improvements would be temporary, lasting only as long as Project construction. As further indicated in Table 4.6-2, the Project's gasoline fuel consumption during the construction period is estimated to be 10,246 gallons during the first year of construction and 13,103 gallons during the second year of construction; this would increase the annual fuel use in the County by 0.001 percent during those years. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient

than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. This impact would be less than significant.

During operations, the neighborhood park is expected to reduce fuel consumption because neighborhood residents would be able to walk to the park instead of driving to a park in another area of the City. This would be a beneficial impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

No Impact.

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The City of Santa Ana has developed a Climate Action Plan (CAP) to develop strategies to reduce greenhouse gas emissions including, using energy and water more efficiently, increasing renewable energy, enhancing access to sustainable transportation modes, recycling waste, and building sustainable communities. The proposed park would serve the surrounding neighborhood and would not include a parking lot, thus promoting alternative transportation methods such as walking and biking. The Proposed Project would not conflict with or obstruct the City's CAP.

The State's 2022 Energy Standards improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. Buildings permitted on or after January 1, 2023, must comply with the 2022 Standards. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments. Additionally, in January 2010, the State of California adopted CalGreen that establishes mandatory green building standards for all buildings in California. The Proposed Project does not involve the construction of any buildings. The Project would not conflict with a state renewable energy or energy efficiency plan.

4.6.4 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.7 Geology and Soils

In August 2023, Converse Consultants (Converse) prepared a geotechnical and percolation test report for the Proposed Project (Converse 2023; Appendix E). The purposes of this investigation were to determine the nature and engineering properties of the subsurface soils and to provide recommendations for site earthwork, and design and construction of the proposed improvements.

4.7.1 Environmental Setting

4.7.1.1 Regional Seismicity and Fault Zones

The California Department of Conservation, Division of Mines and Geology, defines an *active fault* as one that has been subjected to surface displacement within the last 11,000 years. A fault is considered *inactive* if it has not shown geologic evidence of surface displacement in the last 11,000 years.

The proposed site is situated in a seismically active region. As is the case for most areas of Southern California, ground-shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project Site. During the life of the project, seismic activity associated with active faults can be expected to generate moderate to strong ground shaking at the site.

The Project Site is not located within a currently mapped State of California Earthquake Fault Zone for surface fault rupture. The closest fault to the Project Site is the San Joaquin Hills fault, located 6.84 miles to the north. Other faults in the vicinity include the Puente Hills fault and Newport-Inglewood fault, both located more than 13 miles away.

4.7.1.2 Soils

Fill soils were identified up to 5 feet below ground surface and are likely associated with previous grading for the existing structures. The fill soils were likely derived from on-site sources and are similar to the native alluvial soils in composition and density. Based on the exploratory borings and laboratory test results, the subsurface fill soils at the site consisted primarily of a mixture of gravel, sand, silt, and clay. Gravel up to 2.25-inch in maximum dimension was observed in the fill soils.

Based on the exploratory borings and laboratory test results, the subsurface alluvium soils at the site consisted primarily of a mixture of gravel, sand, silt, and clay. Gravel up to 2.0-inches in largest dimension was observed in the borings (Converse 2023; Appendix E).

4.7.2 Geology and Soils (VII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Directly or indirectly cause 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?	☐	☐	☐	☒

No Impact.

i) The Project Site is not located within a designated State of California Earthquake Fault Zone (Converse 2023). There are no known active faults projecting toward or extending across the Project Site. The potential for surface rupture resulting from the movement of nearby major faults is not known with certainty but is considered low.

The Project is the construction of a neighborhood park, including playground equipment, fitness equipment, and other structures. However, the Project does not include habitable structures and would not pose a substantial risk to people or other structures. Evacuation from the site after a major earthquake event would be available on 10th Street and Flower Street. No impact would occur.

Less Than Significant Impact.

ii) In general, Southern California is a seismically active region that contains many earthquake faults. Surface rupture from earthquakes is unlikely to occur in Santa Ana as no faults have been identified within the City boundaries. The Project Site is not located within a currently mapped State of California Earthquake Fault Zone for surface fault rupture. The closest fault to the Project Site is the San Joaquin Hills fault, located 6.84 miles to the north. Other faults in the vicinity include the Puente Hills fault and Newport-Inglewood fault, both located more than 13 miles away.

Moderate to strong ground shaking due to seismic activity is expected at the site during the life span of the Project. Design recommendations outlined in the geotechnical report (Appendix E)

would ensure the park amenities can sufficiently withstand structural failure during an earthquake. Compliance with the structural standards contained in the California Building Code would minimize risks to the public from strong seismic ground shaking. Impacts would be less than significant.

No Impact.

iii) Seismically induced liquefaction is a phenomenon in which cyclic stresses, produced by earthquake-induced ground motion, create excess pore pressures in soils. Based on review of Seismic Hazard Zones map for the Orange Quadrangle (1998), the Project Site is not located within areas mapped for liquefaction zones by State of California (Converse 2023). Additionally, City County has implemented the California Building Code seismic safety standards for structural construction. The proposed park facilities would be designed to withstand geologic conditions anticipated to occur in the Project Area. No impact would occur.

No Impact.

iv) Seismically induced landslides and slope failures are common occurrences during or soon after large earthquakes. The Project Site is not located within a currently designated State of California Landslide Zone (Converse 2023), due to the flat nature of the site and the distance away from any foothills, the potential for seismically induced landslides affecting the site is very low. The Proposed Project would not expose people or structures to substantial adverse effects associated with landslides. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less Than Significant Impact.

Construction of the Proposed Project would require ground disturbing activities, such as demolition and grading, that have the potential to result in soil erosion or the loss of topsoil. The Project would have a total disturbance area of approximately 1.4 acres and would be subject to coverage under the State Water Board Construction General Permit. Stormwater drainage in the area primarily consists of overland flow over the ground and roadway surfaces that concentrate in gutters along Garnsey Street, 10th Street, and Flower Street. Because the Project would comply with current regulations to limit erosion-related water quality impacts during and after construction, there would be a less than significant impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

No Impact.

Seismically induced lateral spreading involves primarily lateral movement of earth materials over underlying materials which are liquefied due to ground shaking. It differs from slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. The topography at the Project Site and in the immediate vicinity is very flat. Due to the low risk of liquefaction and dense nature of the soil materials, the risk of lateral spreading is considered low.

Dynamic dry settlement may occur in loose, granular, unsaturated soils during a large seismic event. Classification of the samples and sampling blow counts indicate that the site medium dense, to dense and clayey soil is present. The potential for dry seismic settlement is not known with certainty, however, the potential is considered low for this site. No impact would occur.

As discussed above, the Proposed Project would not expose people or structures to substantial adverse effects associated with landslides. No impact would occur.

As discussed above, the City has implemented the California Building Code seismic safety standards for structural construction. The City will continue to enact these and other seismic safety programs to minimize hazards from earthquakes and other seismic hazards. The Proposed Project's facilities would be designed to withstand geologic conditions anticipated to occur in the Project Area. Therefore, the Proposed Project would not contribute to a new exposure of people or structures to substantial adverse effects associated with an on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. Depending on the extent and location below finish subgrade, expansive soils can have a detrimental effect on structures. Based on the laboratory test results of the geotechnical report, the expansion indices of the upper five feet of site soil were 0 and 11, corresponding to very low expansion potential (Converse 2023). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

No Impact.

The Proposed Project does not include installation of septic systems or alternative wastewater disposal systems. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Less Than Significant Impact With Mitigation Incorporated.

ECORP conducted a paleontological records search request from the Natural History Museum of Los Angeles County (NHMLAC) (Appendix F). The NHMLAC does not indicate any fossil localities that lie directly within the Project Area, but does indicate fossil localities nearby from the same sedimentary deposits that may occur in the Project Area, either at the surface or at depth.

Fill soils were identified up to 5 feet below ground surface and are likely associated with previous grading for the existing structures. The fill soils were likely derived from on-site sources and are similar to the native alluvial soils in composition and density (Appendix E). Therefore, if the grading extends beyond top layers into older quaternary terrace deposits, then there is a potential for discovery of vertebrate fossils. Impacts would be reduced to less than significant with the implementation of mitigation measure GEO-1. As the implementation of mitigation measure GEO-1 would reduce potential impacts related to paleontological resources, no further analysis of the subject is required.

4.7.3 Mitigation Measures

GEO-1: **Unanticipated Discovery of Paleontological Resources.** If paleontological resources are discovered during construction, all work must halt within a 100-foot radius of the discovery and a qualified paleontologist will be retained to evaluate the find. The paleontologist shall notify the City if the find is significant. The paleontologist shall evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The qualified paleontologist will evaluate the significance of the find and recommend appropriate measures for the disposition of the find (e.g., fossil recovery, curation, data recovery, and/or monitoring). Construction activities may continue on other parts of the construction site while evaluation and treatment of the paleontological resource takes place.

4.8 Greenhouse Gas Emissions

GHG emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the Earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps more than 25 times more heat per molecule than CO_2, and N_2O absorbs 298 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e). Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

The local air quality agency regulating the SoCAB is the SCAQMD, the regional air pollution control officer for the basin. To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff convened a GHG CEQA Significance Threshold Working Group. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the Basin, various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. The SCAQMD numeric bright line threshold of 3,000 metric tons of CO_2e annually was developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a Proposed Project are significant.

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study [Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements (Crockett 2011). The study found numeric bright line thresholds designed to determine when small projects were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, Public Resources Code section 21003(f) provides it is a policy of the State that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The Supreme Court-reviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

The significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The Project is compared to the SCAQMD numeric bright-line threshold of 3,000 metric tons of CO_2e annually.

4.8.1 Regulatory Framework

4.8.1.1 State

Assembly Bill 32 Climate Change Scoping Plan and Updates

In 2006, the California legislature passed AB 32 (Health and Safety Code Section 38500 et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 required CARB to design and implement feasible and cost-effective emission limits, regulations, and other measures, such that statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions). Pursuant to AB 32, CARB adopted a Scoping Plan in December 2008, which outlined measures to meet the 2020 GHG reduction goals. California exceeded the target of reducing GHG emissions to 1990 levels by 2017.

The Scoping Plan is required by AB 32 to be updated at least every five years. The latest update, the 2022 Scoping Plan Update, outlines strategies and actions to reduce greenhouse gas emissions in California. The plan focuses on achieving the state's goal of reaching carbon neutrality by 2045 and reducing greenhouse gas emissions to 40 percent below 1990 levels by 2030. The plan includes a range of strategies across various sectors, including transportation, industry, energy, and agriculture. Some of the key strategies include transitioning to zero-emission vehicles, expanding renewable energy sources,

promoting sustainable land use practices, implementing a low-carbon fuel standard, and reducing emissions from buildings. Additionally, the plan addresses equity and environmental justice by prioritizing investments in communities most impacted by pollution and climate change. The plan also aims to promote economic growth and job creation through the transition to a low-carbon economy.

4.8.1.2 Local

City of Santa Ana General Plan

The City's General Plan Conservation Element provides guidance for the management of the City's air, water, energy, and natural resources (City of Santa Ana 2022b). The following goals and policies are applicable to the Proposed Project:

Goal CN-1: Air Quality and Climate. Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.

Policy CN-1.1: Regional Planning Efforts. Coordinate air quality planning efforts with local and regional agencies to meet or exceed state and federal ambient air quality standards in order to educate the community on and protect all residents from the health effects of air pollution.

Policy CN-1.2: Climate Action Plan. Consistency with emission reduction goals highlighted in the Climate Action Plan shall be considered in all major decisions on land use and investments in public infrastructure.

Policy CN-1.5: Sensitive Receptor Decisions. Study the impacts of stationary and non-stationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks. Develop and adopt new regulations avoiding the siting of facilities that potentially emit increased pollution near sensitive receptors within environmental justice area boundaries.

Policy CN-1.8: Promote Alternative Transportation. Promote use of alternate modes of transportation in the City of Santa Ana, including pedestrian, bicycling, public transportation, car sharing programs, and emerging technologies.

Policy CN-1.15: Community Emissions Reduction. Collaborate with the South Coast Air Quality Management District and local stakeholders in advance of designation as a priority community for air monitoring and reduction, and implement measures and strategies identified in other air monitoring and emissions reduction plans that are applicable to and feasible for Santa Ana.

City of Santa Ana Climate Action Plan

The City of Santa Ana's Climate Action Plan (CAP) provides strategies to increase water and energy efficiency, renewable energy, sustainable modes of transportation, recycling of waste, and to build more

sustainable communities. The CAP includes a list of measures in five sectors to reduce emissions: Transportation and Land Use, Energy, Solid Waste, Water, and Wastewater. According to the CAP, the measures are projected to accomplish the goals of a 15 percent reduction in community-wide emissions by 2020 and nearly reach 30 percent reduction by 2035. The CAP will be updated periodically to meet the 2035 goal as it is anticipated that new policy and technology options for reducing emissions will become available before 2035. The CAP measures affecting municipal operations are projected to accomplish goals of 30 percent reduction by 2020 and 40 percent reduction by 2035 (City of Santa Ana 2015).

4.8.2 Greenhouse Gas Emissions (VIII) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

GHG emissions-related impacts were assessed in accordance with methodologies recommended by the SCAQMD. Where GHG emission quantification was required, emissions were modeled using CalEEMod version 2022.1.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. Project construction generated GHG emissions were calculated using CalEEMod model defaults for Orange County. As the Project is proposing improvements to an existing park, operational GHG emissions are discussed qualitatively.

Construction Significance Analysis

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Site, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 4.8-1 illustrates the specific construction generated GHG emissions that would result from construction of the Project.

Table 4.8-1. Construction-Related Greenhouse Gas Emissions

Emissions Source	CO_2e (Metric Tons/ Year)
Construction Year One	104
Construction Year Two	133
Total Construction Emissions	**237**
SCAQMD Significance Threshold	*3,000*
Exceed SCAQMD Significance Threshold?	**No**

Source: California Emissions Estimator Model (CalEEMod) version 2022.1.1. Refer to Appendix A for Model Data Outputs.
Note: CO_2e = Carbon Dioxide Equivalent; SCAQMD = South Coast Air Quality Management District

As shown in Table 4.8-1, Project construction would result in the generation of approximately 237 metric tons of CO_2e over the course of construction, which is less than the threshold of 3,000 tons of CO_2e. Once construction is complete, the generation of these GHG emissions would cease. This impact is less than significant.

Operational Significance Analysis

The Project is proposing the construction of a new walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local neighborhood; therefore, the Project would only generate negligible GHG emissions during operations and no operational GHG emission impacts would occur as a result of the Project. The Proposed Project may have beneficial impacts on GHG emissions by providing a park within walking distance for local neighborhood residents, who now have to drive to parks elsewhere in the City.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Less Than Significant Impact.

The City of Santa Ana has developed a CAP to provide a framework for reducing GHG emissions. As part of the CAP, the City of Santa Ana has established a GHG reduction target of a 30 percent citywide reduction from baseline by 2035. The City of Santa Ana CAP contains a GHG inventory, which identifies the largest sources of GHG emissions and thereby provides a basis for the development of strategies for achieving the reduction goal. Although the Project requires a zone change, implementation of the Proposed Project would be consistent with the land use goals of the City's General Plan, as it supports and improves the character and integrity of the neighborhood and quality of life. Development and operation of neighborhood parks would be compatible with the surrounding residential uses and no significant environmental impacts are anticipated. The Project would not conflict with population or job growth projections used by the City to develop the GHG inventory contained in the CAP. Thus, the Project is consistent with the GHG inventory set forth by the City.

Additionally, the State of California promulgates several mandates and goals to reduce statewide GHG emissions, including the goal to reduce statewide GHG emissions to 40 percent below 1990 levels by the year 2030 (California Senate Bill [SB] 32) and 80 percent below 1990 levels by the year 2050 (Executive Order S-3-05). The Proposed Project is subject to compliance with SB 32. As discussed previously, construction Project-generated GHG emissions would not surpass the significance threshold of 3,000 metric tons of CO_2e annually established by the SCAQMD and would not increase operational GHG emissions beyond current conditions. The 3,000 metric tons of CO_2e threshold was prepared with the purpose of complying with statewide GHG-reduction efforts. Therefore, this impact would be less than significant.

4.8.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the California Health and Safety Code, Section 25501 as follows:

> "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

A hazardous material is defined in 22 CCR Section 662601.10 as follows:

> A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.

Transporters of hazardous waste in California are subject to several federal and state regulations. They must register with the California Department of Health Services (DHS) and ensure that vehicle and waste container operators have been trained in the proper handling of hazardous waste. Vehicles used for the transportation of hazardous waste must pass an annual inspection by the California Highway Patrol (CHP). Transporters must allow the CHP or DHS to inspect its vehicles and must make certain required inspection records available to both agencies. The transport of hazardous materials that are not wastes is regulated by the U.S. Department of Transportation through national safety standards.

4.9.2 Hazards and Hazardous Materials (IX) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

As the Proposed Project would construct various new park amenities, it would not transport, use, or dispose of any hazardous materials beyond those used for construction and maintenance. Construction activities may involve limited transport, storage, use, or disposal of hazardous materials. Some examples of hazardous materials handled during construction include the use of paints and solvents during construction. These activities would be short-term and one-time events and would be subject to federal, state, and local health and safety requirements. A less than significant impact related to the use or transport of hazardous materials is expected to occur during construction.

Long-term operation of the Proposed Project would involve very little transport, storage, use, or disposal of hazardous material. Typical facility maintenance involves the limited use of hazardous materials through custodial, routine maintenance, and repair activities, including commercial cleansers, lubricants, paints, and pesticides/herbicides for landscaping purposes. These items would be stored in an appropriate place, such as an offsite utility closet, with limited access only by appropriate City employees of the park. as described in Section 4.9.2 Question d, below, the Project Site does not have any know hazardous releases or other contamination, and groundbreaking and construction activities are not anticipated to release any known toxins or contaminants onsite or convey hazardous materials offsite. Therefore, the Project would create a less than significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less Than Significant Impact.

As described above, construction and operation activities would require the use of small amounts of hazardous materials and would be required to comply with federal, state, and local laws and regulations regarding proper storage, application, and disposal. The proposed skate park, basketball court, shade structures, playground and associated improvements would not create a significant hazard to the public or environment through reasonably foreseeable upset and accidental release of hazardous materials. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

Less Than Significant Impact.

The nearest school to the Project Site is Willard Intermediate School at 1342 North Ross Street, located approximately 0.15 mile to the northeast. As stated above, there would be no hazardous materials, substances, or waste associated with Project development other than those typically used for routine maintenance. These substances would be required to comply with federal, state, and local laws and regulations regarding proper storage, application, and disposal. Therefore, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

No Impact.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and the California Integrated Waste Management Board to compile and annually update lists of hazardous waste sites and land designated as hazardous waste property throughout the state.

California Environmental Protection Agency's (CalEPA) Cortese List Data Resources records were reviewed to help determine whether hazardous materials have been handled, stored, or generated on the Project Site or the adjacent properties and businesses (CalEPA 2023). The list, although covering the requirements of Section 65962.5, has always been incomplete because it does not indicate if a specific site was at one time included in the abandoned site program.

The list is a compilation of the following five separate websites:

1. DTSC's EnviroStor – identifies waste or hazardous substances sites.
2. SWRCB's GeoTracker – identifies underground storage tanks for which an unauthorized release report was filed, cleanup sites, and all solid waste disposal facilities from which there is a mitigation of hazardous waste for which a regional board has notified DTSC.

3. A PDF of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
4. A list of cease-and-desist orders and clean up and abatement orders.
5. A list of hazardous waste facilities subject to corrective action.

DTSC's EnviroStor indicated that that Project Site was not identified as a hazardous waste or substances site (DTSC 2023). The database indicates that the nearest hazardous site is a former firing range located approximately 0.3 mile north of the Project Site at the northwest intersection of Parton Street and 15th Street. The cleanup status is inactive and needed evaluation as of the last database update for the site on August 14, 2018.

GeoTracker did not identify any underground storage tank for which an unauthorized release report was filed, a cleanup site, or a solid waste disposal facility from which there is a mitigation of hazardous waste for which a regional board has notified DTSC on the site (SWRCB 2023).

A list of solid waste disposal sites with waste constitutes above hazardous waste levels outside the waste management unit was also checked. No records were listed.

The list of cease-and-desist orders and clean up and abatement orders did not include the Project Site.

The list of hazardous facilities subject to corrective action does not include the Project Site.

As the Proposed Project is not listed on one of the five websites provided to fulfill the Cortese List, the Proposed Project would not create a significant hazard to the public or the environment. There are no hazardous waste facilities and sites with known contamination, or sites where there may be reasons to investigate further located on the Project Site or in its vicinity.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project Area?	☐	☐	☐	☒

No Impact.

The Project Site is located approximately 5 miles north of John Wayne International Airport and is not within an Airport Impact Zone (City of Santa Ana 2009). The Proposed Project would not include the construction of habitable structures or other structures that could pose a safety hazard. As such, the Proposed Project would not result in a safety hazard for people residing or working in the Project Area. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less Than Significant Impact.

The City of Santa Ana maintains a Hazard Mitigation Plan that provides direction and guidance for officials and citizens in the event of emergency (City of Santa Ana 2022c). It serves as a guide for the community and the general public in understanding the hazards facing the community and how to reduce the impacts of those hazards. The plan discusses hazards including earthquakes, floods, climate change, and disease.

The Project Site is located in a highly urbanized area of Santa Ana. The areas immediately to the north, east, south, and west of the proposed park comprise of existing roadways, single-family residences, and multifamily residences. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. Construction activities for the park would involve temporary lane closures along Flower Street during installation of the crosswalk. 10th Street would be redesigned into a cul-de-sac and water quality area.

Construction-related traffic could result in increased travel time due to flagging or traffic to accommodate trucks entering and exiting the park site during construction. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Construction Management Plan would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the park and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. As a component of the Construction Management Plan, the times of day and locations of all temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Truck routes for material and equipment deliveries, as well as for soil or waste export and disposal, would require approval by the City of Santa Ana Public Works prior to construction activities. The Construction Management Plan would be prepared for review and approval prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e., lights and sirens), are expected to limit the potential for significant delays in emergency response times during Project construction. As such, construction is not expected to result in inadequate emergency access.

The Project includes closure of 10th Street at the Project boundary west to Flower Street and construction of a cul-de-sac (Figure 3). The cul-de-sac would include a 35-foot turn radius to accommodate emergency vehicles. The Project also includes demolition of Garnsey Street (Figure 2); this area would be included in the park design. Emergency access to the park and surrounding area would continue to be provided at-grade from Flower Street and 10th Street, similar to existing conditions. Subject to review and approval of site access and circulation plans by the Orange County Fire Authority (OCFA), the Project would not impair

implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause significant impediments along any designated emergency evacuation routes, and the proposed use would not impair implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to these issues and no mitigation measures are required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

No Impact.

The proposed park site is located in Santa Ana within an urbanized neighborhood. The areas immediately to the north, east, south, and west of the Project Site are comprised of existing roadways and multifamily and single-family residences. No wildlands are present in the City or the Project Area. Therefore, the Project would not expose people or structures to a significant risk involving wildland fires. No impact would occur.

4.9.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 Regional Hydrology

Responsibility for the protection of surface water and ground water quality in California rests primarily with the State Water Resources Control Board (State Water Board) and nine Regional Water Quality Control Boards. The City of Santa Ana is under the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB).

The Project is located near the eastern fringes of the Coastal Plain of Orange County Groundwater Basin (Basin 8-001). The groundwater basin contains an estimated 66 million acre-feet when full. The basin underlies a coastal alluvial plain in northwestern Orange County. The basin is bound to the northwest and the north by the Los Angeles-Orange County line, to the northeast by the Whittier fault zone, to the east by consolidated rocks of the Santa Ana Mountains, to the south by consolidated rocks of the Laguna Hills and San Joaquin Hills, and to the southwest by the Pacific Ocean.

The Basin is managed by the Orange County Water District (OCWD), covers an area of approximately 350 square miles, and has a full volume of approximately 66 million acre-feet. The basin has been operated

within its sustainable yield for more than 10 years without degrading water quality, reducing storage, or lowering groundwater levels.

The northwestern portion of the City area drains to the Anaheim Bay–Huntington Harbor Watershed, the northern and southwestern portions drain to the Santa Ana River Watershed, and the southeastern and eastern portions of the City drain to the Newport Bay Watershed (City of Santa Ana 2020).

4.10.1.2 Existing Site Hydrology and Onsite Drainage

The approximate elevation of the site varies between 109 and 111 feet AMSL. Stormwater drainage in the area primarily consists of overland flow over the ground and roadway surfaces that concentrate in gutters along 10th Street, Flower Street, and Garnsey Street. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map 0659C0144J, the Project Site is located within Zone X, which is subject to 500-year floods but not subject to 100-year floods (FEMA 2009).

4.10.1.3 Proposed Site Hydrology and Onsite Drainage

The Project includes approximately 20,500 square-feet (SF) of irrigated landscape and approximately 30,700 SF of non-irrigated surfaces like concrete sidewalks and rubber surfacing. For drainage facilities, a storm drain system connected to catch basins would collect all water from the Project Site and direct it to a natural bioswale for infiltration into the ground. Additional storm quality controls include capturing water from Flower Street and treating the 85th percentile storm event. To address the existing flooding along Flower Street, an underground bio-retention storage facility would be installed underneath the proposed basketball court to store approximately 54,800 cubic feet of water for infiltration. This approach is designed to alleviate some of the flood concerns along Flower Street.

4.10.2 Hydrology and Water Quality (X) Environmental Checklist and Discussion

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 groundwater quality?	☐	☐	☒	☐

Less Than Significant Impact.

The Project Site is located within the jurisdiction of the SARWQCB, which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (i.e., water quality objectives). Water quality standards for all ground and surface waters overseen by the SARWQCB are documented in the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan; SARWQCB 2019). The Basin Plan contains the water quality regulations for the Santa Ana River Basin Region and programs to implement those regulations. Water quality standards are attained when designated beneficial uses are achieved and water quality

objectives are being met. The regulatory program of the SARWQCB is designed to minimize and control discharges to surface and ground water within the region, largely through permitting, such that water quality standards are effectively attained.

Construction of the Proposed Project would require ground disturbing activities, such as grading, trenching, and vegetation removal, that have the potential to result in soil erosion or the loss of topsoil. During construction of the Proposed Project, water quality impacts could occur without proper controls. Soils loosened during grading, as well as spills of fluids or fuels from vehicles and equipment, if mobilized or transported offsite in overland flow, have the potential to degrade water quality.

The Project includes approximately 20,500 SF of irrigated landscape and approximately 30,700 SF of non-irrigated surfaces like concrete sidewalks and rubber surfacing. For drainage facilities, a storm drain system connected to catch basins would collect all water from the Project Site and direct it to a natural bioswale for infiltration into the ground. Additional storm quality controls include capturing water from Flower Street and treating the 85th percentile storm event. To address the existing flooding along Flower Street, an underground bio-retention storage facility would be installed underneath the proposed basketball court to store approximately 54,800 cubic feet of water for infiltration. This approach is designed to alleviate some of the flood concerns along Flower Street.

The Project would have a total disturbance area of approximately 1.4 acres and thus would be subject to coverage under the State Water Board Construction General Permit. During operation, the Proposed Project would not generate runoff that could substantially degrade surface or groundwater quality. Because the Project would comply with current regulations to limit erosion-related water quality impacts during construction and operation, there would be a less than significant impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Less Than Significant Impact.

The Sustainable Groundwater Management Act (SGMA) applies to all California Groundwater Basins and requires that high-and medium-priority groundwater basins form Groundwater Sustainability Agencies and be managed in accordance with locally developed Groundwater Sustainability Plans or Alternative Plans (Department of Water Resources [DWR] 2019). The Proposed Project falls within the Coastal Plain of Orange County Basin, Basin 8-001. The groundwater basin is located in the lower Santa Ana River Watershed. Precipitation in the upper Santa Ana River watershed flows toward the Santa Ana River and Prado Reservoir. Controlled releases from the Prado Dam supply the Santa Ana River in the lower Santa Ana River watershed. DWR under the SGMA defines the basin as a medium-priority basin (DWR 2019).

The level of increase in impervious surfaces at the site is not anticipated to affect the supplies derived from local groundwater wells. The Project water usage is unlikely to significantly affecting water supplies, including groundwater supplies. The Project includes a drinking fountain but does not include restrooms. In addition, the Project would minimize water usage by installing drought tolerant landscaping. Therefore, the Proposed Project would not substantially deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a substantive net deficit in aquifer volume or a lowering of the local groundwater table level. The impact would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 that would:				
i) result in substantial erosion or siltation onsite or offsite;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐

Less Than Significant Impact.

i-iv) The site is partially developed and relatively flat, with elevations ranging from approximately 109 to 111 feet above mean sea level. Drainage from the Project Site flows to roadways and gutters along Garnsey Street, 10th Street, and Flower Street. No jurisdictional features, hydric soils, or wetlands are located on the Project Site. According to FEMA, the Project Site is located within Zone X, which is subject to 100-year floods (FEMA 2009).

However, the nature of the Project (constructing a neighborhood park) would have minimal impact in the event of a flood. The Project includes approximately 20,500 SF of irrigated landscape and approximately 30,700 SF of non-irrigated surfaces like concrete sidewalks and rubber surfacing. For drainage facilities, a storm drain system connected to catch basins would collect all water from the Project Site and direct it to a natural bioswale for infiltration into the ground. Additional storm quality controls include capturing water from Flower Street and treating the 85th percentile storm event. To address the existing flooding along Flower Street, an underground bio-retention storage facility would be installed underneath the

proposed basketball court to store approximately 54,800 cubic feet of water for infiltration. This approach is designed to alleviate some of the flood concerns along Flower Street. As such, the Proposed Project would not significantly increase the rate or amount of surface runoff, nor would it impede or redirect flood flows.

The Proposed Project would require grading and tree/vegetation removal for construction of the park facilities. The Project would have a total disturbance area of approximately 1.4 acres and would be subject to coverage under the State Water Board Construction General Permit. Surfaces would include landscape and hardscape once construction is complete. Drainage facilities including bioswales and bio-retention facilities would ensure there is no long-term erosion. Because the Project would comply with current regulations to limit erosion-related water quality impacts during and after construction, there would be a less than significant impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☐	☒

No Impact.

A *seiche* is a standing wave in an enclosed or partially enclosed body of water. Seiches and seiche-related phenomena have been observed on lakes, reservoirs, swimming pools, bays, and seas. The key requirement for formation of a seiche is that the body of water be at least partially bounded, allowing the formation of the standing wave. The City of Santa Ana is not subject to seiche because no significant water bodies exist within the community.

A *tsunami* is a great sea wave, commonly referred to as a *tidal wave*, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The City is not subject to tsunamis because it is located inland. The Project Site is located more than 10 miles inland from the Pacific Ocean coastline and is therefore not subject to a tsunami.

According to FEMA, the Project Site is located within Zone X, which is not subject to 100-year floods. The nature of the Project (constructing a neighborhood park) would have a minimal prospect of releasing pollutants due to inundation. The Project is also not located within a dam inundation zone according to the DWR Division of Safety of Dams (DWR 2024). No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Less Than Significant Impact.

Water quality standards for all ground and surface waters overseen by the SARWQCB are documented in the Basin Plan (SARWQCB 2019). Water quality standards are attained when designated beneficial uses are achieved and water quality objectives are being met. The regulatory program of the SARWQCB is designed to minimize and control discharges to surface and ground water within the region, largely through permitting, such that water quality standards are effectively attained. Surfaces would be constructed and maintained to ensure there is no long-term erosion. As such, the Proposed Project would not obstruct the implementation of a water quality control plan or groundwater management plan. Because the Project would comply with current regulations to limit erosion-related water quality impacts during and after construction, there would be a less than significant impact.

4.10.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The proposed new 1.4-acre neighborhood park is located at the southeast corner of 10th Street and Flower Street, City of Santa Ana, California, just north of Civic Center Boulevard. The undeveloped portion of the site is surrounded by an approximately 6-foot steel fence with vehicular and pedestrian access points on the east side.

The site is bounded by 10th Street to the north, an alleyway to the east, parking lot to the south, and Flower Street to the west. The approximate elevation of the site varies between 109 and 111 feet AMSL. The site is currently comprised of eight separate parcels (APN's 005-142-34, 005-142-35, 005-142-47, 005-142-48, 005-142-49, 005-142-58, 005-142-02, and 005-142-03), Garnsey Street, and portions of 10th Street and Flower Street. The lots are currently identified as Professional and Administrative Office (PAO) land use and zoned Professional (P). The Project includes rezoning of the site to Open Space (O).

Surface material is comprised of a thin layer of engineered wood fiber. The site contains two single family residences located on APN's 005-142-02 and 005-142-03. Ornamental trees line the outside perimeter of the fence and there are overhead utilities on the east side of Garnsey Street. Please see Figures 1 and 2 for depictions of the Project location.

4.11.2 Land Use and Planning (XI) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒

No Impact.

The Proposed Project involves the construction of a neighborhood park on infill parcels that include a vacant lot, portions of roadways, and two vacant single-family residences. Implementation of the Proposed Project would not physically divide an established community. No significant impacts would occur because of the Proposed Project. No mitigation measures are required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

No Impact.

In May 2022, the Santa Ana City Council adopted a Parks Master Plan that provides goals to develop parkland within a 10-minute walk for all residents, and three acres of parkland per 1,000 residents citywide. The proposed 10th and Flower Park is intended to create a recreational amenity in a "park gap" area, serve four adjacent neighborhoods, and create a new park that was identified in the Parks Master Plan.

Additionally, the City of Santa Ana General Plan Open Space, Parks and Recreation Element was adopted in 1982. The goals listed in the Element include providing sufficient open space to meet the recreational and aesthetic needs of the community, ensuring ready public access and use of open space facilities, and utilizing open spaces as means of reinforcing goals set forth for conservation of natural resources.

The park would provide much needed recreational opportunities for the surrounding neighborhoods and would be consistent with General Plan goals. Although the Project requires a zone change, implementation of the Proposed Project would be consistent with the land use goals of the City's General Plan, as it supports and improves the character and integrity of the neighborhood and quality of life. Development and operation of neighborhood parks would be compatible with the surrounding residential uses and no significant environmental impacts are anticipated. No adverse impact would occur, and no mitigation measures are required.

4.11.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.12 Mineral Resources

4.12.1 Environmental Setting

Minerals are defined as any naturally occurring chemical elements or compounds formed by inorganic processes and organic substances. Minable minerals are defined as a deposit of ore or minerals having a

value materially in excess of the cost of developing, mining, and processing the mineral and reclaiming the Project Area. The conservation, extraction, and processing of mineral resources is essential to meeting the needs of society.

The Surface Mining and Reclamation Act of 1975 (SMARA) states that cities and counties shall adopt ordinances "...that establish procedures for the review and approval of reclamation plans and financial assurances and the issuance of a permit to conduct surface mining operations..." (PRC Section 2774). The intent of this legislation is to ensure the prevention or mitigation of the adverse environmental impacts of mining, the reclamation of mined lands, and the production and conservation of mineral resources are consistent with recreation, watershed, wildlife, and public safety objectives (PRC Section 2712).

SMARA requires the State Geologist to classify land into Mineral Resource Zones (MRZs) according to the known or inferred mineral potential of that land. The process is based solely on geology, without regard to existing land use or land ownership. The primary goal of mineral land classification is to ensure that the mineral potential of land is recognized by local government decision makers and considered before land use decisions, which could preclude mining, are made. Areas subject to California mineral land classification studies are divided into the following MRZ categories that reflect varying degrees of mineral potential:

- MRZ-1: Areas of no mineral resource significance
- MRZ-2: Areas of identified mineral resource significance
- MRZ-3: Areas of undetermined mineral resource significance
- MRZ-4: Areas of unknown mineral resource significance

At present, there are no mineral extraction activities in the City of Santa Ana. Regionally significant mineral resources are found farther north of the City, along the Santa Ana River within the cities of Orange and Anaheim. Santiago Creek also provides aggregate resources in areas north of the City of Santa Ana. Orange County-Temescal Valley P-C Region contains a number of resource sectors that the State has designated of "regional significance;" it also has "regionally significant construction aggregate resource areas" in portions of the Santa Ana River within the Prado Basin and behind Mount Rubidoux. Significant aggregate resources also occur south of Corona within and along Temescal Wash and south toward Lake Elsinore. However, there are no mineral resource sectors in the City (City of Santa Ana 2022).

4.12.2 Mineral Resources (XII) Environmental Checklist and Discussion

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?	☐	☐	☐	☒

No Impact.

According to the Santa Ana General Plan, the City does not have significant mineral resources and there are no mineral extraction activities in the City. Regionally significant resources are found farther north of the City, along the Santa Ana River within the cities of Orange and Anaheim. Santiago Creek also provides aggregate resources in areas north of the City of Santa Ana. The nearest mineral resource sector is Sector J of the Lower Santiago Creek Resource Area, located 1 mile northeast of the City. Given that Project does not have mineral resource sectors and no active or inactive mines, implementation of the Project would not cause a loss of availability of known mineral resources. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

No mineral resource sectors or mines are in the City of Santa Ana. Given that Project does not have mineral resource sectors and no active or inactive mines, implementation of the Project would not cause a loss of availability of known mineral resources. No impact would occur.

4.12.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.13 Noise

4.13.1 Noise Fundamentals

4.13.1.1 Noise Descriptors

Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include the average hourly noise level (in L_{eq}) and the average daily noise levels/community noise equivalent level (in L_{dn}/CNEL). The L_{eq} is a measure of ambient noise, while the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis and defined as follows:

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- **Day-Night Average (L_{dn})** is a 24-hour average L_{eq} with a 10-dBA "weighting" added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

4.13.1.2 Sound Propagation and Attenuation

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations. Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a stationary or point source (Federal Highway Administration [FHWA] 2017). Sound from a line source, such as a highway, propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (FHWA 2017). No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed (FHWA 2011).

The manner in which older structures in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (Caltrans 2002). The exterior-to-interior reduction of newer structures is generally 30 dBA or more (Harris Miller Miller & Hanson Inc. 2006).

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60- to 70-dBA range, and high, above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-

commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1.0 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3.0-dBA change is considered a just-perceivable difference.
- A change in level of at least 5.0 dBA is required before any noticeable change in community response would be expected. An increase of 5.0 dBA is typically considered substantial.
- A 10.0-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

4.13.1.3 Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise.

The Occupational Safety and Health Administration (OSHA) has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these various sources.

Sensitive Noise Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as

parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

The nearest noise sensitive receptor to the Project Area is a single-family residence, which is located approximately 3 meters north of the eastern portion of the Project Area.

4.13.1.4 Vibration Fundamentals

Sources of earthborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or manmade causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Ground vibration can be measured several ways to quantify the amplitude of vibration produced, including through peak particle velocity (PPV) or root mean square velocity. These velocity measurements measure maximum particle at one point or the average of the squared amplitude of the signal, respectively. Vibration impacts on people can be described as the level of annoyance and can vary depending on an individual's sensitivity. Generally, low-level vibrations may cause window rattling but do not pose any threats to the integrity of buildings or structures. Table 4.13-1 displays the reactions of people and the effects on buildings produced by continuous vibration levels.

Table 4.13-1. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006 – 0.019	64 – 74	Range of threshold of perception.	Vibrations unlikely to cause damage of any type.
0.08	87	Vibrations readily perceptible.	Threshold at which there is a risk of architectural damage to extremely fragile historic buildings, ruins, ancient monuments.
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities.	Threshold at which there is a risk of architectural damage to fragile buildings. Virtually no risk of architectural damage to normal buildings.
0.25	94	Vibrations may begin to annoy people in buildings.	Threshold at which there is a risk of architectural damage to historic and some old buildings.
0.3	96	Vibrations may begin to feel severe to people in buildings.	Threshold at which there is a risk of architectural damage to older residential structures.

Table 4.13-1. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.5	103	Vibrations considered unpleasant by people subjected to continuous vibrations.	Threshold at which there is a risk of architectural damage to new residential structures and Modern industrial/commercial buildings.

Source: California Department of Transportation (Caltrans) 2020
Note: VdB = vibration decibels

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. For instance, heavy-duty trucks generally generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances, which as identified in Table 4.13-1 is considered very unlikely to cause damage to buildings of any type. Common sources for groundborne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment.

4.13.1.5 Existing Ambient Noise Environment

The Project Area is located at the southeast corner of 10th Street and Flower Street, just north of Civic Center Boulevard. It is surrounded by single family and multifamily residential land uses to the north, east, and west; retail to the east; and an office complex to the south. Mobile sources of noise, especially cars and trucks traveling on area roadways, are the most common and significant sources of noise in the Project Area.

Existing Ambient Noise Measurements

In order to quantify existing ambient noise levels in the Project Area, ECORP conducted four short-term (15-minutes) noise measurements on the morning of May 22, 2024. The 15-minute measurements were taken between 10:49 a.m. and 12:00 p.m. These short-term noise measurements are representative of typical existing noise exposure within and immediately adjacent to the Project Area during the daytime. Additionally, ECORP conducted one long-term (24-hour) noise measurement in the Project Area to determine the noise experienced onsite from the existing noise environment. The long-term noise measurement was taken on May 21, 2024, and extended into May 22, 2024. The average noise levels at each location are listed in Table 4.13-2.

Table 4.13-2. Existing (Baseline) Noise Measurements

Location Number	Location	CNEL dBA	L_{eq} dBA	L_{min} dBA	L_{max} dBA	Time
Short-Term Noise Measurement						
ST-1	Alleyway adjacent to southwest corner of Project property at 842 N Parton Street	N/A	48.2	43.9	61.4	10:49 a.m. – 11:04 a.m.
ST-2	Southwest corner of W 10th Street and N Parton Street	N/A	54.6	41.7	71.4	11:08 a.m. – 11:23 a.m.
ST-3	Sidewalk fronting 911 W 10th Street	N/A	53.4	40.8	53.4	11:26 a.m. – 11:43 a.m.
ST-4	Sidewalk fronting 906 N Flower Street	N/A	69.0	47.0	81.8	11:45 a.m. – 12:00 p.m.
Long-Term Noise Measurement						
LT-1	Within Project Area; East side of fence at end of N Garnsey Street in front of 841 N Garnsey Street	59.6	57.0	35.1	94.8	10:41 a.m. – 10:41 a.m.

Source: Measurements were taken by ECORP with a Larson Davis SoundExpert LxT precision sound level meter, which satisfies the American National Standards Institute for general environmental noise measurement instrumentation. Prior to the measurements, the SoundExpert LxT sound level meter was calibrated according to manufacturer specifications with a Larson Davis CAL200 Class I Calibrator. See Appendix E for noise measurement outputs.

Notes: L_{eq} is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. L_{min} is the minimum noise level during the measurement period and L_{max} is the maximum noise level during the measurement period. CNEL is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively. dBA = A-weighted decibels

As shown, the ambient recorded noise levels range from 48.2 to 69.0 dBA L_{eq} over the course of the four short-term noise measurements taken in the Project vicinity. The ambient recorded noise level during the span of the 24-hour noise measurement was 59.6 dBA CNEL. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles) on area roadways such as N Flower Street.

According to the City of Santa Ana General Plan, mobile sources of noise, especially cars and trucks traveling on area roadways, are the most common and significant sources of noise in the Project Area. Figure N-1 in the City's General Plan shows the Project Area is located just outside the current 60 dBA CNEL noise contour, which is generally verified by the 24-hour noise measurement of 59.6 dBA identified

in Table 3-1, and according to Figure N-2, the Project Area would be located within the future 60 dBA CNEL noise contour. Other sources of noise are the various land uses (i.e., residential) throughout the area that generate stationary-source noise. The City's General Plan Table N-1 shows that the exterior noise standard for open space is 65 dB CNEL (City of Santa Ana 2022b).

4.13.2 Regulatory Setting

4.13.2.1 Federal

Occupational Safety and Health Act of 1970

OSHA regulates onsite noise levels and protects workers from occupational noise exposure. To protect hearing, worker noise exposure is limited to 90 dBA over an 8-hour work shift (29 CFR 1910.95). Employers are required to develop a hearing conservation program when employees are exposed to noise levels exceeding 85 dBA. These programs include provision of hearing protection devices and testing employees for hearing loss on a periodic basis.

National Institute of Occupational Safety and Health

A division of the US Department of Health and Human Services, the National Institute for Occupational Safety and Health (NIOSH) has established a construction-related noise level threshold as identified in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998. NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for more than 8 hours per day; for every 3-dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of 88 dBA for more than 4 hours per day, 92 dBA for more than 1 hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. The intention of these thresholds is to protect people from hearing losses resulting from occupational noise exposure.

4.13.2.2 State

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines, published by the OPR, also provides guidance for the acceptability of projects within specific CNEL/L_{dn} contours. The guidelines also present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

State Office of Planning and Research Noise Element Guidelines

The State Office of Planning and Research *Noise Element Guidelines* include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Noise Element Guidelines contain a Land Use Compatibility table that

describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL.

California Department of Transportation

In 2020, Caltrans published the *Transportation and Construction Vibration Manual* (Caltrans 2020). The manual provides general guidance on vibration issues associated with the construction and operation of projects concerning human perception and structural damage. Table 4.13-1 presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

4.13.2.3 Local

City of Santa Ana General Plan

The Noise Element of the City's General Plan appraises noise levels in the community, provides noise contours to guide land use decisions, and establishes measures to address current and future noise impacts. The Noise Element ensures that the City limits the impacts of excessive noise levels on the community, especially in noise-sensitive areas and during noise-sensitive times of the day (City of Santa Ana 2022b). The following goals and policies have been identified to be applicable to the Proposed Project:

Goal N-1: Land Use Compatibility. Ensure that existing and future land uses are compatible with current and projected local and regional noise conditions.

Policy N-1.1: Noise Standards. Utilize established Citywide Noise Standards and guidelines to inform land use decisions and guide noise management strategies.

Policy N-1.4: Sensitive Uses. Protect noise sensitive land uses form excessive, unsafe, or otherwise disruptive noise levels.

Goal N-2: Noise Generators. Reduce the impact of known sources of noise and vibration.

Policy N-2.3: Temporary and/or Nuisance Noise. Minimize the effects of intermittent, short-term, or other nuisance noise sources.

The Noise Element also outlines the City's adopted standards and guidelines for noise levels per land use type, as shown in Table 4.13-3.

Table 4.13-3. Interior and Exterior Noise Standards

Category	Land Use Type	Interior Noise Standard (dB CNEL)	Exterior Noise Standard (dB CNEL)
Residential	Single-family, duplex, multi-family	45	65
Institutional	Hospital, school classroom/playground	45	65
	Religious facility, library	45	-
Open Space	Parks	-	65

Source: City of Santa Ana 2022b
Notes: Interior areas are to include but are not limited to bedrooms, bathrooms, kitchens, living rooms, dining rooms, private offices, and conference rooms.
Exterior areas shall mean private yards of single-family homes, park picnic areas, school playgrounds, common areas. Private open space, such as atriums on balconies, shall be excluded from exterior noise requirements provided sufficient common area is included within the project.
Interior noise level requirements assume a closed-window condition. Mechanical ventilation system or other means of natural ventilation shall be provided per Chapter 12 of the Uniform Building Code, as necessary.
CNEL = community noise equivalent level; dB = decibel

City of Santa Ana Municipal Code

Under the City's Municipal Code, the following activities shall be exempted from the noise provisions outlined in Chapter 18, Health and Sanitation:

- **Section 18-314(c) Special Provisions:** Activities conducted on any park or playground, provided such park or playground is owned and operated by a public entity.
- **Section 18-314(e) Special Provisions:** Noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday or any time on Sunday or a federal holiday.

4.13.3 Noise (XIII) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in 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?	☐	☒	☐	☐

Less Than Significant Impact With Mitigation Incorporated.

Onsite Construction Noise

Construction noise associated with the Proposed Project would be temporary and would vary depending on the specific nature of the activities being performed. Noise generation would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

The nearest noise sensitive receptor to the Project Area is a single-family residence, which is located approximately 3 meters (9.8 feet) north of the eastern boundary of the Project Area. Per Chapter 18, Section 18-314(e) of the City's Municipal Code, noise sources associated with construction, repair, remodeling, or grading of any real property are exempt from exterior and interior noise standards provided that construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday and is prohibited any time on Sundays and federal holidays. In the case that Project construction occurs during the times exempted from City noise standards it would not be constrained with a numeric noise level limit; however, if Project construction occurs outside of the noise standard exempted hours, construction noise would have to be limited to the noise levels identified in Table 4.13-3.

To estimate the worst-case onsite construction noise levels that may occur at the nearest noise-sensitive receptors and in order to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using the Federal Highway Administration's Roadway Noise Construction Model and compared against the construction-related noise level threshold established in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998 by NIOSH. As previously discussed, the NIOSH construction-related noise level threshold starts at 85 dBA for more than 8 hours per day; for every 3-dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of 88 dBA for more than 4 hours per day, 92 dBA for more than 1 hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative threshold of 85 dBA L_{eq} is used as an acceptable threshold for construction noise at the nearby sensitive receptors.

It is acknowledged that the majority of construction equipment is not situated at any one location during construction activities, but rather spread throughout a Project Site and at various distances from sensitive receptors. Therefore, this analysis employs Federal Transit Administration (FTA) guidance for calculating construction noise, which recommends measuring construction noise produced by all construction equipment simultaneously from the center of the Project Area (FTA 2018), which in this case is approximately 134 feet from the nearest residence on W 10th Street. The anticipated short-term

construction noise levels generated for the necessary equipment for each phase of construction are presented in Table 4.13-4.

As shown in Table 4.13-4, construction activities would not exceed the 85 dBA NIOSH construction noise threshold during any phase of construction at the nearby noise-sensitive receptors. It is noted that construction noise was modeled on a worst-case basis. It is very unlikely that all pieces of construction equipment would be operating at the same time for the various phases of Project construction as well as at the point closest to residences. As also shown in Table 4.13-4, the greatest construction noise level as experienced by the nearest noise-sensitive land use is estimated to be 78.8 dBA, which would exceed the City standard for noise and therefore no construction would be allowed during the non-exempted hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday, and anytime during Sunday. With implementation of mitigation measure NOI-1, which limits Project construction to the noise standard-exempted hours established by the City, impacts would be less than significant.

Table 4.13-4. Construction Average (dBA) Noise Levels at Nearest Receptors

Construction Phase	Average Ambient Noise Level (dBA L_{eq})	Existing Ambient Noise + Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA L_{eq})	Construction Noise Standard (dBA L_{eq})	Exceeds Standards?
Demolition	56.3	78.8	*85*	**No**
Site Preparation		76.0	*85*	**No**
Grading		77.3	*85*	**No**
Building Construction		77.1	*85*	**No**
Paving		76.6	*85*	**No**
Architectural Coating		65.1	*85*	**No**

Source: Construction noise levels were calculated by ECORP Consulting using the FHWA Roadway Noise Construction Model (FHWA 2006). Refer to Appendix E for Model Data Outputs.

Notes: Average ambient noise levels of the Project Area were estimated using the average L_{eq} of the four short term noise measurement taken on May 22, 2024, and identified in Table 4.13-2.
Construction equipment used during construction derived from CalEEMod. CalEEMod is designed to calculate air pollutant emissions from construction activity and contains default construction equipment and usage parameters for typical construction projects based on several construction surveys conducted in order to identify such parameters. Consistent with FTA recommendations for calculating construction noise, construction noise was measured from the center of the Project Area (FTA 2018), which is 134 feet from the nearest sensitive receptor.
L_{eq} = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
dBA = A-weighted decibels

Offsite Construction Worker Trips

Project construction would result in additional traffic on adjacent roadways over the period that construction occurs. According to CalEEMod, which is used to predict the number of construction-related automotive trips, the maximum number of Project construction trips traveling to and from the Project Area during a single construction phase would not be expected to exceed 192 daily trips in total (20 construction worker trips and 172 hauling trips). According to Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol, a doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference) (Caltrans 2013). The Project Area is accessible from 10th Street and Flower Street, with Flower Street traversing multiple residential neighborhoods. There are approximately 20 residences that are mainly accessible from 10th Street and 38 residences that are mainly accessible from Flower Street within 0.25 mile of the Project Area. According to the Institute of Transportation Engineers' (ITE) 11th Edition Trip Generation Manual (2017), single-family homes generate an average of 9.44 trips daily, and therefore these 58 residences could be expected to contribute up to 548 traffic trips daily to 10th Street and Flower Street near the Project Area (ITE 2017). Thus, Project construction would not result in a doubling of traffic, and therefore its contribution to existing traffic noise would not be perceptible. Additionally, it is noted that construction is temporary, and these trips would cease upon completion of the Project and therefore the impact is less than significant.

Noise/Land Use Compatibility

The City of Santa Ana's Noise Element identifies standards and guidelines for interior and exterior noise levels per land use type, as shown in Table 4.13-3 above. In the case that the noise levels identified for the Proposed Project fall within the levels presented in the General Plan, the Project is considered compatible with the existing noise environment. As previously described, the Project is proposing the construction of a neighborhood park. Proposed park components include a playground area with rubberized play surface, an exercise area, a basketball court, a skate park, and a picnic area. The park boundary would include fencing along 10th Street, and the skate park would be gated and enclosed with fencing on all sides.

The long-term noise measurement taken onsite from May 21, 2024, to May 22, 2024, as shown in Table 4.13-2, identifies an ambient noise level of 59.6 dBA CNEL on the Proposed Project Site. This noise level falls within the acceptable exterior noise level standard (65 dB) for open space uses. The Project Area is considered an appropriate noise environment to locate the proposed land use. This impact is less than significant.

Operational Onsite Noise

According to the City's Municipal Code Chapter 18, Section 18-314(c), activities conducted on any park or playground are exempt from interior and exterior noise standards provided the park or playground is owned and operated by a public entity. However, as the Project is proposing a skate park, playground, and basketball court adjacent to noise-sensitive receptors, a discussion of noise produced by the Project is included for full disclosure purposes.

On-site noise associated with the Proposed Project has been calculated using the SoundPLAN 3D noise model using Project Site Plans provided by the Project proponent. SoundPLAN 3D noise model generates computer simulations of noise situations based on the site's features. Further, SoundPLAN creates noise contour maps using reference noise levels, topography, point and area noise source, mobile noise sources, and intervening structures. The Proposed Project's modeling scenario includes three area sources encompassing the skate park, playground, and basketball court. Reference noise measurements taken by ECORP Consulting, Inc at an existing skate park and playground were used in the modeling (see Appendix F). As previously described, the nearest noise-sensitive receptor to the Project Site is a single-family residence located directly north of the eastern portion of the Project Area. It is noted, although the Project is exempt, that the City has established an exterior noise threshold of 65 dBA for all residential land uses. Table 4.13-5 shows the predicted exterior Project noise levels at nine noise-sensitive locations in the Project vicinity. A noise contour graphic (see Appendix F) has been prepared to provide a visual depiction of the predicted noise levels in the Project vicinity from Project operations.

Table 4.13-5. Exterior Operational Noise Levels

#	Location	Exterior Noise Attributed to the Project (dBA)	Exterior Noise Standards (dBA)	Exceed Exterior Standard?
1	Apartment Complex North of Project Site.	41.3	*65*	**No**
2	Residence North of Project Site.	38.9	*65*	**No**
3	Residence East of Project Site (Directly Adjacent).	44.1	*65*	**No**
4	Apartment Complex North of Project Site.	33.6	*65*	**No**
5	Residence East of Project Site.	37.1	*65*	**No**
6	Residence West of Project Site.	35.7	*65*	**No**
7	Residence West of Project Site.	38.1	*65*	**No**
8	Residence West of Project Site.	35.8	*65*	**No**
9	Residence West of Project Site.	35.6	*65*	**No**

Source: SoundPLAN v 9.0. Refer to Appendix G for Model Data Outputs.
Notes: Exterior noise standards included for comparison purposes as the Project is exempt from City noise standards.
dBA = A-weighted decibels

As shown in Table 4.13-5, Project operational noise would not exceed the City's exterior noise standards at any location. Additionally, the average daily ambient noise of the Project Area under current conditions is approximately 56.3 dBA L_{eq}. This noise level is based on the average of the ambient noise measurements taken in the area and is generally representative of the existing noise environment. As shown above in Table 4.13-5, the Proposed Project would contribute noise levels of approximately 44.1 to 33.6 dBA L_{eq} to the existing ambient environment. The dB scale is logarithmic, not linear, and therefore

sound levels cannot be added or subtracted through ordinary arithmetic. For example, a 65-dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by three dB). Additionally, when combining two separate sources where one of the noise sources is 10 dB or more greater than other noise source, the noise contribution of the quieter source is completely obscured by the louder source. Thus, the existing ambient noise level of 56.3 dBA L_{eq} would remain unchanged due to the Project noise contribution of 44.1 to 33.6 dBA L_{eq} and the Project on-site activities would not perceivably influence the ambient noise levels of the area.

There would be no increase in operational traffic for the Project as the park would be a walk-up, pedestrian park without a vehicle parking lot that would primarily serve the local neighborhood.

As such, operational noise produced as a result of the Project would result in a less than significant impact.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Result in generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐

Less Than Significant Impact.

Construction Vibration Analysis

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction in the Project Area would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is not anticipated that pile drivers would be necessary during Project construction. Vibration decreases rapidly with distance, and it is acknowledged that construction activities would occur throughout the Project Area and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 4.13-6.

Table 4.13-6. Representative Vibration Source Levels for Construction Equipment	
Equipment Type	**Peak Particle Velocity at 25 Feet (inches per second)**
Large Bulldozer	0.089
Pile Driver	0.170
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source: Federal Transit Administration (FTA) 2018

The City's Municipal Code does not have an ordinance addressing vibration associated with temporary construction or demolition. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, Caltrans' recommended standard of 0.3 inches per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings (Caltrans 2020).

Consistent with FTA recommendations for calculating construction vibration, vibration was calculated to account for all Project construction equipment operating simultaneously from the center of the Project Area (FTA 2018). The nearest offsite structure of concern to the construction site, with regard to groundborne vibrations, is a single-family home located approximately 134 feet from the Project Site center.

Based on the representative vibration levels presented for various construction equipment types in Table 4.13-6 and the construction vibration assessment methodology published by the FTA (2018), it is possible to estimate the potential project construction vibration levels. The FTA provides the following equation:

$$[PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}]$$

Table 4.13-7 presents the expected Project related vibration levels at a distance of 134 feet.

Table 4.13-7. Construction Vibration Levels at 134 Feet							
Receiver PPV Levels (in/sec)[1]					**Peak Vibration**	**Threshold**	**Exceed Threshold**
Large Bulldozer, Caisson Drilling, & Hoe Ram	**Loaded Trucks**	**Jackhammer**	**Pile Driver**	**Vibratory Roller**			
0.0072	0.0061	0.0028	0.0137	0.0169	0.0169	*0.3*	**No**

[1]Based on the Vibration Source Levels of Construction Equipment included on Table 4.13-5 (FTA 2018). Distance to the nearest structure of concern is approximately 134 feet measured from Project Site center.
Note: in/sec = inches per second; PPV = Peak Particle Velocity; FTA = Federal Transit Administration

As shown in Table 4.13-7, vibration as a result of construction activities would not exceed 0.3 PPV. Thus, Project construction would not exceed the recommended threshold. This impact is less than significant.

Operational Vibration Impacts

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. Therefore, the Project would not result groundborne vibration impacts during operations. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project Area is located approximately 4.74 miles north of the John Wayne Airport. According to the John Wayne Airport's Airport Environs Land Use Plan (AELUP), the Project Area is located outside of the Airport Impact Zone and AELUP Notification Area (Orange County Airport Land Use Commission 2008). Therefore, no impact would occur.

4.13.4 Mitigation Measures

NOI-1: **Hours of Construction.** Project construction shall be limited to the City standard exempted hours of 7:00 a.m. through 5:00 p.m., Monday through Friday. All Project construction shall be prohibited on Sundays.

4.14 Population and Housing

4.14.1 Population and Housing (XIV) Environmental Checklist and Discussion

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)?	☐	☐	☒	☐

Less Than Significant Impact.

The Proposed Project would add new park structures and amenities to a combination of vacant and developed lots. The Proposed Project does not propose the construction of new housing, businesses, or

extended infrastructure and therefore is not anticipated to directly or indirectly induce population growth in the area. Upon completion, the new park amenities would be maintained by existing City staff.

As such, the Proposed Project is not expected to generate a substantial permanent increase in employment opportunities in the area capable of inducing population growth. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact.

The Project involves construction of amenities such as a skate park, basketball court, playground, shade structures, and associated ADA improvements. As described above, no people live on the property under existing conditions. Both existing residences on-site are currently vacated. Accordingly, implementation of the Proposed Project would not displace substantial numbers of people and would not necessitate the construction of housing elsewhere. No impact would occur.

4.14.2 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 Police Services

Police protection services are provided to the City including the Project Site by the Santa Ana Police Department (SAPD). The SAPD includes multiple departments, including the Field Operations Bureau, comprised of the patrol, operations and traffic divisions. The SAPD central police station is located at 60 Civic Center Plaza, and the City's Westend substation is located at 3750 West McFadden Avenue. In addition, the police department maintains the Santa Ana Regional Transportation Public Safety Office and Jose Vargas Community Affairs Office (SAPD 2024). The closest police station to the Project Site is the central police station, located approximately 0.3 mile southwest of the Project Site.

4.15.1.2 Fire Services

The City contracts fire department services with the OCFA, which fulfills both fire protection and emergency medical responsibilities. The OCFA operates ten stations throughout Santa Ana and has access to an additional 61 stations in its service area. These stations are well distributed at an approximate 1.5-mile service radius throughout the City and the overlapping responsibility of fire companies allows

adequate response to emergencies. The closest fire station to the Project Site is OCFA–Santa Ana Fire Station #71, located at 1029 W 17th Street, approximately 0.5 mile north of the Project Site.

4.15.1.3 Schools

The Project Site is located within the service area of the Santa Ana Unified School District (SAUSD), which serves most of the City of Santa Ana and small portions of the Cities of Irvine, Tustin, Costa Mesa and Newport Beach. SAUSD is the second largest school district in Orange County serving the children of Santa Ana and the second largest employer in Santa Ana. The nearest school to the Project Site is Willard Intermediate School, located approximately 0.15 mile northeast of the site at 1342 N Ross Street.

4.15.1.4 Parks

According to the City of Santa Ana Parks Master Plan, the City of Santa Ana manages 54 parks, nine joint-use school sites, and approximately 13 miles of off-street trails for recreation use. These sites support a variety of indoor and outdoor facilities and programs. The City strives to provide parks within a 10-minute walking or biking distance of all residents (approximately 0.25 to 0.5 mile). The 2022 General Plan sets a long-range goal to provide three acres of parkland for every 1,000 residents in the future. As a 10-year investment strategy and action plan, the Park Master Plan provides detailed guidance to take the first step towards the General Plan's goal: increasing the City's parkland to 1.5 acres per 1,000 residents, or 1.85 acres per 1,000 residents considering new trail corridors and potential new joint-use sites (City of Santa Ana 2022d).

4.15.1.5 Other Public Facilities

The City of Santa Ana Library provides library services through the Main Library, located at 26 Civic Center Plaza, and the Newhope Library Branch, located at 122 North Newhope Street.

4.15.2 Public Services (XV) Environmental Checklist and Discussion

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:				
Fire Protection?	☐	☐	☒	☐
Police Protection?	☐	☐	☒	☐

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☐	☒

4.15.2.1 Fire Protection

The Project does not propose constructing residences and would not directly increase the population in the area. The Proposed Project is an expansion of the existing recreational opportunities and would not necessitate substantial additional services from the Fire Department, particularly considering the code-compliant design of the new facilities. Therefore, the Proposed Project is anticipated to have a less than significant effect on fire services.

4.15.2.2 Police Services

The Project does not propose constructing residences, is meant for use by the existing neighborhood, and would not directly increase the population in the area. The Proposed Project is an expansion of the existing recreational opportunities and would not result in a requirement for additional deputies, nor would it alter the local deputy to population ratio. Furthermore, no significant change in the SAPD response time is anticipated with the construction or operation of the Proposed Project. A private security guard would be posted on rotation and available on-call, which would further reduce the burden on police protection. Therefore, the Proposed Project is anticipated to have a less than significant effect on police protection.

4.15.2.3 Schools

The Proposed Project is a neighborhood recreational facility. The Project does not contain a residential component and would not generate any new students. Therefore, the Project would not physically impact schools by causing the need for altered or additional facilities. No impact would occur.

4.15.2.4 Parks

The Proposed Project is itself a recreational facility. The Project would contribute to meeting the demand for local recreation services in the Project Area, would meet the goals of the City's Park Master Plan, and would, therefore, have a beneficial effect on public park and recreational opportunities. Please see Section 4.16 *Recreation*, below, for further details. Impacts would be less than significant.

4.15.2.5 Other Public Facilities

The Proposed Project would not cause the need for any new or physically altered public facilities. It would provide new park facilities for public outreach and use. No impact would occur.

4.15.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.16 Recreation

4.16.1 Environmental Setting

The Santa Ana Parks, Recreation, and Community Services Agency is responsible for delivering a variety of services to the community that includes recreation programs, parks, libraries, and operations of the Santa Ana Zoo. Currently, approximately 342 acres are developed as park space. The parks in the City range from 0.2 acres to 65.3 acres, and each provides varied amenities and facilities, such as playgrounds, shelters, picnic tables, sports courts fields, lakes, drinking fountains, restrooms, and parking (Santa Ana 2022d).

The City owns and operates 54 parks that are generally distributed uniformly throughout the City. In addition to parks and open space areas, the City also has recreational facilities and programs, trails, joint-use parks, and nearby regional recreation areas which contribute to providing residents with recreational facilities. However, the City does not meet the municipal code requirement of two acres of parkland per 1,000 residents. As a 10-year investment strategy and action plan, the City's Park Master Plan provides detailed guidance to take the first step towards the General Plan's goal: increasing the City's parkland to 1.5 acres per 1,000 residents, or 1.85 acres per 1,000 residents considering new trail corridors and potential new joint-use sites (City of Santa Ana 2022d).

4.16.2 Recreation (XVI) Materials Checklist

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	☐	☐	☐	☒

No Impact.

The Proposed Project would provide additional recreational opportunities to the surrounding neighborhoods and would relieve use pressures for parks outside of the neighborhood. The Project would be designed with the goal of providing children and adults with a venue for both passive and active recreation, which would be a beneficial addition to the community. Therefore, Proposed Project would have no adverse effect on surrounding recreational facilities.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☒	☐	☐

Less Than Significant Impact With Mitigation Incorporated.

The Proposed Project is a neighborhood recreational park project. The Project would incorporate amenities such as a skate park, basketball court, shade structures, playground, and associated ADA improvements. The environmental impacts of construction and operation of the Proposed Project, including required mitigation measures, are discussed in this Initial Study. Impacts would be less than significant with mitigation as described in other sections of this Initial Study.

4.16.3 Mitigation Measures

Mitigation measures to address potentially significant impacts from park development are provided in the appropriate resource sections of this Initial Study. With implementation of these mitigation measures, impacts would be less than significant.

4.17 Transportation

4.17.1 Environmental Setting

The Project Area is accessible from 10th Street and Flower Street, with Flower Street traversing multiple residential neighborhoods. There are approximately 20 residences that are mainly accessible from 10th Street and 38 residences that are mainly accessible from Flower Street within 0.25 mile of the Project Area. According to the ITE 11th Edition Trip Generation Manual (2017), single-family homes generate an average of 9.44 trips daily, and therefore these 58 residences could be expected to contribute up to 548 traffic trips daily to 10th Street and Flower Street near the Project Area (ITE 2017).

The Project is primarily guided by the following transportation-related programs and plans, including the Orange General Plan Circulation Element (County of Orange 2020), City of Santa Ana General Plan Mobility Element (City of Santa Ana 2022b), and the City of Santa Ana Master Plan of Bikeways (City of Santa Ana 2022b). These programs and plans discuss existing transit, roadways, bicycle, and pedestrian facilities within the County and City, analyzed further below.

4.17.2 Transportation (XVII) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

The proposed park would result in a negligible increase in traffic volumes on the streets in the vicinity from park employees, maintenance workers, and some users of the park who may drive to and from the site. The streets that provide access to the park site include 10th Street and Flower Street, which abut the north and west side of the park site, respectively. The volumes of traffic that would be generated by the park would be negligible because the park is proposed to be a walk-up facility that would serve the nearby residential neighborhood. As currently proposed, the park would not include athletic fields, a gymnasium, or other types of uses that typically generate substantial volumes of vehicular traffic.

Construction traffic would be temporary, and these trips would cease upon completion of Project construction. All construction equipment would be staged on-site. During operation, the Project would generate a demand for non-motorized travel as the proposed park would result in additional pedestrians, bicycles, and skaters in the Project Area. The streets in the Project vicinity have sidewalks along both sides of the street and the signalized intersections are equipped with painted crosswalks, pedestrian signals, and pedestrian push buttons to activate the signals.

There are two OC Bus stations located 70 feet north of the Project Site on Flower Street (heading north) and 65 feet to the west along Flower Street (heading south). No streets in the immediate vicinity contain designated bicycle lanes. The Proposed Project would not adversely affect the performance of these transit or non-motorized transportation facilities and would not conflict with any plans or policies relative to these transportation modes. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐

Less Than Significant Impact.

CEQA Guidelines Section 15064.3 subdivision (b) addresses the criteria for analyzing transportation impacts and establishes the vehicle miles traveled (VMT) metric as the most appropriate measure of transportation impacts in a CEQA document. Local agencies are required to adopt VMT as a criterion in determining transportation impacts under CEQA. This adoption was required by Senate Bill (SB) 743 and

the recent changes to Section 15064.3 of the CEQA Guidelines. VMT calculations provide a disclosure of regional impacts related to greenhouse gas production by motor vehicles.

The methodology applied to this analysis is based on current published CEQA guidelines and the California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, of December 2018. SB 743 has defined VMT as the primary metric for CEQA transportation impact analysis, and the Technical Advisory was created to guide CEQA transportation analysis efforts.

There are four screening standards for land use projects that are defined by the OPR Technical Advisory. These were applied to the project characteristics and location to determine if a project exemption from CEQA analysis would be the recommended course of action:

1. Screening Threshold for Small Projects
2. Map-Based Screening for Residential and Office Projects
3. Presumption of Less than Significant Impact Near Transit Stations
4. Presumption of Less Than Significant Impact for Affordable Residential Development

Criterion #1 states that a project can be determined to have a less than significant impact due to project location, size, or land use type. The screening threshold is defined as follows:

"Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact."

Criterion #1 can be analyzed based on the nature of the Project.

According to CalEEMod (Appendix A), the Project is anticipated to result in daily trips during construction. Demolition would generate 26 worker trips and 36 hauling trips per day. Site preparation would generate 16 worker trips per day. Grading would generate 20 worker trips and 364 hauling trips per day. Construction, paving, and painting would result in 26 trips per day. These trips would cease upon Project completion. As a walk-up park with no dedicated parking, the Project would serve an existing neighborhood whose residents currently need to drive to parks in other areas of the City. Therefore, the Proposed Project would result in a reduction in VMT. A less than significant impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

No Impact.

The Project includes closure of 10th Street and construction of a cul-de-sac with a 35-foot turn radius. The Project Site access and circulation plans have been reviewed and approved by OCFA. Access to the apartment building north of the site would be maintained. The Project proposes a neighborhood park and does not include incompatible uses such as farm equipment. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Result in inadequate emergency access?	☐	☐	☐	☒

No Impact.

The Project Site would be serviced by the OCFA. The Fire Department currently has adequate access to the Project Site via 10th Street and Flower Street and these access points would remain after construction. The Project would comply with all design requirements and standards of the building fire code. The Project would have no adverse effect on emergency access.

Emergency access to the park and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access to the Park Site would be provided at-grade from the new 10th Street cul-de-sac and Flower Street. The new cul-de-sac would have a turn radius sufficient for emergency vehicles. Subject to review and approval of site access and circulation plans by the OCFA, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project would not cause significant impediments along any designated emergency evacuation routes, and the proposed use would not impair implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to these issues and no mitigation measures are required.

4.17.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

CEQA defines a TCR as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or determined to be eligible for inclusion in the CRHR or a local historical register or determined by the lead agency to be to be one based on substantial evidence (PRC Section 20174(a)). A cultural landscape that meets this definition is a TCR to the extent that the landscape is geographically defined in terms of size and scope (PRC Section 20174(b)). A historical resource or archeological resource that meets this definition might also be a TCR, if identified as such by a consulting tribe (PRC Section 20174(c)).

The following analysis of the potential environmental impacts related to TCRs is derived primarily from the following sources and agencies:

- Tribal consultation record between the City and culturally affiliated tribes under Assembly Bill (AB) 52 (amendment to PRC 5097.94) and Senate Bill (SB) 18;
- Records search information from the California Historical Resources Information System, as described in Section 4.5, *Cultural Resources*;
- Numerous sources of scholarly ethnographic literature cited herein; and
- Confidential cultural resources inventory report prepared by professionally qualified staff from ECORP (2024).

4.18.1.1 Assembly Bill 52

AB 52 requires meaningful consultation with California Native American tribes on potential impacts on TCRs, as defined in Public Resources Code Section 21074.

4.18.1.2 Senate Bill 18

SB 18 requires local governments to consult with California Native American Tribes identified by the Native American Heritage Commission (NAHC) prior to the adoption or amendment of a general plan or specific plan.

4.18.1.3 Summary of Consultation

In compliance with AB 52 and SB 18, a Sacred Lands File (SLF) search was conducted by the NAHC for the Project on January 3, 2024. The results of the SLF search indicated positive results. The NAHC recommended contacting tribes associated with the Project Area in order to avoid unforeseen discoveries once the Project has started and provided a list of tribal representatives to contact for additional information. All tribal representatives identified by the NACH were notified of the Project.

On May 2, 2024, Project notification letters with invitations to consult on the Project were sent by email with delivery confirmation to representatives of the 10 tribes on the NAHC contact list:

- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino - Tongva Tribe
- Juaneno Band of Mission Indians Acjachemen Nation - Belardes
- Juaneno Band of Mission Indians Acjachemen Nation 84A

- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

In accordance with PRC Section 21080.3.1(b)(2), the tribes were afforded 30 days to request consultation for AB 52 and the response window closed on June 1, 2024. The tribes were afforded 90 days to request consultation for SB 18 and the window closed on July 31, 2024.

The Gabrieleno Band of Mission Indians – Kizh Nation (Tribe) requested consultation in an email dated July 3, 2024. The City contacted the tribal office by email on July 8, 2024, and suggested several possible times to meet. The Tribe offered to perform consultation via email, to which the City agreed. The Tribe provided historical tribal information to the City via email on July 31, 2024. The Tribe stated that there was a potential to encounter tribal cultural resources (TCRs) such as artifacts during construction because of the Project's location in the Santa Ana TCR landscape. The Tribe provided three mitigation measures including tribal monitoring, treatment of non-ceremonial/non funerary objects, and treatment of human remains and associated funerary or ceremonial objects. The City revised the mitigation and provided the edits to the Tribe on August 15, 2024. The City concluded consultation on August 21, 2024.

The Gabrielino Tongva Indians of California responded via email on May 29, 2024 and requested a copy of the cultural resources report. The report was provided on July 22, 2024. On August 7, 2024, the Tribe requested a monitor during all ground disturbing activities. The City provided a proposed set of mitigation measures to the Tribe on August 15, 2024. The City concluded consultation on August 21, 2024.

On June 26, 2024, the Juaneno Band of Mission Indians Acjachemen Nation - Belardes responded via email requesting consultation and a copy of the cultural resources report. The Tribe's preliminary recommendation was for all ground disturbance to be monitored by a representative of the Tribe. The City provided the cultural resources report on August 2, 2024. The City provided a proposed set of mitigation measures to the Tribe on August 15, 2024. The City concluded consultation on August 21, 2024.

4.18.2 Tribal Cultural Resources (XVIII) Environmental Checklist and Discussion

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 tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

A cultural resources inventory for the Proposed Project was completed and includes a records search of the CHRIS at the SCCIC, a literature review, a pedestrian survey, and a Sacred Lands File (SLF) search from the NAHC. The NAHC indicated a Sacred Lands File Search was positive, meaning they had a record of a sacred site in the same Public Land Survey section (one square-mile area) the Project area. The City consulted with the Gabrieleno Band of Mission Indians-Kizh Nation, Gabrielino Tongva Indians of California, and Juaneno Band of Mission Indians Acjachemen Nation – Belardes under AB 52 and SB 18 as described above.

If an archaeological resource of Native American origin and cultural significance is discovered during construction and determined to be a TCR, or human remains are discovered at the site, implementation of mitigation measures TCR-1, CUL-1, TCR-2, and TCR-3, as applicable, would reduce impacts to TCRs to a less than significant level.

4.18.3 Mitigation Measures

TCR-1: **Monitoring Agreement.** Prior to the commencement of ground disturbing activities, the City shall extend the offer to enter into a tribal monitoring agreement with the Gabrieleño Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California, and Juaneño Band of Mission Indians, Acjachemen Nation. The offer to execute a monitor agreement shall be made at least 30 days prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

- For the purpose of compliance with this measure, the City shall accept any of the following circumstances to be compliant with this measure: a) that tribes entering into agreements with the City rotate the monitoring duties among them; b) that only one tribe enters into an agreement with the City to monitor exclusively; or c) that all three tribes enter into agreements with the City and each provide full-time monitors. In the unlikely event that no tribes are willing to enter into a tribal monitoring agreement with the City, then work can proceed without a tribal monitor provided that an archaeological monitor is present and that the offer to all three tribes was extended and documented.
  - In the event that one or more Tribe chooses not to enter into an agreement or fails to respond to the offer, the City shall allow construction to proceed without the Native American monitor(s) as long as the offer was extended and documented.
- The monitors will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground- disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the culturally affiliated Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon completion of the Project.
- On-site tribal monitoring shall conclude upon the latter of the following:
  - Written confirmation to consulting culturally affiliated Tribe from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or

- A determination and written notification by the culturally affiliated Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact culturally affiliated Tribal TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the approved culturally affiliated Tribal monitor and/or archaeologist. The culturally affiliated Tribe will recover and retain all discovered TCRs in the form and/or manner all consulting culturally affiliated Tribes deems appropriate, and for any purpose the consulting culturally affiliated Tribes deem appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. If human remains or funerary objects are encountered during any activities associated with the Project:

- Work in the immediate vicinity (i.e., not less than the surrounding 100 feet) shall cease and the Orange County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code shall be enforced for the duration of the Project. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin.
- The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641).
- Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

4.19 Utilities and Service Systems

4.19.1 Utilities and Service Systems (XIX) Environmental Checklist and Discussion

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 telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Less Than Significant Impact.

4.19.1.1 Water Service

The Proposed Project would involve the construction of neighborhood park facilities, and water use would be limited to drinking water fountain use and landscaping. No restrooms are proposed. The City of Santa Ana Water Resources Division provides water and sewer services to the city. Considering the size of the park totaling 1.4 acres, the Proposed Project would not require the need for the construction or expansion of new water treatment facilities. Additionally, landscaping would be comprised of drought tolerant plants. The park site is within an urbanized neighborhood, and existing water infrastructure is in place to serve the proposed park use. The development and implementation of the Project would not significantly increase water usage. Therefore, a less than significant impact would occur as a result of the Proposed Project, and no mitigation measures are necessary.

4.19.1.2 Wastewater Treatment

The park site would not include restrooms. The park site is within an urbanized neighborhood, and existing wastewater infrastructure is in place to serve the proposed park use. No significant impacts would occur, and no mitigation measures are necessary.

4.19.1.3 Stormwater Drainage

Stormwater improvements for the park would connect to the existing storm drainage infrastructure and would not require off-site new stormwater drainage facilities. Although the Proposed Project could slightly increase the on-site impervious surface areas, the park would provide rock bioswales, a stormwater capture system, and different pervious surface materials to ensure that runoff volume from the Project Site does not exceed the existing runoff volume. Off-site drainage facilities would not be affected substantially since the off-site runoff volume would be reduced due to the proposed stormwater capture facilities. Significant environmental effects would not occur due to construction of stormwater drainage facilities. No mitigation measures are required.

4.19.1.4 Electric Power

The electrical power at the Project Site is provided by Southern California Edison (SCE). The Proposed Project would use limited electric power for nighttime lighting. No habitable structures would be constructed that would require constant electric power usage. Only minimal electric power would be used during operation, and no offsite expanded electric power facilities would be necessary to implement the Proposed Project. Impacts would be less than significant, and no mitigation measures are required.

4.19.1.5 Natural Gas

The natural gas at the Project Site is provided by Southern California Gas Company (SoCalGas). The Proposed Project would not involve any habitable structures and does not include any equipment that would use natural gas. Therefore, no increase in natural gas demands would result from Project implementation. No impact is anticipated, and no mitigation measures are required.

4.19.1.6 Telecommunications

The park site is surrounded by urban uses. The Proposed Project does not involve any habitable structures or equipment that require improvements to telecommunication facilities, and no increased demand is anticipated. No mitigation measures are required.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

Less Than Significant Impact.

The City's Water Resources Division prepared a 2020 Urban Water Management Plan (City of Santa Ana 2021b), to submit to the California DWR to satisfy the UWMP Act of 1983 (UWMP Act or Act) and subsequent California Water Code requirements. A single dry year is defined as a single year of minimal to no rainfall within a period where average precipitation is expected to occur. Multiple dry years are defined as five or more consecutive dry years with minimal rainfall within a period of average precipitation.

The City depends on a combination of imported and local supplies to meet its water demands and has taken numerous steps to ensure it has adequate supplies. Development of local supplies augments the reliability of the water system. There are various factors that may impact reliability of supplies such as legal, environmental, water quality and climatic which are discussed below. MWD's 2020 UWMP concludes that they can meet full-service demands of their member agencies starting 2025 through 2045 during normal years, single-dry year, and multiple-dry years. Consequently, the City is projected to meet full-service demands through 2045 for the same scenarios, due to diversified supply and conservation measures (City of Santa Ana 2021).

According to CalEEMod estimates, the Project would consume approximately 590,417 gallons per year or 1.81 acre-feet per year. Between Fiscal Year 2015/16 and Fiscal Year 2019/20, water use within the City's service area ranged from 33,148 to 35,343 acre-feet per year (potable and non-potable combined). In 2025, City-wide water demand is estimated at 33,882 acre-feet per year (City of Santa Ana 2021). Thus, the Project would represent a less than 0.005 percent increase in the City's water use. The Project would also comply with the Water Shortage Contingency Plan outlined in the UWMP, if implemented. For example, limits may be applied to the number of days, frequency, and duration of outdoor watering. As such, impacts on water supplies would be less than significant.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact.

The Project does not include construction of restrooms or facilities that would generate wastewater. No impact would occur.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

Less Than Significant Impact.

Solid waste would be generated by the Project both on a short-term basis, during the construction phase, and on a long-term basis, through the daily operation of the park. Construction waste is required to be handled and recycled at levels consistent with the California Green Building Standards Code. Construction debris and waste would be handled by authorized haulers. All nonhazardous demolition debris, if any, would be transported to the appropriate material recovery facility and sorted for recyclables and nonrecyclables before delivery to landfills. Operation of the park would be expected to generate a negligible amount of solid waste from community users. Therefore, the net increase in solid waste that would be experienced at regional landfills would be negligible. As such, it is anticipated that the landfills servicing the Proposed Project would have sufficient capacity to accommodate the project's solid waste disposal needs, and no significant impacts would occur as a result of the Proposed Project. No mitigation measures are necessary.

Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

No Impact.

The City is required to comply with all state solid waste diversion, reduction, and recycling mandates, and would do so for the Proposed Project. No impact to federal, state, or local statutes related to solid waste would occur. No mitigation measures are required.

4.19.2 Mitigation Measures

No significant impacts were identified and no mitigation measures are required.

4.20 Wildfire

4.20.1 Environmental Setting

Government Code 51175-89 directs the California Department of Forestry and Fire Protection (CALFIRE) to identify areas of very high fire hazard severity within Local Responsibility Areas (LRA). Mapping of these areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior and expected burn probabilities to quantify the likelihood and nature of vegetation fire exposure to buildings. According to the State of California Fire Hazard Severity Zones map, the Project Site is not located in a VHFHSZ (CALFIRE 2023).

4.20.2 Wildfire (XX) Environmental Checklist and Discussion

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?	☐	☐	☒	☐

Less Than Significant Impact.

The General Plan Safety Element is intended to reduce the potential risk of death, injuries, property damage, and the economic and social dislocation resulting from hazards such as fires, floods, earthquakes, landslides, and other hazards. It serves as a guide for the City government and the general public in understanding the hazards facing the City of Santa Ana and how to reduce the impacts of those hazards.

Upon completion, emergency vehicle access to the Project Site will be provided via two entrances, along Flower Street and 10th Street. During the City's required review of the Proposed Project's applications, the site plan would be reviewed to ensure that adequate access to and from the site and around the proposed amenities is provided for emergency vehicles. With adherence to City requirements for emergency vehicle access, and because the Proposed Project is not in or near a state responsibility area or VHFHSZ (CALFIRE 2023), impacts to emergency response and evacuation plans would be less than significant.

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
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?	☐	☐	☐	☒

No Impact.

The Proposed Project would not substantially alter slopes, wind patterns, or other factors that could exacerbate wildfire risks. The 1.4-acre Project Site is in a generally flat and highly urbanized area bordered by 10th Street to the north, Flower Street to the west, a parking lot to the south, and residential to the north, east, and west. According to the CALFIRE Fire Hazard Severity Zones map, the Project Site is not located in or near land classified as VHFHSZ; therefore, the Proposed Project is unlikely to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact is anticipated.

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
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?	☐	☐	☐	☒

No Impact.

The Proposed Project would construct park amenities within a developed area, and the site is not located in or near land classified as VHFHSZ; therefore, the Proposed Project would not exacerbate fire risk resulting in temporary or ongoing impacts to the environment. No impact would occur.

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
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?	☐	☐	☐	☒

No Impact.

The Proposed Project is not located in or near a VHFHSZ. Construction of the Proposed Project would not require substantial grading or creation of slopes. Accordingly, the Proposed Project is not likely to expose people or structures to landslides or downstream flooding because of runoff, post-fire slope instability, or drainage changes. No impact would occur.

4.20.3 Mitigation Measures

No significant impacts were identified and no mitigation measures are required

4.21 Mandatory Findings of Significance

4.21.1 Mandatory Findings of Significance (XXI) Environmental Checklist and Discussion

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The Proposed Project would not substantially degrade the quality of the environment or substantially reduce the habitat of a fish or wildlife species. With mitigation measure BIO-1 (Section 4.4), the Proposed Project would not cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. With mitigation measures CUL-1, CUL-2, TCR-1, TCR-2, and TCR-3 the Proposed Project would not eliminate important examples of the major periods of California's history or

prehistory. Therefore, the Proposed Project would have a less than significant impact with mitigation incorporated.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

As described in the impact analyses in this IS/MND, any potentially significant impacts of the Proposed Project would be reduced to a less than significant level. Projects completed in the past have also implemented mitigation, as necessary. Accordingly, the Proposed Project would not otherwise combine with impacts of related development to considerably add to any cumulative impacts in the region. With mitigation, the Proposed Project would not have impacts that are individually limited, but cumulatively considerable. Therefore, the Proposed Project would have a less than cumulatively considerable impact with mitigation incorporated.

Does the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated.

The checklist categories of Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Cultural, Geology and Soils, Hydrology and Water Quality, Population and Housing, Tribal Cultural, Noise, Transportation, and Wildfire evaluate the Proposed Project's impacts that may have adverse effects on human beings, either directly or indirectly. All the Proposed Project's impacts on human beings, both direct and indirect, that are attributable to the Proposed Project were identified and mitigated. Therefore, the Proposed Project would not directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct and indirect impacts of the Proposed Project are identified as having no impact, less than significant impact, or less than significant impact with mitigation. Direct and indirect impacts to human beings would be less than significant with the implementation of mitigation measures listed in this IS/MND.

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